

The Cardinal Newman Catholic Educational Trust

'Seeking God in all things together'

Cardinal Newman

Gifts & Hospitality Policy 2022/23



Ratification

Dr. Daniel Doyle
CEO - Newman Catholic Trust
24-06-2022

Anne Rolls
Anne Rolls
Chair - Newman Catholic Trust
24-06-2022

Details of Policy Updates

Date	Details

GIFTS & HOSPITALITY PROCEDURE

The Newman Trust's commitment and vision is to provide every child in all of its schools with an education of the highest standards rooted in our Catholic beliefs and ethos - establishing Newman Trust as a beacon of excellence within education.

"God wants us to be saints and not settle for a bland or mediocre existence" (Gaudete et Exsultate 1). Therefore, we will strive as a faith community, with strong governance at all levels and in partnerships with our families and communities, to unlock the God-given potential of all who work within the Newman Trust.

"Faith... is an act of will, following on the conviction that to believe is a duty" (Saint John Henry Newman). Therefore, the Newman Trust aims to create a community of change - a community that lives an active life of stewardship, service and faith.

Underpinning the Trust are our company values which form the heart of our vision, mission and drive:

C – Courage: At Newman, we show courage in our faith and when we learn – facing challenges and overcoming adversity.

A – Attentive: At Newman, we are attentive to the needs of others and respond with action. We are attentive to and actively seek the presence of God in all things.

R – Respect: At Newman. We show respect and concern for each other, our communities, our planet and all people.

E – Excellence: At Newman, we challenge our students to go beyond what is expected, seek excellence in all areas and strive for the greater glory of God.

S – Stewardship: At Newman, we believe that it is our duty to work amongst God's people. This means active service, volunteering and working for social justice.

Commitment to Equality:

We are committed to providing a positive working environment free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed several key policies to ensure that the principles of Catholic Social Teaching in relation to human dignity and dignity in work become embedded into every aspect of school life and these policies are reviewed regularly in this regard.

The Newman Catholic Trust is committed to the values of probity and accountability. All staff, Directors and Academy representatives should conduct themselves with integrity, impartiality and honesty at all times. Within the terms of the Code, staff, Directors and Academy Representatives are expected to exercise common sense. If they are in any doubt they must consult the Headteacher/Chair of Academy Committee and in every case declare the acceptance of a gift or hospitality in the register maintained at each school and the Newman Central Leadership Team, using the Academy's 'Declaration of Gifts and Hospitality' form. The process is designed to safeguard Academy Representatives/Directors and staff from any misunderstanding, scrutiny or criticism.

The general principles which govern gifts and hospitality are:

- Offers of hospitality should only be accepted if there is a genuine need to represent the Academy;
- Gifts may be accepted outside these principles in exceptional circumstances;
- The Code of Conduct applies to all Directors/Academy Representatives and staff of the Newman Catholic Trust;
- To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied by staff and referred to the Headteacher/Chair of Academy Committee/CEO if in doubt. (See Appendix A)
- The registers are accessible to school Headteacher, the Board of Directors, Local Academy Representatives, Newman Central Leadership Team and External Auditors;
- Any request by a member of the public to view a register will be referred to the CEO. In considering any request, the requirement for the Academy to be open and transparent will be balanced against the requirements of prevailing GDPR and Freedom of Information legislation.

The intention of the policy is to ensure that the Academy 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 Academy. The Academy 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 Academy 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 might be deemed improper.
3. At all times in their business relationships acting to maintain the interests and good reputation of the Academy.
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 Academy 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.

Hospitality

The following principles should be followed in deciding whether to accept hospitality.

Staff and Directors/Academy Representatives should ask themselves whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered. If the answer is yes, the hospitality should be declined. In making judgements, relevant facts to consider include the individual or organisations offering the hospitality, its scale and nature, and its timing in relation to decisions to be made by the Academy. Care should be taken to avoid situations in which an individual member of staff, Director or Academy Representative is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that individual or organisation. Examples of when it may be proper to accept hospitality (always considering the particular circumstances) are as follows:

- attendance at conferences, events and demonstrations of equipment organised by external organisations where there is a service interest;
- attendance at events or functions where there is a demonstrable need for the Academy to be represented to either give or receive information or to participate as part of the Academy's commercial image;
- attendance at events or functions which are part of the civic, cultural or sporting life of the Academy;
- working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

Gifts

Received from Outside Newman Trust

All personal gifts should be refused or donated to charity unless they fall within the categories set out below:

- Modest gifts of a promotional character, e.g. calendars, diaries, stationery.
- Gifts on the conclusion of any courtesy visit to an external organisation of a sort normally given by that organisation.
- Gifts up to £50 in value.
- Gifts which are intended for the benefit of the Academy as a whole or for an individual school within the Academy e.g. donated raffle prizes.

Gifts are deemed to include:

- Goods provided for personal or other private use
- Personal services
- Loans of equipment, vehicles etc for personal use;
- The provision of goods/services at preferential cost for personal or other private use

Made by Newman Trust:

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. The CFO has responsibility for documenting all gifts made to staff, directors, LAC representatives, other volunteers and suppliers including their value and who approved the expenditure. The aggregate amount in each academic year must be disclosed in the audited accounts, including separate disclosure for individual transactions above £5,000. The Finance Committee has oversight of this document at least twice per year (spring and summer).

Registration of Gifts and Hospitality

Where gifts and hospitality fall outside the exceptions listed above, staff, Directors and Academy Representatives must, within 28 days of accepting any gift or hospitality, provide written notification to the relevant school Headteacher or senior member of the Newman Central Leadership Team using the 'Declaration of Gifts and Hospitality' form (Appendix 2). The Headteacher or senior member of the Newman Central Leadership Team must approve the form with a dated signature and pass for entry into the register. In the event it is the CEO who is making the declaration, another senior member of the Trust Central Leadership Team must approve.

Appendix 1:

The PROVIT (Acronym) test

Whether or not the offer is acceptable:

Purpose	Token, thanks or seeking a favour?	
	Token or thanks?	Yes
	Favour?	No
Rules	What are they? Does this situation conform?	
Openness	Is the offer transparent?	
Value	Expensive or inexpensive?	
Ethics	Does the offer fit with Academy ethics? Is this an exceptional circumstance?	
Identity	Who has made the offer?	
Timing	Are you about to make a decision affecting the donor?	

Appendix 2:

The Newman Trust Gifts and Hospitality Register

To be retained by the school:

Recipient	Date	Donor	Nature of Gift/Hospitality	Estimated Value	Comments