

Zest Academy Trust

Gift and Hospitality Policy

Approved & Adopted By Trust Board: 15/07/2016

Review Period: Annual

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Person Responsible: CFO

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Gift and Hospitality Policy

Introduction

Zest Academy Trust recognises that upon the receipt of hospitality and gifts they must be subject to clear restrictions and that any that are accepted are appropriately declared and recorded. This policy takes into consideration the requirements under the UK Bribery Act 2010.

Purpose

The process set out in this policy is designed to safeguarding employees from any misunderstanding or criticism.

Scope

This policy applies to all Trust employees, permanent, temporary or on a casual basis, working for Zest Academy Trust. It also includes all volunteers, including Trust Board Trustees, Members and Academy Council Members when acting on behalf of the Trust of the individual Academy.

Definition

By definition, a gift is something that is given to an individual. Employees should be aware that all gifts and hospitality received (other than those of a minor nature) are not considered to be the property of the individual, but the property of the Trust or individual Academy, and should be recorded in accordance with this policy.

Donations to the Trust or individual Academy are a separate issue and are not covered by the scope of this policy.

Minor Nature

Gifts of minor nature are considered to be:

- Small gifts from those receiving a service from the Trust or individual Academy as a token of appreciation, for example from pupils to teachers.
- Gifts from suppliers up to a maximum value of £25.00
- Promotional items from suppliers that are widely given to all clients, for example calendars, pens, notepads, etc.

Personal gifts not included as those outlined, as 'minor nature' may not be solicited under any circumstances. To do so would be in contravention of the Bribery Act 2010.

Gifts of 'minor nature' need not be recorded or declared. All gifts of money and gifts over the value of £25 must be recorded and in the academy's 'Gift and Hospitality Register'. These will not be kept by the individual and remain the property of the Trust or individual Academy

Hospitality

Lavish hospitality should not be accepted so that it cannot be interpreted as a way of exerting an improper influence over the way staff carry out their duties.

Hospitality in excess of a moderate working lunch should not be accepted without the approval of the Trust Board. All offers of hospitality, other than those of a minor nature, must be recorded in the Register of Gifts and Hospitality noting if the offer was accepted or declined.

Other hospitality may be accepted where:

- A member of staff is representing the Trust or individual Academy in the community
- The hospitality concerns attendance at a relevant conference or course, where the hospitality is corporate not personal

The timing of hospitality in relation to procurement or purchasing decisions that the Academy may be taking is especially sensitive. The Trust or individual Academy should **never** accept a gift or hospitality from any organisation where you can reasonably foresee that you will be involved in deciding whether or not to award them a contract or order.

External hospitality is generally not appropriate. Where the Trust or individual Academy pays for external hospitality, the CEO or Head of School, who will review the request in line with the UK Bribery Act 2010, should approve this.

Gift and Hospitality Register

Date	Recipient	Person or organisation offering gift or hospitality	Details of gift or hospitality	Actual Value (or estimate of the gift or hospitality)	Reason for accepting the gift	Approval of CFO