The Praxis Trust

Gifts and Hospitality Policy

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POLICY PURPOSE

The purpose of this policy is to provide guidance on the Gifts & Hospitality pre-approval limits & thresholds.

This guidance applies to all Trust employees, trustees, governors, temporary staff & volunteers.

Employees must not offer or accept Gifts or Hospitality except in accordance with this guidance

This guidance does not apply to internal Gifts & Hospitality which do not involve third parties i.e. from one Academy employee to another Academy employee or attendance by Trust staff at an internal Praxis Trust event.

1 DEFINITIONS OF GIFTS & HOSPITALITY

1.1 Gifts

Gifts are defined as any item of value given or received from a third party (customer, supplier, associated party etc.). Examples include but are not limited to; wine, champagne, jewellery, gift baskets, hampers, legacy bequests.

1.2 Hospitality

Hospitality refers to any hospitality given or received by an employee & includes but is not limited to; meals, drinks, concerts, charitable events, leisure activities, conferences, sporting & social events including related travel, food & accommodation costs which are not paid for by the employee or reimbursed by The Praxis Trust.

This does not relate to training events booked in the normal manner.

2 GENERAL PRINCIPLES

2.1 Proportionality

- The Gift or Hospitality should be reasonable & proportionate to the recipient's role (not donor's wealth).
- All Gifts & Hospitality must be clearly connected to a legitimate business activity & have a clear business purpose.
- The giving or receiving does not create an actual or perceived conflict of interest.
- Gifts & Hospitality must not be part of a repeated pattern of giving / receiving from the same individual or supplier in the previous 12 months.
- Employees & their line managers (where approval is required) are responsible for ensuring that the value, frequency & timing of Gifts & Hospitality offered or received do not make them inappropriate or excessive & do not breach the limits & thresholds set in this guidance.

- For hospitality involving spouses &/or family members of employees, the value must be recorded against the member of staff, except for internal Praxis Trust events where there is no requirement to record. Gifts should not be accepted for spouses or family members.

3 PROHIBITED GIFTS AND HOSPITALITY

All Praxis Trust staff are prohibited from receiving or giving the following:

- Cash or cash equivalent as detailed in the guidance
- Gifts or Hospitality that would give rise to an obligation or duty.
- Gifts or Hospitality where there is a risk that the offer could have, or perceived to have an influence on a business outcome or decision.
- Gifts or Hospitality that may be linked in any way to bribery & corruption.
- Entertainment of a sexually explicit nature or other types of Gift & Hospitality that could damage the reputation of The Praxis Trust.
- Illegal or offensive Gifts & Hospitality or where the employee knows or suspects it would be against the rules of the recipients organisation.
- Gifts or hospitality that would be reasonably be viewed as excessive
- Gifts or hospitality where acceptance could give rise to a perceived or actual conflict of interest.
- Tickets or invitations to events where no employees of the donor organisation are present.

4 RECORDING & LIMITS OF GIFTS & HOSPITALITY

4.1 Recording Requirements

All gifts or hospitality offered or received at valued at £50 or above must be registered in the Gifts & Hospitality Register, **whether accepted or declined**. The Gifts & Hospitality register is located in each Academy Finance office, a consolidated report is available at the Trust registered office.

5 GIFTS – GIVEN AND RECEIVED

- Giving or receiving cash or cash equivalent gifts e.g. gift vouchers or concert / sporting event ticket where no host is in attendance is prohibited & not acceptable under any circumstances.
- There is no limit to the number of gifts that can be given & received up to £50, but must not be part of a repeated pattern of giving / receiving from the same individual or company in the previous 12 months.
- Gifts of alcohol may be accepted subject to the defined limits detailed in the policy.

6 HOSPITALITY RECEIVED

6.1 Entity Limits

- Hospitality received is limited to a maximum of 5 events that can be accepted from the same third party in any one calendar year per each area of responsibility. This could be 5 staff attending the same event, or 5 staff attending five different events.

6.2 Individual Limits

- Hospitality received, providing it is not prohibited, is limited to a maximum of 2 events or £500 cumulative value in any one year per staff member.

7 HOSPITALITY GIVEN – ENTITY LIMITS

- Hospitality offered to an individual or entity, provided it is not prohibited is limited to 5 events for the same third party per academic year.

Any requests to provide hospitality will require authorisation as follows:

- Where approval for the giving or receiving gifts or hospitality is required, it shall be confirmed in an e-mail by the authoriser (there is no delegation of this duty). Where approval is required, this must be confirmed before any hospitality is offered to the recipient.

- All evidence, including e-mails must be forwarded to the Chief Finance Officer for 6 year retention in line with financial requirements.

- Any transactions for any Principal (subject to limits) must be approved by the Chair of Trustees.

Value of Gift or Hospitality	**Recording Required**	**Approval Required**	**Approver**
Cash gifts or equivalent.	**Yes**	**N/A**	**All must be declined**
Declined Gifts.	**Yes**	**N/A**	**Chair of Trustees**
Less than £50.	**No**	**No**	**N/A**
£50 & less than £250.	**Yes**	**Yes**	**Principal**
Above £250.	**Yes**	**Yes**	**Chair of Trustees**
Gifts or hospitality of any value where you or the Principal have concerns about compliance with the overall policy.	**Yes**	**Yes**	**Chair of Trustees**
Value of Gift or Hospitality	**Recording Required**	**Approval Required**	**Approver**

Attendance by an Employee's spouse / partner at any non-internal Praxis Trust Event.	**Yes**	**Yes**	**Principal / Chair of Trustees**
Any Gift & Hospitality offered to or received from an individual over the business's pre-approval limit either in a single transaction or cumulatively on a rolling 12 month basis.	**Yes**	**Yes**	**Chair of Trustees**

8 DECLINING GIFTS OR HOSPITALITY

- Any Gifts or Hospitality offered to staff in excess of the limits detailed in the guidance must be politely & sensitively declined & recorded in the Gifts & Hospitality Register.

- Whenever possible, decline the gift or invitation at the time it is offered & explain that the Praxis Trust has a strict policy in place to prevent conflict of interest.

- It is best to decline in private & in person. However, if this is not possible simply telephone or write a letter expressing regret for declining the gift but thanking the donor for their thoughtfulness.

- In exceptional circumstances, where it may not be possible to return a gift, the Trust will donate the gift to charity but prior approval must be obtained from the Chair of Trustees.

Signed by: _____ Date: _____

Chair of Trustees

THE PRAXIS TRUST – GIFTS & HOSPITALITY REGISTER

APPENDIX 1

ALL REGISTRATIONS MUST BE MADE IN ACCORDANCE WITH THE GIFT & HOSPITALITY POLICY						
DATE RECEIVED	STAFF NAME	DESCRIPTION OF GIFT OR HOSPITALITY	ESTIMATED VALUE £	APROVAL REQUIRED Y/N	APPROVER SIGNATURE	ACTION TAKEN IF NOT APPROVED OR ACCEPTED