



GIFTS AND HOSPITALITY POLICY

APRIL 2024

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Policy author	Director of Operations
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Updates December 2024

Section 5.1	Removal of: <i>“If the Head teacher/Head of school is the recipient or intended recipient of any offer of gifts and hospitality they must inform the chair of the board of trustees and record the offer on the gifts and hospitality register.”</i> To reflect that the Head teacher/Head of school is governed by the same limits as all Staff, Trustees and Members.
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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 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 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, vouchers, 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.

Please note, that cash is not defined as a gift and therefore cannot be accepted under this policy.

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

- 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 £25 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined

- Must consult the chief financial officer or [headteacher/Head of School before accepting or offering any gifts or hospitality with a value of over £25.

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/Head of School

The headteacher/Head of School is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The headteacher/Head of School 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 financial officer, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

The headteacher/Head of School is responsible for communicating the school/trust's rules and expectations about gift-giving to parents.

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/Head of School are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the headteacher/Head of School, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

4.5 The Director of Compliance

The Director of Compliance is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

5. ACCEPTABLE GIFTS AND HOSPITALITY

5.1 Offer of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of up to £25. 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/Head of School.

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/Head of School.

Any gifts or hospitality offered with a value of over £25 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the CFO or headteacher/Head of School before accepting.

Declarations should be sent using the form in Appendix A, to the Director of Governance and Compliance - katherine.sullivan@hopelearningcommunity.org.uk

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. UNACCEPTABLE GIFTS AND HOSPITALITY

The following must never be offered or accepted:

- Cash 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.

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 headteacher/Head of School. The headteacher/Head of School 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 Director of Compliance, CFO and Director of Operations.

This policy will be reviewed annually and approved by the board of trustees.

9. LINKS WITH OTHER POLICIES

This gifts and hospitality policy is linked to the:

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

APPENDIX A – Declaration of Gifts and Hospitality Form

Declaration of Gifts and Hospitality

Trustees, Governors and Staff Declaration Form

I wish to declare the following information in accordance with the Trust Board's requirements that a Register of Gifts and Hospitality should be maintained in accordance with the Gifts and Hospitality Policy

Name:
Post/School:
Signature:
Date:
Provide full details of gifts and hospitality received. This includes gifts that may be received from parents. As per policy the following do not need to be declared: <ul style="list-style-type: none">• modest gifts of a promotional character, e.g. calendars, diaries and other similar articles.• gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation.
Date gift/hospitality received:
From whom gift or hospitality was received:

