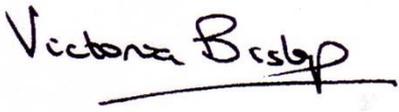


Title	HAT Gifts and Hospitality Policy
Reviewed	September 2018
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Associated Policies	
Originator	Colin Hinds
Approved	

Acceptance of Gifts and 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, directors 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, Directors 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 £25 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined

- Must consult the Director of Finance and Operations or Principal / Head of School before accepting or offering any gifts or hospitality with a value over £25.

4.2 Academy Directors

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 Principal / Head of School

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

They 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 and Operations 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.

4.4 The Director of Finance and Operations

The Director of Finance and Operations 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 Directors (including the CEO) and the Principal / Head of School are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Principal / 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 Assistant to the Director of Finance and Operations

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

4.6 Parents

Whilst it is not the Trust's wish to discourage all gift-giving and the Trust recognises that small gifts of gratitude are always appreciated. Parents should be mindful that the Trust prevents staff from accepting gifts which are considered to be lavish or excessive. Parents should therefore keep in mind the Trust's prescribed limit of £25, when considering buying gifts for staff members.

5. Acceptable gifts and hospitality

5.1 Offers of Gifts and Hospitality Received

Members, Directors 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, Directors and staff must consult the Director of Finance and Operations or Principal / 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 Director of Finance and Operations or Principal / Head of School.

The overriding rules governing the acceptance of gifts, benefits and hospitality are that:

- 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 Director of Finance and Operations or Principal / Head of School before accepting.
- Your conduct in a private capacity must not foster the suspicion of any conflict between your official duty and your private interests.
- Your conduct whilst acting in an official capacity must not give the impression to any member of the public or to any organization with whom you deal or to your colleagues that you have been, (or may have been) influenced by a gift or consideration to show favour or disfavour to any person or organization.
- You must not accept gifts, benefits or hospitality either directly or through a third party (i.e. a family member or friend) that would, or might appear to:
 - a) place you under any obligation to an individual or organization making the offer
 - b) compromise your impartiality or otherwise be improper.
- Any gifts or hospitality must be refused if either you or the Trust are in any doubt about the propriety of accepting them.
- The Chief Executive Officer is the final arbiter on the advisability of acceptance or refusal of gifts and hospitality.

If the CEO / Principal / Head of School 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

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 in any circumstance.

Expense claims should be made to the Director of Finance and Operations or Principal / Head of School and receipts must always be enclosed.

The Director of Finance and Operations or Principal / Head of School must be consulted about any proposal to provide gifts or hospitality with a value of over £20 per head.

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, Directors or staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process prior to or immediately after contract award.
- 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, Directors 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 Director of Finance and Operations or Principal / Head of School, or donate the gift or hospitality to a worthy cause, and must also record the offer and donation 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 Finance and Operations and will be subject to periodic inspection by the Trust's Internal and External auditors, a report on the outcome of which will be shared with the Trust Board of Directors.

This policy will be reviewed by the Director of Finance and Operations and approved by the Trust Audit Committee.

9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures

Appendix 1: Gifts and Hospitality Register

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