

THE NEWMAN CATHOLIC COLLEGIATE



GIFTS AND HOSPITALITY POLICY

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Gifts and Hospitality Policy

The Newman Catholic Collegiate aims to provide the highest standard of service to all its students and parents and to care for the well-being of its employees. In return students, parents and the public are entitled to expect the highest standards of conduct from all the collegiate Directors and employees.

The Board of Directors, academy committee members and employees should not accept excessive or frequent gifts or hospitality from existing or prospective suppliers. When considering to accept such offers, they must consider whether they could affect their personal judgement or integrity. The Board of Directors and individual academies maintain a register of gifts and whether they were accepted or not. Directors, academy committee members and employees should inform either the academy or the Business Director as they arise. As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below.

This policy is to ensure that the collegiate 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 collegiate. The collegiate should be able to show that all decisions are reached based on value for money and for no other reason. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

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

Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the collegiate by...

1. Maintaining an unimpeachable standard of honesty and integrity in all business relationships.
2. Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
3. At all times in their business relationships acting to maintain the interests and good reputation of the collegiate.
4. Any employee who becomes aware of a breach of policy must report this immediately to their line manager who will instigate investigations as necessary.
5. 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 the collegiate in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain or involving relatives or associates of members of staff must supply details of such transactions for entry into the Register of Business Interests.
6. Employees are permitted to accept gifts, rewards or benefits from members of the public or organisations the collegiate has official contacts with only where they are isolated gifts of a trivial character (such as diaries or calendars). Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision.
7. Where purchased items include a "free gift", such gifts should be either used for collegiate business or handed to an Academy within the collegiate to be used at charity raffles etc.
8. 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. 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 a business decision.
9. Any hospitality other than of a nominal value (up to £15) or facilities provided during the normal course of business should be reported for an entry in the Register of Business Interests.

Hospitality

The following principles should be applied when deciding whether or not to accept hospitality.

- Staff, Directors and Academy Committee representatives should ask themselves whether members of the public could reasonably think that they might be influenced by the hospitality offered. Factors to be considered are – person or organisation offering the hospitality and its timing in relation to decisions being made by the collegiate.
- Care should be taken to avoid situations in which an individual Director, Academy Committee Representative or staff member is the sole person invited to partake of hospitality or where there is a pattern of receiving hospitality from that organisation.

Examples of when it may be proper to accept hospitality (depending on the circumstances) are as follows: -

- a) Attendance at conferences and events organised by outside bodies where there is a service interest.
- b) Attendance at events or functions where there is a need for the collegiate to be represented to either give or receive information.
- c) Working lunches where the refreshments are provided on a reasonable level.

Gifts

All personal gifts should be refused or donated to charity unless they come within the scope below.

Gifts of the following type may be accepted:

- a) Incidental promotional gifts e.g. calendars, diaries, pens.
- b) Gifts up to the value of £15 e.g. chocolates or flowers
- c) Gifts which are intended for the collegiate or an individual academy within the collegiate can be accepted but must not be retained by the individual who receives them. Such gifts should be passed to the Academy or Board of Directors as appropriate.

To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied by staff, academy committee representatives and Directors. See Appendix B.

Unacceptable Gifts/Hospitality

The following are examples of gifts or hospitality which should be refused by staff, Academy Committee members or Directors:

- Gifts of money (not including donations to the collegiate)
- Free membership or subscriptions (e.g. sports clubs)
- Free goods, services or equipment which are normally provided by a supplier to the collegiate at a charge.
- Foreign travel unless as a specific academic or research activity approved by the Principal.

Purchase of Alcohol

The collegiate funds must not be used to purchase alcohol for consumption or as gifts/hospitality, except where it is to be used for religious services.

Registration of Hospitality and Gifts

Staff, Academy Committee representatives and Directors must, within 7 days of accepting any gift or hospitality with an estimated value more than £15, provide written notification to the Principal or Board of Directors using the 'Declaration of Gifts and Hospitality' form (Appendix A). This form must be completed in full, giving full details of the gift or hospitality received.

All accepted offers must be recorded in case of queries, Subject Access requests and FOI requests. Any concerns identified should be noted and an action plan put in place.

If a staff member did accept a gift and consumed/ used the gift prior to approval, this must be reported to the Principal and depending on the value of the gift, to the Senior Executive Leader. Any staff member that accepts a gift without prior approval between the value of £15 - £50 should be reminded of this Policy.

