

GIFTS & HOSPITALITY POLICY

Learning Academies Trust

Version: Version 2

Approved by: Finance & Personnel Committee

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Next review date: 02 December 2024



LEARNING
ACADEMIES TRUST

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CHANGES

| Policy date | Summary of change | Author | Version | Review date |
|-------------|--------------------------|-----------------|---------|-------------|
| 23/02/2017 | Policy has been created. | Simon Spry, CEO | 1.0 | 23/02/2020 |
| 02/12/2021 | 3 yearly review & update | Kay Mabin, CFO | 2.0 | 02/12/2024 |

1. AIMS

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. LEGISLATION AND GUIDANCE

Guidance provided by Bishop Fleming, Accountants and Trust Academy Trust Handbook 2021 and the LAT Finance Procedures Manual section 4.43 and Finance Policy section 10.3.

3. DEFINITIONS

| Term | Definitions |
|------------|-------------|
| N/a | |
| | |

4. GENERAL GUIDANCE

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

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

1. Maintaining an impeccable 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 Trust.
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 Trust in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing.
6. 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 Trust has official contacts with only where they are isolated gifts of a trivial character (such as seasonal chocolates or annual 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" from suppliers, such gifts should be either used for Trust business or handed to the Trust to be used at charity raffles.
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 £20.00) or facilities provided during the normal course of business should be reported for an entry in the Register of Business Interests.

This Policy will be reviewed by the Trust Board on a 3-yearly cycle.