



MANOR
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TOGETHER

Gifts and Hospitality Policy

Approved by: MAT Directors
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1. Aims

This policy aims to ensure that:

- the Trust's funds are used only in accordance with the law, its *Articles of Association*, its *Funding Agreement* and the *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; and
- 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 of 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, Responsibilities and Approval

4.1 All Members, Trustees, Local Governors and staff

All Members, Trustees, Local 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;
- use their official position to further their private interests or the interests of others; or
- solicit gifts or hospitality.

All Members, Trustees, Local Governors and staff **must**:

- obtain authorisation from the relevant person, as described in this policy, before accepting or offering any gifts or hospitality with a value of over £25; and
- without delay, submit a *Gifts and Hospitality Form* (see Appendix 1) for any gifts or hospitality offered to or accepted by them or the Trust, with a value over £25. The information on the *Gifts and Hospitality Form* must be included on the *Gifts and Hospitality Register* within 7 working days of when the offer was made – even if it is declined (see Appendix 2).

4.2 Staff

If a member of staff (other than the CEO or Headteacher/Head of School) is the recipient/giver, or intended recipient/giver of any offer of gifts or hospitality with a value of more than £25, they must submit a *Gifts and Hospitality Form* (Appendix 1) – even if it is declined.

Before they or the Trust can accept or offer gifts or hospitality with a value of over £25, staff must obtain formal authorisation from their Headteacher/Head of School on the *Gifts and Hospitality Form*. The Headteacher/Head of School will consult the CEO and Finance Director before approving or declining any request made via a *Gifts and Hospitality Form*.

Once the Headteacher/Head of School has signed to complete the form and/or approve or decline the request, the member of staff must submit the form to the School Business Manager to include on the school's *Gifts and Hospitality Register*.

4.3 Members, Academy Directors and Local Governors

Academy Directors 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.

If an Academy Member, an Academy Director or a Local Governor is the recipient/giver, or intended recipient/giver of any offer of gifts or hospitality with a value of more than £25, they must submit a *Gifts and Hospitality Form* (Appendix 1) to the Chair of Directors and Finance Director without delay – even if the offer is declined.

Before an Academy Member, an Academy Director, a Local Governor, or the Trust, can accept or offer gifts or hospitality with a value of over £25, they must obtain formal authorisation from the Chair of Directors on the *Gifts and Hospitality Form*. If the Chair of Directors is the recipient/giver, or intended recipient/giver, they must obtain authorisation from the Vice Chair of Directors and Finance Director.

The Finance Director must ensure the offer is included on the *Gifts and Hospitality Register*.

4.4 Headteacher/Head of School

The Headteacher/Head of School:

- is responsible for ensuring that all staff in their school are aware of and understand this policy, and that it is being implemented consistently; and
- 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.

If a Headteacher/Head of School is the recipient/giver, or intended recipient/giver of any offer of gifts or hospitality with a value of more than £25, they must submit a *Gifts and Hospitality Form* (Appendix I) to the CEO and Finance Director without delay – even if it is declined.

Before the Headteacher/Head of School or the Trust can accept or offer gifts or hospitality with a value of over £25, they must obtain formal authorisation from the CEO and Finance Director on the *Gifts and Hospitality Form*.

Once the CEO and Finance Director have signed to complete the form and/or approve or decline the request, the Headteacher/Head of School must submit the form to the School Business Manager to include on the school's *Gifts and Hospitality Register* within 7 days of the offer being made.

4.5 Finance Director

The Finance Director will ensure that:

- the Trust maintains an up to date *Gifts and Hospitality Register*;
- they include offers made to and by Members, Trustees and Local Governors on the *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*; and
- the Trustees, Local Governors and Headteachers/Heads of School are provided with information on gifts and hospitality received and given, as appropriate.

4.6 School Business Manager

The School Business Manager in each school is responsible for maintaining the *Gifts and Hospitality Register* for their school on a day-to-day basis and must communicate any and all updates to the Finance Director without delay.

5. Acceptable Gifts and Hospitality

5.1 Offer of Gifts and Hospitality Received

Members, Trustees, Local 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, Local Governors and staff must consult the relevant person detailed for authorisation above.

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 relevant person detailed for authorisation in section 4 above.

Failure to declare any offer of gifts or hospitality in line with this policy will be treated as a disciplinary matter.

5.2 Offer of Gifts and Hospitality Given

Any gifts or hospitality provided by the Trust, such as a working lunch for visitors, thank you gifts for volunteers must not be extravagant. A maximum value of £25 should be used as a guideline.

The Headteacher/Head of School must be consulted about any proposal to provide gifts or hospitality with a value of £25.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Headteacher/Head of School and receipts must always be enclosed for any member of staff claiming for expenses incurred in their job role when attending courses etc.

6. Unacceptable Gifts and Hospitality

The following must never be offered or accepted:

- Monetary gifts – including cash, vouchers or gift cards;
- Gifts or hospitality offered to family members, partners or close friends of Members, Trustees, Local 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; or
- 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 Member, Trustee, Local Governor or staff member who is offered any of the unacceptable gifts or hospitality outlined in section 6 above should politely decline the offer and submit a *Gifts and Hospitality Form* (Appendix 1) to be included on the *Gifts and Hospitality Register* (Appendix 2).

If they feel it would not be appropriate for them to decline, they should refer the matter to the relevant person detailed for authorisation in section 4 above, who may:

- a. decline the offer; or
- b. donate the gift or hospitality to a worthy cause – to be agreed with the CEO.

The offer must still be recorded on the *Gifts and Hospitality Register*.

8. Non-Compliance

Disciplinary action will be taken against anyone who:

1. fails to decline gifts or hospitality the Trust has deemed unacceptable; or
2. fails to declare any gifts or hospitality offered in line with this policy.

9. Monitoring Arrangements

The *Gifts and Hospitality Register* is regularly monitored by the CEO.

This policy will be annually reviewed by the Finance and General Purposes Committee and approved by the Directors.

10. Links With Other Policies

This *Gifts and Hospitality Policy* is linked to the:

- *Staff Code of Conduct*
- *Staff Disciplinary Procedures*
- *Governor Standards of Conduct, Behaviour and Practice*
- *Accounting Policy*

Appendix I: Gifts and Hospitality Form

Name		
Job title and school		
Please tick: <input type="radio"/> An offer was made to me by a third party <input type="radio"/> I wish to make an offer to a third party		
Please tick if applicable: <input type="radio"/> I wish to accept the offer made to me by a third party <input type="radio"/> I have declined the offer made to me by a third party		
Date the offer was made to me (if applicable)	This information must be added to the <i>Gifts and Hospitality Register</i> within 7 working days.	
Description of the gift/hospitality		
Approximate value of the gift/hospitality		
Party offering/in receipt of the gift/hospitality		
SIGN HERE		DATE
<p style="color: red;">The section below is to be completed by the designated authorising person(s)</p> Staff - authorised by Headteacher/Head of School Headteacher/Head of School - authorised by CEO and Finance Director Members, Directors and Local Governors – authorised by Chair of Directors		
Please tick: <input type="radio"/> Approve request to accept/make the offer <input type="radio"/> Decline request to accept/make the offer <input type="radio"/> Offer already declined by recipient		
APPROVER 1 NAME	SIGN	DATE
APPROVER 2 NAME	SIGN	DATE

