



## Gifts and Expenses Policy

<b>Board Approved Date</b>	July 2024
<b>Version</b>	1.2
<b>Author Initials</b>	SW
<b>Review Date</b>	July 2027

*(This policy supersedes all previous)*

## Amendments

Policy Date	New Version Number	Summary of change	Comments
July 2024	1.2	Amended title of CFOO and details on staff travel and accommodation.	

## **GIFTS AND EXPENSES POLICY**

### **1. Principles**

The purpose of this policy is to ensure that employees conduct themselves and are seen to be conducting themselves to the highest standards of ethics and integrity. In certain circumstances, breaches of this policy may be addressed under the Disciplinary Policy.

1.1 Staff are entitled to reimbursement of expenses incurred whilst on business related to Education South West.

1.2 This policy protects the employees and Education South West.

### **2. Policy and Procedure**

#### **2.1 Gifts**

2.1.1 All members of staff are required to declare to the ESW Finance Manager any gifts received from a commercial organisation by a member of staff with a value over £25. All such gifts are deemed to be donations to ESW and are retained by ESW for fundraising activities.

2.1.2 In the situation where a member of staff is offered hospitality, wherever possible the acceptance of this hospitality must be approved (via email) by the Chief Executive Officer, in advance of the event. In every case, the acceptance of hospitality must be declared by email to the Chief Financial and Operating Officer (CFOO) and the reason and the third party disclosed.

2.1.3 All forms of bribery are strictly prohibited. If a member of staff is unsure about whether a particular act constitutes bribery, raise it with the Chief Financial and Operating Officer (CFOO).

2.1.4 Specifically, staff must not give or offer any payment, gift, hospitality or other benefit in the expectation that an advantage will be received in return, or to reward any business received; or accept any offer from a third party that is made with the expectation that ESW will provide a business advantage for them or anyone else.

#### **2.2 Expenses**

2.2.1 Travel and accommodation for staff can be made via the finance team/local administrator(primary), or secondary personal assistants to the Head. Members of SLT, Shared services managers and Trust Leaders will, from time to time need to make arrangements directly.

In all cases, best price should be sought, appropriate to the destination and the event attended.

Failure to observe this principle permits the Chief Executive Officer/Principals/ CFOO to elect not to reimburse costs incurred directly by a member of staff for travel or accommodation.

- 2.2.2 An authorised (by line manager) an expense claim form is submitted with receipts for all expenditure attached. Where receipts are not attached, the claim will be referred to the Finance Director for review who at his/her discretion can countersign the claim or may refuse to reimburse the claim.
- 2.2.3 Claims for subsistence vary depending on where a member of staff might be staying. Reimbursement for subsistence is made to maximum of £20 for breakfast or lunch, and £35 for evening dinner. If it is necessary to claim for more than these standard rates, then the member of staff will require the countersignature of the Academy Principal or CFOO on their claim.
- 2.2.4 Receipts for subsistence must be itemised. Where this is not the case the claim will be referred to the Academy Principal/Finance Director for review who at his/her discretion can countersign the claim or may refuse to reimburse the claim. No claim for alcohol or cigarettes will be paid.
- 2.2.5 When staying in hotel or conference accommodation where the only means to access the internet is to pay the hotel or centre charge, this may be reimbursed on presentation of a receipt.
- 2.2.6 Claims for using public transport or carparks which could not be pre-booked may be reimbursed with a receipt.
- 2.2.7 Staff or interview candidates using their own vehicle are reimbursed at the rate set by HMRC for business mileage.
- 2.2.8 Any expenses not referred to in 2.2.1 to 2.2.7 may be claimed at the discretion of the Principal, a member of the Leadership Team, and/or the CFOO.

### **3. Review of the Policy**

This policy is reviewed by the ESW Trust Board every three years.