



Gift and Hospitality Policy

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Our Vision and Ethos

Nishkam schools are Sikh ethos multi faith schools that take a distinctive approach to many traditional faith schools. The Nishkam School Trust education model is led by virtues such as, compassion, humility, service, contentment, optimism, trust and forgiveness. Virtues are prevalent throughout our teaching and learning model and are modelled by our pupils, staff and teachers. Our pupils explore the divine context of humanity and wonder of all creation and also learn from the wisdom of all religions and in doing so explore the infinite human potential to do good unconditionally. We support all pupils and staff to develop aspects of their own religious, spiritual or human identities. In service of God, we pray for guidance in this endeavour and forgiveness for the errors we may make.

1. Purpose and Scope

The intention of this policy is to ensure that the Trust can demonstrate that no undue influence has been applied or could be said to have been applied by anyone dealing with The Trust.

All Trustees, staff and governors are expected to maintain high standards of professionalism and propriety in all their dealings to make sure they are always entirely free from any conflict of interest and act within the vision of the Trust, and not accept a gift or hospitality in circumstances where it could influence, or could be seen to influence, that person's actions or decisions. The Trust and all academies will be open and transparent in declaring all gifts and hospitality whether or not accepted.

Business gifts and hospitality should not be accepted by any member of staff, except as provided for below in this Policy.

A full record will be made in the Gifts and Hospitality Register. Each academy will retain an up-to-date register.

2. Objectives

The objectives of this policy are to:

- Ensure that The Trust can demonstrate that no undue influence has been applied by any person or organisation in its business transactions;
- Set clear requirements for staff regarding the accepting and giving of gifts and hospitality.

3. Legislation and Regulation

This policy is written in accordance with requirements set out in the Academies Trust Handbook.

The policy complies with the following regulations and legislation:

- The Bribery Act 2020
- The Companies Act 2006 Section 1763

The Bribery Act 2021 makes it a criminal offence to:

- Offer, promise, or give a bribe;
- Request, agree to or accept a bribe;
- (by an organisation) failure to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.

4. Definitions

Gifts are any items, cash, awards, prizes, goods or services, offered without expectation of payment or benefit. Gifts also include goods or services offered at a discounted rate, or on terms not available to the general public.

Hospitality is defined as food, drink, accommodation or entertainment (such as cultural or sporting events) provided free of charge, heavily discounted or on terms not generally available to the general public.

5. Hospitality

The following principles should be followed in deciding whether or not to accept hospitality:

Whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered, or that the Trust might be placed under any obligation as a result of acceptance. If the answer is yes, the hospitality must be declined.

In making judgments, relevant facts to take into account include the person or organisation offering the hospitality, its scale and nature, and its timing in relation to decisions to be made by the Trust and Care should be taken to avoid situations in which an individual Trustee, governor or member of staff is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation.

Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) include:

- Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a demonstrable interest or business case for the Trust's participation;
- Attendance at events or functions where there is a demonstrable need for the Trust to be represented to either give or to receive information or to participate as part of the Trust's corporate image;
- Attendance at events or functions which are part of the civic, cultural or sporting life of the Trust, including events arranged by the Trust / Sponsor; and
- Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are not disproportionate.

6. Gifts

All personal gifts should be refused, donated to charity or subject to a staff raffle (Christmas gifts only) unless they come within one of the following categories:

- Modest gifts of a promotional character, e.g. calendars, diaries and other similar articles;
- Gifts on the conclusion of any courtesy visit to or from an outside organisation, providing these are of a sort normally given by that organisation;
- Individual gifts to teachers from parents of pupils up to £30; and
- Gifts up to £10 in value. (These do not have to be registered via Appendix 1)

Gifts which are intended for the Trust, or any of its constituent academies, may be accepted but must not be retained by the individual who receives them on behalf of these bodies. Such gifts should be forwarded as appropriate.

7. Registration of Gifts and Hospitality

All staff, trustees and governors must, within 14 days of accepting any gift or hospitality from an external body (subject to limits in 6.1), provide written notification to the CEO (central Trust staff, School Leaders and Trust Board members) or School Leader (academy staff and governors) using the 'Gifts and Hospitality' form (Appendix 1). All offers should be recorded, whether accepted or not.

The Gifts and Hospitality form must be completed in full, setting out full details of the offer or the gift and / or hospitality offered or received.

8. Giving Gifts and Hospitality

The Trust will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented in the Gift and Hospitality Register (Appendix 2) and has regard to the propriety and regularity of the use of public funds.

Exclusions

This does not apply to:

- the award of gifts, prizes, etc related to the achievement of pupils e.g. attainment or merit awards, nor Trust-wide staff recognition events or activities.
- recognition awards/gifts to staff for specific areas of work or activity. Such awards must be in line with those allowed by academy arrangements operating within the Trust's Reward and Recognition Scheme.

Expenditure on staff wellbeing (flowers, leaving gifts, etc) should be recorded in the template on Appendix 2 and posted as staff hospitality or staff wellbeing in the accounting system.

Charitable donations e.g. instead of flowers for a funeral or matching amounts raised by students, should be of a de minimis level (£10) in order to comply with the Trust's objects.

Where hospitality is provided by the Trust this should be approved in advance by the CEO/ CFO or School Leader. In approving hospitality the CEO/CFO or School Leader should ensure it is not in breach of the UK Bribery Act 2010 and also that the costs are appropriate for a publicly funded organisation.

Hospitality such as working lunches, coffees, catering on training courses and modest hospitality in the form of meals, etc are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not for their family or friends). These would not be added to the register but would be approved by the Chief Operations CEO/CFO level should be recorded in the register.

Staff – meals and other refreshments

As for visitors above, working lunches are perfectly acceptable. In exceptional circumstances it may be appropriate for the Trust or its academies to provide a celebratory meal or event. This would be sanctioned by the Chair of Local Advisory Boards (academies) or Chair of the Audit and Risk Committee (central Trust).

In approving such an event consideration will be given to both rules on personal taxation from HMRC and the requirement to properly utilise public funds.

9. Review

This policy will be reviewed by the Executive Team every two years and will be approved by the Trust Board.

APPENDIX I

Declaration of Gifts and Hospitality - receipt

Name: _____ Place of work: _____

Job title: _____

Description of Item	Offered to	Approved By	Date	Was item accepted (Y/N)	Approximate Value (£)

I certify that I have listed above all gifts and hospitality which need to be declared under the terms of the Trust's Gifts & Hospitality Policy (with an estimated value in excess of £10).

Signed: _____

Date: _____

APPENDIX 2

Declaration of Gifts and Hospitality – given by the Trust

Name: _____ Place of work: _____

Job title: _____

Description of Item	Offered to	Approved By	Date	Was item accepted (Y/N)	Approximate Value (£)

I certify that I have listed above all gifts and hospitality which need to be declared under the terms of the Trust's Gifts & Hospitality Policy that I have offered on behalf of the Trust in connection with my role (with an estimated value in excess of £10).

Signed: _____

Date: _____