





NEWMAN CATHOLIC TRUST

HEART SPEAKS TO HEART

Gifts & Hospitality Policy 2024-25

Ratification

Role	Name	Signature	Date
Chair of Board	Chris Izuka		13/2/25
CEO	Dr Daniel Doyle		13/2/25

Commitment to Equality:

We are committed to providing a positive working environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of 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.

"Rooted in faith, we ignite a love of learning, foster inclusive education and empower every individual to achieve their utmost potential."

At the Newman Catholic Trust, we stand united in our unwavering mission to nurture a transformative educational experience, where every child is seen, valued, and cherished as a unique gift from God. Rooted in faith, we ignite a love for learning that awakens curiosity, sparks imagination, and fuels a lifelong journey of discovery.

Guided by the teachings of Christ and inspired by the profound wisdom of our namesake, Saint John Henry Newman, we strive to foster a community where inclusion is lived, diversity is embraced, and every individual is empowered to fulfil their highest potential. As Newman said, *"To live is to change, and to be perfect is to have changed often."* We believe that education is a sacred journey of continual transformation—intellectually, spiritually, and personally. We believe that true education is not just about knowledge, but about shaping hearts and minds, cultivating resilience, and nurturing the whole person.

Our vision is simple yet profound: to be a beacon of hope and excellence, where students are not only academically accomplished but spiritually enriched and personally empowered to make a difference in the world. In all that we do, we strive to embody our core values:

- **Christ/Child Centred:** Placing the Gospel values, the teachings of Christ and the well-being of each child at the heart of every action we take.
- **Inclusive and Consultative:** Ensuring open communication and engagement with all members of our community.
- **Caring:** Showing empathy, understanding, and support in navigating any challenges that may arise.
- **Transparent:** Fostering openness and honesty in all our interactions.
- **Strategic:** Approaching all matters with careful planning and consideration for the wider community.
- **Professional:** Maintaining the highest standards of conduct and integrity in our decision-making.
- **Accountable:** Taking responsibility for our actions and fulfilling our commitment to ensuring a safe and nurturing environment for all.

1. Purpose and Scope

The Newman Catholic Trust is committed to the highest standards of integrity, probity and accountability. All staff, Directors and Local Governing Committee (LGC) representatives are expected to uphold these principles and conduct themselves with honesty, impartiality and transparency in all dealings. This policy provides clear guidance on the acceptance and provision of gifts and hospitality to ensure that decisions remain impartial and based solely on the best interests of the Trust and its schools.

This policy applies to all employees, Directors, LGC representatives and volunteers across the Trust. It ensures that no undue influence is applied or could be perceived to have been applied by external parties, suppliers or individuals in a position to influence the Trust's decision-making processes. It supports compliance with the Academies Financial Handbook, regulatory expectations and ethical best practice.

2. Principles Governing Gifts and Hospitality

Integrity – No gift or hospitality should be accepted or provided where it could be perceived as an attempt to influence decision-making, secure preferential treatment or compromise impartiality.

Transparency – Gifts or hospitality outside of permitted exceptions must be recorded in the Trust's **Gifts and Hospitality Register**.

Value for Money – Any expenditure must be appropriate, modest and justifiable within public sector expectations.

Consistency – This policy applies equally to all Trust employees, Directors and LGC representatives to ensure fairness.

Accountability – The CEO, Principals and governance bodies will oversee compliance, with clear mechanisms to report and address breaches.

3. Legal and Ethical Framework

This policy is underpinned by key legal and ethical frameworks, including:

- **The Bribery Act 2010** – Criminalising bribery in both giving and receiving forms, including improper influence in business decisions.
- **The Companies Act 2006** – Defining conflicts of interest and directors' duties regarding financial propriety.
- **Academy Trust Handbook (ESFA)** – Requiring robust governance and financial oversight in managing gifts and hospitality.
- **The Seven Nolan Principles of Public Life** – Upholding selflessness, integrity, objectivity, accountability, openness, honesty and leadership in public sector governance.

4. Acceptable and Non-Acceptable Gifts and Hospitality

Staff and Directors/LGC 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:

Category	Acceptable	Non-Acceptable
Hospitality	Light refreshments at meetings, working lunches for business purposes, attendance at professional networking events where representation is necessary.	Lavish entertainment, all-expenses-paid trips, private hospitality from suppliers where a contract is in place.
Gifts from External Sources	Modest promotional items (e.g. calendars, stationery), gifts up to £50 , token gifts at public events, donations for school fundraising.	Gifts exceeding £50 , cash or equivalents (e.g. vouchers), personal gifts from suppliers, repeated gifts forming a pattern.
Gifts Given by the Trust	Reasonable staff recognition, retirement tokens, low-value seasonal gifts (e.g. cards, small food items), modest hospitality for visiting dignitaries where appropriate.	Excessive or unapproved gifts, high-value items, gifts with no clear business justification.

Where doubt arises, individuals must seek guidance from their **Principal, Chair of Board/LGC or CEO** and ensure that any acceptance or refusal is recorded.

5. Declaration and Registration Process

1. Threshold for Declaration

- Gifts and hospitality **over £50** must be declared in the Trust's Gifts and Hospitality Register.
- Any gifts or hospitality that could be **perceived as undue influence** should also be declared, regardless of value.
- Offers that are **declined** should also be recorded where refusal may require explanation.

2. Declaration Submission

- **Staff** must complete the **Declaration of Gifts and Hospitality Form** within **14 days** of receiving a gift or hospitality.
- **Directors and LGC representatives** should declare gifts at the next **Board or LGC meeting**.
- Submissions should be electronic where possible for efficiency and security.

3. Approval Process

- The **Principal or CEO** must approve all declared gifts or hospitality.
- If the declaration concerns the **CEO**, approval must be sought from the **Chair of the Board of Directors**.

4. Register Maintenance

- The Trust **Chief Finance Office** will maintain a **centralised register** of all declarations, subject to periodic review.
- The **Finance Committee** will conduct a **bi-annual audit** to ensure compliance.

5. Public Disclosure Requests

- Requests to view the register will be considered in line with **GDPR** and **Freedom of Information legislation**.
- Only **aggregated, non-personal data** will be disclosed where appropriate.

6. Breaches of the Policy

Failure to adhere to this policy may result in:

- Investigation under the **Trust's Disciplinary Policy**.
- Potential **gross misconduct** proceedings.
- Referral to external authorities where breaches suggest corruption or fraud.

Staff and Directors must report suspected breaches to their **line manager or the CEO** immediately.

7. Ethical Decision-Making: The PROVEIT Test

To assess whether a gift or hospitality is appropriate, staff should apply the **PROVEIT** test:

Factor	Question to Ask
Purpose	Is this purely a token of thanks, or does it come with an expectation of favour?
Rules	Does this comply with the Trust's policies and the Academies Financial Handbook?
Openness	Would I be comfortable declaring this publicly?
Value	Is the value modest and reasonable?
Ethics	Is this aligned with the Trust's Catholic ethos and public sector expectations?
Identity	Who is offering this, and why?
Timing	Does this coincide with a key decision or procurement process?

If any doubt remains, staff must consult their **Principal, Chair of Board/LGC or CEO** before accepting.

8. Oversight and Review

- This policy will be reviewed **every two years** by the **Trust's Board (or it can be delegated to the FAR Committee)**.
- Updates will be made in response to changes in **regulatory requirements** or **best practice**.
- The **Accounting Officer** and **Chief Finance Officer (CFO)** are responsible for monitoring compliance and reporting concerns.

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