



# SMALL GIFTS & HOSPITALITY POLICY

<b>Approval Date</b>	February 2022
<b>Policy owner</b>	Michelle Wilkins, Director of Finance
<b>Policy model</b>	Compliance: all RSAT schools to use this policy
<b>Review Date</b>	Spring 2023
<b>Regulatory Requirements Met</b>	Section 5.32 of "Academy Trust Handbook 2021"

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## **1.0 Aims**

This policy aims to ensure that:

- The Trust's 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
- 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

## **2.0 Legislation and Guidance**

This policy is based on the [Academies Financial Handbook](#), which states that Academy Trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit that 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.

## **3.0 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.

For the purpose of this policy, gifts are for the value of less than £100. For gifts greater than £100 please refer to the Donations 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.

## **4.0 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.

- Must record any gifts or hospitality offered to them or the Trust with a value of over £20 on the gifts and hospitality register (see Appendix 1) within 7 working days, even if declined.
- Must consult the Director of Finance or Headteacher before accepting or offering any gifts or hospitality with a value of over £20.

#### **4.2 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 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.

They will also ensure, alongside the Director of Finance, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £20 are in line with this policy.

#### **4.4 The Director of Finance**

The Director of Finance 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 Trust's trustees and Headteachers are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Headteacher, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £20 are in line with this policy.

#### **4.5 The Office Manager**

The Office Manager for each school is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

### **5.0 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 £20, 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 Director of Finance 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 Director of Finance or Headteacher.

Any gifts or hospitality offered with a value of over £20 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 Director of Finance 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 the Local Governing Body 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 Offer of gifts and hospitality given**

Any gifts or hospitality provided by the Trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £20 per head should be used as a guideline.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Headteacher and receipts must always be enclosed. Pre-approval must be acquired before any expenditure is incurred.

The Director of Finance or Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £20.

## **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 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

## **7.0 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 or Director of Finance. The Headteacher or Director of Finance 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.

## **8.0 Monitoring Arrangements**

The gifts and hospitality register is monitored regularly by the Executive Business Managers (EBM).

This policy will be reviewed annually by the Director of Finance and approved by the Finance Committee.

## APPENDIX 1: Declaration of Gifts and Hospitality Form

Receiving benefits, gifts, rewards or hospitality in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. Staff are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible.

If you have received or wish to declare a gift or hospitality, please complete the form and return to the Executive Business Manager.

### Details of employee receiving gift or hospitality

<b>Full Name</b>	
<b>Job Title</b>	
<b>Date of Declaration</b>	

### Description of gift or hospitality

<b>Description of gift / hospitality</b>	
<b>Value/estimated value of gift / hospitality</b>	
<b>Purpose of the offer</b>	
<b>Person/organisation providing the gift or hospitality</b>	
<b>Relationship to the person/organisation offering the gift or hospitality</b>	
<b>Acceptance of gift / hospitality</b>	Yes / No

### Approved by

<b>Signature</b>	
<b>Date</b>	
<b>Name</b>	
<b>Job Title</b>	

### Policy History

<b>Policy Date</b>	<b>Summary of change</b>	<b>Contact</b>	<b>Version/ Implementation Date</b>	<b>Review Date</b>
January 2022	Updated template. Addition of "Regulatory Requirements Met" on cover page	Finance	February 2022	Spring 2023
February 2021	New policy implemented	Finance	V1-February 2021	February 2022