



POLICY FOR GIFTS AND HOSPITALITY

Presented to:

Trustees Resource Committee

21 March 2019

Date approved: ¹	21 March 2019
Date adopted:	
Date reviewed: ²	
Date of next review: ³	

¹ This is the date the policy was approved by the meeting

² This is the date the policy was reviewed prior to its approval above

³ This is the date as set by the policy review clause or the date approved plus two years

- Headteacher also means Head of College and Principal
- School also means College, Academy or Academies
- References to School are taken to mean any school within the Four Cs Multi-Academy Trust

Contents

	Page
1. Aims	3
2. Legislation and Guidance	3
3. Definitions	3
4. Roles and Responsibilities	3
5. Acceptable Gifts and Hospitality	4
6. Unacceptable Gifts and Hospitality	5
7. Declining Gifts and Hospitality	5
8. Monitoring Arrangements	5
9. Links With Other Policies	5
10. Review	5
11. Appendix 1: Gifts and Hospitality Register	6

1.0 Aims

This policy aims to ensure that:

- Trust 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 as charitable trustees and company directors.
- 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.

Where Trustees are mentioned in this policy, this relates to all levels of Governance, ie Members, Trustees and Local Governing Committee members.

2.0 Legislation and Guidance

This policy is based on the Academies Financial Handbook, which states that 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 Trustees, Staff and/or any other representative of the Trust. This policy also complies with our funding agreement and articles of association.

3.0 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.

4.0 Roles and Responsibilities

4.1 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 £50 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined.
- Must consult the Chief Financial Officer (CFO) or Headteacher before accepting or offering any gifts or hospitality with a value of over £50.

4.2 Academy 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 Chief Executive Officer (CEO) and Headteachers

- The CEO and Headteachers are responsible for ensuring that Staff are aware of and understand this policy, and that it is being implemented consistently.
- The CEO and Headteachers 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 Trust and schools and to those outside the organisation.
- They will also ensure, alongside the CFO and Trust Finance Manager 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.

4.4 The Chief Financial Officer (CFO) and Trust Finance Manager (TFM)

The CFO and Trust Finance Manager 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 CEO/Headteachers are provided with information on gifts and hospitality received and given, as appropriate.
- They will also ensure, alongside the CEO and Headteachers, 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 Trust Finance Manager

The Trust Finance Manager is responsible for maintaining the gifts and hospitality register on a day-to-day basis, established on the information provided to them.

5.0 **Acceptable Gifts and Hospitality**

5.1 Offers Received

- Trustees 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.
- Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, Trustees and Staff must consult the CFO 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 CFO or Headteacher.
- 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. Anyone who is offered such gifts or hospitality must consult the CFO 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.

5.2 Offers 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 per head should be used as a guideline.

Expense claims should be submitted to the Finance Office and receipts must always be enclosed.

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

6.0 **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 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.

7.0 **Declining Gifts and Hospitality**

Any 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 CFO. The Headteacher or CFO 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 register, in line with this policy, will be dealt with as a staff disciplinary matter.

8.0 **Monitoring Arrangements**

The gifts and hospitality register is monitored regularly by the CFO.

9.0 **Links with Other Policies**

This policy is linked to the:

- Staff code of conduct.
- Staff disciplinary procedures.
- Accounting policy.

10.0 **Review**

The Trust Board will review this policy in line with the procedure for policy review.

Date for Review

If no other reason for review, this policy will be reviewed every three years by the Trustees with the next review being Summer 2022.

Appendix 1: Gifts and Hospitality register

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

- Headteacher also means Head of College and Principal
- School also means College, Academy or Academies
- References to School are taken to mean any school within the Four Cs Multi-Academy Trust