



Built on botheredness . . .

the **enquire**  
learning trust

## **Gifts and Hospitality Policy**



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## Version History

<b>Approved by:</b>	Trustees
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Date	Author	Version	Comment
July 2019	PK / JY	1	
July 2021	PK	2	Reviewed
July 2023	JO	3	Reviewed and updated: - Gift register template added - Hospitality register added

## 1. Introduction

This Policy aims to set out guidelines which will enable the Trust to meet its aims and core values to protect individuals from misunderstanding or criticism.

Inevitably some issues will affect Trustees and senior post holders more than others and some breaches of the policy may be regarded more seriously for those in such positions. This policy should be read in conjunction with the Trust's Finance Policy and Fraud Policy.

The principle of integrity requires that Trustees and employees should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted must be declared and recorded.

## 2. Gifts

Employees must not accept cash, or personal gifts with a significant monetary value, under any circumstances, although items of nominal value, (i.e. approximately £75.00 or below) or free promotional pens, calendars, diaries and similar items, may be accepted.

Personal gifts may not be solicited under any circumstances.

When employees have to decline a gift, staff should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.

All gifts received must be recorded by each academy in the Trust's gifts register, which will be maintained by the Director of Finance (DOF). The link to the Trust Gift Register (one tab per academy) can be found here - [Gift Register.xlsx](#)

## 3. Hospitality

Employees should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should employees offer such hospitality to others on behalf of Trust. The timing of hospitality in relation to procurement or purchasing decisions that Trust may be taking is especially sensitive. Above all, staff must never solicit hospitality. As a general rule, staff should not accept hospitality that Trust would not reciprocate in similar circumstances.

When employees have to decline hospitality, staff should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy. If necessary, staff should pay a share of any costs, and claim these in the ordinary way.

### Acceptable Hospitality

Employees may accept modest working meals and light refreshments without making any declaration. Other hospitality may be accepted, for instance where:

- An event is clearly part of the life of the community or where Trust should be seen to be represented.
- The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal. Before accepting any hospitality, approval should be sought from either the DOF or the Principal or Vice Principal in respect of employees. In exceptional circumstances retrospective approval may be obtained.
- All hospitality received must be recorded in Trust's hospitality register with the exception of working meals, receptions etc.

- Sponsorship where an outside organisation wishes to sponsor or is seeking to sponsor the activity of Trust, whether by invitation, tender or negotiation, or voluntarily, the basic conventions concerning the award of contracts, and acceptance of gifts or hospitality apply.

### Hospitality Register

- The DOF will maintain a Hospitality Register for the Trust and for senior leadership team. It will be the responsibility of individuals to ensure that the DOF is notified of all hospitality given or received. Expense claims where hospitality is to be provided by Trust this should be approved in advance by the CEO or DOF, Principal in respect of employees. In exceptional circumstances retrospective approval may be obtained. All hospitality provided must be recorded in Trust's hospitality register – link here - [Hospitality Register.xlsx](#)
- Any hospitality provided should not be extravagant and a maximum figure of £40 per head should be used as a guideline. This figure may be increased by the Trustees if it deems appropriate. Claims for reimbursement of expenses should be made on the relevant Expense Claim Form and submitted to the DOF for authorisation. Receipts should always be enclosed. Wherever possible hospitality for school activities including inset day meetings should be funded through unrestricted funds. Alternatively authorised invoices from the suppliers can be paid in accordance with the normal procedures.

### Review of this policy

Trustees to review this policy every 3 years. It may however review this policy earlier than this if the government produces new regulations, or if it receives recommendations on how this policy might be improved.