

Gifts & Hospitality Policy



Review Date

April 2023

Ratified

May 2023

Next Review

April 2027

Responsible Directorate

Finance

Our Vision



Transforming Lives of our learners

We seek to ensure that all our learners receive a high-quality education from expert staff and aspire to achieve the best they possibly can, no matter their background or ability. Our learners have safe, supportive learning environments in which they develop, grow, and challenge themselves. We are determined that our learners will receive the very best enrichment and opportunities to help them reach their full potential and ensure they are prepared for the future, wherever it might take them.



Transforming Lives of our colleagues

Our colleagues are supported with the very best professional development through our innovative ATT institute, allowing them to stay focused on learning and developing as practitioners whilst they progress in their careers. We share the very best practice across our community of academies to help build systems and processes that really work.



Transforming Lives in the communities we serve

We are committed to actively engaging with and addressing inequality in our local areas. We understand that every one of our academies and their diverse communities are different, so we aim to build a supportive, collaborative, and nurturing relationship with each whilst sharing our key values across our Trust.

Commitment to Education

Transparency and Integrity

Innovation and Improvement

Dedication to Inclusivity

Our Values

Commitment to Education

Our core purpose is to positively impact the lives of all our learners. Education will always be at the heart of everything we do.

Transparency and Integrity

We are proud of our success whilst being open and honest about our areas for improvement. Our actions are always ethical and in the best interests of all our stakeholders.

Innovation and Improvement

We are committed to innovative education- always moving forward and never standing still. Our learners are ambitious and prepared for a future that is constantly changing and developing.

Dedication to Inclusivity

Our learners are all different and all important to us. We aspire to support, challenge, and help each one of them reach their full potential, regardless of their background or level of ability.

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1 | Aims and Application

- 1.1 It is our Trust's policy to conduct all of our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate.
- 1.2 As an employer, we can face an unlimited fine for failing to prevent bribery, as well as exclusion from tendering for public contracts and damage to our reputation. We therefore take our legal responsibilities very seriously.
- 1.3 In this policy, **third party** means any individual or organisation that our staff come into contact with during the course of work for our Trust. This includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, government, and public bodies including their advisers, representatives, officials, politicians and political parties and/or parents and community members.
- 1.4 This policy applies to all persons working for our Trust or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, business partners, sponsors or any other person associated with us, wherever located (collectively referred to as **employees** in this policy).

2 | Gifts, Hospitality and Expenses

- 2.1 The Trust allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:
- Establishing or maintaining good business relationships
 - Improving or maintaining our image or reputation
 - Marketing or presenting our products and/or services effectively.
- 2.2 The giving and accepting of gifts is allowed if the following requirements are met:
- It is not made with the intention of influencing, or may be perceived as influencing somebody's judgment, a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits
 - It is given in the Trust's name, not in your name
 - It does not include cash or a cash equivalent (such as a gift certificate or vouchers)
 - It is appropriate in the circumstances, taking account of the reason for the gift, its timing and its value - for example, small gifts at Christmas
 - It is given in an open and honest manner
 - It complies with any applicable local law
 - The amount is not excessive or frequent
 - It is appropriate to the trading relationship.

- 2.3 The Chief Executive Officer will authorise only reasonable, appropriate, and proportionate entertainment and promotional expenditure that has been recorded on the Supplier Funded Activity Log/Gift Register (see [Appendix](#)). Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to their line manager.
- 2.4 It should be noted that bribery is a criminal offence under the UK Bribery Act (2010), and corrupt acts expose the organisation and its employees to the risk of prosecution, fines, and imprisonment, as well as endangering our reputation.

3 | Donations

- 3.1 The Trust does not make contributions to political parties.
- 3.2 The Trust only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Chief Executive Officer and Chief Finance and Operations Officer.

4 | What You Must Not Do

- 4.1 It is not acceptable for you (or someone on your behalf) to:
- Give, promise to give, or offer a payment, a gift, or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
 - Give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome
 - Accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return
 - Accept hospitality from a third party that is unduly lavish or extravagant under the circumstances
 - Offer or accept a gift to or from government officials or representatives, or politicians or political parties without prior approval of the Chief Executive Officer
 - Threaten or retaliate against another worker who has raised concerns under this policy
 - Engage in any other activity that might lead to a breach of this policy.
 - Accept any form of “Cash” gift from those mentioned above including from parents/carers of students
- 4.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve the right to terminate our contractual relationship with other partners if they breach this policy.

5 | Record Keeping

- 5.1 Financial records are required to be kept and maintained; we have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 5.2 You must notify your Principal or the Deputy CEO (Finance & Operations) by email of any gifts or hospitality you are offered above the value of £10. They may ask you to complete the form in the [Appendix](#).
- 5.3 You must submit all expenses claims relating to hospitality, gifts, or payments to third parties in accordance with our expenses policy and record reason for expenditure.
- 5.4 All accounts, invoices and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept 'off-book', as this could facilitate or conceal improper payments.

6 | How to Raise a Concern

- 6.1 You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.
- 6.2 If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the Chief Executive Officer or your Principal as soon as possible.
- 6.3 If you are unsure about whether a particular act constitutes bribery or corruption, raise it with the Chief Executive Officer or your Principal for clarification.
- 6.4 Employees who raise concerns or report another's wrongdoing may worry about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that nobody suffers any detrimental treatment as a result.
- 6.5 Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Director of People Strategy immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our *Grievance Policy*.

Appendix - Supplier Funded Activity Log/Gift Register

To be completed for supplier funded activities/entertainment/gifts (for entertainment/hospitality, this form should be completed in advance)			
Recipient (Name of Person)		Proposed Event Date	
		Date of Gift	
Name of Supplier		Annual Spend	
Product/Service Supplied		Academies Supplied	
Other ATT Staff Attending			
Location of Activity/ Venue			
Nature of Activity/Gift			
Business Opportunity: (e.g. Building relationships, reviewing new products/premises, networking)			
Completed By:			
Date:			
Reviewed By:			
Date:			