

## **SOUTH BANK ACADEMIES**

### **Gifts and Hospitality Policy**

#### **Introduction**

This policy document outlines the responsibility of The South Bank Academies (Trust), its schools and employees, in relation to the acceptance of the following from persons or organisations external to the South Bank Academies, including its supply chain:

- Gifts
- Hospitality
- Awards
- Any other benefit that might be seen to compromise personal judgment or integrity,

It is the responsibility of the Principal of each school to ensure that its staff members have read and understood this policy document.

An occasional gift item or hospitality may be accepted if each of the following points 1,2,3,5 and 6 OR if points 4, 5, and 6 below apply:

1. It is offered and received in good faith
2. It is clearly connected to maintaining a professional business relationship between the giver and the recipient.
3. It has an intrinsic or retail value of £20 or less
4. It is entirely incidental to the recipient's duties or responsibilities toward the Trust e.g. a prize
5. It has not been requested or demanded by the recipient
6. There is no risk that it is or could be seen to be an inducement for either the giver or the recipient to take a particular course of action.

As a rule, it is forbidden to accept money in any form, e.g. cash, cheques, including tips, gratuities or service charges. The only exceptions are:

- Receipts for chargeable goods and services
- Donations to the South Bank Academies

Income must be passed to the Finance Team for banking in the South Bank Academies bank account The Trust and its Academies must fully document the decision for acceptance of the receipt of Gifts, Hospitality Awards and any other benefit that may be deemed to compromise personal judgement always ensuring that there is propriety and regularity in the use of public funds.

#### **Why the Trust Needs This Policy**

- To protect the reputation of the South Bank Academies, its employees and agents from accusations of bias, partiality or favouritism.
- To ensure compliance with the law including the Bribery Act 2010 and the Charities Act 1993.

### **Who is affected by this Policy?**

Trustees, staff, volunteers, supply chain partners and any other agent or supplier working for or on behalf of the South Bank Academies.

### **Responsibilities**

Trustees, Directors and Governors

- Must ensure that the Trust is compliant with UK law and regulation.
- Set the tone and influence the culture of the Trust.
- Must ensure that the Trust's employees, agents, contractors and service users are and are seen to be honest and free from bias in all their dealings.
- Must promptly declare the offer or receipt of any gifts or hospitality that either; exceed, or may be perceived to exceed, £20 in value; or that may actually or be perceived to influence decision making as soon as the offer is made.
- Must never accept cash or monetary instruments and should immediately report any offer to management.
- Must report to the appropriate authorities any perceived or actual attempt to offer or receive a bribe.
- Should set financial and other limits around the value of acceptable gifts and hospitality.

### **Trust Leadership/Executive Team**

- Must deploy appropriate systems, processes and procedures to enable the declaration of interests, gifts and hospitality.
- Must promptly declare the offer or receipt of any gifts or hospitality that either; exceed, or may be perceived to exceed, £20 in value; or
- That may actually or be perceived to influence decision making as soon as the offer is made.
- Must never accept cash or monetary instruments and should immediately report any offer to management.
- Determine the acceptability of offers of gifts and hospitality made by managers or staff.
- Must report to the appropriate authorities any perceived or actual attempt to offer or receive a bribe.
- Must ensure that all staff, including temporary staff, consultants and contractors are aware of this Policy.
- Must ensure appropriate controls are deployed and implemented to enable fraud or irregularity to be detected, prevented, and corrected.
- Must maintains and review the School's Register of Gifts and Hospitality
- Ensures that this Policy and associated procedures are communicated and adhered to;
- Ensures that processes and procedures for declaring gifts and hospitality are operational and are up to date;
- Periodically reviews and audits the Register of Gifts and Hospitality;
- Investigates and reports on allegations of fraud or malpractice.

## **Staff**

- Must remain aware of and compliant with this Policy and all associated procedures implemented by management to enable this Policy;
- Must promptly declare the offer or receipt of any gifts or hospitality that either o Exceed, or may be perceived to exceed, £20 in value; or
- That may actually or be perceived to influence decision making as soon as the offer is made.
- Must never accept cash or monetary instruments and should immediately report any offer to management.
- Should promptly report any actual or suspected fraud or irregularity in accordance with the Trust's reporting procedures;
- Must report to the appropriate authorities any perceived or actual attempt to offer or receive a bribe.

## **The Effect of Non Compliance**

### **South Bank Academies**

Failure to comply with this Policy may result in the Trust breaching Charity Commission regulation and the law and may also expose the Trust to unnecessary commercial or reputational risk.

### **The Individual**

Failure to comply with this Policy and/or its associated procedures may result in disciplinary action including dismissal. Where appropriate, the Trust may also bring criminal charges and may seek to claim damages through civil proceedings.

## **Review of Charging Policy**

This policy will be reviewed annually.