



Gifts and Hospitality Policy

2021-24

A handwritten signature in black ink, appearing to be "J. Taylor", written over a horizontal line.

CEO SIGNATURE

A handwritten signature in black ink, appearing to be "J. T. Jones", written over a horizontal line.

CHAIR OF TRUST BOARD SIGNATURE

17.11.21

DATE

3 years

NEXT REVIEW DATE



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1. Introduction

1.1.1. This policy aims to ensure that:

- The Trust's funds are used only in accordance with the law, its Articles of Association, its funding agreement and the latest Academy Trust 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;
- Directors fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors; and
- Members, Directors, Governors 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.

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2. Legislation and Guidance

2.1.1. 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 be seen to compromise the personal judgement or integrity of Members, Directors, staff and/or any other representative of the Trust.

2.1.2. This policy also complies with our Funding Agreement and Articles of Association.

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3. Definitions

3.1.1. **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.

3.1.2. **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.

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4. Roles and Responsibilities

4.1. Members, Directors, Governors and staff

4.1.1. Members, Directors, Governors 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 over £50 on the gifts and hospitality register (see Appendix 1) within 7 working days, even if declined;
- School staff **must** consult their Headteacher(HT)/Head of School(HOS) before accepting or offering any gifts or hospitality with a value of over £50. The School's HT/HOS **must** also notify the Director of Finance and Operations ("DFO") of any such transactions within 7 working days, even if declined;
- HT/HOS, central hub staff and Directors **must** consult the DFO before accepting or offering any gifts or hospitality with a value over £50;
- If the DFO is the recipient, or intended recipient, of any offer of gifts or hospitality they **must** record these on the gifts and hospitality register. Where the value is over £50 they **must** consult the CEO prior to any such transactions; and
- If the CEO is the recipient, or intended recipient, of any offer of gifts or hospitality they **must** record these on the gifts and hospitality register. Where the value is over £50 they **must** consult the Chair of the Trust Board prior to any such transactions.



4.2. Directors

- 4.2.1. Directors 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.
- 4.2.2. This will be achieved by scrutinising the gifts and hospitality register on an annual basis as part of the Finance and Audit committees delegated responsibilities.

4.3. The Headteacher(HT)/Head of School(HOS)

- 4.3.1. The HT/HOS is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.
- 4.3.2. The HT/HOS 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.
- 4.3.3. They will also ensure, alongside the DFO, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £30 are in line with this policy.

4.4. The Director of Finance and Operations

- 4.4.1. The DFO will 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 Academy Trust Handbook;
 - The directors, CEO and Headteachers/Head of Schools are provided with information on gifts and hospitality received and given, as appropriate;
 - They will also ensure, alongside the Headteacher/Head of School, 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 Central MAT team

4.5.1. The central MAT team is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

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5. Acceptable Gifts and Hospitality

5.1. Offers of gifts and hospitality received

- 5.1.1. Members, Directors, Governors 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.
- 5.1.2. Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, members, directors and staff must consult the DFO or HT/HOS.
- 5.1.3. 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 DFO or HT/HOS.
- 5.1.4. Any gifts or hospitality offered with a value of over £50 **must** be recorded on the gifts and hospitality register within 7 working days, even if declined. Any Member, Director, Governor or member of staff who is offered such gifts or hospitality must consult the relevant individual as stipulated in s4.1.1.
- 5.1.5. 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. Gifts from parents

5.2.1. It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £50 these are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register. Where gifts valued over £50 are accepted, they must be recorded in the register.

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5.3. Offers of gifts and hospitality given

5.3.1. As a general rule the Trust does not offer gifts and hospitality to anyone.

5.3.2. The only exception to this is a working lunch may be provided to visitors but this **must** not be extravagant. A maximum value of £50 per person should be used as a guideline and **must** not include the purchase of any alcohol.

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6. Unacceptable Gifts and Hospitality

6.1.1. The following must never be offered or accepted:

- Monetary gifts;
- Gifts or hospitality offered to family members, partners or close friends of Members, Directors, Governors or staff;
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process; and
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time, which for the purposes of this policy are any gifts or hospitality with a value of over £150.

6.1.2. This list is not intended to be exhaustive.

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7. Declining Gifts and Hospitality

- 7.1.1. Any Member, Director, Governor or staff member who is offered any of the unacceptable gifts or hospitality outlined in section 6 above should politely decline the offer.
- 7.1.2. If they feel it would not be appropriate for them to decline, they should refer the matter to the HT/HOS or DFO. The HT/HOS or DFO 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.
- 7.1.3. Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the Trust has deemed unacceptable.
- 7.1.4. 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.

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8. Monitoring Arrangements

- 8.1.1. The gifts and hospitality register is monitored regularly by the DFO and by the Finance and Audit Committee on an annual basis.

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Appendix 1: gifts and hospitality register

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