



Gifts & Hospitality Policy

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Definitions

In this **Gifts and Hospitality Policy**, unless the context otherwise requires, the following expressions shall have the following meanings:

- i **'The Romero Catholic Academy'** means the Company named at the beginning of this **Gifts and Hospitality Policy** and includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, Blue Sky, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Term.**
- ii **'Romero Catholic Academy'** means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- iii **'Board'** means the board of Directors of the Romero Catholic Academy.
- iv **'Clerk'** means the Clerk to the Board or the Clerk to the Local Academy Committee of the Academy appointed from time to time, as appropriate.
- v **'Chair'** means the Chair of the Board of the Directors or the Local Academy Committee appointed from time to time.
- vi **'Catholic Senior Executive Leader'** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii **'Diocesan Schools Commission'** means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii **'Local Academy Committee'** means the governing body of the School.
- ix **'Academy Committee Representatives'** means the governors appointed and elected to the Local Academy Committee of the School, from time to time.
- x **'Principal'** means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- xi **'School'** means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii **'Shared Services Team'** means the staff who work in the central team across the Company (e.g. HR/ Finance)
- xiii **'Vice-Chair'** means the Vice-Chair of the Governing Body elected from time to time.

1. Introduction

The Romero Catholic Academy is committed to the values of probity and accountability. All staff, Directors and Academy representatives should conduct themselves with integrity, impartiality and honesty at all times. Within the terms of the Code, staff, Directors and Academy Representatives are expected to exercise common sense. If they are in any doubt they must consult the Principal/Chair of Academy Committee and in every case declare the acceptance of a gift or hospitality in the register maintained at each school and the Shared Services Team, using the Academy's 'Declaration of Gifts and Hospitality' form.

The process is designed to safeguard Academy Representatives/Directors and staff from any misunderstanding, scrutiny or criticism.

The general principles which govern gifts and hospitality are:

- Offers of hospitality should only be accepted if there is a genuine need to represent the Academy;
- Gifts may be accepted outside these principles in exceptional circumstances;
- The Code of Conduct applies to all Directors/Academy Representatives and staff of the Romero Catholic Academy;
- To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied by staff and referred to the Principal/Chair of Academy Committee/ CSEL if in doubt. (See Appendix A)
- The registers are accessible to school Principals, the Board of Directors, Local Academy Representatives, Senior Shared Services Team and External Auditors;
- Any request by a member of the public to view a register will be referred to the CSEL. In considering any request, the requirement for the Academy to be open and transparent will be balanced against the requirements of prevailing GDPR and Freedom of Information legislation.

2. Hospitality

The following principles should be followed in deciding whether to accept hospitality. Staff and Directors/Academy Representatives should ask themselves whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered. If the answer is yes, the hospitality should be declined. In making judgements, relevant facts to consider include the individual or organisations offering the hospitality, its scale and nature, and its timing in relation to decisions to be made by the Academy.

Care should be taken to avoid situations in which an individual member of staff, Director or Academy Representative is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that individual or organisation.

Examples of when it may be proper to accept hospitality (always considering the particular circumstances) are as follows:

- attendance at conferences, events and demonstrations of equipment organised by external organisations where there is a service interest;
- attendance at events or functions where there is a demonstrable need for the Academy to be represented to either give or receive information or to participate as part of the Academy's commercial image;
- attendance at events or functions which are part of the civic, cultural or sporting life of the Academy;
- working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

3. Gifts

Received from Outside Romero

All personal gifts should be refused or donated to charity unless they fall within the categories set out below:

- Modest gifts of a promotional character, e.g. calendars, diaries, stationery.
- Gifts on the conclusion of any courtesy visit to an external organisation of a sort normally given by that organisation.
- Gifts up to £50 in value.
- Gifts which are intended for the benefit of the Academy as a whole or for an individual school within the Academy e.g. donated raffle prizes.

Gifts are deemed to include:

- Goods provided for personal or other private use
- Personal services
- Loans of equipment, vehicles etc for personal use;
- The provision of goods/services at preferential cost for personal or other private use

Made by Romero

When making gifts, the MAC must ensure the value is reasonable, is within its scheme of delegation, the decision is documented, and achieves propriety and regularity in the use of public funds.

The CFO has responsibility for documenting all gifts made to staff, directors, LAC representatives, other volunteers and suppliers including their value and who approved the expenditure. The aggregate amount in each academic year must be disclosed in the audited accounts, including separate disclosure for individual transactions above £5,000. CC1 has oversight of this document at least twice per year (spring and summer).

4. Registration of Gifts and Hospitality

Where gifts and hospitality fall outside the exceptions listed above, staff, Directors and Academy Representatives must, within 28 days of accepting any gift or hospitality, provide written notification to the relevant school Principal or senior member of the SST (CSEL, Director of Operations, Chief Financial Officer, Head of HR) using the 'Declaration of Gifts and Hospitality' form (Appendix 2).

The Principal or senior member of the SST must approve the form with a dated signature and pass for entry into the register. In the event it is the CSEL who is making the declaration another senior member of the SST must approve.

5. Monitoring

Each Local Academy and the SST maintains a register of gifts and hospitality accepted.

The pro-forma (see Appendix B) detailing the individual declarations should be kept in the Register. Any concerns/issues identified should be noted and an action plan put in place.

6. Penalties for Breaching the Code

The Academy's disciplinary procedures may be applied where it is found that breaches of the Code have occurred.

7. Monitoring of the Code

As part of its role in promoting high standards of conduct, the Finance, Resources and Premises Committee may request to see the registers at any time.

8. Retention of Documentation

Documentation in the Register will be kept for seven years.

9. Tax implication

The company recognises the need to raise awareness of any tax implication arising.

10. Monitoring and Review

The Board of Directors delegate the implementation of this policy to the Academy Committee.
This policy will be reviewed by CC1 Finance, Audit, Resources and Premises.

Appendix 1

The PROVIT (Acronym) test

Whether or not the offer is acceptable:

Purpose	Token, thanks or seeking a favour?	
	Token or thanks	Yes
	Favour	No
Rules	What are they? Does this situation conform?	
Openness	Is the offer transparent?	
Value	Expensive or inexpensive?	
Ethics	Does the offer fit with Academy ethics? Is this an exceptional circumstance?	
Identity	Who has made the offer?	
Timing	Are you about to make a decision affecting the donor?	

Appendix 2

The Romero Catholic Academy Gifts and Hospitality Register
To be retained by the school

School/ Shared Services Team _____

Recipient	Date	Donor	Nature of Gift/Hospitality	Estimated Value (£)	Comments