



Gifts, Hospitality and Entertaining Policy

Issue Date	24 th September 2014
Review Date	24th September 2017

Gifts and Hospitality Policy

Purpose

- This outlines the School Partnership Trust Academies' (SPTA) policy with regard to the receipt of gifts and hospitality by its staff from any third parties arising from duties undertaken on behalf of SPTA any of its academies or related companies.
- SPTA is committed to ensuring that the governance of SPTA and its academies is conducted in accordance with the highest standards of integrity, probity and openness. This policy has also been set in context of the **SPTA Anti -fraud Policy** and the Bribery Act 2010.

General Rules

- SPTA 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 Finance Office within their establishment to be recorded in the Register of Gifts and Hospitality.
- Directors, local governors and staff may accept the following gifts/ hospitality without the need to seek the approval of SPTA Core Finance 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)
 - NB: 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 academies should consult the SPTA Finance Director.
- The following examples of gifts/hospitality require approval by SPTA Core Finance and should be formally recorded by the Finance Office 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.

Unacceptable Gifts/Hospitality

The following are examples of offers of gifts/hospitality which should be refused by staff:

- Gifts of money (not including donations to SPTA or its academies)
- Free membership or subscriptions (e.g. sports clubs)
- Foreign travel unless as a specific element of a business, academic or research activity approved by SPTA Core Finance.
- Free goods, services or equipment which are normally provided by a supplier to SPTA or its academies at a charge
- Any offers of gifts and hospitality falling into any of the above categories should be reported immediately to the SPTA Finance Director.

Entertaining Policy

Purpose

- This outlines the School Partnership Trust Academies' (SPTA) policy with regard to the provision of entertaining third parties by its employees and on the use of public funding for the provision of hospitality/entertaining of its staff.
- SPTA recognises that it is customary and routine for education professionals to provide reasonable gifts and entertainment to clients and to receive the same from clients and suppliers. Entertaining must not be made with the purpose of gaining an unfair commercial advantage. We must avoid the situation where entertaining an individual employed by an organisation could breach that organisation's code or cause embarrassment.
- SPTA is committed to ensuring that the governance of SPTA and its academies is conducted in accordance with the highest standards of integrity, probity and openness. This policy has also been set in context of the **SPTA Anti -fraud Policy** and the Bribery Act 2010.

General Rules

Provision of entertaining to third parties:

- Where funding is to be used from SPTA and/or its academies then all entertaining must be approved and agreed with SPTA Core Finance prior to that expenditure.
- Entertaining will not be reimbursed via monthly expense claims and the company credit cards cannot be used for entertaining unless approval has been sort from SPTA Core Finance.
- If approved all entertaining must be recorded on the Entertaining Expenditure Register held by the Finance Office at SPTA/academy. This should include an assessment of the impact on the recipient, value and the perception this may have within the market place.

Provision of entertaining to staff:

- Maximum amount £5 per staff member per annum – this is at the discretion of the Director/Principal.
- It is acceptable to provide staff with lunches for full day training events (this excludes provision of alcohol). Other meals/lunches can only be provided / reimbursed in line with the Travel and Subsistence Policy.
- Any provision of Alcohol for the consumption by staff should only be provided in the case of a celebratory event, completion of successful Ofsted or outstanding examination results. However, this should still be kept to a minimum ie. one glass per staff member and full approval must be gained from SPTA Core Finance prior to the purchase. This should be recorded on the Entertaining Expenditure Register.

Penalties for Breach of either above policies

If a breach of this policy amounts to a breach of the Bribery Act 2010 it may attract the following penalties:

- **Individuals** – the penalties for individuals on conviction are severe, and may include imprisonment up to 10 years for all individuals involved.
- **Corporate** – SPTA itself and partners, officers and directors may be liable to severe financial penalties for bribery committed by employees, contractors, agents, representatives and other third parties who provide services for or on SPTA's behalf. The costs of any external investigation ordered by the regulator may easily be more than £1m, and will be payable by SPTA.
- **Third parties** – any breach of this policy by any contractor, agent, consultant or supplier will normally result in SPTA's contract with any such party being terminated insofar as its terms or law permits.
- **Investigations** – any breach, or suspected breach, of this policy will be investigated and appropriate disciplinary action taken as necessary, which may include reporting to appropriate authorities.
- **Disciplinary action** – any breach of this policy may result in disciplinary action being taken under local disciplinary procedures, and may lead to dismissal if it constitutes gross misconduct. SPTA will support any employee or officer who makes such a report and will ensure that the report is treated appropriately. No disciplinary action may be taken against any person who makes a legitimate report, even if the suspicions reported turn out to be incorrect. Disciplinary action may be taken against any person who attempts to victimise or discriminate against a person making such a report.

Role of the Finance Office in relation to the above policies

- Responsible for ensuring that any offer or receipt of gifts, hospitality or donations to staff is recorded in SPTA's or in the individual academy's Register of Gifts and Hospitality.
- Reporting any possible conflict of interests arising from the offer or receipt of gifts and or hospitality to SPTA Core Finance
- Any entertaining expenditure is recorded within the Entertaining Expenditure Register with appropriate details.
- Returning on a termly basis to Core Finance at SPTA a copy of the Gifts and Hospitality Register. (Dec, March, Aug). This must be notified even if no transactions are included.