



GIFT AND HOSPITALITY POLICY

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Table of Contents

Introduction.....	3
Policy Statement	3
Purpose	3
Guiding principles	3
Definitions	4
Roles and responsibilities	4
Members, Trustees, Staff and Volunteers	4
The Principal/Headteacher.....	4
The Chief Operating Officer	4
The Finance Director	4
Acceptable gifts and hospitality.....	4
Offers of gifts and hospitality received	4
Offers of gifts and hospitality given.....	5
Unacceptable gifts and hospitality	5
Declining gifts and hospitality.....	5
Monitoring arrangements.....	6
APPENDIX 1: Gifts and hospitality register	7

Introduction

Leading Edge (the 'Trust') is a team of school leaders that aim to be Leading Edge and pioneering in their approach to education and well-being. We are a growing family of like-minded schools that offer a values-based education to the communities we serve and welcome staff, students, parents/carers and volunteers from all different ethnic groups and backgrounds.

The term 'Trust Community' includes all staff, trustees, governors, students, parents/carers, volunteers and visitors.

We are a values-based Trust, which means all actions are guided by our three 'Es' as follows:

- **Excellence** – 'Outstanding quality'
- **Evolution** – 'Continuous change'
- **Equity** – 'Fairness and social justice'

This policy is based on the value of 'Equity'

Related policies

This Gifts and Hospitality policy should be read in conjunction with:

- Staff code of conduct
- Staff disciplinary procedures
- Finance policy

Policy Statement

Purpose

This policy outlines the Trust's approach with regard to the giving and receiving of gifts and hospitality by its Members, Trustees and Staff arising from duties undertaken on behalf of the Trust.

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 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 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.

Guiding principles

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 Members, Trustees, Staff and Governors.

This policy also complies with the Trust's funding agreement and articles of association.

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.

Roles and responsibilities

Members, Trustees, Staff and Volunteers

- 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 Principal/Headteacher, CEO or COO, dependant on value and in line with this policy, before accepting any gifts or hospitality.
- Must 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.

The Principal/Headteacher

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

The Principal/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.

The Chief Operating Officer

The Chief Operating 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 Trustees and Headteacher/Principal are provided with information on gifts and hospitality received and given, as appropriate

The Finance Director

The Finance Director is responsible for managing the central gifts and hospitality register which is updated by school business/finance managers on a regular basis.

Acceptable gifts and hospitality

Offers of gifts and hospitality received

Members, Trustees, Staff and Volunteers 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, Staff and Volunteers must consult the Finance Director, Chief Operating Officer or Principal/ 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 Finance Director, Chief Operating Officer or Principal/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. Any Member, Trustee, Staff member or Volunteer who is offered such gifts or hospitality must consult the Principal/Headteacher before accepting in the first instance or the Chief Operating Officer if the value of the gift or hospitality is over £100.

If the Principal/Headteacher is the recipient, or intended recipient, of any offer of gifts or hospitality over £25, they must inform the Chief Executive Officer 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.

Offers of gifts and hospitality given

Any gifts or hospitality provided by the Trust, such as a working lunch for visitors, gifts of flowers for bereaved staff must not be extravagant. A maximum value of £25 per head should be used as a guideline for gifts. A maximum value of £10 per head should be used as a guideline for hospitality. Rates will not exceed the HMRC staff entitlement rate.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Business Manager/Finance Manager and receipts must always be enclosed.

In exceptional circumstances The Headteacher/Principal can provide gifts or hospitality with a value of up to £25. The Chief Operating Officer must be consulted about any proposal to provide gifts or hospitality with a value of over £25.

Unacceptable gifts and hospitality

The following must never be offered or accepted:

- Monetary gifts.
- Gifts or lavish hospitality offered to family members, partners or close friends of Members, Trustees, Staff or Volunteers without prior approval from the Principal/Headteacher or Chief Operating Officer
- 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.

Declining gifts and hospitality

Any Members, Trustees, Staff or Volunteers offered any of the unacceptable gifts or hospitality outlined in the section 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 Chief Operating Officer or Principal/Headteacher. The Chief Operating Officer or

Principal/Headteacher 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.

Monitoring arrangements

A central gifts and hospitality register will be updated by school business/finance managers in individual schools and will be managed by the Finance Director.

Application of this policy will be managed by the Finance Director and will be checked during the Trust internal audit programme.

This policy will be reviewed and approved by the Board of Trustees annually.

APPENDIX 1: Gifts and hospitality register

Date	Name	Description, value and reason	Party involved	Accepted/rejected	Approved by