



Compass Education Trust

Seeking Success for All

Policy Name:	Gifts and Hospitality Policy
Governance Lead:	Trust Board
Staff Lead:	Tracy Brunning
Review Process:	Annual
Location:	R:\SLT\Policies
Date of Last Review:	September 2023
Date of Next Review:	September 2024

CEO: Mr Ahson Mohammed

The 'Compass Education Trust Limited' is a charitable company limited by guarantee.

Registered company no: 07666213. Registered office: The Billericay School, School Road, Billericay, CM12 9LH

1. Introduction

- 1.1 The Trust Board is aware of the requirements of the EFA's Academies Trust Handbook and it seeks to ensure compliance via this and other policies. 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 or Governor, except as provided for below.
- 1.2 The intention of the Policy is to ensure that the Trust can demonstrate that no undue or improper influence has been applied, or could be perceived to have been applied and that school funds are used for the purposes intended. The academies must be able to demonstrate that all decisions, whether educational, financial or otherwise are reached on the basis of the proper application of procedures, in the best interest of the academies and their students and for no other reason. There is also a requirement to ensure that all expenditure fulfils requirements relating to propriety and regularity. This policy seeks to protect staff from suspicion of dishonesty and ensure they are free from any conflict of interest with respect to acceptance or provision of gifts, hospitality or any other inducement from or to suppliers of goods or services to the school.
- 1.3 Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

2. The receipt of gifts

- 2.1 The Trust encourages and expects staff, trustees and governors to use their networks and contacts for its benefit. It is however a fundamental requirement for all staff and governors, that they must not derive any financial benefit from the decisions they make or contribute to, beyond the agreed remuneration. Therefore staff, trustees and governors shall not use their authority or office for any personal gain beyond their agreed remuneration and shall seek to uphold and enhance the standing of the Trust by:

maintaining the highest standard of honesty and integrity in all 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 business and other relationships, act in the best interests and maintain the good reputation of the Trust and its schools.
- 2.2 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 act as set out in the policy.
- 2.3 Any personal interest that may impinge, or might reasonably be deemed by others to impinge, on an employee's, trustee's or governor's impartiality, or conflict with the duty owed to the academy in any matter relevant to an employee's, trustee's or governor's duties (such as conflicting business interests) shall be declared in writing. Any member of staff, Trustee or Governor 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, maintained by the Company Secretary.

- 2.4 Staff, trustees and governors are permitted to accept gifts, rewards or benefits from students, students' families, members of the public, or organisations with which the Trust and/or its schools has official contact, only where they are isolated gifts of a trivial nature, or inexpensive seasonal gifts (e.g., chocolates, flowers, diaries, calendars). Therefore, gifts should not be accepted if they appear to be disproportionately generous, or could be construed as an inducement to affect a decision or action, whether business, educational, or other.
- 2.5 Where purchased items include a "free gift", such a gift should be either used for Trust business or handed to the one of the schools in the Trust to be used at charity raffles, or as prizes, etc. If in doubt the CEO, headteacher or Head of Finance should be consulted.
- 2.6 In relation to conventional hospitality (lunches, outings, tickets for events, etc), these may be accepted provided it is reasonable and proportionate in the circumstances. If in any doubt the headteacher or chairman of the Trust board should be consulted. Invitations for the following should not normally 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.
- 2.7 Any hospitality, other than of a nominal value (e.g., of a value exceeding £35.00) offered during the course of business, should be reported to the CEO or headteacher and/or recorded in the gifts and hospitality register which is maintained by the Company Secretary.

3. The provision of gifts

- 3.1 There may be occasions where it is appropriate for the academy to provide and fund limited gifts or hospitality (the latter will principally be provided by each school's catering team) to staff, governors or others, from time to time.
Examples may include:
- Staff, trustees or governors leaving the school, particularly after a long period* of service or at retirement (*over 20 years)
 - Flowers or fruit to employees who are sick, getting married or having a baby, etc
 - Small gifts as a "thank you" to guest speakers or other external parties who have performed some voluntary service to the school or governing body
 - Small Christmas gifts as a "thank-you" to certain employee groups eg cleaners
 - Lunch or refreshment at special events or celebratory occasions

In all these cases any gifts must be proportionate and approved by the CEO, headteacher, Trust chairman or chairman of the LGB as appropriate. Gifts which might be perceived as extravagant are not permitted and gifts will not normally be made to staff or governors for the normal performance of their duties. (any additional payments, gifts, "bonuses," etc to staff would fall within the remit of the personnel pay committee in each school and would therefore require its approval).

Where more expensive hospitality or gifts are proposed, which may be considered out of the ordinary or exceptional to the above categories, approval shall be sought from the chairman, chair of finance committee or finance committee as appropriate.

All gifts shall be funded from **non-public funds**. In practice where "staff collections" are made to contribute towards a gift for a colleague, these funds may be paid into the school account to allow the appropriate purchase to be made. Thus, the payment will be made by the school

but will be offset by income to offset the cost, with the school making its contribution based on length of service.

4. Alcohol

The ESFA Accounts Direction identifies purchases of alcohol as examples of irregular expenditure, with a clear indication that alcohol should not be purchased by Academy Trusts.

No purchases of alcohol will be made using Trust funds.