

The Four Stones Multi Academy Trust

Gifts and Hospitality Policy

Version Control

Policy author: Chief Operating Officer
Policy approved by: Finance, Audit and Risk Committee
Next policy review date: Summer 2023

Version	Date	Details
1.0	12 th May 2021	Policy written for the multi academy trust

1. Compliance with the policy

All staff, members, trustees and governors in The Four Stones Multi Academy Trust (MAT) should ensure that they have read, understand and comply with this policy.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that the terms of this policy might have been breached. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should escalate this matter to the Chair of the Trust Board, Chief Executive Officer (CEO), Chief Financial Officer (CFO) or Chief Operating Officer (COO).

2. Introduction

As a general guideline, business gifts and hospitality should not be accepted, except as provided for in this policy.

The intention of this policy is to ensure that the MAT and its schools can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the MAT or its schools. The MAT and its schools should be able to show that all decisions are reached on the basis of value for money and for no other reason.

Any consideration of whether or not the principles of this policy have been breached will be determined by reference to this provision. Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.

3. General principles

Members of staff, members, trustees and governors shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the MAT and its schools by:

- maintaining an unimpeachable standard of honesty and integrity in all their business relationships;
- complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper; and
- at all times in their business relationships acting to maintain the interests and good reputation of the MAT and its schools.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager who will instigate investigations as necessary or report it in accordance with the Whistleblowing Policy and Procedure as soon as possible.

4. Register of business, pecuniary and governance interests

The interests of the MAT or the way that you do your job must not be influenced by personal interests or those of relatives, friends or membership of external organisations or societies. There should be no grounds for suspicion that you are using your position with or knowledge of the MAT for personal gain or that you could be influenced by improper motives. If you belong to outside organisations, including voluntary organisations, there must be no conflict with your job or other MAT interests. Members of staff must advise the relevant headteacher in writing about anything which could give this impression so that the relevant 'Register of business, pecuniary and governance interests' can be updated.

Further guidance is available in the 'Conflicts of Interest Policy' and 'Conflicts of Interest Procedure'.

5. Receiving gifts and hospitality

You must not accept any commission, discount, allowance, direct or indirect profit, inducement, payment, perk or benefit in connection with any professional work undertaken, other than any fee recoverable on behalf of the MAT and its schools.

In relation to conventional hospitality (lunches, outings, tickets for events etc) provided that it is normal and reasonable in the circumstances they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.

A gauge of what is acceptable in terms of hospitality is whether the MAT and its schools would offer a similar level of hospitality in similar circumstances. Examples are:

- Occasional working lunches with customers, providers or partners are generally acceptable as a way of doing business, provided they are not to an unreasonable level or cost;
- Acceptability depends on the appropriateness of the invitations, in terms of the level of hospitality, the frequency and the status of the invited employee. In all such cases the Chair of the Trust Board, CEO or relevant headteacher must be consulted;
- Paid holidays or concessionary travel rates are not acceptable. Neither are offers of hotel accommodation, nor the use of company villas/apartments;
- If a member of staff is visiting a company to view equipment that the MAT is considering buying, they should ensure that expenses of the trip are paid by the MAT. Acceptance of refreshments and/or a working lunch may be acceptable, but care must be taken to ensure that the MAT's purchasing and/or tender procedures are not compromised;
- Acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to work are acceptable;
- Offers to speak at corporate dinners and social gatherings, or events organised by, for example, a professional body, where there is a genuine need to impart information or represent the MAT and its schools must be agreed in advance with the Chair of the Trust Board, CEO or relevant headteacher. Where a spouse or partner is included in the invitation, and approval has been given for the member of staff to attend, it will be acceptable for the spouse or partner to attend as well, but if expenses are incurred, these must be met personally;
- Any invitation that is accepted should be made in a professional/working capacity as a representative of the MAT and its schools; and
- Invitations to corporate hospitality events must each be judged on their merit. Provided the general rules have been taken into account, it may be acceptable for a member of staff to join other company/organisation guests at:
 - sponsored cultural and sporting events, or other public performances, as a representative of the MAT and its schools; and
 - special events or celebrations.

You must consider the number of such events, and always take into account what public perception is likely to be.

Further guidance is available in the 'Gifts, inducements, hospitality and sponsorship' section of the 'Working in The Four Stones MAT (including Code of Conduct)' policy.

6. Giving gifts and hospitality

The MAT and its schools will not normally give gifts to other individuals or organisations. If gifts or hospitality are given, the decision must be fully documented in the Gifts and Hospitality Register and have due regard to the propriety and regularity of the use of public funds.

Please note that the following are allowed:

- The award of gifts, prizes, etc related to the achievement of students;
- MAT-wide staff recognition events or activities;
- The 'Discretionary awards to staff' within the 'Financial Procedures Manual'. Please note that gifts to staff of up to £30 do not need to be added to the Gifts and Hospitality Register;

- Hospitality such as working lunches, teas and coffees, catering on training courses and modest hospitality in the form of meals are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not for their family or friends). These and any hospitality of up to £30 for visitors do not need to be added to the Gifts and Hospitality Register but would be approved by the Chair of the Trust Board, Chief Executive Officer (CEO), Chief Financial Officer (CFO) or Chief Operating Officer (COO) to ensure they are of a reasonable level. Hospitality provided above this level should be recorded in the Gifts and Hospitality Register; and
- As for visitors above, working lunches and refreshments are perfectly acceptable for staff. Any hospitality for staff of up to £30 does not need to be added to the Gifts and Hospitality Register.

It may be appropriate for the MAT and its schools to provide a celebratory meal or event. Such expenditure must be deducted from unrestricted funds or taken from a specific staff fund, approved by the Chair of the Trust Board, Chief Executive Officer (CEO), Chief Financial Officer (CFO) or Chief Operating Officer (COO) and added to the Gifts and Hospitality Register.

7. Monitoring

The Chief Operating Officer (COO) will maintain a MAT-wide Gifts and Hospitality Register and this will be available for inspection by the Finance, Audit and Risk Committee and reported to the Committee on an annual basis.

8. Link to other policies

This policy should be read in conjunction with the following policies:

- Anti-Fraud and Corruption Policy
- Conflicts of Interest Policy
- Conflicts of Interest Procedure
- Disciplinary Procedure
- Financial Procedures Manual
- Staff expenses policy
- Working in The Four Stones MAT (including Code of Conduct)