

Policy for Gifts, Hospitality, Awards, Prizes and other benefits

Policy Code:	F2
Policy Start Date:	December 2021
Policy Review Date:	December 2023

Please read this policy in conjunction with the documents listed below:

- Finance Manual
- Trust Scheme of Delegated Authority
- F3 [Anti-Fraud, Corruption and Bribery Policy](#)

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1 Policy Statement

This policy enables the Trust to monitor and control the distribution and receipt of gifts and other benefits and ensure fairness and transparency in business transactions. It enables the Trust to ensure that the value of gifts, awards, prizes and other benefits is reasonable given the context.

It is a **criminal offence** for a United Kingdom citizen, resident or company associate to pay or receive a bribe, either directly or indirectly in the UK or abroad.

The Bribery Act 2010 creates three main offences:

- Bribing a person to induce or reward them to perform a relevant function improperly;
- Requesting, accepting or receiving a bribe as a reward for performing a relevant function improperly;
- Using a bribe to influence a foreign official to gain a business advantage.

1.2 References to the Trust or Academy within this policy specifically include all primary, secondary and special academies within the Trust, as well as the Early Years setting at the Priory Witham Academy, Priory Apprenticeships and Lincolnshire SCITT.

1.3 This policy does not form part of any member of staff's contract of employment and it may be amended at any time.

2 Roles, Responsibilities and Implementation

2.1 The Policy is applicable to and should be adhered to by all staff, trustees and governors within the Trust. It applies to both receipt and offer of gifts, hospitality, awards and benefits.

2.2 The Finance Committee has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Chief Financial Officer.

2.3 Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all employee are responsible for supporting colleagues and ensuring its success.

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2.4 It is all staff members' responsibility to report appropriate gifts and awards.

2.5 It is the responsibility of the Headteacher's PA in each Academy to administer each gift and hospitality register.

3 Aims

3.1 This policy aims to ensure that:

- The Trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academies Financial Handbook.
- The Trust and those associated with it operate in a way that commands broad public support.
- The Trust has due regard to propriety and regularity, and ensures value for money in the use of public funds.
- Trustees fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors.
- Members, Trustees and staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same.

4 Acceptable gifts and hospitality

4.1 Gifts Received

- Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted.
- The reasonableness of the gift must be considered. It is a subjective matter but the following questions should be asked:
 - Might the transaction be seen to compromise the employee's personal judgement?
 - Might the transaction lead to a compromise of personal integrity?
 - Does the gift/award seem too generous or out of the ordinary relative to the context?

If the answer to any of these questions could be "Yes", the gift is deemed unreasonable and should not be accepted.

- The gift must be recorded on the Gift Register (see section 6) when the item received has a value or estimated value of over £30 or when the item, no matter the value, could be deemed unreasonable.

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- If in doubt, guidance must be sought from the Chief Financial Officer.

4.2 *Gifts Given*

- Any gifts or hospitality provided by the Trust to visitors, such as a working lunch, must not be extravagant. A maximum value of £30 per head should be considered.
- Alcohol must not be purchased from Trust funds.
- Gifts must be recorded on the Gift Register (see section 6) when the item given has a value or estimated value of over £30.
- Gifts should not be purchased for staff from Trust funds other than in exceptional circumstances. Such gifts must be within the HMRC classification of trivial benefits.
- If in doubt, guidance must be sought from the Chief Financial Officer.

5 **Unacceptable gifts and hospitality**

- Cash
- Gifts or hospitality offered to family members, partners or close friends of either members, trustees, governors or staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time

6 **Registering the Transaction**

6.1 *When to record*

- When the item received or given has a value or estimated value of over £30 **or**
- when the item, no matter the value, could be deemed unreasonable

6.2 *Where to record*

- An entry should be made for each separate gift or award on the gift and hospitality register. Link:
https://sharepoint.prioryacademies.co.uk/sites/admin/federation/_layouts/15/start.aspx#/Gift%20Register/Forms/AllItems.aspx)

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6.3 *When approval is required*

In all and any case - the receiver cannot be the sole approver of a transaction in which they are involved.

Type	Transaction	Head	Head and CFO	Finance Committee
Gift, award, prize or hospitality	Given or received	£31* to £1,000	£1,001 to £2,000	£2,001 and above

*Note that if the item is deemed unreasonable then all values must be recorded.

7 **How the register is managed and monitored**

- Each business unit (Academy, Federation, Apprenticeship or Teaching centre) will keep its own register.
- The relevant PA/Administrator for each site will operationally run the register.
- The Finance Committee, Trustees, Chief Financial Officer (CFO) and Chief Executive Officer (CEO) can request to view the register at any point in the year.
- There will be an internal audit on the register once a year, organised and led by the CFO in March of each year.

8 **Policy Changes**

This policy may only be amended or withdrawn by The Priory Federation of Academies Trust.

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The Priory Federation of Academies Trust

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This Policy has been approved by the Priory Federation of Academies
Finance Committee

Signed..... Name..... Date:

Trustee

Signed..... Name..... Date:

Chief Executive Officer

Signed..... Name..... Date:

Designated Member of Staff

Please note that a signed copy of this agreement is available via Human
Resources.