



COASTAL
ACADEMIES TRUST

Gifts & Hospitality Policy

GIFTS & HOSPITALITY POLICY
COASTAL ACADEMIES TRUST

Date of Policy: March 2019

Date of Review: March 2021

Member of staff responsible for policy review

Chief Finance Officer – Judy Brace

Signed by:  Date: 18 March 2019

**Mr Paul Luxmoore, Executive Head & Accounting Officer,
Coastal Academies Trust**

Signed by:  Date: 18 March 2019

Mr Robin Curtis, Chair of Directors, Coastal Academies Trust

Gifts & Hospitality Policy

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 this policy is to ensure that the Coastal Academies Trust (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.

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 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 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. 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 contracts 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 either be used for Trust business or handed to the Trust 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 entry in the Register of Business Interests.