



SIKH ACADEMIES TRUST  
Faith Inspired Education

# **SAT GIFTS AND HOSPITALITY POLICY**

Date reviewed: Autumn 2024  
Date of next review: Autumn 2025

## **GIFTS AND HOSPITALITY**

### **1. Purpose**

- a. The principle of integrity requires that Sikh Academies Trust (SAT) Members, Trustees, Local Advisory Board members, staff should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted are appropriately declared and recorded.
- b. The process set out in this policy and procedure is designed to safeguard everyone from any misunderstandings, criticisms or allegations of favouritism or bribery.
- c. This policy takes into consideration the requirements under the Academy Trust Handbook 2024 and the UK Bribery Act 2010, which came into effect 1<sup>st</sup> July 2011. This guidance is under section 9 of the Act.
- d. Academy Trust Handbook 2024 states under 5.3.2 Academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or other benefits that may compromise their judgement or integrity and should ensure all staff are aware of it. When making gifts, the trust 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.
- e. Academy Trust Handbook 2024 states under section 5.52: For academies with a religious designation, the provision of services to protect and develop their religious character and ethos, which can only be provided by their religious authority, are regarded as meeting the “at cost” requirement.

### **2. Scope**

- a. This policy applies to all responsible for the governance of SAT and all employees of SAT. For the purposes of this policy, ‘Employees’ include everyone working at SAT – in the trust team or at any of the academies under the Trust, whether on a permanent, temporary, or casual basis, employed directly or indirectly and whether or not treated as employed for tax and employment law purposes. It also includes all volunteers, including Members/Trustees/Local Advisory Board members.

### **3. Procedures**

#### **a. Gifts.**

- i. You must not accept personal gifts with a significant monetary value nor any amount of cash, however small. Items of nominal value (approximately £50 or below) or free promotional pens, calendars, diaries, or similar items may be accepted, subject to the rules outlined below.
- ii. Gifts which are intended for the school as an institution can be accepted but must not be retained by the individual who receives them. Such gifts should be deposited with the Finance Office for use by the school.
- iii. Personal gifts may not be solicited under any circumstances. To do so would be in contravention of the Bribery Act and would be a disciplinary offence which could lead, depending on the circumstances, to summary dismissal.

- iv. When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010. Exceptionally, if a gift of money (of any value) or of items worth more than £50 cannot be refused without causing offence, it must be made clear to the donor that it is being accepted for the use of the school (for which many thanks), and not as a personal gift. The gift must then be declared (see 3.v) and deposited with the Finance office for school use as in 3.ii; this must be done immediately to ensure that there is no impression that the gift is being retained for personal use.
- v. Low-value gifts of items (up to about £50) need not be declared. All gifts of money and gifts of items worth more than £50 must be recorded in the school's [gifts and hospitality register](#), which is available on the staff dashboard, within five working days. If the gift is not registered within this time and it becomes known later, it may be assumed by the Trust that the failure to register was deliberate if there is any cause to question how the gift was dealt with. Retention by an individual of gifts intended for the school's use under 3.ii or 3.iv will be treated as a disciplinary offence which could lead depending on the circumstances, to summary dismissal.

**b. Supplier special offer gifts**

- i. Gifts are sometimes offered by suppliers with the purchase of items. All special offer gifts are the property of the school and must be turned into the finance office for use by the school. Such gifts should never sway the decision as to which supplier to use.

**c. Receiving hospitality**

- i. You should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf of the school. You should never solicit hospitality.
- ii. As a general rule, staff should think carefully before accepting hospitality that the school would not reciprocate in similar circumstances. If you wish to accept hospitality which exceeds this level of expense, but which does not appear to you to be lavish in the context of the offeror's situation or business, you should seek advice from the Executive Headteacher.
- iii. The timing of hospitality in relation to procurement or purchasing decision that the school may be taking is especially sensitive. You should never accept a gift or hospitality from any organisation where you can foresee that you will be involved in deciding whether to, they should be awarded a contract or order.
- iv. When you must decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.
- v. You may accept modest working meals and light refreshments without making any declaration. All other hospitality must be recorded in the school's [gifts and hospitality register](#) which is available on the staff dashboard.

- vi. Other hospitality may be accepted where: You are representing the school in the community or are imparting information about the school to the public. An event is clearly part of the life of the community or where the school should be seen to be represented. The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.

**d. Offering hospitality**

- i. Offering hospitality is generally not appropriate. Where it is desired that the school pays for external hospitality, this should be approved in advance by the Executive Headteacher, who should review the request in light of the UK Bribery Act 2010.
- ii. Any hospitality provided, where internal or external, should not be extravagant.
- iii. School will not provide any gift to any staff or external person; however small items may under exceptional circumstances be given to staff on their retirement or leaving the job after a long tenure. The Executive Headteacher is authorised to take appropriate decision for the amount in such cases (usually under £50)
- iv. School may provide gifts to students as an incentive for achieving good results or for good behaviour. These will be used on a selective basis to encourage better performance.
- v. School will ensure that offering gifts/hospitality is in line with the custom which does not invite public criticism.