

# GIFTS & HOSPITALITY POLICY 2022-24

*Potteries Educational Trust*



<b>Policy Family</b>	Finance
<b>Reference</b>	FIN-06
<b>Responsible Manager</b>	Chief Financial Officer
<b>Approval Date</b>	9 <sup>th</sup> June 2022 – Audit and Risk Committee
<b>Issue Number</b>	2
<b>Next Review Date</b>	June 2024

## **Aim**

The Potteries Educational Trust (PET) has established a Gifts and Hospitality Policy to support with regards to the receipt of gifts and hospitality by its Trustees, Governors or staff from any third parties arising from duties undertaken on behalf of the Trust. The Trust is committed to ensuring that the governance is conducted in accordance with the highest standards of integrity, probity and openness.

## **Scope**

This policy and associated Financial Regulations and Procedures apply to The Potteries Educational Trust, which includes a number of member organisations. Collectively, the member organisations within the trust are referred to as the Trust.

## **Policy**

Within the Potteries Educational Trust, Trustees, Governors or staff must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity. Staff are asked to immediately report any offer or receipt of such gifts to the Chief Executive Officer and/or the Principal / Headteacher of the relevant academy so they can be reported to the Chief Financial Officer who will record this in the Register of Gifts and Hospitality

### **Acceptable Gifts/Hospitality Not Requiring Approval**

Trustees, Governors or staff may accept the following gifts/hospitality without the need to seek approval or formally register receipt:

- Courtesy hospitality at business lunches/dinners or attendance in an official capacity at a public function
- Incidental promotional gifts such as calendars, diaries or pens
- Receipt of small items from suppliers or contractors as expressions of gratitude such as boxes of chocolate or individual bottles of drink (at a value of less than £25)

- Appreciative parents and students/pupils may wish to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £25 they are considered to be acceptable

Care must always be taken to ensure that whenever such gifts/hospitality are accepted no obligation to the person or organisation in question is accepted. In cases of doubt Trustees, Governors or staff must consult the Chief Executive Officer or Chief Financial Officer.

### **Acceptable Gifts/Hospitality Requiring Approval**

The following examples of gifts/hospitality require approval by either the Chief Executive Officer, Chief Financial Officer or Principal / Headteacher of the relevant academy and will be formally recorded by the Chief Financial Officer in the Register of Gifts and Hospitality:

- Attendance as a non-paying guest of a commercial organisation or individual at a non-work related cultural or sporting event (at a value of more than £25)
- Promotional gifts worth in excess of £25
- Other offers of gifts/hospitality not falling into any of the above categories, valued in excess of £25

Please see Appendix 1 to this policy which provides a copy of a gifts and hospitality registration form for use by any Trustees, Governors or staff members to record the receipt of such gifts/hospitality which require approval as outlined above.

### **Unacceptable Gifts/Hospitality**

The following are examples of offers of gifts/hospitality which must be refused by Trustees, Governors and staff:

- Gifts of money (not including donations to the Trust)
- Free membership or subscriptions (e.g. sports clubs)
- Foreign travel unless as a specific element of a business, academic or research activity already approved by the Trust
- Free goods, services or equipment which are normally provided by a supplier to the Trust at a charge

Any offers of gifts and hospitality falling into any of the above categories must be reported immediately to the Chief Executive Officer and/or the Principal / Headteacher of the relevant academy

### **The Role of the Chief Financial Officer**

The role of the Chief Financial Officer in relation to the Gifts and Hospitality Policy is:

- to be responsible for ensuring that any offer or receipt of gifts, hospitality or donations to Trustees, Governors or staff is recorded in the Trust's Register of Gifts and Hospitality when informed
- to report any possible conflict of interests arising from the offer or receipt of gifts and/or hospitality to the Chief Executive Officer and Chair of Trustees

The register is located in the Chief Financial Officer's office which is based at the City of Stoke-on-Trent Sixth Form College site and is available on request.

### **Consequences of Non-Compliance with the Policy**

Should any member of staff fail to declare gifts or comply with this policy, it may be necessary to implement disciplinary procedures.

It is the personal responsibility of all Trustees, Governors or staff to declare any receipt of gifts and hospitality covered under this policy.

### **Implementation**

Implementation of this policy will be the responsibility of the Chief Financial Officer, who will act on behalf of the Trust in all matters relating to gifts and hospitality.

### **Communication**

This Policy will be circulated to all Trustees, Governors and staff within the Trust and is also available on the Potteries Educational Trust website.

### **Monitoring**

The responsible manager named on the front of this policy is responsible for ensuring that this document is kept up to date and revised as appropriate, seeking management and/or trustee approval in advance of the review date so that a new version can be communicated to staff and stakeholders in a timely fashion.

## Appendix 1 –Gifts and Hospitality Registration Form

This form is for use by any Trustees, Governors or staff members to record the receipt of such gifts/hospitality requiring approval as outlined within the PET Gifts and Hospitality Policy

Date	Trustee / Governor / Staff Member Name	Description of gift/hospitality offered	Organisation / Individual offering gift/hospitality	Accepted / Rejected	Approved By (Signature)

**Approval can only be granted by either the Chief Executive Officer, Chief Financial Officer or Academy Principal / Headteacher**

**Approved items must then be submitted to the Chief Financial Officer for recording on the Gifts and Hospitality Register**