

GIFTS AND HOSPITALITY

January 2022

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
- 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

Legislation and guidance

This policy is based on the [Academies Financial 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, trustees, staff and/or any other representative of the trust.

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

This policy takes into consideration the requirements under the UK Bribery Act 2010

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.

Roles and responsibilities

Trustees and staff

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 over £25 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Chief Finance Officer or Headteacher before accepting or offering any gifts or hospitality with a value of over £25.

Headteacher

The Headteacher is responsible for ensuring that staff and Trustees are aware of and understand this policy, and that it is being implemented consistently.

The 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 Finance Officer, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

Chief Finance Officer

The Chief Finance Officer 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 Academies Financial Handbook
- The Trustees and Headteacher are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Headteacher, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

Acceptable gifts and hospitality

Offers of gifts and hospitality received

Trustees and staff can accept gifts and hospitality that have a value of up to £25. 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, Trustees and staff must consult the Chief Finance Officer or Headteacher.

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 Chief Finance Officer or Headteacher.

Any gifts or hospitality offered with a value of over £25 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any Trustees or member of staff who is offered such gifts or hospitality must consult the Chief Finance Officer or Headteacher before accepting.

If the Headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the Chair 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.

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.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Chief Finance Officer and receipts must always be enclosed.

The Chief Finance Officer or Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £25.

Unacceptable gifts and hospitality

The following must never be offered or accepted:

- Monetary gifts
- 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.

Declining gifts and hospitality

Any Trustees or staff member who is offered any of the unacceptable gifts or hospitality outlined above should politely decline the offer.

If they feel it would not be appropriate for them to decline, or despite declining the gift or hospitality is still presented to them they should refer the matter to the Headteacher or Chief Finance Officer (in the case of the Headteacher being the recipient they should refer the matter to the Chair of Trustees). The Headteacher or Chief Finance Officer 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 disciplinary matter.

Discussed and approved by Governors' Finance and Staffing committee: 26 January 2022

Next Review: January 2024

Appendix 1: Gifts and Hospitality Register

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