



Urbis Academy Trust
Esse Optimus Qui Possum

URBIS ACADEMY TRUST

DECLARATION OF INTEREST POLICY

GIFTS AND HOSPITALITY POLICY

October 2021

1. INTRODUCTION

- 1.1 The Urbis Academy Trust is committed to the highest standards of integrity in all its business activities. A declaration of interests is issued annually to Directors/Trustees, Governors and Staff. This aims to ensure that any current or potential conflicts of interest are openly declared and recorded in accordance with Company and Charity Law.

2. APPLICATION

- 2.1 This policy applies to all Trustees, staff and members of academy trust. Procedures apply to students and their families as well as from potential suppliers.

3. SECTION 1

3.1 Declaration of Interest

- 3.1.1 The Urbis Academy Trust needs to establish a register of pecuniary interests for the trustees and Staff. The register should be open to inspection and easily accessible at all times.

- 3.1.2 This register must clearly show that any decisions made are arrived at in a true and fair way. It is important for anyone involved in spending public money can demonstrate that they do not benefit personally from decisions they make.

- 3.1.3 Trustee and Staff should declare any links they have with firms or individuals, from which the Trust and/or each individual Academy, acting on behalf of the Trust may wish to buy goods or services.

- 3.1.4 Examples of **direct** interests are:

- The individual owns, totally or in part, a Company or Organisation which may be used by the Academy Trust to supply goods or services.
- The individual has a substantial financial interest in a Company as described in above.
- The individual offers goods or services which may be used by the academy Trust

- 3.1.5 Examples of **indirect** interests are:

- Any of the direct interests, as shown above, but where the individual concerned is a relative/friend of the trustee or member of staff.
- Where an interest is declared, either direct and indirect, the individual should take no part in any discussion of a matter involving the interest nor vote on any question with respect to the matter.

- 3.1.6 Declaration of Interest

- A declaration of interest form must be completed. This form will be reviewed on an annual basis, but must be updated and amended in year, if an individual's circumstances change (See App 1)

4. Section 2

4.1 Gifts and Hospitality

4.1.1 Trustees and staff should not accept gifts or rewards from any organisation or individual with whom they have contact in the course of their work as an inducement either for doing something or not doing something in their official capacity. Particular care should be taken about any gift from a person or organisation which has, or is hoping to have, a contract with the Academy. Gifts of a trivial or inexpensive nature may be accepted (e.g diaries, calendars), but more substantial or expensive offerings should be declined. No gift of a value of more than £25 should be accepted. Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision. If unsolicited gifts of a substantial nature arrive from contractors they should be returned with a polite explanation that the Academy's policies do not allow their acceptance. Gifts should be recorded in the gift book in the SBM's office.

4.2 Hospitality

4.2.1 It is accepted that trustees and staff sometimes receive conventional hospitality (e.g refreshments at business meetings) they may attend, as part of their official function, or an event organised by another body for promotional or influential purpose. Offers of hospitality that exceed this norm should be in general refused. The following items should be avoided: hospitality offered in substitution for fees e.g lectures or other work done; inducements which could lead to a contractual position between the Academy and supplier, contractor or consultant; substantial offers of social functions, travel or accommodation; acceptance of meals, tickets and invitations to sporting, cultural or social events, particularly from the same source.

4.2.2 You must never canvass or seek gifts or hospitality.

4.3 Recording Gifts and Hospitality

4.3.1 Trustees and staff must record being offered or accepting any gifts by completing the Gifts and Hospitality Form and recorded the gift in the Gifts' book in the SBM office(See App 2) Any hospitality other than of a nominal value (up to £25) or facilities provided during the normal course of business should be reported for an entry in the Register of Business Interests A.

4.4 Failure to Comply

4.4.1 In all instances where there is reasonable belief that there has been a failure to declare, the chairman of the trust or headteacher will conduct a formal investigation of the situation. Employees may be subject to disciplinary procedures to pursue potential matters of misconduct.

4.5 Guiding Principles

4.5.1 The guiding principles are:

- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest
- The action of individuals acting in an official capacity should not give the impression (to any member of the public, to any organisation with whom they deal with or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation.

4.6 Criminal Offence

4.6.1 It is a criminal offence for any employee or associated person acting for, or on behalf of the Academy Trust to corruptly accept any inducement or reward for doing, promising or refraining from doing anything in the course of their employment, or corruptly showing favour or disfavour, in the handling of contracts. In acting corruptly the employee would demonstrate their intention to purposefully act with lack of probity and with a disregard for the implications of their actions for the Academy.

4.7 Bribery act

4.7.1 The importance of doing this has recently been reinforced by the Bribery Act 2010, which came into force on 1 July 2011. Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the;

- Intention of inducing or rewarding improper performance of a function or activity

Or

- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity

A criminal offence will be committed under the Bribery Act 2010 if;

- An employee or associated person acting for, or on behalf of, the Academy Trust offers, promises, gives, requests, receives or agrees to receive bribes

Or

- An employee or associated person acting for, or on behalf of, the Academy Trust offers, promises or gives a bribe to another with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence)

4.8 Gifts

4.8.1 Gifts can be 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.

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