




HORNCHURCH ACADEMY TRUST

Hornchurch Academy Trust is a company limited by guarantee

Registered in England: Company Number 10760863

Registered Office: Whybridge Junior Academy, Rainham, Essex, RM13 7AH

www.hornchurchacademy.org

		Hornchurch Academy Trust
	Policy review Date	1 st February 2021
	Date of next Review	1 st February 2024
	Who reviewed this plan?	Mrs J Sladden
	Date approved by Board of Trustees?	8 th July 2021

HOSPITALITY AND GIFTS POLICY AND PROCEDURE



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Hospitality and Gifts Policy and Procedure

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Section One: Statement and procedure overview

1. Statement

There will be occasions when school employees are faced with the difficulty of deciding whether or not to accept gifts or offers of hospitality during the course of their work.

The policy applies to all employees of Hornchurch Academy Trust (permanent, temporary and casual), contractors and those in partnership roles working for any of the schools on the school premises, for example, agency employee, builders, and drivers.

This policy is intended to assist employees in making the right decision in any given set of circumstances.

In order to demonstrate clearly that appropriate actions have been taken in these matters, a Hospitality and Gifts Register (The Register) will be introduced within each school to record when hospitality or gifts have been offered or accepted. This will be subject to monitoring and regular review.

The National Joint Council for Local Government Services ("Green Book") refers to official conduct at Part 2, paragraph 2.1 and states that

Employees will maintain conduct of the highest standard such that public confidence in their integrity is sustained.



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Procedure overview

Stage	Action	Responsibility and Timescale
Employee receives offer of hospitality or gift. (Whilst inexpensive diaries, pens and calendars, need not be recorded, every other offer of hospitality or gifts must be recorded in the Register whether accepted or not. If in doubt, enter it on the register.)	Employee obtains entry slip for registering hospitality from the school office. Employee completes section one and returns it to the Head of School or CFO.	Employee to action as soon as offer is received.



Head of School or CFO to consider whether offer should be agreed or declined.	Head of School or CFO to complete sections two and three. They will retain section two and return section three to employee of staff concerned within seven working days, indicating whether agreement to accepting the hospitality/gift is given and recorded.	Head of School or CFO to respond within seven working days.
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Employee is notified of decision	<p>Acceptance of the hospitality/gift is agreed</p> <p>Acceptance of the hospitality/gift is not authorised on this occasion</p>	<p>Employee should proceed as appropriate.</p> <p>Employee should make immediate arrangements to ensure the hospitality/gift is declined or returned if the gift has already exchanged hands as soon as possible</p>
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Employee disagrees with decision of Head of School or CFO	<p>Employee to arrange to discuss decision with Head of School or CFO</p> <p>If Head of School or CFO upholds their original decision – Employee has no right of appeal.</p> <p>If Head of School or CFO changes their original decision, this will be confirmed to the employee in writing.</p>	<p>Employee to arrange as soon as practicable.</p> <p>Head of School or CFO to respond as soon as practicable.</p>
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3. Scope of this document

Any offer, gift, favour or hospitality directed at an employee personally should be treated with extreme caution as the person or organisation making the offer may be doing or hoping to do business with the school. Under no circumstances should employees allow themselves to be put in a position, which gives the impression that improper influence has been present in the school dealings. This includes the acceptance of any item/offers that might be regarded as an inducement from clients or contractors of the school. Minor items, such as pens, diaries or calendars, which are of nominal value, can be accepted.

If an employee is of the opinion that an offer of gift has been made or hospitality offered, in order to seek some advantage with the school or Trust, then this should be brought immediately to the attention of the Head of School and CFO who will inform the Schools Finance Team on (01708) 432213.



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All employees should adhere to this policy. If an employee breaches the policy, this could lead to disciplinary action and potential dismissal.

Section Two: Procedure

1. Roles and Responsibilities

- Employees are expected to complete section one of the Entry slip (appendix A) for registering offers of hospitality or gifts as soon as an offer is received and send it to the Head of School or CFO.
- A named member of staff in each school will be responsible for maintaining the Register for the school and will arrange for the Head of School or CFO to complete sections two and three of the Entry slip.
- Head of School or CFO to complete sections two and three. They will retain section two and return section three to employee within seven days, indicating whether agreement to accepting the hospitality/gift is given and recorded.

2. Procedure for hospitality and gifts register

The following procedure should be adopted where hospitality or gifts are offered to you by an external organisation.

Whilst inexpensive diaries, pens and calendars need not be recorded every other offer of hospitality or gifts must be recorded in the Register, whether it is accepted or not. If in doubt, enter it on the register. The Register is maintained by the school.

