



SPARKEN HILL
ACADEMY

Gifts and Hospitality Policy

Rev	Date Issued	Prepared By	Approved	Review Date	Comments
1.2	Feb 2021	VMD	25/02/2021	Feb 2022	Revised giving of gift value.
	Feb 2022	VMD	24/02/2022	Feb 2023	No change to previous.
	Feb 2023	VMD	22/02/2023	Feb 2024	No change to previous
	Feb 2024	VMD	27/02/2024	Feb 2025	No change to previous
	Feb 2025	VMD	27/02/2025	Feb 2026	No Change to Previous
	Feb 2026	VMD	26/02/2026	Feb 2027	No change to previous

Background

Sparken Hill Academy Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff, trustees and Governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Academy Trust.

In order to protect all individuals associated with the Trust, and the reputation of the Trust and its academies, from accusations of bribery or corruption staff, trustees, and Governors must take extreme care that none of their dealings, directly or indirectly, could be deemed as a reward or benefit, in line with the Prevention of Fraud and Bribery Act 2010. This Act makes it a criminal offence to:

- Offer, promise or give a bribe
- Request, agree to or accept a bribe
- (by an organization) fail to prevent bribery by those acting on its behalf (associated persons) to obtain or retain business or a business advantage for the organization.

Under this Act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

The Academy will hold a Gifts and Hospitality Register. All gifts/hospitality accepted with a value between £20 - £50 must be recorded in the register; gifts valued over £50 should be reported to the Accounting Officer (Principal) for consideration and approval prior to acceptance. The Gifts and Hospitality register will be held in the Business Managers office.

Definition

A Gift is any item or service, award, prize or any other benefit which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public or which might be seen to compromise the personal judgment or integrity of the recipient.

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public.

Dealing with Gifts and Hospitality

The Trust expects staff, trustees and Governors to exercise the utmost discretion in giving and accepting gifts and hospitality when on Academy business. Particular care should be taken about a gift from a person or organization that has, or is hoping to have, a contract with our organization. In any case of doubt advice should be sought from the Business Manager or Academy Directors.

Staff, trustees and Governors must not make use of their official position to further their private interests or those of others.

Staff, trustees and Governors must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that the Academy might be placed under an obligation.

Gifts of low intrinsic value such as promotional calendars or diaries, small tokens of gratitude, can be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, individuals should decline the gift or refer the matter to the Academy Business Manager or Academy Directors.

It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £20 these are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register. Where gifts valued between £20 - £50 are accepted, these must be recorded in the register; gifts valued over £50 should be reported to the Accounting Officer (Principal) for consideration and approval prior to acceptance.

Where a more valuable gift, benefit or service is offered which is to the good of the Academy, rather than an individual, it must be referred to the Business Manager, or if in the case of the Business Manager, to the Accounting Officer (Principal) for approval within their discretion; if acceptable, then these terms must be recorded in the register.

Hospitality such as working lunches, coffees etc are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. Modest hospitality, provided it is reasonable in the circumstances, should be similar to the scale of hospitality which the Academy as an employer would be likely to offer. These would not be added to the register. Hospitality received above this level should be recorded in the register.

If a member of staff, trustee or Governor is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the academy (other than light refreshments) it is their responsibility to discuss this with the Business Manager immediately.

When a member of staff, trustee or Governor has to decline an offer of a gift or hospitality, this should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy. If not accepting a gift would be regarded as causing offence (such as a sudden and unexpected gift or one where refusal could cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Academy Accounting Officer (Principal) as soon as possible, who may decide to return the gift, or may donate it to the Academy raffle/fair or a charitable cause.

Examples of gifts or hospitality that should not be accepted:

- Cash or monetary gifts (not including donations to the Academy)
- Gifts or hospitality offers to a member of your family;
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process;
- Staff, trustee or Governor Attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants. (Where it is considered that there is a benefit to the Academy in a member of staff,

trustee or Governor attending a sponsored event, the attendance must be formally approved and registered by the Accounting Officer (Principal)).

Where a gift is received on behalf of the Academy, the gift remains the property of the Academy. The gift may be required for departmental display or it may, with the Accounting Officers (Principal) approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the department on or before the recipient's last working day.

Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the Academy and must be used accordingly.

Giving Gifts and Hospitality

The Academy will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented in the Gift and Hospitality Register and has regard to the propriety and regularity of the use of public funds. This does not apply to the award of gifts; prizes etc. related to the achievement of pupils e.g. attainment or merit awards. The value set for giving a gift from Sparken Hill Academy **must not** exceed **£40**.

Where hospitality is provided by the Academy this should be approved in advance by the Business Manager. In approving hospitality the Accounting Officer (Principal) or Business Manager should ensure it is not in breach of the UK Bribery Act 2010 and also that the costs are appropriate for a publically funded organization. Hospitality such as working lunches, tea/coffee, sandwiches or lunch are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not for their family or friends). These would not be added to the register. Hospitality provided above this level should be recorded in the register.

Non Compliance

In the case where it is believed a member of staff, trustees, and Governors has not declared a gift or hospitality then a formal investigation will be instigated by the appointed investigating officer within the Academy. If misconduct is indicated, this may take the form of disciplinary procedures in the case of employees.

This policy will be reviewed annually.