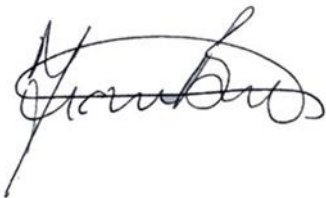
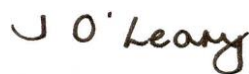


Gifts and hospitality policy



Management log

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Chair of the Board CEO

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1 Equality statement

1.1 The SHINE Multi Academy Trust (SHINE) is committed to promoting equal opportunities and all stakeholders¹ will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (Protected Characteristics).

2 Introduction

2.1 The intention of this policy is to ensure that the Board of trustees (Board) 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 academies within SHINE. The Board should be able to show that all decisions are reached on the basis of value for money and no other reason. Any consideration of whether or not the principles of this policy have been breached will be determined by reference to this policy.

2.2 This policy applies to all staff employed by SHINE and all members, trustees and local governors undertaking activities on behalf of the Board or their local governing body (LGB).

3 Receipts of gifts

3.1 Any gift or offer of a gift other than a nominal value up to £50 must be declared and entered onto the register of gifts and hospitality held in each of our academies main office and the finance and business director (FBD) for the SHINE team (see template register – appendix A). The gift must be given for an appropriate reason, at an appropriate time (not in advance of the issuing of an opinion or determination). The gift must be of a 'one off' or irregular nature.

3.2 Casual gifts from members of the public, organisations or suppliers where they are isolated gifts of a trivial character such as diaries/calendars or other work-related stationery and equipment may be accepted and not recorded on the register.

¹ SHINE defines stakeholders as anyone who is invested in the welfare and success of SHINE and its pupils, including premises staff, administrators, teachers, support staff, pupils, parents/carers, families, community members, businesses, and elected officials such as school board members, city councillors, and state representatives.

3.3 Gifts should not be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision.

3.4 Where purchased items include a “free gift”, such gifts should be either used for Academy business or handed to the Academy to be used as charity raffles etc.

3.5 If a gift arrives without warning and is identified as falling outside the small value item of £50, it must be handed over to the CEO or headteacher (in the case of members and trustees it should be declared to the chair of the Board and for local governors to the chair of the LGB) who will decide whether the gift should be returned, or passed onto a charity or good cause, and will inform the donor what has happened.

3.6 In all other cases advice must be sought from your line manager, if in doubt no gift may be accepted without prior written approval of the CEO or headteacher (as applicable).

4 Hospitality

4.1 All offers of hospitality should be approached with caution.

4.2 Hospitality or facilities provided during the normal course of business may be considered appropriate to accept where it is not lavish, not a frequent occurrence and there is no suspicion of a conflict of interest as. Such as drink and a sandwich during a visit or working lunch does not require the approval of the CEO or headteacher or be recorded on the register.

4.3 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 and recorded on the Register. 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 business decisions.

4.4 There is an important difference between, for example, attendance in an official capacity at a function organised by a public body or related to SHINE business, which in general would be regarded as acceptable, and accepting hospitality from a private individual or firm standing to benefit from the goodwill of SHINE which would contravene this policy. Particular care must be taken when dealing with contractors and firms or individuals in a comparable position.

5 Cash

5.1 Under no circumstances must members, trustees, local governors or staff accept personal gifts of cash.

6 Offering gifts and hospitality

6.1 Any expenditure on gifts must be authorised by the CEO or headteacher and any gifts authorised will be of relatively low value.

6.2 The Board reserves the right not to reimburse expenditure on gifts that are purchased without authorisation.

6.3 Authorisation will only be forthcoming exceptionally and will normally only be considered in relation to the marking of special occasions relating to other organisations with which SHINE have a formal relationship with.

6.4 Hospitality offered on SHINE's behalf must have a clear justification and be pre-authorised by the CEO.

7 Breaches of policy

7.1 Employees, members, trustees or local governors shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of SHINE by: -

7.1.1 Maintaining an unimpeachable standard of honesty and integrity in all their business relationships.

7.1.2 Complying with the letter and spirit of the law², and contractual obligations, rejecting any business practice that might be deemed improper.

7.1.3 At all times in their business relationships acting to maintain the interests and good reputation of SHINE.

² Duties under the Law: stakeholders are required to conduct all business with integrity ensuring compliance with the UK Bribery Act <https://www.legislation.gov.uk/ukpga/2010/23/contents> failure to comply with the law is cited as a breach of policy

7.1.4 Any employee who becomes aware of a breach of policy must report this immediately to the CEO or headteacher (as applicable) who will instigate investigations as necessary.

7.1.5 Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with their duty to SHINE in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing.

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

7.1.7 Breaches by members, trustees and local governors acting on behalf of the Board or their LGB will be handled in accordance with their conduct rules.

7.1.8 Where it is suspected or proven that actual fraud has taken place, the Board will involve the Police, Charity Commission and other bodies as appropriate.

