

Author	Company Secretary
Issued	December 2017

Intended target group	Directors, LAC Representatives, all staff
Next review due	September 2020 unless circumstances indicate amendments

BD/33Ag(16)

This policy is applicable to all DBMAC academies

Gifts and Hospitality Policy

Purpose

- The receipt of gifts, money or excessive hospitality can damage the company's reputation and lead to possible prosecutions for corruption.
- This policy seeks to protect Directors and 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; and to protect the company from accusations of bribery or other impropriety.

Definitions

- A gift is any item, cash, goods or benefit in kind given or offered for which no payment or service was given or received in return.
- Hospitality can be defined as any food, drink, accommodation or entertainment provided free of charge or heavily discounted.
- Staff is taken to mean all permanent and fixed term staff employed by The Dominic Barberi Multi Academy Company (DBMAC) and by any other contractors, consultants or other persons (including Local Academy Representatives/Governors) acting under the name of the DBMAC or any of its constituent academies.

Principles

- The DBMAC expects staff to exercise the utmost discretion in giving and accepting gifts and hospitality when on school business. Particular care should be taken with regard to a person or organisation that has, or is hoping to have, a contract with the school.
- Directors and staff must not accept gifts, hospitality or benefits in kind from a third party where it might be perceived that their personal integrity is being compromised or that the DBMAC might be placed under an obligation.
- No favour or preference which is not generally available should be sought, accepted or given.
- Directors and staff must not make use of their official position to further their private interests or those of others.

Gifts and Hospitality

- The individual should consider carefully whether it is appropriate to accept or decline a gift or hospitality

- If in doubt advice should be sought from the Chief Financial and Business Officer (CFBO) who may in turn liaise with the Principal.
- Gifts of low intrinsic value such as promotional calendars or diaries or small tokens of gratitude can be accepted.
- Any gift or hospitality with a value of £25 or over must be recorded in the Register of Gifts and Hospitality. This will be held by the CFBO..
- It is each individual's responsibility to inform the CFBO by e-mail of any gifts or hospitality that is offered.

Contracts with Suppliers

- Directors and staff must base all purchasing decisions and negotiations for contracts solely on achieving best value for money.
- The DBMAC requires Directors and staff who have official dealings with contractors and other suppliers of goods and services to the DBMAC and any of its constituent academies to avoid conducting any private business with them by any means other than through normal commercial channels.
- Directors and staff should be aware of the Prevention of Corruption Act 1916 which states that any money, gift or consideration received by an employee in public service, from a person or organisation holding, or seeking to obtain a contract, will be deemed by the courts to have been received corruptly unless the employee proves otherwise.

Gifts To and From Students

- Given the nature of the professional responsibilities of staff, they are strongly advised not to give or accept gifts/hospitality (exceeding £25 in value) from students during their period of study.
- Any gifts/hospitality from students, exceeding £25 in value must be entered in the Register of Gifts and Hospitality
- Academies are encouraged to provide guidance to parents on the appropriate value of gifts or explain that the school prevents teachers from accepting gifts worth over a certain amount – whilst not discouraging all gift-giving and making it clear that small tokens of gratitude are always appreciated.

Register of Gifts

The CFBO has responsibility for the ownership of the policy and the Gift and Hospitality Register. Individual Directors and staff are personally responsible for reporting any gifts/hospitality offered and whether these have been accepted or declined. The CFBO will record this information in the register.

The following should be recorded:

- Nature of gift/hospitality
- Value of gift/hospitality
- Name of person/company offering the gift/hospitality
- Date gift/hospitality accepted/refused
- Name of employee

Examples of gifts/hospitality which require approval and to be formally recorded in the Register of Gifts and Hospitality

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

Examples of unacceptable Gifts/Hospitality

- Gifts of money (not including gifts to an academy)
- Free membership or subscriptions (eg sports clubs)
- Foreign travel unless as a specific element of business approved by the academy
- Free goods, services or equipment which are normally provided by a supplier at a charge

Date Approved by Board: 13th December 2017

Verified by Company Secretary : Maureen D Jackson

Date: 14th December 2017
