



Gifts and Hospitality Policy

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1.0 Introduction

The principle of integrity requires that Rodillian Multi Academy Trust [RMAT] staff and trustees should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted must be declared and recorded.

The process set out in this policy and procedure is designed to safeguard employees from any misunderstanding or criticism.

This policy takes into consideration the requirements under the UK Bribery Act 2010, which came into effect 1 July 2011. The Ministry of Justice has published guidance which provides the basis for inclusion in this policy. This guidance is under section 9 of the Act.

2.0 Roles and Responsibilities

The Finance Director is responsible for ensuring compliance with the RMAT policies and procedures.

The requirements of this procedure are mandatory and apply to all RMAT staff and trustees.

3.0 Procedure

GIFTS

- You must not accept cash or personal gifts with a significant monetary value under any circumstances, although items below a nominal value of £25, for example promotional pens, calendars, diaries or similar items may be accepted.
- Gifts which are intended for the RMAT as an academic body can be accepted but must not be retained by the individual who receives them. Such gifts should be deposited with the Finance Office for use by the RMAT.
- Personal gifts may not be solicited under any circumstances.
- When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.
- All gifts received with a value of £25 or more must be recorded on a 'Declaration of Hospitality and Gifts' form and in the RMAT's gifts and hospitality register, which is maintained by the Finance Director.

SUPPLIER SPECIAL OFFER GIFTS

- Gifts are sometimes offered or provided by suppliers with the purchase of items. All special offer gifts are the property of the RMAT and must be handed to the Finance Office for use by the RMAT.

HOSPITALITY

- You should never accept hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf of the RMAT. The timing of hospitality in relation to procurement or purchasing decisions that the RMAT may be taking is especially sensitive. You should never solicit hospitality. As a general rule, you should not accept hospitality that the RMAT would not reciprocate in similar circumstances.
- If necessary, you should pay your share of any costs and claim these in the usual way.
- When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.
- You may accept modest working meals and light refreshments without making any declaration. All other hospitality must be recorded on a 'Declaration of Hospitality and Gifts' form and in the RMAT's gifts and hospitality register which is maintained by the Finance Director.
- Other hospitality may be accepted where:

- You are representing the RMAT in the community or are imparting information about the RMAT to the public.
- An event is clearly part of the life of the community or where the RMAT should be seen to be represented.
- The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.

EXPENSE CLAIMS

- Where hospitality is to be provided by the RMAT this should be approved in advance by the Finance Director. The Finance Director should review the hospitality in light of the UK Bribery Act 2010. Hospitality is not prohibited by the Act but should be considered in light of it.
- Any hospitality provided should not be extravagant.
- Claims for reimbursement of expenses should be made on the relevant Expenses Claim form and receipts should always be enclosed.

4.0 PROVEIT Test

- Please use the following guideline to determine whether an offer of a gift or hospitality is acceptable:
 - Purpose – Token, thanks or seeing a favour? (token or thanks = yes; favour = no)
 - Rules – What are they? Does this situation conform?
 - Openness – Is the offer transparent?
 - Value – Expensive or inexpensive?
 - Ethics – Does the offer fit with RMAT's ethics?
 - Identify – Who has made the offer?
 - Timing – Are you about to make a decision affecting the giver?

5.0 UK Bribery Act 2010

- It is an offence under Section 7, which can be committed by a commercial organisation which fails to prevent persons associated with them from bribing another person on their behalf.
- Facilitation Payments, payments to induce officials to perform routine functions they are otherwise obligated to perform, are bribery under the Act.
- Trustees and Senior Leadership do not tolerate Bribery in any form.
- Senior Leadership considers all organisations which the RMAT does business with, in order to consider the risk.

- Senior Leadership considers all persons or organisations which act on behalf of the RMAT or provide services for the RMAT, in order to consider the risk.
- Actions of suppliers of goods do not create a risk for the RMAT under the UK Bribery Act 2010.
- As risk of bribery can often be greater in overseas transactions, all overseas transactions must be approved in writing on the purchase order by the Finance Director, regardless of the value of the transaction.

6.0 Registration of Gifts and Hospitality

Staff must, within 28 days of receiving any gift or hospitality, provide written notification to the Finance Director using the 'Declaration of Gifts and Hospitality' form (form attached to this policy document).

The Declaration of Gifts and Hospitality forms must be completed in full, setting out full details of the offer of gift or hospitality as well as:

- Estimated or actual value
- Purpose of the offer
- Person / organisation providing the offer and the relationship to the member of staff
- Whether the offer was accepted or not

The form will then be approved by the Finance Director or Finance Manager and the Gifts and Hospitality Register updated.

7.0 Retention of Documentation

The Gifts & Hospitality Register and supporting documentation will be kept for a minimum of seven years.

8.0 Attachments

Gifts and Hospitality Register
Declaration of Gifts and Hospitality' form

GIFTS AND HOSPITALITY REGISTER



Date added to Register	Staff Member receiving offer	Person / Organisation making offer	Details of Gift or Hospitality	Date received or refused	Form attached



DECLARATION OF HOSPITALITY AND GIFTS FORM

Receiving benefits, gifts, rewards or hospitality in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. Staff and Governors are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible. All staff and Governors should conduct themselves with integrity, impartiality and honesty at all times and should maintain high standards of propriety and professionalism.

If you have received a gift or hospitality, please complete this form and return to the Finance Director.

Details of the person receiving the Gift or Hospitality

Full Name	
Job Title	
Date of Declaration	
Signature	

Description of Gift or Hospitality

Description of gift / hospitality	
Estimated / actual value	
Purpose of the offer	
Person/ Organisation providing the gift or hospitality	
Relationship (or future relationship) to the person / organisation offering the gift or hospitality	
Gift / hospitality accepted	YES / NO
Any other comments	

Approved by

Full Name	
Job Title	
Date of Declaration	
Signature	