GIFTS & HOSPITALITY POLICY

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Approved by:	Finance, Audit & Risk Committee
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Contents

1. Aims 2
2. Legislation and guidance 2
3. Definitions 2
4. Roles and responsibilities 3
5. Acceptable Gifts of Hospitality 4
6. Unacceptable Gifts and Hospitality 4
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 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.
- 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 over £50.00 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined.
- Must consult the Chief Financial & Operating Officer or Headteacher/ Headteacher/ Head of Academy before accepting or offering any gifts or hospitality with a value of over £50.00.

4.2 Trustees

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 Headteacher/ Headteacher/ Head of Academy

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

The Headteacher/ Headteacher/ Head of Academy 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 Financial & Operating Officer, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50.00 are in line with this policy.

The Headteacher/ Headteacher/ Head of Academy is responsible for communicating the Trust's rules and expectations about gift-giving to parents.

4.4 Chief Financial & Operating Officer

The Chief Financial & Operating 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 Academy Trust Handbook
- The Trustees, CEO and Headteacher/ Headteacher/ Head of Academy are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the CEO, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50.00 are in line with this policy.

4.5 The Office Manager

The office manager is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

4.5 Parents

The Trust understands that parents may wish to provide staff with gifts on certain occasions. Parents should be guided to review this policy for information relating to any restrictions on gift giving in line with the Trust's approach:

- Gift-giving is not discouraged by the Trust and 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 members of school staff.
- The Trust prevents teachers and other staff from accepting gifts from any one individual that has a value of more than £50.00. Collective gifts of more than £50.00 are accepted provided no one individual has contributed more than £50.00.

5. Acceptable Gifts of Hospitality

5.1 Offer of gifts and hospitality received.

Members, Trustees and staff can accept gifts and hospitality that have a value of up to £50.00. 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 Chief Financial & Operating Officer or Headteacher/ Head of Academy.

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 Financial & Operating Officer or Headteacher/ Head of Academy.

Any gifts or hospitality offered with a value of over £50.00 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 Chief Financial & Operating Officer or Headteacher/ Head of Academy before accepting.

If the CEO or Headteacher/ Head of Academy 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 Offer 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 £50.00 per head should be used as a guideline.

Alcohol must not be purchased out of the school or Trust budgets.

Expense claims should be made to the Trust Finance Team, once approved by the relevant Line Manager and receipts must always be enclosed.

The Chief Financial & Operating Officer or CEO must be consulted about any proposal to provide gifts or hospitality with a value of over £50.00.

6. 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.

7. Declining Gifts and Hospitality

Any members, Trustees 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 Chief Financial & Operating Officer. The CEO or Chief Financial & Operating 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 staff disciplinary matter.

8. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the Chief Financial & Operating Officer and the Trust Finance Manager.

The board of Trustees have delegated responsibility for reviewing this policy to the Finance, Audit & Risk Committee every two years or sooner if required.

9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Financial Regulations Policy
- Trust Financial Regulations

Appendix 1: Gifts and Hospitality register

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED /REJECTED	APPROVED BY

The Gifts & Hospitality Register should be completed for all individual gifts over £50.00 as specified in the Trust's Gifts and Hospitality Policy. It is recommended that this register is periodically signed by an appropriate member of staff or the Board of Trustees to confirm nil returns.