



Mater Ecclesiae

Catholic Multi Academy Trust

'One Family in Christ'

Gifts and Hospitality Policy





Document Control

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1. Introduction and background

The purpose of this policy is to outline the approach for the acceptance by staff, Governors and Directors, of gifts and hospitality of whatever nature from outside the Trust, whether from individuals or organisations. The policy also outlines the approach to the offering of gifts and hospitality by the Trust, which aligns to requirements identified by the Academy Trust Handbook.

2. Who is responsible for this policy?

The Trust's Directors have overall responsibility for the effective operation of this policy and for ensuring compliance with any relevant legislation. Responsibility for day-to-day adherence to the policy is delegated to the Executive Leadership Team and Headteachers.

3. Who is covered by the policy?

This policy covers all employees at all levels and grades, including trainees, part-time and fixed-term employees. It does not apply to agency staff and self-employed contractors.

4. Acceptance of hospitality

- 4.1 Offers of modest hospitality should only be accepted if there is a genuine need to represent the Trust in the development of legitimate and ethically sound business relationships.
- 4.2 The acceptance of hospitality must take into consideration the person or organisation making the offer, as well as the nature of any current or potential future relationship with them.
- 4.3 If patterns of accepting hospitality occur, by whom, the nature of, or the source of should be investigated to ensure that there is no underlying unethical conduct.
- 4.4 Examples of where it may be reasonable to accept hospitality include:
 - Attendance at events such as conferences, sporting or civic events, cultural events central to the life of the Trust, or demonstrations of services or equipment, where there is a clearly demonstrable case for the Trust's presence.
 - Working meals when it forms a part of an appropriate event and is modest and proportionate.
- 4.5 Overnight hospitality relating to any of the above examples should be approved by the Chief Financial Officer prior to being accepted.
- 4.6 If hospitality is offered but subsequently declined due to being outside this policy, the person or organisation making the offer should be made aware of the Trust's Gifts and Hospitality policy.

5 Acceptance of gifts

5.1 Any gifts intended for the Trust overall must be forwarded as appropriate by the person receiving it.

5.2 Examples of where personal gifts offered to employees include:

- Modest gifts of promotional character, e.g. calendars, diaries, or pens, particularly if they are the type of gift ordinarily made by that organisation.
- Modest gifts to teachers and Academy support staff, made by parents or carers up to the value of £30.
- Gifts up to the value of £30.

5.3 The definition of a gift includes:

- A tangible item or service given for personal or professional use.
- Loans of equipment for personal use.
- Discounts on tangible items or services given for personal benefit.

6 Giving of gifts and hospitality

6.1 The Trust will not routinely fund the giving of gifts to individuals or organisations, in recognition that monies received and held by the Trust are public funds for the provision of education. This includes flowers, leaving gifts and charitable donations.

6.2 Staff may fund gifts relating to staff and governor welfare through staff collections.

6.3 Examples of gifts that may be given include:

- The awarding of small gifts or prizes to pupils that recognise achievement
- Provision of light refreshments at public or parent meetings that promote the school or Trust, or provides information about pupils, and where the event has a clearly defined purpose. This cost should not exceed £5 per person
- Modest refreshments provided as part of meetings
- Small gifts, for example flowers for guest speakers or volunteers up to the value of £50
- Small gifts, for example flowers, for longstanding employees who leave up to the value of £50
- Flowers for Trust colleagues, in exceptional circumstances, for example who are ill or experiencing personal difficulties, up to the value of £50

6.4 Hospitality for staff, such as occasional working lunches, may be provided up to a value of £30 per person. These do not have to be added to the Register but should be monitored by the Headteacher and Chief Financial Officer to ensure expenditure is reasonable.

6.5 In accordance with the Academy Trust Handbook, the purchase of alcohol using Trust funds is forbidden, except where it is to be used in religious services.

7 Procurement

- 7.1 The Financial Regulations Handbook details the processes for procurement. Consideration must be given to any potential influence, that may be inferred from the acceptance of hospitality or gifts. This applies to current or potential future relationships.

8 Registration and monitoring of gifts and hospitality

- 8.1 Staff, governors and Directors must notify their Headteacher (for Academies) or the Chief Financial Officer (for the central Trust and Directors) if they wish to accept a gift or hospitality exceeding £30. This notification should be in advance of acceptance if possible, and if not within 10 working days.
- 8.2 For each Academy, School Business Managers will maintain a Register of Gifts and Hospitality, and will submit this on request for review and inclusion in audits and statutory reports. The registers will be monitored by the CFO at least annually.

9 Compliance

- 9.1 Breaches of this policy should be notified promptly to the Chief Financial Officer.
- 9.2 The Registers of gifts and hospitality will be reviewed at least annually by the Chief Financial Officer.

10 References and resources

- Academies Handbook [Academy trust handbook 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901237/academy-trust-handbook-2024.pdf)
- Academies Accounts Direction [Academies accounts direction 2023 to 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901237/academies-accounts-direction-2023-to-2024.pdf)
- Charity Law [Charity purposes and rules - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/charity-purposes-and-rules)