

# Gifts and Hospitality Policy

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Author	COO
Approved by	Trust Directors
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## Contents

1. Aims.....	2
2. Legislation and guidance .....	2
3. Definitions .....	2
4. Roles and responsibilities .....	3
5. Acceptable gifts and hospitality.....	4
6. Unacceptable gifts and hospitality .....	5
7. Declining gifts and hospitality.....	5
8. Monitoring arrangements .....	5
9. Links with other policies .....	5
Appendix 1: gifts and hospitality register.....	6

### 1. Aims

This policy aims to ensure that:

- The academy trust's funds are used only in accordance with the law, its articles of association, its funding agreement, and the latest Academies Financial Handbook
- The trust and those associated with it operate in a way that commands broad public support
- The trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds
- Trustees fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors
- Members, trustees, and staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same

### 2. Legislation and guidance

This policy is based on the [Academy Trust Handbook](#), which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might compromise their personal judgement or integrity. This should include members, trustees, staff and/or any other representative of the trust. The handbook states that the trust should ensure that all staff are aware of this policy.

This policy also complies with our funding agreement and articles of association.

### 3. Definitions

**Gifts** are any items, cash, awards, prizes, goods or services, offered without expectation of payment or benefit. Gifts also include goods or services offered at a discounted rate, or on terms not available to the general public.

**Hospitality** is defined as food, drink, accommodation, or entertainment (such as cultural or sporting events) provided free of charge, heavily discounted or on terms not generally available to the general public.

## **4. Roles and responsibilities**

### **4.1 Members, trustees, and staff**

Members, trustees, and staff:

- Must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that the trust might be placed under any obligation as a result of acceptance
- Must not use their official position to further their private interests or the interests of others
- Must not solicit gifts or hospitality
- Must record any gifts or hospitality offered to them or the trust with a value of £50 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Chief Financial Officer, CEO or Headteacher before accepting or offering any gifts or hospitality with a value of £50

### **4.2 Academy trustees**

Academy trustees will ensure that the trust's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

### **4.3 The Chief Executive Officer (CEO)/Headteacher**

The CEO/headteacher is responsible for ensuring that trust staff (CEO) and school staff (headteachers) are aware of and understand this policy, and that it is being implemented consistently.

The CEO/headteacher will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the school and trust and to those outside the organisation.

They will also ensure, alongside the Chief Operations Officer (COO), that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of £50 are in line with this policy.

### **4.4 The Chief Operations Officer (COO)**

The COO is responsible for ensuring that trust central team staff are aware of and understand this policy, and that it is being implemented consistently.

The COO will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the trust and to those outside the organisation. They will declare any gifts of any value at all.

The Chief Operations Officer (COO) will also ensure that:

- The trust maintains a gifts and hospitality register
- Figures for transactions relating to gifts made by the trust are disclosed in the trust's audited accounts, in accordance with the Academies Financial Handbook
- The academy trustees, CEO and headteacher are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the CEO and headteacher, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

**4.5 The Finance Officer** is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

#### 4.6 Parents

- The Trust does not wish to discourage all gift-giving, and that small tokens of gratitude are always appreciated.
- Gift-giving is not a requirement, and parents are not expected to buy gifts for class teachers or other school staff
- Staff will be required to declare gifts from parents over the value of £50 or £150 as a collective group in a collection
- The Trust in accordance with the AFH Section 5.31 shall make gift to staff or volunteers ensuring propriety and regularity.

### 5. Acceptable gifts and hospitality

#### 5.1 Offers of gifts and hospitality received

Members, trustees, and staff can accept gifts and hospitality that have a value of up to £50. These do not have to be pre-approved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, members, trustees, and staff must consult the COO or CEO.

Similarly, hospitality such as working lunches may be accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the COO or CEO.

Any gifts or hospitality offered with a value of £50 or above must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the COO or CEO before accepting.

If the Headteacher, COO or CEO is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the board of trustees and record the offer on the gifts and hospitality register.

Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a staff disciplinary matter.

#### 5.2 Offers of gifts and hospitality given

Any gifts or hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £50 should be used as a guideline.

Alcohol must not be purchased out of the school and/or trust budget.

Expense claims should be made to the COO or CEO and receipts must always be enclosed.

The COO, CEO or Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £50.

## **6. Unacceptable gifts and hospitality**

The following must never be offered or accepted:

- Monetary gifts from suppliers or business associates
- Gifts or hospitality offered to family members, partners or close friends of members, trustees, or staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time

This list is not intended to be exhaustive.

## **7. Declining gifts and hospitality**

Any members, trustee or staff member who is offered any of the unacceptable gifts or hospitality outlined in section 6 above should politely decline the offer.

If they feel it would not be appropriate for them to decline, they should refer the matter to the CEO or COO or Chair of the Trust. The CEO or COO may decline the offer or donate the gift or hospitality to a worthy cause and must also record the offer on the gifts and hospitality register.

Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the trust has deemed unacceptable.

Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, will be dealt with as a staff disciplinary matter.

## **8. Monitoring arrangements**

The gifts and hospitality register is monitored regularly by the COO and the audit committee.

This policy will be reviewed every year by the audit committee and approved by Trustees.

## **9. Links with other policies**

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Accounting policy

## Appendix 1: gifts and hospitality register

Date	Name	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted/rejected	Approved by