

NET Gifts and Hospitality

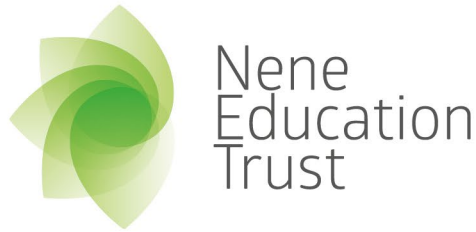
Policy Number 51

Document Management Information

Applicable to:	All staff and volunteers
Dissemination:	Via TL email and held in NET Frameworks Team
Linked policies:	Code of Conduct Finance Policy and Procedures Trustee and Committee Expenses Policy
Implementation:	Principals and Finance Team to hold and receive the forms CFO to monitor
Training:	None – dissemination with instructions via TL email
Review Frequency:	3 years
Policy Author:	Alison Woodward
Policy Lead:	CFO
Approval by:	Finance and Resources Committee
Approval Date:	January 2023
Next Review Due:	Spring 2026

Revision History

Document version	Description of Revision	Date Approved
1	Policy devised	30/1/23



Aims

This policy aims to ensure that:

- The Nene Education Trust's (the Trust) funds are used only in accordance with the law, its articles of association, its funding agreement, and the latest Academy Trust Handbook.
- The Trust and those associated with it operate in a way that commands broad public support.
- The Trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds.
- Trustees fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors.
- Staff members, Trust Members, Trustees, Local Committee members are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same.

This policy applies to all members of the Trust community, including Members, Trustees, Local Committee members as well as all staff and any other representative of the Trust.

Legislation and guidance

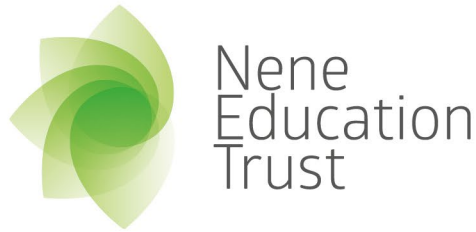
This policy is based on the Academy Trust Handbook, which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of Members, Trustees, Local Committee members, staff and/or any other representative of the Trust.

This policy also complies with the Trust's funding agreement and articles of association.

Definitions

Gifts are any items, cash, awards, prizes, goods, or services, offered without expectation of payment or benefit. Gifts also include goods or services offered at a discounted rate, or on terms not available to the general public.

Hospitality is defined as food, drink, accommodation, or entertainment (such as cultural or sporting events) provided free of charge, heavily discounted or on terms not generally available to the general public.



Roles and responsibilities

Staff, Trust Members, Trustees, Local Committee members:

- Must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that the trust might be placed under any obligation as a result of acceptance.
- Must not use their official position to further their private interests or the interests of others.
- Must not solicit gifts or hospitality.
- Must record any gifts or hospitality offered to them or the trust with a value of over £25 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined.
- Must consult the Chief Finance Officer (CFO) or the Principal as appropriate, before accepting or offering any gifts or hospitality with a value of over £25.

Trustees

Trustees must ensure that the Trust's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

Executive Team and Principals

The Trust Executive Team and Principals are responsible for ensuring that their staff are aware of and understand this policy, and that it is being implemented consistently.

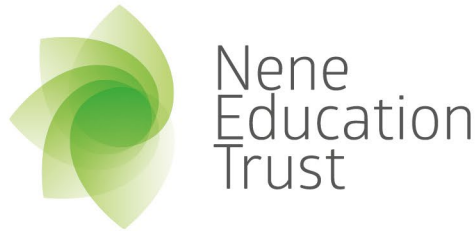
The Trust Executive Team and Principals will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to their school, the Trust and to those outside the organisation.

They will also ensure, alongside the CFO, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

Chief Finance Officer

The CFO will ensure that:

- The Trust and schools maintain a gifts and hospitality register.
- Figures for transactions relating to gifts made by the Trust are disclosed in the Trust's audited accounts, in accordance with the Academy Trust Handbook.



- The Trustees are provided with information on gifts and hospitality received and given, when required. They will also ensure, alongside the Executive Team and Principals, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

Governance Manager

The Governance Manager is responsible for ensuring that Members, Trustees Local Committee members are aware of and understand this policy, and that it is being implemented consistently.

