



# The Acceptance of Gifts and Hospitality

## 1. Introduction

1.1 The Bishop Anthony Educational Trust is committed to the values of probity and accountability. All trustees and staff should conduct themselves with integrity, impartiality and honesty at all times, and should maintain high standards of propriety and professionalism.

1.2 The guiding principles are:

- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest.
- The action of individuals acting in an official capacity should not give the impression to any member of the public, to any organisation with whom they deal or to their colleagues that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation.

## 2. Application

2.1 This policy applies to all trustees and members of staff.

2.2 Procedures apply to gifts from existing and potential suppliers.

## 3. Acceptance of Gifts

3.1 Trustees and staff should not accept gifts or rewards from any organisation or individual with whom they have contact in the course of their work as an inducement either for doing something or not doing something in their official capacity. Particular care should be taken about any gift from a person or organisation which has, or is hoping to have, a contract with the Trust.

3.2 Gifts of a trivial or inexpensive nature may be accepted (eg diaries, calendars), but more substantial or expensive offerings should be declined.

3.3 Gifts are deemed to include:

- Goods provided for personal or other private use
- Personal services
- Loans of equipment, vehicles etc for personal use
- The provision of goods / services at preferential cost for personal or other private use

3.4 If unsolicited gifts of a substantial nature arrive from contractors they should be returned with a polite explanation that the Trust's policies do not allow their acceptance.

## 4. Acceptance of Hospitality

4.1 Hospitality can take a variety of forms, some of which it is appropriate to accept, some of which must be declined.



4.2 Staff may be offered hospitality as a normal business practice in a way that is directly linked to their role. Examples of this kind of hospitality include the offer of refreshments at business meetings or the offer of lunch or dinner at the end of an official engagement. This kind of conventional hospitality may be accepted.

4.3 Trustees and staff may also be offered other forms of hospitality which are not related to their role and are not linked to Trust business. This might include substantial offers of social functions, travel or accommodation, offers of tickets and invitations to sporting, cultural or social events. These forms of hospitality should be declined.

4.4 If any member of staff is in doubt about whether it is appropriate to accept any offer of hospitality, the advice of the Board of Directors should be sought.

4.5 You must never canvass or seek gifts or hospitality.

## **5. Declaring the acceptance of a gift**

5.1 Trustees and staff must record being offered or accepting any gifts by completing a Declaration of Gifts and Hospitality (Annex A). The declaration should be approved by the Director for trustees and staff. The Trust's finance officers will maintain the Register for Gifts and Hospitality (Annex B).

## **6. Failure to comply**

6.1 In all instances where there is a reasonable belief that there has been a failure to declare, a Director will conduct a formal investigation of the situation. Employees may be subject to disciplinary procedures to pursue potential matters of misconduct.

6.2 It is a criminal offence for a trustee to corruptly accept any inducement or reward for doing, promising or refraining from doing anything in the course of their employment, or corruptly showing favour or disfavour, in the handling of contracts. In acting corruptly the person would demonstrate their intention to purposefully act with a lack of probity and with a disregard for the implications of their actions for the Trust.



**Declaration of Gift or Hospitality**

Please indicate by ticking box A or B whether you have been offered and declined or have accepted a gift or hospitality

Name:	
Position:	

**A** I have been offered a gift / hospitality which I have declined

**B** I have been offered a gift / hospitality which I have accepted.

Declaration details		
Name of external organisation and their relationship with the Trust.	Nature of interest / gift / hospitality	Estimated Value If applicable

I believe my objectivity and independence in relation to the above external organisation has not been impaired in any way by the offer of gifts or hospitality.

SIGNED (Recipient) \_\_\_\_\_ Date \_\_\_\_\_

NAME (capitals) \_\_\_\_\_

SIGNED (Director) \_\_\_\_\_ Date \_\_\_\_\_

NAME (capitals) \_\_\_\_\_

Completed forms should be sent to the finance officer to enter in Register.

Entered in Register	Date:	Reference:
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## Declaration of Gifts and Hospitality Register

Date of entry	Name of member of staff	Estimated Value £	Nature of gift / hospitality	Supplier of gift / hospitality	Declaration Form Reference