



# **Gifts & Hospitality Policy**

<b>Responsibility:</b>	<b>Director of Finance &amp; Premises</b>
<b>Updated:</b>	<b>September 2021</b>
<b>Approved by Trustees:</b>	<b>September 2021</b>
<b>Review date:</b>	<b>September 2022</b>

## **1. Gifts & Hospitality:**

- 1.1 Guide lines regarding the nature and procedures to follow regarding gifts and hospitality are included in the staff handbook and Financial Regulations. If in any doubt about whether the matter should be considered under this policy clarification must be sought from the Director of Finance & Premises.

## **2.0 Guidelines regarding Gifts and Hospitality**

- 2.1 These guidelines will help you to judge what sort of gift, and what level of hospitality is acceptable.

The following general rules apply and must guide decisions on receipt of gifts and hospitality as an employee of the Academy:

- Accepting gifts should be the exception. You may accept small 'thank you' gifts of token value, such as a diary, a coffee mug or bunch of flowers, not over £25 in value. You should notify the Director of Finance & Premises of any gift or hospitality over this value for entry in the Register of Business Interests.
- Where smaller value gifts (under the value of £25) are received from the same person or company, the frequency of receipt should be limited to less than four occurrences in a rolling 12-month period to avoid a cumulative build-up of gift value. You should notify the Director of Finance & Premises of any gift or hospitality over this frequency for entry in the Register of Business Interests.
- Always say "no" if you think the giver has an ulterior motive. Be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will elicit a more prompt service or preferential treatment.
- Never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the Academy, seeking employment with the Academy or is in dispute with the Academy, even if you are not directly involved in that service area.
- Where items purchased for the Academy include a 'free gift', such a gift should either be used for Academy business or handed to the Director of Finance & Premises to be used for charity raffles for the PSSA.

- If you are in any doubt about the acceptability of any gift or offer of hospitality it is your responsibility to consult the Director of Finance & Premises

A gauge of what is acceptable in terms of hospitality is whether this Academy would offer a similar level of hospitality in similar circumstances.

- Occasional working lunches with customers, providers or partners are generally acceptable as a way of doing business provided they are not to an unreasonable level or cost.
- Invitations to corporate hospitality events must each be judged on their merit. Provided the general rules have been taken into account, it may be acceptable to join other company/organisation guests at:
  - a. sponsored cultural and sporting events, or other public performances, as a representative of the Academy;
  - b. special events or celebrations.

But, consider the number of these events, and always take into consideration what public perception is likely to be if they knew you were attending.

- Acceptability depends on the appropriateness of the invitations, in terms of the level of hospitality, the frequency and the status of the invited employee.
- In all cases the person or company providing the hospitality must be present or represented at the event.
- Paid holidays or concessionary travel rates are not acceptable. Neither are offers of hotel accommodation nor the use of company villas/apartments.
- If you are visiting a company to view equipment that the Academy is considering buying, you should ensure that expenses of the trip are paid by the Academy. Acceptance of refreshments and/or a working lunch may be acceptable, but care must be taken to ensure that the Academy's purchasing and/or tender procedures are not compromised.
- Acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to your work are acceptable.
- Offers to speak at corporate dinners and social gatherings, or events organised by, for example, a professional body, where there is a genuine need to impart information or represent the Academy must be agreed in advance with The Executive Principal. Where your spouse or partner is included in the invitation, and approval has been given for you to attend, it will be acceptable for your spouse or

partner to attend as well, but if expenses are incurred, these must be met personally.

- Any invitation you accept should be made to you in your professional/working capacity as a representative of the Academy.

This Gifts & Hospitality Policy was reviewed and ratified by Trustees of Plume Academy on 22 September 2021.