

## Gifts and hospitality policy

Rev Level	Revision Date	Description of Changes
01	22/07/2013	<ul style="list-style-type: none"> <li>Initial release</li> </ul>
02	15/09/2015	<ul style="list-style-type: none"> <li>Director of Finance name added.</li> </ul>

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### 1. Introduction

As a general guideline, gifts, hospitality or other personal benefits (hereinafter referred to as "Gifts") should not be accepted or offered by any member of staff, except as provided for below.

Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

### 2. Objectives

The objectives of the OAT Policy are:

- Ensure the Trust can demonstrate that no improper influence has been applied to decisions made.
- To show that all decisions whether educational, financial or otherwise are reached on the basis of the proper application of OAT procedures.

### 3. Scope

The Policies and Procedures apply to all employees of OAT.

### 4. The receipt of gifts

The Trust encourages and expects staff and governors to use their networks and contacts for its benefit. It is however a fundamental requirement on all staff, the contravention of which would be considered to be gross misconduct, that they must not derive any financial benefit beyond their agreed salary from the decisions they make or contribute to, which involve the education of students, or the spending of the significant sums of public money that are entrusted to the Trust or its Academies. Therefore staff shall not use their authority or office for personal gain beyond their agreed salary and shall seek to uphold and enhance the standing of the Trust by:

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

Any employee who becomes aware of a breach of Policy must refer to the Trust's Whistle Blowing Policy and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.

Any personal interest that may impinge, or might reasonably be deemed by others to impinge, on an employee's impartiality, or conflict with the duty owed to the Trust in any matter relevant to an employee's duties (such as conflicting business interests) shall be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving their relatives or associates must make an appropriate entry in the Register of Business Interests.

Staff are permitted to accept gifts, rewards or benefits from students, students' families, members of the public, or organisations which the Trust has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as chocolates, flowers, diaries or calendars). Therefore, gifts should not be accepted if they appear to be disproportionately generous, or could be construed as an inducement to effect a decision or action, whether business, educational, or other.

Where purchased items include a "free gift", such a gift should be either used for Trust business or handed to the Trust to be used at charity raffles, pupil prizes, etc.

In relation to conventional hospitality (lunches, outings, tickets for events, etc), it may be accepted provided that it is normal and reasonable in the circumstances. However, invitations for the following should not be accepted:

- where there is no reasonable business justification for doing so
- where an invitation is disproportionately generous
- where the invitation could be seen as an inducement to affect a business or other decision.

Any hospitality other than of a nominal value (£15) or facilities provided during the normal course of business should be reported to Michael Bullard, Director of Finance

- Who the gift is from
- Date the gift is received
- Details of the gift
- Action taken (whether the gift is retained or refused or passed on, etc), for entry into the Gifts in Kind Log Sheet.

## **5. The providing of gifts**

The Trust encourages and seeks cooperative relationships between staff, governors, stakeholders and external organisations. Accordingly there can be occasions where it is appropriate for the Trust to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house. Likewise it may be appropriate for leaving gifts to be provided to staff leaving the employment of the Trust, particularly after a long period of service. Such gifts are often supplemented with private contributions from continuing members of staff.