Gifts and Hospitality

Approved by:	Chief Executive	**Date:**	March 2023
Last reviewed:	March 2023		
Next review due by:	March 2026		

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1.Introduction

As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below.

The intention of the 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 any supplier or anyone else dealing with the Trust. The Trust should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

2.Employee conduct

Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Academy by….

1. Maintaining an unimpeachable standard of honesty and integrity in all their business relationships.

2. Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.

3. At all times in their business relationships acting to maintain the interests and good reputation of the Academy.

4. Any employee who becomes aware of a breach of policy must report this immediately to his or her manager who will instigate investigations as necessary.

5. Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with the duty owed to the Academy in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff must supply details of such transactions for entry into the Register of Business Interests.

6. Employees are permitted to accept gifts, rewards or benefits from members of the public or organisations the Academy has official contacts with only where they are isolated gifts of a trivial

character (such as diaries or calendars). Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to effect a business decision.

7. Where purchased items include a “free gift”, such gifts should be either used for Academy business or handed to the Academy to be used at charity raffles etc.
8. In relation to conventional hospitality (lunches, outings, tickets for events etc.) provided that it is normal and reasonable in the circumstances they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.
9. Any hospitality other than of a nominal value (up to £15) or facilities provided during the normal course of business should be reported for an entry in the Register of Gifts and Hospitality held by the Chief Executive’s PA.
10. For clarity this policy covers such items as gift tokens and loyalty cards.

3. Register of Gifts, benefits and hospitality

This register shows gifts, benefits and hospitality, including their value that have been accepted or given by DLPT employees or trustees during the financial year identified. The register will be kept by the PA to the CEO.

This register is updated whenever a notification is received.

Receipt of gifts, benefits and hospitality received by DLPT employees/trustees. From September …….			
Date of receipt	**Description of gift, benefit and/or hospitality offered**	**Reason for acceptance**	**Person/organisation offering gift or hospitality**

Receipt of gifts, benefits and hospitality given by DLPT employees/trustees. From September …….			
Date of issue	**Description of gift, benefit and/or hospitality offered**	**Reason for offer**	**Person/organisation receiving gift or hospitality**