Gifts & Hospitality Policy

Agreed by the Board of Trustees (RAR)

Autumn 24

Version – Final D

Company Number: 07728828

Registered Office: Wroughton Junior School, Inverary Road, Swindon SN4 6DL

Version Control

Version	Date	Status	Author (AU) / Approver (AP)
Draft 01	02/19	Completion of first draft	AG (AU)
Final – A	03/02/19	Ratified by Local Governing Body	GB(AP)
Draft 02	27/07/21	Completion of review & updates	PB
Final B	12/10/2021	Ratified by Board of Directors	Trust Board (AP)
Draft 03	30/08/2023	Completion of review & updates	PB (AU)
Final C	Sept 23	To be ratified by RAR	RAR (AP)
Final D	Autumn 24	To be ratified by RAR, changes as below.	SR (AU) RAR (AP)

Review

Next Review	Autumn 2026

Updates

Page	Updates
	27/07/21 • Academies Handbook • Directors from Trustees • Head of School from Head Teacher • RAR Committee from Resources Committee • Removed - Must consult the Chief Financial & Operations Officer, the School Business Manager before accepting or offering any gifts or hospitality with a value of over £25. • Added 4.5 Staff • All staff are aware of this policy and are aware of the procedure in reporting such gifts. • HoS to inform chair of the academy committee not chair of directors.
Page 3 & 5 Page 5	Change value of gift from £25 to £40 Head of School to Headteacher
	Autumn 2024: Change value of gift from £40 to £25 Change references from Director to Trustee CFOO to CFO 5.1 Offer of gifts over £25 – inform CFO not Chair of AC

1. Purpose of the Policy

The academy trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academies 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, governors 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 & Guidance

This policy is based on the Academies 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, directors, governors, 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 & Responsibilities

4.1 Members, trustees, governors 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

4.2 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.

4.4 The Chief Finance Officer (CFO)

The 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 Academies Handbook
The trustees, academy governors and Head Teacher are provided with information on gifts and hospitality received and given, as appropriate

4.5 Staff

All staff are aware of this policy and are aware of the procedure in reporting such gifts.

4.6 Parents

We do appreciate that parents/carers and children like to offer small tokens of gratitude from time to time. We do not wish to discourage all gift-giving; small tokens of gratitude are always appreciated, but never expected.

5. Acceptable Gifts & Hospitality

5.1 Offers of gifts and hospitality received

Members, trustees, governors 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, governors and staff must consult the CFO or Head teacher.

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.
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.
If the Headteacher, or intended recipient, of **any** offer of gifts or hospitality, they must inform the CFO 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 Offers of gifts and hospitality given

Annually, a small budget is allocated to hospitality for small working lunches or food for staff during training days. This cost centre is monitored monthly by the CFO, Headteacher and RAR committee.
It is not permitted that gifts can be purchased for staff using funds from the school budget.
Staff expenses whilst working away from school always have to be pre-authorised by the Headteacher or CFO absence. Staff members are not entitled to claim expenses at the cost of the school.

Any gifts or hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £15 per head should be used as a guideline.
Alcohol must not be purchased out of the school budget.

6. Unacceptable Gifts & 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, governors 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 & Hospitality

Any member, trustee, governor 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 CFO. The Headteacher or 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 2 years by the CFO and approved by the trustees.

9. Linked with other Policies

This gifts and hospitality policy is linked to the:
Staff code of conduct
Staff disciplinary procedures
Finance Procedures Policy

Appendix 1: gifts and hospitality register

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