



The Olympus Academy Trust Governance Framework Appendix E Gifts & Hospitality Policy

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Amendment History

Version	Amendment Date	Author	Amendment Summary
1	24 January 2012	EO	<ul style="list-style-type: none"> Approved by Board of Directors and Trust Members
2	18 December 2012	EO	<ul style="list-style-type: none"> Effective from 1 January 2013. Approved by Board of Directors.
3	5 January 2013	EO	<ul style="list-style-type: none"> Updated terminology only. Approved by Board of Directors.
4	23 April 2014	EM	<ul style="list-style-type: none"> Updated following review. Approved by Board of Directors.
5	23 March 2016	KSt/JKh	<ul style="list-style-type: none"> Amendments adding additional scrutiny to 2.5 and also review of gifts and hospitality to ARC on an annual basis. Clarification of 'modest hospitality' in section 2.4. Approved by Board of Directors.

6	14 July 2017	JAn	<ul style="list-style-type: none"> • Replace Director with Trustee. • Approved by Board of Trustees.
7	July 2018	PDa	<ul style="list-style-type: none"> • Annual review; timings for notifications adjusted in 2.2, 2.9 & 4.2. • Approved by Board of Trustees
8	May / June 2020	JAn/BSm	<ul style="list-style-type: none"> • Annual review – minor changes. • Approved by Board of Trustees

1. Introduction

- 1.1 The purpose of this policy is to provide all those involved with governance with guidelines as to the level of gifts and hospitality that may be acceptably received or given and to provide a system for such gifts or hospitality to be recorded (including those declined). The aim is to ensure that trustees, governors and committee members are not open to possible criticism or any charge of undue influence.
- 1.2 Trustees, governors and committee members are expected at all times to conduct themselves in respect of their relations with The Olympus Academy Trust with the highest degree of probity. The Trust expects the highest standard of honesty from all trustees, governors and committee members in their business dealings, and expects that this can be shown to be the case.
- 1.3 Trustees, governors and committee members must refuse any gifts or hospitality where any suggestion of improper influence is possible. Special caution is necessary where it is offered by a person or body having business with or seeking a decision from The Trust.

2. Gifts and Hospitality Received (Accepted or Declined)

- 2.1 Acceptance of a gift, reward or benefit in connection with membership of the board of trustees, a local school improvement committee (previously known as a local governing committee) or a board committee is generally not acceptable and could therefore be considered a serious breach of the code of conduct which states:
 - Trustees, governors and committee members must not accept gifts or allow extravagance in any entertainment received or given in connection with the Trust's business and must always follow the Trust's Policy on recording hospitality received, given or declined. The Purchasing Policy outlines similar guidance for employees.
- 2.2 All gifts or hospitality must be declared and recorded in the Gifts and Hospitality Register within 7 calendar days of it being offered. To register gifts or hospitality, trustees, governors and committee members must inform the company secretary (who is currently The Head of Business Operations) in writing and provide the following information.
 - Name of recipient.
 - Details of gift/hospitality (to include date of hospitality, and location & details of event where appropriate).
 - Approximate value.
 - Date offered.
 - Whether accepted or declined.
 - Provider of gift/hospitality (name of both the organisation and the individual where appropriate).

2.3 The presumption behind this policy is that trustees, governors and committee members may not solicit or accept any form of gift or hospitality from any parent/carer, applicant, supplier, contractor or consultant with whom the Trust is dealing or could possibly be dealing. In particular:

- No gift or hospitality of any kind may be accepted by a trustee, governor or committee member in any circumstances where there is any possibility that the donor intends that it should secure benefit for the donor.
- No gift or hospitality may be accepted by a trustee, governor or committee member with the exception of those set out in 2.4 below.

2.4 The exceptions are:

- Inexpensive gifts such as those traditionally given at Christmas - by way of guideline any gift that has greater value than approximately £10 should be declined. Any gift in excess of this should be returned to the donor explaining that it is The Trust's policy not to accept such gifts.
- Collective gifts - there may be circumstances where a group of individuals collectively buys a gift of greater value than indicated above perhaps to mark a special occasion. Such gifts may be accepted with the consent of the company secretary who will consult with the relevant committee chair.
- Modest hospitality in connection with a business meeting or event. By way of guideline trustees, governors and committee members should decline to accept hospitality that the Trust (as a public body and education provider) could not reasonably be expected to reciprocate. As an example the provision of a light buffet would be considered modest (and therefore acceptable) whereas an event offering complimentary tickets to a theatre performance and 3-course dinner and drinks would not.
- Hospitality provided as part of a conference or seminar where food and drinks may be sponsored by a company, but is part of the event.

2.5 There are some forms of hospitality that are completely unacceptable and these include:

- Holidays
- The use of accommodation for private use
- Personal invitations to any event that is not related to trustees, governors and committee members' duties
- The opportunity to acquire any goods or services at a discount or at terms not available to the general public
- The opportunity to obtain goods or services not available to the general public

- 2.6 Occasionally trustees, governors or committee members may be invited to daytime or evening corporate hospitality events provided by organisations which may or may not have dealings with the Trust. These can take many forms and should usually be declined unless the event is an opportunity to network with existing or potential business partners and declining might place the Trust at a competitive disadvantage. In such circumstances then the relevant chair and the Chief Executive will decide on attendance. Care must be taken to ensure that the event is not used to influence trustees, governors or committee members.
- 2.7 Where the Trust is in any form of tendering or contractual negotiations with an organisation offering hospitality, it should always be declined.
- 2.8 This list is not exhaustive. If there is any doubt regarding the acceptability of gifts or hospitality, then the matter should always be referred to the company secretary for advice before being accepted.
- 2.9 In all cases when gifts or hospitality are declined, whether it is due to the exercise of this policy or for any other reason, the company secretary should be notified within 7 days and the appropriate entry made in the Register.
- 2.10 In some cases gifts or hospitality may be difficult to return or decline and should be handed to the company secretary. They will be registered and donated to charity or used by the Trust as prizes in a competition or draw.

3. **Cash, Grants and Loans**

- 3.1 Trustees, governors and committee members must not under any circumstances accept:
- Any gifts of cash irrespective of the amount.
 - Any payment, grant or loan from any funds associated with the Trust except as part of any agreed remuneration or reimbursement in line with the Expenses Policy and within approved rates.
 - Loans from the Trust's stakeholders or partner organisations
- 3.2 Trustees, governors and committee members must not receive and must not give loans from their personal money to staff or students; or to other trustees, governors or committee members.

4. **Gifts and Hospitality Offered (whether accepted or refused)**

4.1 Gifts or hospitality offered to other organisations or individuals will:

- Be reasonable and appropriate to the circumstances.
- Support the furtherance of the Trust's objectives.
- Always take into account the fact that academies are funded by public monies.

4.2 All gifts or hospitality in excess of £10 given to other organisations or individuals must be recorded in the register within 7 days by contacting the company secretary in writing.

4.3 Any hospitality given by trustees, governors and committee members which is to be reclaimed from the Trust must be cleared with the company secretary in advance.

4.4 Where the Trust is in any form of tendering or contractual negotiations with an organisation, offering hospitality must always be avoided.