



Alpha Trust

Gifts & Hospitality Policy



COMMITTEE:	Board of Trustees
RESPONSIBILITY:	Mrs Gillian Marshall
POLICY REVIEWED:	July 2020
APPROVED BY ALPHA TRUSTEES:	July 2020
REVIEW CYCLE:	Every 2 years or as appropriate
REVIEW DUE:	July 2022
ADOPTED BY [ACADEMY NAME] LOCAL GOVERNING BOARD:	

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ALPHA TRUST GIFTS & HOSPITALITY POLICY

Purpose

This document outlines Alpha Trust policy with regard to the offer or receipt of gifts and hospitality by its Staff, Governors, Trustees and Volunteers from any third parties arising from duties undertaken on behalf of the Academy's within the trust.

The policy applies to all Staff, Governors, Trustees and Volunteers of Alpha Trust and is designed to safeguard them from any misunderstanding or criticism. The Trust's disciplinary procedures may be applied where it is found that a breach has occurred.

The process set out is designed to safeguard governors and staff and volunteers from any misunderstanding or criticism

Alpha Trust is committed to ensuring that the governance of the trust is conducted in accordance with the highest standards of integrity, probity and openness.

The rationale for a gifts & hospitality policy and definitions

Your conduct as a member of Staff, Governor, Trustee or Volunteer should never lead anyone to question your interests, or lead anyone to think that you have been influenced by gifts and hospitality. It is also a criminal offence to demand or accept a gift or reward in return for allowing yourself to be influenced as a part of the trust.

A gift is any item or service that you receive free of charge. It also includes any goods or services, which you personally are offered at a discounted rate or on terms not available to the general public.

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

General Rules

The Chief Financial Officer of the Trust will ensure the maintenance in each Academy within the Trust of a Register of Gifts and Hospitality for those transactions requiring registration.

This will record:

- The date;
- The name of the recipient;
- Brief details of the gift or hospitality including the (estimated) value;
- The name of the giver and relationship to the trust;
- Whether the gift or hospitality was accepted or declined;
- Reason(s) for the decision, or other relevant information.
- The signature of the Executive Principal/Principal/ Headteacher or Chair of the LGB of the academy to signify approval, or noting a decline.
- For Trustees the signature of the Chair of Trustees or CEO to signify approval, or noting a decline.

Staff, Governors, Trustees and Volunteers should use the PROVEIT test, and the list of acceptable gifts/hospitality below, to assess whether or not to accept and/or report any gift or hospitality.

Any required reporting must take place within 28 days of receipt.

Alpha Trust Staff, Governors, Trustees and Volunteers must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity. Any offer or receipt of such gifts must be reported to the Executive Principal/Principal/ Headteacher, Chair of LGB or Chair of Trustees and recorded in the Register.

Gifts that are intended for the Trust or Academy as a corporate body can be accepted but must not be retained by the individual who receives them. Such gifts should be passed to the Trust or Academy as appropriate and recorded in the Register.

In every case, the acceptance of a gift or hospitality must be declared in the Register using the Alpha Trust's 'Declaration of Gifts and Hospitality' form (Appendix A).

The PROVEIT Test

The following should be considered when assessing the acceptability of any gift or hospitality:

Purpose	Token, thanks or seeking a favour? (token / thanks: yes; favour: no)
Rules	What are they? Does this situation conform?
Openness	Is the offer transparent?
Value	Expensive or inexpensive? (under £30: yes; Over £30: no)
Ethics	Does the offer fit with the Academy's ethics? Is this an exceptional circumstance?
Identity	Who has made the offer?
Timing	Are you about to make a decision affecting the giver?

Acceptable Gifts/Hospitality

Staff, Governors, Trustees and Volunteers may normally* accept the following gifts / hospitality without the need to seek approval or formally register receipt:

- Courtesy hospitality at working lunches / dinners where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level;
- Attendance in an official capacity at:
 - conferences, events and demonstrations organised by outside bodies where there is a service interest;
 - events or functions where there is a demonstrable need for the Trust or Academy to be represented to either give or to receive information or to participate as part of the Trust or Academy's corporate image;
 - events or functions which are part of the civic, cultural or sporting life of the Trust or Academy;
- Modest promotional gifts such as calendars, diaries or pens, of the type routinely made available to customers / potential customers, or gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation;
- Small items from suppliers, contractors, parents or students as expressions of gratitude such as boxes of chocolate or individual bottles of drink.

Other gifts / hospitality may be accepted at the discretion of the Executive Principal/Principal/ Headteacher, Chair of LGB or Chair of Trustees and should be recorded in the Register.

*Care must always be taken to ensure that whenever such gifts / hospitality are accepted no obligation to the person or organisation in question is accepted; even gifts / hospitality

meeting the above criteria should be declined and recorded in the register if they fail the PROVEIT test. An example could include a small gift from a contractor just before a tender contract is due to be awarded.

Summary

Gifts or hospitality which:

- pass the PROVEIT test and meet the acceptable gifts/hospitality criteria above may be accepted without approval or registration;
- pass the PROVEIT test but do not meet the acceptable gifts/hospitality criteria should be recorded in the Register and referred to the Executive Principal/Principal/ Headteacher or Chair of Governors who must decide whether or not they can be accepted;
- fail the PROVEIT test must be declined and recorded in the Register.

In cases of doubt, the Executive Principal/Principal/ Headteacher, Chair of LGB or Chair of Trustees should be consulted.

If a gift cannot be accepted but cannot physically be returned it should be donated to a charity unrelated to the Trust or Academy or recipient and details recorded in the Register.

Monitoring

The Register of Gifts and Hospitality will be available for viewing at all times by the following appropriate officers: Executive Principal/Principal/ Headteacher, Governors, Trustees, CEO, CFO and External Auditors.

The LGB should review the Registers on an annual basis and report the outcome to the Trust Audit Committee. Copies of any completed forms (Appendix A) should be attached to the LGB's annual declaration to the Trust, thus confirming the Register is up to date; if there are no declarations of a gift or hospitality, a nil return should be made. Any concerns/issues identified should be noted and an action plan put in place.

Entries in the register will be retained for a period of seven years.

Any request by a member of the public to view the Register will be referred to the ~~LGB Audit~~ Committee Executive Principal/ Principal/ Headteacher who, in considering the request, will balance the requirement for the Academy to be open and transparent against the requirements of the Data Protection Act and GDPR.

Appendix A

Alpha Trust Declaration of Gifts and Hospitality Form	
SECTION A <i>(to be completed by the employee, member of Academy Local Governing Board or Trustee or school Volunteer)</i>	
Name of Employee, Local Governor, Trustee or Volunteer:	
Name of the person or organisation that made the offer, gift or hospitality:	
Details of the gift or hospitality offered/received including estimated or actual value:	
The circumstances in which the offer was made or gift/hospitality accepted:	
Action taken: <i>(e.g., kept for personal use, personally consumed, donated to charity)</i>	
Date offered:	Date accepted:
I confirm that I have applied the PROVEIT test:	
Signed:	Date:
SECTION B: <i>(To be completed by the Executive Principal/ Principal/ Headteacher in the case of an employee or volunteer. To be completed by the CEO and Chair of Trustees in the case of a Governor or Trustee)</i>	
I authorise acceptance of the gift/hospitality detailed above (Please delete as appropriate)	
Reason for decision:	
Name:	Position:
Signed:	Date: