



## GIFTS & HOSPITALITY POLICY

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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 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. 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 which 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. 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 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 Headteacher or Chief Financial Officer before accepting or offering any gifts or hospitality with a value of over £20

## **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**

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 Chief Financial Officer, 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 Chief Financial Officer**

The Chief Financial Officer 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 academy trustees and Headteacher are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Headteacher, 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 Clerk to the Kickstart Academy**

The Clerk to the Kickstart Academy is responsible for maintaining the gifts and hospitality register on a day-to-day basis and should be notified of all gifts and offers of hospitality covered by this policy.

## **4.6 Parents**

The Trust does not wish to discourage all gift-giving and small tokens of gratitude are always appreciated. The Trust acknowledges at certain times during the academic year (eg Christmas, end of year, specific student achievements), parents may wish to give the Trust's staff gifts as a token of appreciation. Staff members in receipt of a gift with a value greater than £10 should consult with the Headteacher prior to accepting the gift and the Clerk should also be notified for incorporation into the register.

# **5. Acceptable gifts and hospitality**

## **5.1 Offers 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 Headteacher or Chief Financial Officer.

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 Headteacher or Chief Financial Officer.

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 Headteacher or Chief Financial Officer 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 board of trustees 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**

There may be occasions where the Trust provides gifts/hospitality to others. The most common example of this is parental engagement events, such as coffee mornings, and gifts for members of staff when leaving, retiring etc. The Headteacher has responsibility for purchasing these items and will use their discretion regarding value, while being mindful of spending public funds.

Until a separate policy is put in place, the Trust will follow Telford College's Expenses Policy. The policy sets out the types of expenses staff can/cannot claim when working off-site and the process for claiming expenses.

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.

With the exception of claims by the Headteacher, all expense claims should be authorised by the Headteacher prior to submission and receipts must always be enclosed. The Headteacher's expenses will be authorised by their line manager.

The Chief Financial Officer must be consulted about any proposal to provide gifts or hospitality with a value over £25.

## **6. 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. 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 Chief Financial Officer. The Headteacher or Chief Financial Officer 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 Chief Financial Officer.

This policy will be reviewed every three years by the Finance & Audit Committee 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 policies