



Gifts & Hospitality Policy

Approved by:	Finance, Audit & Risk Committee	Date: 25 th November 2019
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1. Aims

This Policy aims to ensure that:

- Greensand Multi-Academy Trust (the Trust) 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;
- Staff, Governors, Trustee and Members within the Trust 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 staff, Governors, Trustees Members and/or any other representative of the Trust.

This Policy also complies with our Funding Agreements 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 Staff, Governors, Trustee and Members

Staff, Governors, Trustee and Members:

- 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 a school within the Trust, or 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 £50, including any collective class gift with a value exceeding £50, on the appropriate gifts and hospitality register (see Appendix 1 & Appendix 2) within 7 school days, even if declined;
- Must consult the Chief Executive Officer (CEO) or Finance and Operations Director (FOD) if they are a Headteacher, a member of the Trust's Central Team, a Trustee or Member, or the

appropriate Headteacher if they are a Governor or member of staff, before accepting or offering any gifts or hospitality with a value of over £50.

4.2 Trustees

The 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 Headteachers

The Headteacher of each member school within the Trust is responsible for ensuring that staff are aware of and understand this Policy, and that it is being implemented consistently.

The Headteachers within the Trust 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 their school and the Trust and to those outside the organisation.

Each Headteacher must ensure that there is a gift and hospitality register in place for their school and that this is regularly monitored and maintained.

They will also ensure, alongside the CEO or FOD that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50 are in line with this Policy.

4.4 The Finance and Operations Director

The Trust's FOD will ensure that:

- The Trust maintains a Gifts & 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 Trustees and Headteachers are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the Headteachers, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50 are in line with this Policy.

4.5 Maintenance of the Gifts & Hospitality Registers

School level: Each School Business Manager (SBM) is responsible for maintaining their individual school's gifts and hospitality register (see Appendix 1) on a day-to-day basis. The SBM must ensure that any gifts or hospitality offered to their staff or Governors with a value of over £50 is recorded on their individual school's gifts and hospitality register within 7 school days, even if declined.

Trust level: The Trust's Lead Governance Professional is responsible for maintaining the Trust's Gifts & Hospitality Register (see Appendix 2) on a day-to-day basis. The Lead Governance Professional must ensure that any gifts or hospitality offered to the CEO or FOD, a Headteacher, a member of the Trust's Central Team, Trustees or Members with a value of over £50 is recorded on the Trust's Gifts and Hospitality Register within 7 school days, even if declined.

Registers are accessible for viewing by the following appropriate officers: CEO, FOD, Lead Governance Professional, Trust Finance Manager, HR, SBM, Headteacher, Members, Trustees, Governors, external auditors and internal auditors.

Any request by a member of the public to view a gifts & hospitality register will be referred to the FOD. In considering any request, they will balance the requirement for the Trust to be open and transparent against the requirements of the Data Protection Act 1998.

5. Acceptable gifts and hospitality

5.1 Offers of gifts and hospitality received

Staff, Governors, Trustee and Members can accept gifts and hospitality that have a value of up to £50. These **do not** have to be pre-approved or recorded on a gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, staff, Governors, Trustee and Members must consult the CEO or FOD, or Headteacher, as appropriate.

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 CEO or FOD, or Headteacher, as appropriate.

Any gifts or hospitality offered with a value of over £50 must be recorded as follows:

- **School level: members of staff & Governors – each gift is to be recorded on their individual school’s gifts and hospitality register. Each entry in the register is to be signed off as approved by the Headteacher;**
- **Trust level: CEO or FOD, a Headteacher, members of the Trust’s Central Team, Trustees or Members – to be recorded on the Trust’s Gifts and Hospitality Register, and each entry is to be signed off as approved by the CEO or Chair of Trustees as appropriate.**

All register entries must be recorded within 7 school days of the offer of any gifts or hospitality, even if declined.

Any staff member, Governor, Trustee or Member who is offered such gifts or hospitality must consult the CEO or FOD, or Headteacher, as appropriate before accepting.

If a Headteacher, the CEO or FOD is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the Chair of Trustees and record the offer on the Trust’s Gifts and Hospitality Register and, for Headteachers, also on their own school’s 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.

If no gifts are received during a term, the SBM should record on the school’s gifts and hospitality register that no gifts were received and the Headteacher should sign the register to formally acknowledge this.

5.2 Offers 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 £15 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 SBM or FOD, as appropriate, and receipts must always be attached.

The CEO or FOD or Headteacher, as appropriate, must be consulted about any proposal to provide gifts or hospitality with a value of over £50.

6. Unacceptable gifts and hospitality

The following must never be offered or accepted:

- Monetary gifts (excluding gift cards);
- Gifts or hospitality offered to family members, partners or close friends of staff, Governors, Trustee or Members;
- 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 staff member, Governor, Trustee or 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 CEO or FOD or Headteacher, as appropriate. The CEO or FOD or Headteacher may decline the offer, or donate the gift or hospitality to a worthy cause, and must also record the offer on the Trust's Gifts & Hospitality Register or the individual school's gifts and hospitality register, as appropriate.

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 an individual school's gifts and hospitality register, or on the Trust's Gifts & Hospitality Register, in line with this Policy, will be dealt with as a staff disciplinary matter.

8. Monitoring arrangements

The member schools' individual gifts and hospitality registers will be monitored regularly by the SBM at their school. A paper copy of the register must be kept and available for inspection at all times.

Each SBM is required to provide an up-to-date scanned copy of the completed and signed off school's gift and hospitality register for the previous term to the Trust's Lead Governance Professional within the first two weeks of the new term so that registers can be regularly monitored and reviewed by the Trust's Finance, Audit & Risk Committee (FARC).

This Policy will be reviewed every two years by the FARC and approved by the FARC.

9. Links with other policies

This Gifts and Hospitality Policy is linked to the:

- Staff code of conduct of the Trust member schools;
- Staff disciplinary procedures of the Trust member schools;
- Accounting Policy for the Greensand MAT.

Appendix 2:



Gifts and Hospitality Register for Greensand MAT for (insert term & year) 20??

Date	Name of party offered the gift / hospitality (staff member, Trustee or Member)	Description of gift / hospitality & approximate value	Name of party offering the gift / hospitality	Accepted/Rejected? (A or R)	Approved by CEO/FOD/Chair of Trustees (signature)