



ST MICHAEL'S COLLEGE GIFTS AND HOSPITALITY PROCEDURE 2022-2024

The college is required by Southwark Colleges financial procedures to keep a register of gifts and hospitality.

This policy aims to ensure that:

- The academy trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academy Trust Handbook
- The trust and those associated with it operate in a way that commands broad public support
- The trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds
- Governors fulfil their fiduciary duties and wider responsibilities as charitable governors and company directors
- Members, Governors and staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same

LEGISLATION AND GUIDANCE

This policy is based on the Academies Financial Handbook, which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of members, Governors, staff and/or any other representative of the trust. This policy also complies with our funding agreement and articles of association.

DEFINITIONS

- a) Hospitality

Hospitality can be defined as any food, drink, accommodation or entertainment provided free of charge or heavily discounted or on terms not available to the general public.

b) Gifts

Gifts are items given or received for which no payment was made. Gifts also include goods or services offered at a discounted rate, or on terms not available to the general public.

IN GENERAL

(For Members, Governors, Staff)

You should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf of St Michael's Catholic College.

You must not use your official position to further private interests or the interests of others and you must not solicit gifts or hospitality,

When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy. If necessary, you should pay your share of any costs, and claim these in the ordinary way.

You may accept modest working meals and light refreshments without making any declaration. Other hospitality may be accepted, for instance where there is a genuine need to impart information or represent St Michael's Catholic College in the community or it concerns the attendance of a relevant conference or course.

Before accepting any hospitality, approval should be sought from the Principal in respect of employees. All hospitality received must be recorded in the gift and hospitality register with the exception of working meals, receptions etc.

You must not accept cash, or personal gifts with a significant monetary value, under any circumstances, although items of nominal value, (i.e. approximately £30 or below) may be accepted.

Gifts of low intrinsic value such as calendars or diaries can be accepted. If there is any doubt as to whether the acceptance of an item is appropriate, staff should decline the gift or refer the matter to their line manager.

When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.

Where approval is granted any gift or hospitality received with an equivalent value of **£30 or over** must be recorded in the college's register of gifts and hospitality within 7 working days. The Head of Administration will maintain the register, the Principal and Chair of governors will sign off the register at the end of the financial year.

The following details should be recorded.

Nature of gift/hospitality. In the case of a gift, it should be specified whether it is a personal gift or a gift accepted on behalf of the college.

Value of gift/hospitality.

Name of firm/individual concerned.

Date gift/hospitality accepted.

Name of employee/Governor.

The entry containing the information should be signed by the recipient and countersigned by the Head of Administration. Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a staff disciplinary matter.

In the case of Governors any gifts or hospitality received relating to their connection with the college should be recorded in the Register of gifts and hospitality. If the Principal is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the chair of the board of trustees and record the offer on the gifts and hospitality register.

The register is kept in the Head of Administration's office and is available on request. It is the personal responsibility of staff and Governors to declare any receipt of gifts and hospitality covered under this procedure.

Governors will ensure that the trust's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

The Principal is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The Principal will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the school and trust and to those outside the organisation.

August 2022

Signed: -----Date-----

Chair of the Finance & Resources Committee

Review Date: 2024