

The GALLERY TRUST



A community of special schools

Gifts and Hospitality Policy

Date of Policy	September 2022
Approved at Finance and Personnel	July 2022
Date of review	September 2024
SLT Lead	Chief Operating Officer
Signed: Chief Executive Officer	_____
Chair of Trustees	_____

Introduction

- 1.1 As a general guideline, gifts, hospitality or other personal benefits (hereinafter referred to as “gifts”) should not be accepted or offered by any member of staff, or member, trustee and governor (“governor”), except as provided for below.
- 1.2 The intention of the Policy is to ensure that The Gallery Trust can demonstrate that no undue or improper influence has been applied, or could be perceived to have been applied, by any supplier or anyone else dealing with the Trust. The Trust must be able to show that all decisions, whether educational, financial or otherwise, are reached on the basis of the proper application of laid-down procedures and for no other reason.
- 1.3 Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

2 The Receipt of Gifts

- 2.1 The Trust encourages and expects staff and governors to use their networks and contacts for its benefit. It is however a fundamental requirement on all staff and governors, the contravention of which would be considered to be gross misconduct, that they must not derive any financial benefit beyond their agreed salary from the decisions they make or contribute to, which involve the education of students, or the spending of the significant sums of public money that are entrusted to The Gallery Trust. Therefore, staff and governors shall not use their authority or office for personal gain beyond their agreed salary and shall seek to uphold and enhance the standing of the Trust by:
 - Maintaining an unimpeachable standard of honesty and integrity in all their business and other relationships
 - Complying with the letter and spirit of the law in contractual obligations, rejecting any business practice that might be deemed improper
 - At all times in their business and other relationships, act to maintain the interests and good reputation of the Trust
- 2.2 Any employee who becomes aware of a breach of Policy must refer to the Trust’s Whistleblowing Policy and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.
- 2.3 Any personal interest that may impinge, or might reasonably be deemed by others to impinge, on an employee’s or governor’s impartiality, or conflict with the duty owed to the Trust in any matter relevant to an employee’s or governor’s duties (such as conflicting business interests) shall be declared in writing. Any member of staff or governor who is aware of any business dealings conferring personal gain, or involving their relatives or associates must make an appropriate entry in the Register of Business Interests.
- 2.4 Staff and governors are permitted to accept gifts, rewards or benefits from students, students’ families, members of the public, or organisations which the Trust has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as chocolates, flowers, diaries or calendars). Therefore, gifts should

not be accepted if they appear to be disproportionately generous, or could be construed as an inducement to affect a decision or action, whether business, educational, or other.

2.5 Where purchased items include a "free gift", such a gift should be either used for Trust business or handed to the Trust to be used at charity raffles, student prizes, etc.

2.6 In relation to conventional hospitality (lunches, outings, tickets for events, etc), it may be accepted provided that it is normal and reasonable in the circumstances. The decision as to whether to accept the hospitality should be made by the Chief Executive Officer or Head Teacher. However, invitations for the following should not be accepted under any circumstances:

- Where there is no reasonable business justification for doing so
- Where an invitation is disproportionately generous
- Where the invitation could be seen as an inducement to affect a business or other decision.

2.7 Any hospitality accepted by a member of the Trust's staff to the value of over £50 must be approved by the Chief Executive Officer or Head Teacher and reported to the Chair of the Finance & Personnel Committee.

3 The Providing of Gifts

3.1 The Trust encourages and seeks cooperative relationships between staff, governors, stakeholders and external organisations. Accordingly, there can be occasions where it is appropriate for the Trust to fund limited gifts.

The Chief Executive Officer or Head Teacher may agree that in certain circumstances the following gifts are appropriate:

- To supplement the private contributions made by continuing members of staff to staff who are leaving the employment of the Trust or transferring to other establishments in the Trust to the value of £20 for five years' service and above: £30 for ten years' service and above: £50 for fifteen years' service and above: £75 for 20 years' service and above
- The purchase of flowers/gift up to a value of £30
- Under no circumstances should alcohol be purchased