Each entry slip has a unique number and comprises of three sections. You should complete section one (the person being offered the hospitality/gift) and send it to the person responsible for maintaining the Register.

The Head of School or CFO will complete sections two and three. They will retain section two and return section three to the employee within seven days, indicating whether agreement to accepting the hospitality/gift is given and recorded.

If the:

- Acceptance of the hospitality/gift is agreed the employee should proceed as appropriate.
- Acceptance of the hospitality/gift is not authorised on this occasion the employee should make immediate arrangements to ensure the hospitality/gift is declined or returned if the gift has already exchanged hands.



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- Employee disagrees with the decision of the Head of School or CFO the employee should discuss it with him/her.
- Head of School or CFO upholds their original decision, after discussion with the employee, there is no appeal against this and the employee must therefore abide by that decision.
- Head of School or CFO changes their original decision after discussing the matter with the employee, this will be confirmed to the employee in writing.

For more information please contact the Schools Finance Team on (01708) 432213.

3. Maintaining the register

As stated above, it is important for information regarding hospitality & gifts to be recorded consistently. Those responsible for the Register should ensure that they:

- Keep all completed hospitality/gift entry slips in a ring binder.
- Record relevant information on a spreadsheet using the following headings in each column:
 - Hospitality/Gift Form Number
 - Date form sent
 - Name of person issued to
 - Gift/Hospitality offered
 - Company/Body making offer
 - Date completed (part1) form sent to Head of School or CFO
 - Date authorised form received
 - Outcome (authorised/not authorised/shared)
 - Date receipt sent to employee.

4. Gifts

Except for minor promotional gifts distributed to a wide range of people and not uniquely given to that individual, (e.g. pens, calendars, diaries, charts, measures etc. usually given at Christmas time for use in the office), employees should refuse any gift offered to them or to members of their family by a person or organisation which has, or seeks, dealings with the school.

5.. Hospitality

Where an employee is invited to lunch or some other function by a person or organisation, which has, or seeks, dealings with the school, the propriety of accepting the invitation should be considered carefully.



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The principal criterion in assessing whether or not to accept hospitality is whether if the matter became known, it would suggest the presence of improper influence or would affect public confidence in the employee or the school. The level of any hospitality which following consideration, is accepted should always be of a modest nature.

6. Refusal of hospitality and gifts

It is not possible to give a complete list of circumstances where hospitality and/or gifts should be refused. The list set out below provides examples. However the rule must be that, if employees are in doubt, they should seek advice from the internal auditors.

The following offers of gifts and hospitality should be refused:

- Money
- Holiday or hotel accommodation
- Use of a company flat or car
- Frequent hospitality from one source
- Extravagant meals at expensive restaurants
- Concessionary rates which are not, as a matter of practice, available equally to other organisations/individuals
- Invitations to 'events' where the employee is not attending in an official capacity or the function is clearly not relevant to the school e.g. Wimbledon, golfing tournaments, horse racing etc.

7. Monitoring

The internal auditors will monitor compliance with this policy and procedure. The policy and procedure will be subject to regular review on the basis of good practice and monitoring data.

School/Gifts Registers should be reviewed regularly and reported to the Finance Committee on an annual basis. All Registers should be reported even if there have been no entries for the year.

8. Register responsibility

Person responsible for the Gifts/Hospitality Register is the Head of School in each school.

Section Three: More information

For more information please contact the Schools Finance Team on 01708 432213.



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APPENDIX A

SAMPLE FORM

HOSPITALITY/GIFT REGISTER

No. 01

01

No.

SECTION 1: Entry onto Hospitality Register

Would you please record and authorise my proposed action with regard to the following hospitality/gift which I have been offered:

Name: _____

School _____

Date of offer: _____

Company/Body offering hospitality/gift: _____

SECTION 3: Receipt

(To be completed by Head of School or CFO and returned to person making entry on register)

I acknowledge receipt of your entry onto the hospitality/gift register:

- I agree your acceptance of this hospitality/gift
- Your acceptance of the hospitality/gift is not authorised on this occasion
- Your decision to decline the hospitality/gift is noted

Signature: _____

Date: _____



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Person offering hospitality/gift, (if known): _____

Hospitality/gift offered: _____

Are you aware of any other employees being offered the same hospitality/gift? Yes No

Proposed action: Accept Decline Already declined

Signature: _____ Date: _____

SECTION 2: Record of Head of School or CFO's Action

Agree acceptance

Acceptance of hospitality/gift not authorised

Agree action to decline

Noted that hospitality/gift has been declined

Signature: _____

Date: _____