



Gifts and Hospitality Policy

1. Policy Statement

The Lincoln Anglican Academy Trust is committed to the highest levels of integrity, openness and fairness in all of its business transactions. All employees, Directors and Governors are expected to maintain the high standards of propriety and professionalism in all their dealings and to avoid any conflicts of interest.

Employees, Directors and Governors should take extreme care to ensure that they are not open to accusations of bribery and corruption. The LAAT is committed to complying with the Bribery Act 2010 which makes it a criminal act to:

- Offer, promise or give a bribe
- Request, agree to or accept a bribe
- Fail to prevent bribery by those associated with an organisation who are trying to gain an advantage for that organisation

Non-compliance with this policy is a disciplinary offence and could lead to dismissal without notice.

If there is any doubt about how to apply this policy, guidance should be sought from the Finance Director, Chief Executive or Deputy Chief Executive.

Please read this policy in conjunction with the documents and policies listed below:

- LAAT Code of Conduct
- Finance Policy
- Gifts and Hospitality Register

2. Scope

This policy applies to all individuals working in LAAT Schools and to individuals working in LAAT offices, as well as LAAT members, Directors and Governors.

The policy applies to the receipt and offer of gifts, awards, hospitality and benefits.

3. Principles

The underlying principles of the policy are as follows:



- Staff, Directors and Governors should exercise extreme caution when accepting or giving gifts and hospitality whilst conducting LAAT business. They should not use their position for the personal gain of themselves or others.
- Under no circumstance should gifts, awards, hospitality and benefits be accepted where there is a risk that it might be seen as an attempt to influence a business decision, or where personal integrity may be compromised.
- Gifts and hospitality of low value can be accepted subject to certain conditions. Higher value gifts may be permitted subject to approvals, but must be recorded. Further details are outlined below.

4. Gifts

Gifts include items, services, prizes or other benefits which are received free of charge or are offered to the individual on terms which are not available to the general public.

Example of gifts that should not be accepted are gifts of cash and gifts from a supplier immediately before or during a competitive tender exercise.

Gifts that are accepted on behalf of the Academy/LAAT remain the property of the Academy/LAAT. Gifts or items that are sent free of charge as part of a special offer when purchasing goods on behalf of the Academy/LAAT belong to the Academy/LAAT and must be used accordingly.

Staff must not accept gifts where there is any possibility that their professional integrity may be compromised.

It is common for students and their parents or carers to give gifts as a small token of appreciation or as a thank you to members of staff at certain times throughout the academic year. Staff may accept gifts from students and their parents or carers provided that they meet this definition.

Any member of staff receiving a gift with a value of greater than £25.00 should inform the Chief Executive, Deputy Chief Executive or Finance Director who will then decide whether the gift can be accepted. If approved, it should then be recorded in the Gifts and Hospitality Register.

Staff should make the Deputy CEO aware of any student who is giving them gifts on a regular basis, or any student or parent or carer who expects something in return for a gift, as this would not be acceptable.



If not accepting a gift could be seen as causing offence, for example for cultural reasons, the item should be accepted. The matter should then be brought to the attention of the LAAT Finance Director as soon as possible who may decide to return the gift, or may donate it to a charitable cause.

If there is any doubt as to the appropriateness of accepting a gift, the matter should be referred to the Chief Executive, Deputy Chief Executive or Finance Director for further guidance.

It is not the LAAT's standard practice to give gifts to individuals or organisations. If gifts are given, staff must ensure that the reasons for the decision are clearly recorded in the Gift and Hospitality Register.

This does not apply to the award of gifts and prizes related to the achievement of pupils.

5. Hospitality

Hospitality includes food, drink, accommodation, entertainment or the opportunity to attend sporting or cultural events provided free of charge or on terms not available to the general public.

It is acceptable to provide and receive hospitality such as teas, coffees and modest working lunches for meetings with visiting staff or business colleagues. These do not need to be recorded in the Gifts or Hospitality Register.

Hospitality above these level will require prior authorisation by the Finance Director or Chief Executive Officer / Deputy Chief Executive Officer and must be recorded in the register.

Staff must not accept gifts where there is any possibility that their professional integrity may be compromised. Hospitality should not be accepted from a supplier immediately before or during a competitive tender exercise.

6. Gifts and Hospitality Register

A Gifts and Hospitality Register (example shown in Appendix 1) must be maintained in each Academy and central LAAT offices.

The register must include for each gift or item of hospitality both received and declined, the date received or declined, a description, estimated monetary value, name of the donor and recipient, name of approver and date of approval, along with any supporting comments. Alongside the register, a record should also be kept of the authorisation given and reasons why (for example, a copy of the email confirmation).



The register must be available for inspection at any time by the Finance Manager, Finance Director, Deputy Chief Executive or Chief Executive.

The register must be submitted to the Finance Director at the end of each financial year for review and consolidation.

7. Review

The Finance Committee will review this policy annually and recommend any changes to the Board of Directors.