



Northern Ambition Academies Trust

NORTHERN AMBITION ACADEMIES TRUST Anti-Fraud and Whistleblowing Policy

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Next review	May 2019

1. INTRODUCTION

This policy sets out the arrangements for staff, governors and Trustees who are offered gifts and/or hospitality by external organisations in the course of their work for the Trust and its schools. The policy has been developed in line with Northern Ambition Academies Trust's commitment to openness and value for money.

There are two main reasons why the Trust needs this Gifts and Hospitality Policy:

- The receipt of gifts, money or excessive hospitality can damage the Trust's reputation and lead to possible prosecutions for corruption.
- This policy seeks to protect staff from suspicion of dishonesty and ensure they are free from any conflict of interest with respect to the acceptance or provision of gifts, hospitality or any other inducement from or to suppliers of goods or services to the Trust or its schools.

2. DEFINITIONS

A 'gift' is any item, cash or goods, given or offered for which no payment or service was given or received in return.

'Hospitality' can be defined as any food, drink, accommodation or entertainment provided free of charge or heavily discounted.

'Staff' means all permanent, temporary and fixed term staff employed by Northern Ambition Academies Trust in whatever capacity and by any other contractors, consultants or other persons (including governors and Trustees) acting in the name of the Trust or its schools.

3. PRINCIPLES

Northern Ambition Academies Trust expects staff to exercise the utmost discretion in giving and accepting gifts and hospitality when on Trust business. Particular care should be taken with regard to a person or organisation that has, or is hoping to have, a contract with the Trust or its schools.

Staff must not accept gifts, hospitality or benefits in kind from a third party where it might be perceived that their personal integrity is being compromised or that Northern Ambition Academies Trust or its schools might be placed under an obligation.

No favour or preference which is not generally available should be sought, accepted or given.

Staff must not make use of their official position to further their private interests or those of others.

4. ACTIONS TO BE TAKEN BY STAFF

If offered a gift or hospitality, the individual should consider carefully whether it is appropriate to accept or decline. If in doubt, advice should be sought from the Business Manager who may in turn liaise with the Headteacher and/or the Director of Finance and Operations.

Gifts of low intrinsic value such as promotional calendars or diaries, or other small tokens of gratitude can be accepted. Any gift or hospitality deemed to have a value of £25 or over must be recorded in a Register of Gifts and Hospitality. Each school within the Trust must maintain such a register and it must be available for inspection if requested by the Trust's management, auditors or the Audit Committee.

It is each individual's responsibility to inform the Business Manager of any **offer** of gifts or hospitality over the £25 threshold, whether accepted or not, so that these can be entered into the Register.

4.1 Contracts with Suppliers

Staff must base all purchasing decisions and negotiations for contracts solely on achieving best value for money.

Northern Ambition Academies Trust requires staff who have official dealings with contractors and other suppliers of goods and services to the Trust or its schools to avoid conducting any private business with them by any means other than through normal commercial channels.

Staff should be aware of the Prevention of Corruption Act 1916 which states that any money, gift or consideration received by an employee in public service, from a person or organisation holding, or seeking to obtain a contract, will be deemed by the courts to have been received corruptly unless the employee proves otherwise.

4.2 Gifts To and From Students

Given the nature of the professional responsibilities of staff, they are strongly advised not to give or accept any gifts/hospitality (exceeding £25 in value) from pupils during their period of study.

Any gifts/hospitality from students exceeding £25 in value must be entered in the Register of Gifts and Hospitality.

5. REGISTER OF GIFTS/HOSPITALITY

The Business Manager in each school has responsibility for holding the Gifts and Hospitality Register. Individual staff are *personally* responsible for reporting any gifts/hospitality offered and whether these have been accepted or declined. The Business Manager will record this information in the register.

The following should be recorded:

- Nature of gift/hospitality
- Estimated value of gift/hospitality
- Name of person/company offering the gift/hospitality
- Date gift/hospitality accepted/refused.
- Name of employee

The Trust's Audit Committee will review these registers on a regular basis as part of their internal assurance processes.