If the gift is over the value of £50 this will be reported to the Board of Directors. The disciplinary Policy and Anti-Fraud Policy will apply where staff have accepted gifts over £50 without prior approval. Under no circumstances should any staff member except a cash gift.

The Resources and Services subcommittee can request to see the register of Hospitality and Gifts at any time and all documentation in the register will be kept for seven years.

Donations to the Collegiate

There will be on occasion times when donations are given to the collegiate or individual academies within the collegiate. When donations are received, the reason for the donation and who by should be identified and the money should be allocated against the activity or purpose for which it was originally donated. If a donation is received without a specific area or activity identified, then the matter will be discussed either the Resources and Services subcommittee or the Board of Directors.

Donations from the Collegiate

The Collegiate may hold fund raising events to generate funds for a specific purpose, or for another charity e.g. McMillian Cancer Support. On these occasions there is no limit to the donations raised. Donations may be given to charities by the collegiate or individual academies within the collegiate directly. When donations are given, the reason for the donation and who too should be identified. Any donation given to a charitable cause must be taken from unrestricted funds only. All schools complete a charity collection form and send this to the central team for a cheque or BACs payment to be issued to the charity. Any Donations made directly by the collegiate or its academies over the amount of £3,000 must be referred to the Resource and Services Subcommittee for approval.

Sponsorship

Where an outside organisation wishes to sponsor or is seeking to sponsor the activity of the collegiate, whether by invitation, tender or negotiation, or voluntarily, the basic conventions concerning the award of contracts, and acceptance of gifts or hospitality apply. The sponsor must be approved by the Board of Directors.

Expenditure on gifts and hospitality

When giving gifts, the trust **must** ensure that the value of the gift is reasonable, is within the trust's scheme of delegation, the decision is fully documented, and has due regard to propriety and regularity in the use of public funds. The collegiate maintains a record of such transactions. Expenditure on hospitality from public funds is only incurred in the provision of education. Hospitality is generally only provided in the workplace. Modest hospitality is occasionally provided outside the workplace and the Business Director and Academy Manager maintain a register of the occasion's hospitality is provided, the number of people involved and costs incurred.

Expense Claims

Claims for reimbursement of expenses for hospitality or gifts should be made on an expense claim form and submitted to the Academy Manager. Receipts should always be enclosed. Alternatively, authorised invoices from the supplier can be paid in accordance with the normal financial procedures. All claims should be authorised prior to the expense being made. All expense forms are sent to the central team for checking.

This Policy will be reviewed by the Board of Directors every 2 years and must be signed by the Chair of the Board of Directors, the Senior Executive Leader, the Academy Committee Chair and the Principal.

Policy Reviewed:	October 2021
Next Review:	October 2023
Signature of Chair of Directors:	Signature of Accounting Officer:
Signature of Chair of Academy Committee:	Signature of Principal:

Academy Name _____

Name: _____

Description of gift or hospitality provided	
Value/Estimated value of gift or	
Date of offer and date of receipt of gift or hospitality	
Person/body offering/providing the gift or hospitality:	
Person or body receiving the gift or hospitality (other than/as well as you)	
Any relationship (including potential future relationship) which you or the Agency has with the person or body offering the gift or hospitality	
Why accepting it was in the Academy/Collegiate interests:	
For gifts (including items such as tickets and vouchers): do you seek permission to retain/use it yourself, or will you pass/have you passed it to the Principal/Board of Director's or other appropriate person to be passed on to charity or deal with it in some other way?	
For hospitality or gifts already enjoyed, used or consumed: Why was prior approval not sought?	

Signed Print Name Date

Principal Print Name Date

Reason for refusal/approval: _____

Academy Committee Chair _____ Signed

Board of Directors Chair _____ Signed (if declaration applies to a board member other than themselves, then the Vice Chair & Senior Executive Leader would authorise)

The **PROVEIT** test:

Whether or not the offer is acceptable:

Purpose	Token, thanks or seeking a favour? (token or thanks: yes; favour: no)
Rules	What are they? Does this situation conform?
Openness	Is the offer transparent?
Value	Expensive or inexpensive?
Ethics	Does the offer fit with Collegiate ethics? Is this an exceptional circumstance?
Identity	Who has made the offer?
Timing	Are you about to make a decision affecting the giver?