



## **BOHUNT EDUCATION TRUST**

### **GIFTS AND HOSPITALITY POLICY**

#### **1. Introduction**

As a general guideline, gifts, hospitality or other personal benefits (hereinafter referred to as “Gifts”) should not be accepted or offered by any member of staff, except as provided for below. Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

#### **2. Objectives**

The objectives of the Bohunt Education Trust (BET) Policy are:

- Ensure BET can demonstrate that no improper influence has been applied to decisions made.
- To show that all decisions whether educational, financial or otherwise are reached on the basis of the proper application of BET procedures.

#### **3. Scope**

The Policies and Procedures apply to all employees of BET.

#### **4. The receipt of gifts**

BET encourages and expects staff, trustees and governors to use their networks and contacts for its benefit. It is however a fundamental requirement on all staff, the contravention of which would be considered to be gross misconduct, that they must not derive any financial benefit beyond their agreed salary from the decisions they make or contribute to, which involve the education of students, or the spending of the significant sums of public money that are entrusted to the Trust or its schools. Therefore staff shall not use their authority or office for personal gain beyond their agreed salary and shall seek to uphold and enhance the standing of the BET by:

- maintaining an unimpeachable standard of honesty and integrity in all their business and other relationships
- complying with the letter and spirit of the law in contractual obligations, rejecting any business practice that might be deemed improper
- at all times in their business and other relationships, act to maintain the interests and good reputation of BET

Any employee who becomes aware of a breach of Policy must refer to BET’s Whistle Blowing Policy and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.

Any personal interest that may impinge, or might reasonably be deemed by others to impinge, on an employee's impartiality, or conflict with the duty owed to BET in any matter relevant to an employee's duties (such as conflicting business interests) shall be declared in writing. Any member of staff aware of any business dealings conferring personal gain, or involving their relatives or associates must make an appropriate entry in the Register of Business Interests.

Staff are permitted to accept gifts, rewards or benefits from students, students' families, members of the public, or organisations which BET has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as chocolates, flowers, diaries or calendars). Therefore, gifts should not be accepted if they appear to be disproportionately generous, or could be construed as an inducement to effect a decision or action, whether business, educational, or other. Where purchased items include a "free gift", such a gift should be either used for BET business or handed to the Trust to be used at charity raffles, pupil prizes, etc.

In relation to conventional hospitality (lunches, outings, tickets for events, etc), it may be accepted provided that it is normal and reasonable in the circumstances. However, invitations for the following should not be accepted:

- where there is no reasonable business justification for doing so
- where an invitation is disproportionately generous
- where the invitation could be seen as an inducement to affect a business or other decision.

Any hospitality other than of a nominal value (£15) or facilities provided during the normal course of business should be reported to the Finance Dept. -

- Who the gift is from
- Date the gift is received
- Details of the gift
- Action taken (whether the gift is retained or refused or passed on, etc),

## **5. The providing of gifts**

BET encourages and seeks cooperative relationships between staff, trustees, governors, stakeholders and external organisations. Accordingly, there can be occasions where it is appropriate for BET to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house. Likewise, it may be appropriate for leaving gifts to be provided to staff leaving the employment of BET, particularly after a long period of service. Such gifts are often supplemented with private contributions from continuing members of staff.

Review frequency: 3 years

Reviewed by BET Board - December 2017

Next date of approval: January 2018