



# **Gifts Policy**

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## **1. Purpose**

- 1.1 This document outlines the policy of the Dulwich Hamlet Educational Trust on the receipt of gifts by its staff, governors, trustees and members from any third parties arising from duties undertaken on behalf of the Dulwich Hamlet Educational Trust (the Trust). The Trust is committed to ensuring that the governance of the Trust is conducted in accordance with the highest standards of integrity, probity and openness.
- 1.2 Your conduct as a member of staff, governor, trustee or member should never lead anyone to question your interests, or lead anyone to think that you have been influenced by gifts and hospitality. This is important because your own personal reputation and that of the Trust could be seriously affected if you inappropriately accept a gift or hospitality. It may be a criminal offence to demand or accept a gift or reward in return for allowing you to be influenced in your Trust role.
- 1.3 Any gift or hospitality which is more than just a token, defined as a having a value of more than £25, or offered by parties who are competing for work with the Trust should be politely refused or returned.
- 1.4 Internal gifts, for example a gift of flowers for a retirement, must have a value of no more than £50. Alcohol is prohibited as an internal gift.

## **2. General Rules**

Trust staff, governors, trustees and members must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity in relation to Trust business. Staff are asked to immediately report any offer or receipt of such gifts to the Chief Financial Officer or Chair of Trustees to be recorded in the Register of Gifts and Hospitality.

## **3. Definitions**

- (a) A 'gift' is any item or service that you receive free of charge. It also includes any goods or services which you personally are offered at a discounted rate or on terms not available to the general public.
- (b) 'Hospitality' is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

If you are at all in doubt about the offer of a gift or hospitality you should always speak to the Chief Financial Officer.

## **4. Exceptions**

Governors, staff, trustees and members may accept the following gifts/hospitality without the need to seek the approval of the Trust but should consider registering at their discretion:

- (a) courtesy hospitality at business lunches/dinners or attendance in an official capacity at a public function;
- (b) incidental promotional gifts such as calendars, diaries or pens;
- (c) receipt of small items from suppliers or contractors as expressions of gratitude such as boxes of chocolate or individual bottles of drink (at a value of less than £25);
- (d) internal gifts, for example a gift of flowers for a retirement, (at a value of no more than £50).
- (e) class gifts from parents to staff (at a value of no more than £25 per contributor)

NB: Care must always be taken to ensure that whenever such gifts/hospitality are accepted no obligation to the person or organisation in question is accepted. In cases of doubt consult the Chief Financial Officer or Chair of Trustees.

## **5. Unacceptable Gifts/Hospitality**

The following are examples of offers of gifts/hospitality which should be refused:

- (a) Gifts of money (not including donations to the Trust or any of its academies).
- (b) Free personal membership or subscriptions (e.g. sports clubs).
- (c) Foreign travel unless as a specific element of a business, academic or research activity approved by the Trust.
- (d) Free goods, services or equipment which are normally provided by a supplier to the Trust or any of its academies at a charge.
- (e) Gifts or hospitality offered to your husband, wife, partner, family member or friend.
- (f) Lavish or extravagant gifts or hospitality, even if they relate to activities in your own time.
- (g) Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process.

Any offers of gifts and hospitality falling into any of the above categories should be reported immediately to the Chief Financial Officer or Chair of Trustees.

## **6. Role of the Chief Financial Officer in relation to the Gifts and Hospitality Policy**

The Chief Financial Officer shall:

- (a) Ensure that any offer or receipt of gifts, hospitality or donations to staff is recorded in the Trust's Register of Gifts and Hospitality;
- (b) Report conflicts of interest arising from the offer or receipt of gifts and or hospitality to the ESFA as necessary; and
- (c) Provide the Register of Gifts and Hospitality to the Trust's Audit Committee meetings.