



# **TFT Gift & Hospitality Policy**

**February 2018**

**Generated by: Niamh Field**

**Date agreed by Finance, Resources, Audit and Risk Committee: 7 March 2018**

**Frequency of Review: Three Years**

**Date of Next Review: February 2021 or earlier in response to statutory changes**

## **Purpose**

1. The receipt of gifts, money or excessive hospitality could damage The Futures Trust's reputation and lead to possible prosecutions for corruption.
2. The principle of integrity requires that staff should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of gifts and hospitality must be subject to clear restrictions and that any that are accepted must be declared and recorded.
3. This policy seeks to protect staff and ensure they are free from any conflict of interest with respect to acceptance or provision of gifts, hospitality or any other inducement from or to suppliers of goods or services to The Futures Trust.

## **Definitions**

4. A gift is any item, cash, goods or benefit in kind given or offered for which no payment or service was given or received in return.
5. Hospitality can be defined as any food, drink, accommodation or entertainment provided free of charge or heavily discounted.
6. Staff is taken to mean all permanent and fixed term staff employed by The Futures Trust and by any other contractors, consultants or other persons (including Members, Trustees and Governors) acting on behalf of The Futures Trust.

## **Gifts and Hospitality**

### Acceptable Gifts

7. To accept gifts should be the exception. You may accept small 'thank you' gifts of token value, such as a diary, a coffee mug or a bunch of flowers. You should notify the Trust Finance Director of any gift or hospitality over this value for entry in the Register of Business Interests. It is each individual's responsibility to inform the Trust Finance Director by e-mail of any gifts or hospitality that is offered.
8. The individual should consider carefully whether it is appropriate to accept or decline a gift or hospitality. If in doubt advice should be sought from the Trust Finance Director.
9. 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. When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.
10. Personal gifts may not be solicited under any circumstances.

11. Never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with The Futures Trust, seeking employment with The Futures Trust or is in dispute with The Futures Trust, even if you are not directly involved in that service area.
12. Where items purchased for The Futures Trust include a 'free gift', such a gift should either be used for Trust business or handed to the Trust Finance Director to be used for charity raffles.

#### Acceptable hospitality

13. 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.
14. 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:
  - i. Sponsored cultural and sporting events, or other public performances, as a representative of The Futures Trust.
  - ii. Special events or celebrations.
15. Other hospitality may be accepted, for instance where:
  - i. There is a genuine need to impart information or represent The Futures Trust in the community.
  - ii. An event is clearly part of the life of the community or where The Futures Trust should be seen to be represented.
  - iii. The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.
16. Before accepting any hospitality, approval should be sought from the Chief Executive Officer, the Headteacher or Deputy Headteacher in respect. In exceptional circumstances retrospective approval may be obtained. All hospitality received must be recorded in The Futures Trust's hospitality register with the exception of working meals, receptions etc.
17. Paid holidays or concessionary travel rates are not acceptable. Neither are offers of hotel accommodation nor the use of company villas/apartments.
18. If you are visiting a company to view equipment that The Futures Trust is considering buying, you should ensure that expenses of the trip are paid by The Futures Trust.
19. 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 Futures Trust must be agreed in advance with the Headteacher of the School. 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 will be met personally.

## Gifts to and from students

20. Given the nature of the professional responsibilities of staff, they are strongly advised not to give or accept gifts/hospitality (exceeding £25 in value) from students during their period of study.
21. Any gifts/hospitality from students, exceeding £25 in value must be entered in the Register of Gifts and Hospitality.

## **Contracts with Suppliers**

22. Staff must base all purchasing decisions and negotiations for contracts solely on achieving best value for money.
23. The Futures Trust requires staff who have official dealings with contractors and other suppliers of goods and services to The Futures Trust to avoid conducting any private business with them by any means other than through normal commercial channels.
24. Staff should be aware of the Prevention of Corruption Act 1916 which states that any money, gift or consideration received by an employee in public service, from a person or organisation holding, or seeking to obtain a contract, will be deemed by the courts to have been received corruptly unless the employee proves otherwise.

## **Sponsorship**

25. Where an outside organisation wishes to sponsor or is seeking to sponsor the activity of The Futures Trust, whether by invitation, tender or negotiation, or voluntarily, the basic conventions concerning the award of contracts, and acceptance of gifts or hospitality apply.

## **Register of Gifts and Hospitality**

26. The Trust Finance Director has responsibility for the ownership of the policy and the Register of Gifts and Hospitality.
27. Individual staff are personally responsible for reporting any gifts/hospitality offered and whether these have been accepted or declined. The Trust Finance Director will record this information in the Register.



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### Gift & Hospitality Register

<p>This form must be completed by any member of staff, Member, Trustee or Governor receiving or declining a gift or hospitality, which relates to their position in The Futures Trust and has a value of more than £25. If the individual is concerned about the likely level of any gift or hospitality that he or she may receive, agreement from the Chief Executive Officer or Headteacher must be obtained in accordance with The Futures Trust's guidance.</p>	
<b>Name</b>	<b>Position</b>
<b>Individual, company or organisation offering gift or hospitality</b>	
<b>Date, time, venue</b>	<b>Gift Hospitality accepted/rejected</b>
<b>Nature and approximate value of hospitality/gift.</b>	
<b>If accepted, has the gift been retained for personal or for school use?</b>	
<b>If accepted, reason for accepting gift/hospitality</b>	
<b>Signed</b>	<b>Date</b>

Please complete and return this form to the Trust Finance Director.