



# **Gifts & Hospitality Policy for all Trust staff**

The Richard Huish Trust

Trust CFO

As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below. For Trust Directors, Local Governing Body Governors and Members please see the Trust Code of Conduct.

The intention of the policy is to ensure that the Trust and its member Academies and Schools can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the Academy or School. Each Trust member organisation should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

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

Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Academy by....

1. Maintaining an unimpeachable standard of honesty and integrity in all their business relationships.
2. Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
3. At all times in their business relationships acting to maintain the interests and good reputation of the Trust and each member organisation.
4. Any employee who becomes aware of a breach of policy must report this immediately to his or her manager who will instigate investigations as necessary.
5. 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) should be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff must supply details of such transactions for entry into the Register of Business Interests. A declaration of interest form is available from the Clerk. The register of interests for Members, Trustees and Governors is maintained by the Clerk and published on the Trust or local school website.
6. Employees are permitted to accept gifts, rewards or benefits from members of the public or organisations the Trust or any of its member organisations has official contacts with only where they are isolated gifts of a trivial character ( such as diaries or calendars ) and have a value less than £25. Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to effect a business decision.
7. Where purchased items include a "free gift", such gifts should be either used for Trust business or handed to the relevant Academy or School to be used at charity raffles etc.
8. In relation to conventional hospitality (lunches, outings, tickets for events etc.) provided that it is normal and reasonable in the circumstances they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.

9. Any hospitality received, during the normal course of business, greater than £50 in value should be reported to the relevant Academy/School Clerk responsible for maintaining the Register of Business Interests. For Trust Directors and Members this will be the Trust Clerk.
10. Each member organisation's register of business interest entries for gifts and hospitality that exceed these thresholds will be reviewed at least annually by the Trust Finance and Audit Committee or sooner if the individual register owner feels it necessary.