



Gifts and Hospitality Policy

Updated: March 2022
Produced by: Mrs E Swansbury
School Business Manager
Ratified by: To be ratified by the Board of Trustees
Signed:

Review Date: Chair of Trustees Headteacher
February 2024

This page has been intentionally left blank

Contents

1. Introduction.....	2
2. Legislation and guidance	2
3. Definitions.....	2
4. Roles and responsibilities	2
5. Acceptable gifts and hospitality received.....	3
6. Acceptable gifts and hospitality given	4
7. Unacceptable gifts and hospitality	4
8. Declining gifts and hospitality.....	5
9. Declaration of Gifts	5
10. Complaints	5
11. Monitoring and Review.....	5
Appendix 1: Gifts and Hospitality Register.....	6
Appendix 2: Register of Gifts and Hospitality Form.....	7

1. Introduction

- 1.1. This policy aims to ensure that Ryhope Infant School Academy's (the 'Academy') funds are used only in accordance with the law, our articles of association, the funding agreement and the latest Academy Trust Handbook.
- 1.2. It also aims to ensure the Academy and those associated with it, operate in a way that commands broad public support with due regard to propriety and regularity, whilst ensuring value for money, in the use of public funds.
- 1.3. This policy applies to all members, trustees and staff and details 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

- 2.1. 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/or any other representative of the Academy.
- 2.2. This policy also complies with our funding agreement and articles of association.

3. Definitions

- 3.1. 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.
- 3.2. 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.
- 3.3. 'Business Contact' refers to any person, body or organisation with which the Academy is involved on a financial or charitable basis (including contractors, developers, consultants and charities). This also includes business contacts who are potential suppliers (i.e. they are tendering for future business).

4. Roles and responsibilities

- 4.1. 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.
 - use their official position to further their private interests or the interests of others.
 - solicit gifts or hospitality

- 4.2. Members, trustees and staff **must**:
- record any gifts or hospitality offered to them or the Academy with a value of over £25, on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined.
 - consult the School Business Manager (SBM) or Headteacher before accepting or offering any gifts or hospitality with a value of over £25.
- 4.3. Academy trustees will ensure that the Academy's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.
- 4.4. The Headteacher is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.
- 4.5. 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 Academy and to those outside the organisation.
- 4.6. The Headteacher will also ensure, alongside the SBM, that decisions on whether individuals or the Academy can accept or offer gifts or hospitality with a value of over £25, are in line with this policy.
- 4.7. The SBM will ensure that:
- a gifts and hospitality register for the Academy is maintained.
 - 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.
 - Academy trustees are provided with information on gifts and hospitality received and given, as appropriate and;
 - alongside the Headteacher, 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.

5. Acceptable gifts and hospitality received

- 5.1. All personal gifts should be refused, donated to charity, shared among staff or subject to a staff raffle unless they come within one of the following categories:
- Low cost, functional items suitable for business use rather than personal use and displaying the supplier's logo e.g. diaries, pens and calendars.
 - Gifts on the conclusion of any courtesy visit to or from an outside organisation, providing these are of a sort normally given by that organisation
 - Gifts offered by parents/carers or pupils to Academy staff to express their thanks up to the value of £25. All staff must refuse all gifts of money.
- 5.2. Where hospitality in the form of meals and drinks is offered by a business contact, this is only acceptable where it forms part of a normal business meeting (e.g. meals at evening meetings).
- 5.3. Offers of hospitality to specific events, such as a dinner or sporting event, must only be accepted after authorisation from the Headteacher (or in the case of the Headteacher, authorisation from the hair of Trustees). These would normally only be

approved where there is a clear and demonstrable benefit to the Academy and the hospitality would not expose the Academy to criticism that the business contact was exerting undue influence. These do not need to be recorded in the Register of Gifts and Hospitality.

- 5.4. Visits by employees to exhibitions, conferences, business meals and social functions in connection with the Academy's business and authorised by the Academy, shall be at the Academy's expense.
- 5.5. 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 Headteacher or SBM before accepting.
- 5.6. If the Headteacher is the recipient, or intended recipient, of any offer of gifts or hospitality, they must be declared to the Chair of Trustees in writing.
- 5.7. Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a disciplinary matter.

6. Acceptable gifts and hospitality given

- 6.1. The Academy will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented in the Gift and Hospitality Register (Appendix 1) and has regard to the propriety and regularity of the use of public funds.
- 6.2. This does not apply to:
 - The award of gifts, prizes etc related to the achievement of pupils
 - The award of gifts to individuals who have provided a voluntary service to the Academy (e.g. Trustee, Volunteer), where the gift does not exceed £25 and has regard to the propriety and regularity of the use of public funds.
- 6.3. Expenditure on staff gifts such as leaving flowers is deemed as contentious expenditure by ESFA and an improper use of public funds, therefore such expenditure must not be committed to.
- 6.4. Hospitality such as working lunches, coffees, catering on training courses and modest hospitality in the form of meals etc., are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not for their family or friends). These would not be added to the register but would be approved by the SBM or Headteacher to ensure they are of a reasonable level.
- 6.5. Hospitality provided above this level should be recorded in the register.

7. Unacceptable gifts and hospitality

- 7.1. 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 (e.g. VIP event hospitality)

7.2. This list is not intended to be exhaustive.

8. Declining gifts and hospitality

- 8.1. Any members, trustee or staff member offered any of the unacceptable gifts or hospitality outlined in section 7 above, should politely decline the offer.
- 8.2. If they feel it would not be appropriate for them to decline, they should refer the matter to the SBM or Headteacher. The SBM or 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.
- 8.3. Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the trust has deemed unacceptable.
- 8.4. 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 disciplinary matter.

9. Declaration of Gifts

- 9.1. Any gifts that are received must be declared in writing to the Headteacher on the Register of Gifts and Hospitality (Appendix 2) with the exception of those items identified in sections 5.3 and 6.2.
- 9.2. These documents shall be available for inspection by the Academy's internal and external auditors.
- 9.3. Headteacher gifts should be declared to the Chair of Trustees in writing

10. Complaints

- 10.1. Complaints regarding this policy or its application should be raised under the academy's usual complaints procedure.

11. Monitoring and Review

- 11.1. This policy is reviewed by the Board of Trustee on a biennial basis or sooner where it is deemed necessary.

Appendix 1: Gifts and Hospitality Register

Recipient	Nature of Gift / Hospitality	Donor	Date	Estimated Value (£)	Comments

NB: Comments should include the reason the offer was accepted and the use to which any gifts were put e.g. donated to academy raffle etc.

Appendix 2: Register of Gifts and Hospitality Form

REGISTER OF GIFTS AND HOSPITALITY TRUSTEE AND STAFF DECLARATION FORM

I wish to declare the following information in accordance with the Academy's requirements that a Register of Gifts and Hospitality should be maintained.

Name:

Post:

Signature:

Date:

You should provide full details of your declaration below, including a nil return.

Declaration of Gifts and Hospitality			
Date Gift / Hospitality Received	Description of Gift / Hospitality	Name of Donor	Estimated Value £

The form should be completed and returned to the Headteacher for consideration, in line with the Academy's policies.

Headteacher Declaration

I have reviewed the above gifts/hospitality and confirm these **can / cannot** (delete as appropriate) be accepted.

Signed:

Date:

In the event that gifts/hospitality cannot be kept, they must be returned to the donor with a suitable official letter. If it is not possible to return gifts, then the Headteacher will keep a record of it and decide how it is to be used. Such gifts shall remain the property of the Academy and should be included in the Register of Gifts and Hospitality.