



Gifts and Hospitality Policy

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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 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 be seen to compromise the personal judgement or integrity of members, trustees, staff and/or any other representative of the trust. It 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 £100 on the gifts and hospitality register within 28 working days, even if declined.
- Must consult the Finance Director or Principal before accepting or offering any gifts or hospitality with a value of over £100 (either individually, or if multiple gifts of the same nature offered during the year, then where these sum to more than £100 in a 12-month period).
- In the interests of safeguarding children, and to prevent staff from being open to accusation of exerting undue influence, no member of staff is permitted to give a gift to a student at any time unless this “gift” relates to a pre-approved award scheme, approved by the Leadership Team, as part of school policy.
 - Must record any gift(s) from a student or the parent/s of a student over the value of £100 on the gifts and hospitality register (either individually over £100, or if multiple gifts of the same nature offered during the year, then where these sum to more than £100 in a 12-month period).

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 Principal

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

The Principal 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 Finance Director that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £100 are in line with this policy (either individually, or if multiple gifts of the same nature offered during the year, then where these sum to more than £100 in a 12-month period).

The Principal will report any declared gifts or donations as they arise to the Finance Director, and no later than by the end of the following month. A nil return must be submitted in writing if no gifts or donations have been received in that month.

4.4 The Finance Director

The Finance Director will ensure that:

- The trust maintains a gifts and hospitality register
- The Principal has reported any declared gifts or donations as they arise, and no later than by the end of the following month. A nil return must be submitted in writing if no gifts or donations have been received in that month.



- 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 academy trustees and Principals are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the principal that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £100 are in line with this policy (either individually, or if multiple gifts of the same nature offered during the year, then where these sum to more than £100 in a 12-month period).

4.5 Parents

Teaching unions have often pointed out that present giving has become over-commercialised and competitive. The Trust encourage pupils/parents to consider other alternatives in the first instance, these can include-:

- Gifting to the school
- Give to charity

5. Acceptable gifts and 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 £100 (either individually, or if multiple gifts of the same nature offered during the year, then where these sum to more than £100 in a 12-month period). 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 Finance Director or Principal.

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 Finance Director or Principal.

Any gifts or hospitality offered with a value of over £100 (either individually, or if multiple gifts of the same nature offered during the year, then where these sum to more than £100 in a 12-month period) must be recorded on the gifts and hospitality register within 28 working days, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the Finance Director or Principal before accepting.

If the Principal is the recipient, or intended recipient, of any offer of gifts or hospitality over £100 (either individually, or if multiple gifts of the same nature offered during the year, then where these sum to more than £100 in a 12-month period) they must inform the CEO and Finance Director 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 £100 should be used as a guideline (either individually, or if multiple gifts of the same nature offered during the year, then where these sum to more than £100 in a 12-month period).

Alcohol must not be purchased out of the trust or academy budget.

In exceptional circumstances it may be deemed appropriate for the trust or academy to thank a person for their service to the trust or offer condolences to family members and show their gratitude by buying a small gift.

The Finance Director must be consulted about any proposal to provide gifts or hospitality with a value of over £100 (either individually, or if multiple gifts of the same nature offered during the year, then where these sum to more than £100 in a 12-month period).

Expense claims should be made to the line manager of the person making the claim and receipts must always be enclosed. Please see the Financial Regulations Manual for more detail about expense claims.

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 except in relation to clause 5.2 above
- 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 Principal or Finance Director. The Principal or Finance Director 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 Finance Director and annually by the External Auditors as part of the preparation of the Annual Report and Accounts.

9. Other policies

This policy should be read in conjunction with:

- Academies Trust Handbook
- Financial Regulations Manual
- Staff code of conduct and other relevant HR policies