



## **KHALSA ACADEMIES TRUST**

### **GIFTS AND HOSPITALITY POLICY**

Approved on :February 2019

Next review: February 2021

#### **Receipt of gifts, hospitality, entertainment and other favours**

Khalsa Academies Trust and its schools depends on its employees and governors to ensure that the highest standards of ethical conduct are maintained in its business dealings.

Each school maintains a register of gifts and favours offered and whether these were accepted or rejected. The employee or governor is required to report offers to the school's headteacher (or in the case of an offer to the headteacher, report to the Chair of Governors) promptly and, in any event, so that the register can be completed within seven days of the offer being made. The register is presented to the governing board on a termly basis.

Employees and governors should report any incidents of suspected bribery to the headteacher (or the Chair of Governors) at the earliest possible time that a concern is identified. These may include:

- Suspected or actual attempts at bribery for the employee or governor.
- Concerns that other employees or governors may be being bribed.
- Concerns that other employees or governors may be bribing third parties.

The school will immediately carry out a thorough investigation and take appropriate action if the allegations are proven, including reporting any matter to the relevant authorities.

Governors and members of staff involved in making buying decisions may not accept excessive, frequent or regular gifts, hospitality, entertainment or other services from existing or prospective suppliers.

They may not receive hospitality in the form of holidays or weekends away, tickets to theatres or other entertainment events or the use of company flats, hotel suites or hospitality boxes at sporting and other events.

They must exercise extreme caution where any gift and/or hospitality is offered by a person or organisation seeking to do business with the school. When considering whether to accept such offers, they must consider whether these could affect their independence or cause concern that

they might affect their independence and report the offer to the school's anti-corruption and bribery officer before acceptance.

A 'trivial gift' or modest gift of a promotional nature given to a wide range of people and not uniquely to one individual may be deemed as acceptable. Such gifts may include calendars, diaries, pens or other small items and do not need prior approval for acceptance. They also do not need to be recorded in the gifts and hospitality register.

### **Expenditure on hospitality and gifts**

The school allows expenditure on hospitality provided that it is:

- Arranged in good faith.
- Not offered, promised or accepted to secure an advantage for the school or any of its employees or associated persons or to influence the impartiality of the recipient.

Employees should submit requests for such expenditure to the headteacher (with a copy to the school bursar for budgetary reasons), detailing:

- The objective of the proposed expenditure.
- The identity of those who will be attending, in the case of an event.
- Details and the rationale of the proposed activity.

Expenditure will only be authorised where the anti-corruption and bribery headteacher or the Chair of Governors considers that:

- No conflict of interest may arise.
- It could not be perceived that undue influence or a business benefit was being sought.

Such expenditure is reported to the full governing body and the school maintains a register of expenditure incurred.

### **Business entertaining**

- It is recognised that there is a legitimate business need, on occasions, for representatives of the school to entertain or provide hospitality to official visitors to the school.
- When entertaining official visitors, the representation from the school should not be disproportionate to those being entertained. There should be more external guests than school employees at any one event and only essential employees should attend.
- Water, teas, coffees and other refreshments, including lunches and or dinners are a permissible expense when providing hospitality to external visitors to the school, or candidates for interview. In-house catering provision will be used wherever possible.
- Hospitality costs must be authorised by the headteacher in advance, who should record the reason why they feel this provides value for money to the school. The costs should be kept to a minimum and paid for through private/unrestricted funds.
- The following information must be provided to support the claim:

- The names of the attendees.
- The organisation which they represent.
- The purpose of the entertainment.
- The reason why the headteacher believes this provides value for money to the school.

**Staff entertaining**

School funds must not be used:

- To provide hospitality or meals for staff.
- To purchase food or beverages at restaurants or hotels for school staff and/or their families.

Where school staff are on residential training courses or on professional development conferences, personal expenditure incurred during an overnight stay such as alcohol, newspapers, private telephone calls etc, must be paid for before departure by the employee and cannot be reclaimed from the school.

*Purchase of alcohol*

School funds may not be used for the purchase of alcohol.

*Expenditure on gifts*

The purchase of gifts, using school funds, is not permitted. These must be covered by private collections made from employees and governors.