

Gifts and Hospitality Policy



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Contents

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
Appendix 1: gifts and hospitality register	6

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This policy relates to all schools within the Arden Forest C of E Multi Academy Trust.

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 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.

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
- Gifts or hospitality over £50 must be approved by the Headteacher (or by the Chair of the LGB, if the headteacher is the gift recipient) and recorded in the school's register. The CFO must be consulted to ensure consistency across the Trust and will maintain oversight of the central register, reporting to the Trust Board/Audit & Risk Committee.
- The Trust will ensure all staff are aware of this policy and the requirement to record gifts and hospitality in line with the Scheme of Delegation.

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 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.

Gifts or hospitality over £50 must be approved by the Headteacher (or by the Chair of the LGB, if the headteacher is the gift recipient) and recorded in the school's register. The CFO must be consulted to ensure consistency across the Trust and will maintain oversight of the central register, reporting to the Trust Board/Audit & Risk Committee.

4.4 The chief financial officer

The chief financial officer (CFO) 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 academy trustees and headteacher are provided with information on gifts and hospitality received and given, as appropriate

Gifts or hospitality over £50 must be approved by the headteacher (or by the Chair of the LGB, if the headteacher is the gift recipient) and recorded in the school's register. The CFO must be consulted to ensure consistency across the Trust and will maintain oversight of the central register, reporting to the Trust Board/Audit & Risk Committee.

5. Acceptable gifts and hospitality

5.1 Offers of gifts and hospitality received

Members, 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, members, 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.

Gifts or hospitality over £50 must be approved by the Headteacher and recorded in the school's register. The CFO must be consulted to ensure consistency across the Trust and will maintain oversight of the central register, reporting to the Trust Board/Audit & Risk Committee.

If the headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must record the offer on the gifts and hospitality register which is reviewed termly by the LGB and CFO. Where the value is over £50 the headteacher must seek approval from the chair of the LGB and record the offer on the gifts and hospitality register.

If the CEO, CFO and COO are the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must record the offer on the gifts and hospitality register which is reviewed termly by the MAT Board. Where the value is over £50 they must seek approval from the chair of the MAT Board 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. Please note this does not include the long service gift referenced in 5.2.

5.2 Offers of gifts and hospitality given

There are some circumstances where it is appropriate to offer hospitality. This includes lunch where external agencies are asked to work over a lunch period or an entire day. Any hospitality will have a maximum value of £50 per head although in most cases be considerably less than this. When the Trust provides gifts or hospitality, the business case must be documented, the decision must be within the Scheme of Delegation, and it must meet the standards of propriety and regularity set out in the Academy Trust Handbook.

Visitors to the school will also be offered refreshments such as tea or coffee.

Gifts to staff will not be purchased out of the school's budget. Any gifts purchased will be made from collections. The only exception to this is for long term service of over 25 years. The school should make the CFO aware that a member of staff is approaching their 25 years anniversary of continuous service at the same school. The MAT will arrange for a purchase of a £50 gift card for that staff member.

In exceptional cases, such as the retirement or long service of governors or trustees, the MAT may approve a modest gift (not exceeding £50) as a token of appreciation. Any such gifts must be in line with the Scheme of Delegation and recorded in the register.

Alcohol must not be purchased out of the school budget.

Expense claims should be made following the school's expense procedure.

Offers of gifts or hospitality given over £50 must be pre-approved by the Headteacher (or by the Chair of the LGB, if it is the Headteacher) and recorded in the school's register. The CFO must be consulted to ensure consistency across the Trust and will maintain oversight of the central register, reporting to the Trust Board/Audit & Risk Committee.

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 will be determined by the Chair of Trust on a case-by-case basis.

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 CFO who will bring it to the attention of the Chief Executive Officer (CEO). The 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 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 CFO.

This policy will be reviewed every three years by the CFO and approved by the Finance Committee of the Arden Forest C of E Trust Board.

9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Finance policy

Appendix 1: gifts and hospitality register

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

APPENDIX 2

REGISTER OF GIFTS AND HOSPITALITY

Governors and staff declaration form

I wish to declare the following information in accordance with the Governing Body's requirements that a Register of Gifts and Hospitality should be maintained.

Name:
Post:
Signature:
Date:
You should provide full details of your declaration below, including a nil return:
Declaration of gifts and hospitality:
Date gift received:
From whom Gift or hospitality received: