

# Gifts and Hospitality Policy

*For the purposes of this policy, 'the Trust' refers to **The Trust and all schools** within the Trust*

Monitoring and review	
Author	Helen Reeves
Approver	Trustees
Owner	Helen Reeves, Director of Human Resources
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## **1. Purpose of This Policy**

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, 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

## **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.

## **5. Roles and Responsibilities**

### **5.1 Members, Trustees, Governors and Staff**

Members, trustees, 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 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Chief Finance Office or Headteacher before accepting or offering any gifts or hospitality with a value of over £50.

### **5.2 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.

### **5.3 The Headteacher**

- The Headteacher is responsible for ensuring that staff 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 £50 are in line with this policy.
- The Headteacher is responsible for communicating the school/trust's rules and expectations about gift-giving to parents.

### **5.4 The 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 Academy Trust 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 £50 are in line with this policy.

## 5.5 The Governance Professional

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

## 6. Acceptable Gifts and Hospitality

### 6.1 Offer of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of £50. These must be 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 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 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee, governor 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 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.

### 6.2 Offer of Gifts and Hospitality Given

- Refreshments for meetings involving external visitors or whole day training/strategy events may be catered from the school's budget providing that cost per head is reasonable
- Colleagues may give each other gifts funded from their own money, including collections for staff who are leaving or celebrating a special occasion
- Schools who have agreements with HMRC may give staff "Thanks you" gift cards to the value of £20 as an instant thank you for exceptional effort. Such awards are at the Headteacher's discretion
- Schools may send gifts such as flowers or fruit to staff on leave such as maternity, long-term sick leave at the Headteacher's discretion and subject to affordability
- Catering (excluding alcohol) for school celebratory events for all staff may be reasonably funded from school budgets at the discretion of the Headteacher and subject to affordability
- Staff may claim business mileage at the HMRC standard rate for essential business journeys. Mileage is counted from the usual workplace and return journey to the workplace. Business

mileage does not apply from the employee's home to their usual workplace. Staff driving on company business are responsible for ensuring their vehicle insurance includes business use. The school/Trust accepts no liability in this regard.

- Staff may claim reasonable travel expenses and subsistence in line with the Travel & Subsistence Policy when away from their usual workplace on company business.
- Claims for travel and subsistence must be submitted on the appropriate form, authorised by a senior manager and processed via payroll. Claims must be submitted within three months of the event.

Any gifts or hospitality provided by the Trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £50 per head 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 relevant line manager and receipts must always be enclosed.

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

## **7. 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.

## **8. 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 Headteacher or Chief Finance Officer. 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 staff disciplinary matter.

## **9. Monitoring Arrangements**

The gifts and hospitality register is monitored regularly by the Chief Finance Officer.

This policy will be reviewed every year by the Human Resources Director and approved by the Policy Review Committee.

## **10. Links with Other Policies**

This gifts and hospitality policy is linked to the:

- Staff Code of Conduct
- Disciplinary Policy
- Finance Policy

## Appendix A: Gifts and Hospitality Register

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