Trust Finance Team and Principals

The Trust Finance Team and Principals will maintain the gifts and hospitality register on a day-to-day basis.

Acceptable gifts and hospitality

Offer of gifts and hospitality received

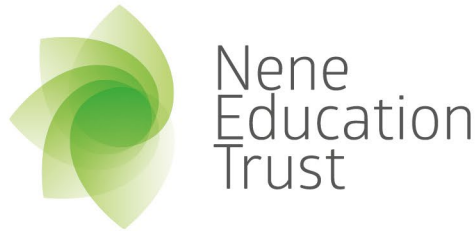
Members, Trustees Local Committee members and staff can accept gifts and hospitality that have a value of up to and including £25. These do not have to be pre-approved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, guidance must be sought from the CFO or Principal.

Similarly, hospitality such as working lunches may be accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the CFO or Principal.

Any gifts or hospitality offered with a value in excess of £25 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any Member, Trustee, Local Committee member or member of staff who is offered such gifts or hospitality must consult the CFO or Principal before accepting.

If the Principal is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the CFO and record the offer on the gifts and hospitality register. If the CFO is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the CEO and record the offer on the gifts and hospitality register.



Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a staff disciplinary matter or dealt with under the NET Code of Conduct in the case of Members, Trustees, Local Committee members.

Offer of gifts and hospitality given

Any hospitality provided by the Trust or one of its schools, such as a working lunch for visitors, must not be extravagant. A maximum value of £25 per head should be used as a guideline.

Alcohol must not be purchased out of the trust's or individual schools budget in any circumstances..

The purchase of gifts should apply only to visitors or external parties and not staff. The CFO must be consulted about any proposal to provide gifts or hospitality in excess of £25. School staff should also consult with the Principal in the first instance.

Gifts should not be given to staff from school funds e.g., flowers or gifts on birthdays, when children are born, retirements or when staff leave. These should be funded through staff collections or from the Principal's or Trust Executive Team's own expense.

Expense claims should be made through the usual mechanism and receipts must always be enclosed.

Details of expenses claims related to off-site working are set out by the Finance Team for staff and in the Trustees and Committee Expenses Policy.

Unacceptable gifts and hospitality

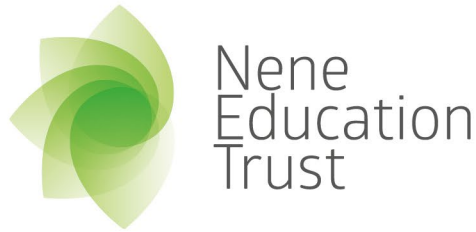
The following must never be offered or accepted:

- Monetary gifts.
- Gifts or hospitality offered to family members, partners or close friends of members, trustees or staff.
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process.
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time.

This list is not intended to be exhaustive.

Declining gifts and hospitality

Any Member, Trustee, Local Committee member or member of staff who is offered any of the unacceptable gifts or hospitality outlined above should politely decline the offer and must log the offer with the CFO.



If a Member, Trustee, Local Committee member or member of staff feels it would not be appropriate for them to decline, they should refer the matter to the CFO or Principal. The CFO or Principal may decline the offer or donate the gift or hospitality to a worthy cause and must also record the offer on the gifts and hospitality register.

Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the Trust has deemed unacceptable.

Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, will be dealt with as a staff disciplinary matter or under the Code of Conduct in the case of Members, Trustees, Local Committee members.

Monitoring arrangements

- It is the responsibility for the CFO to monitor the application of the policy and the gifts and hospitality registers.
- It is the CFO's responsibility to review this register regularly and report to the CEO or in exceptional circumstances the Trust board, if there are concerns with the information provided.

This policy will be reviewed every 3 years by the CFO and approved by the Finance Committee.

Appendix 1

Each school and the Trust Central Team (Trust Finance Team) will be expected to keep a register of gifts and hospitality via Microsoft Forms. Link here:

https://forms.office.com/Pages/ShareFormPage.aspx?id=f9b6PwSXq0ub1pfJcJ_XVzA1IPGMhipCp7CcuOu9199UNVYwVUICVFo2M1JZQTBFRjKxUUuPUzJCTS4u&sharetoken=HbhNKIBWv0JalJ2noCG