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Administration



Gifts and Hospitality Policy

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Contents

1	Introduction	Page 4
2	Principles	Page 4
3	The receipt of gifts	Page 4
4	The providing of gifts	Page 5

Appendix

1	Gifts and hospitality log	Page 6
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1 Introduction

- 1.1 This policy has been adopted by the Governing Body of Ormiston Maritime Academy on April 2016.
- 1.2 As a general guideline, gifts, hospitality or other personal benefits (hereinafter referred to as "Gifts") should not be accepted or offered by any member of staff, except as provided for below.
- 1.3 Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

Equality and Diversity : All policies are intended to ensure that no-one is treated in any way less favourably on the grounds of race, colour, national or ethnic or social origin, race, disability, gender, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity, age, religion / belief or political / other personal beliefs.

2 Principles

- 2.1 The principles of the Ormiston Maritime Academy (OMA) policy are:
 - To ensure the Academy can demonstrate that no improper influence has been applied to decisions made.
 - To show that all decisions whether educational, financial or otherwise are reached on the basis of the proper application of Ormiston Academy Trust (OAT) / OMA procedures.

3 The receipt of gifts

- 3.1 The Academy encourages and expects staff and governors to use their networks and contacts for its benefit. It is however a fundamental requirement on all staff, the contravention of which would be considered to be gross misconduct, that they must not derive any financial benefit beyond their agreed salary from the decisions they make or contribute to, which involve the education of students, or the spending of the significant sums of public money that are entrusted to the Academy. Therefore staff shall not use their authority or office for personal gain beyond their agreed salary and shall seek to uphold and enhance the standing of OAT and OMA by:
 - maintaining an unimpeachable standard of honesty and integrity in all their business and other relationships
 - complying with the letter and spirit of the law in contractual obligations, rejecting any business practice that might be deemed improper
 - at all times in their business and other relationships, act to maintain the interests and good reputation of the Academy
- 3.2 Any employee who becomes aware of a breach of Policy must refer to the Academy's Whistleblowing Policy and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.
- 3.3 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 Academy

in any matter relevant to an employee's duties (such as conflicting business interests) shall be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving their relatives or associates must make an appropriate entry in the Register of Business Interests.

- 3.4 Staff are permitted to accept gifts, rewards or benefits from students, students' families, members of the public, or organisations which the Academy has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as chocolates, flowers, diaries or calendars). Therefore, gifts should not be accepted if they appear to be disproportionately generous, or could be construed as an inducement to effect a decision or action, whether business, educational, or other. All gifts received should be reported to line managers who will report it to the Compliance Officer for recording purposes.
- 3.5 Where purchased items include a "free gift", such a gift should be either used for Academy business or handed to the Academy to be used at charity raffles, pupil prizes, etc.
- 3.6 In relation to conventional hospitality (lunches, outings, tickets for events, etc), it may be accepted provided that it is normal and reasonable in the circumstances. However, invitations for the following should not be accepted:
- where there is no reasonable business justification for doing so
 - where an invitation is disproportionately generous
 - where the invitation could be seen as an inducement to affect a business or other decision.
- 3.7 Any hospitality other than of a nominal value (£15) or facilities provided during the normal course of business should be reported to the Director of Finance –
- Who the gift is from
 - Date the gift is received
 - Details of the gift
 - Action taken (whether the gift is retained or refused or passed on, etc), for entry into the Gifts in Kind Log Sheet.

4 The providing of gifts

- 4.1 The Academy encourages and seeks cooperative relationships between staff, governors, stakeholders and external organisations. Accordingly there can be occasions where it is appropriate for the Academy to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house. Likewise it may be appropriate for leaving gifts to be provided to staff leaving the employment of the Academy, particularly after a long period of service. Such gifts are often supplemented with private contributions from continuing members of staff.

Appendix 1

Gifts and Hospitality log

Year

Date	From whom	Received by	Description of gift	Finance Director informed (Yes/No and date)	Action taken