



Gifts and Hospitality Policy

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Extol Lead:	CFO



1. Aims

This policy aims to ensure that Extol Trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest version of the Academy Trust Handbook. By adhering to this policy the Trust will display its due regard to propriety and regularity and ensure value for money in the use of public funds.

This policy will allow members, trustees, governors and employees to be 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

This policy is based on the latest version of the Academy Trust Handbook which states the following:

“Academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or other benefits that may compromise their judgement or integrity and should ensure all staff are aware of it. When making gifts, the trust must ensure the value is reasonable, is within its scheme of delegation, the decision is documented, and achieves propriety and regularity in the use of public funds.”

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

4.1 Members, trustees, governors & employees

Members, trustees, governors and employees:

- Must not give or accept gifts or hospitality 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 private interests or the interests of others



- Must not solicit gifts or hospitality
- Must consult with the CFO/ Headteacher before accepting or offering any gifts or hospitality with a value over those amounts disclosed in section 5 of this policy.
- Must disclose any gifts or hospitality offered to them or the Trust with a value of over those disclosed in section 5 of this policy to the person responsible for approving such (see 4.4)

4.2 The Headteacher

Each Headteacher within Extol Trust is responsible for ensuring that staff within their school are aware and understand this policy and that it is being implemented consistently.

Each Headteacher will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to their school, other schools in the Trust and to those outside of the organisation.

They will also come to a decision, alongside the CFO, on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over those amounts disclosed in section 5 of this policy.

4.3 Chief Finance Officer

The CFO will ensure that:

- The Trust maintains a gifts and hospitality register and that it is monitored on a monthly basis.
- Trustees are provided with information on gifts and hospitality received and given as appropriate.
- They will also come to a decision, alongside Headteachers on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over those amounts disclosed in section 5 of this policy.

4.4 Accounting Technician

The Accounting Technician is responsible for maintaining the gifts and hospitality register on a regular basis and will send a copy to the CFO at the end of every term.

4.5 Parents

Parents are advised that the aim of this policy is by no means to discourage all gift giving, small tokens of gratitude are always appreciated.

Gifts are often provided on certain celebratory occasions and at the end of the academic year. The Trust prevents all employees from directly accepting gifts over a value of £30.



5. Acceptable gifts and hospitality

5.1 Offers of gifts and hospitality received

Members, trustees, governors and employees may accept gifts and hospitality with a value of £30 per person or less. These do not require prior approval and do not need to be recorded on the Gifts and Hospitality Register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If there is any doubt regarding the appropriateness of a gift, advice should be sought from the CFO or Headteacher.

Reasonable hospitality, such as working lunches and refreshments provided during meetings, may also be accepted where there is a legitimate business purpose and accepting the hospitality does not give rise to a conflict of interest or the perception of influence.

Any gift or hospitality offered with an estimated value exceeding £30 must be declared and recorded on the Gifts and Hospitality Register within 7 working days, regardless of whether it is accepted or declined. Prior approval must be obtained from the CFO or Headteacher before acceptance. Such approval must be documented on the Gifts and Hospitality Form (Appendix 1).

If the Headteacher is the recipient, or intended recipient, of any gift or hospitality, approval must be obtained from the CFO and recorded on the Gifts and Hospitality Form (Appendix 1).

Failure to declare gifts or hospitality in accordance with this policy may be treated as a disciplinary matter.

5.2 Offers of gifts and hospitality given

Any gifts or hospitality funded by the Trust or its schools must represent an appropriate use of public funds, be reasonable in the circumstances, and must not be extravagant.

Hospitality provided to external visitors, partners, suppliers or other stakeholders, such as working lunches and refreshments, should normally not exceed £15 per person and should be proportionate to the business purpose being undertaken.

The Trust may provide gifts to employees, governors, trustees and members in recognition of occasions such as long service, retirement, bereavement, significant illness, or other exceptional circumstances.

Gifts should normally not exceed £30 per person, unless there are exceptional circumstances and additional approval has been obtained.



As gifts are funded from public monies, all gifts must receive prior approval before purchase and be recorded on the Gifts and Hospitality Register within 7 working days, irrespective of value.

Approval must be obtained as follows:

- Gifts proposed by a member of school staff must be approved by the Headteacher.
- Where the gift is proposed by, or relates to, the Headteacher, approval must be obtained from the Chief Financial Officer (CFO).
- Gifts proposed by the Trust Central Team must be approved by the CFO.
- Where a gift is proposed by, or relates to, the CFO, approval must be obtained from the Chief Executive Officer (CEO).

The reason for the gift, the recipient, the value and the approving officer must be recorded on the Gifts and Hospitality Register.

Alcohol must not be purchased using Trust or school funds.

6. Unacceptable gifts and hospitality

The following must never be offered, accepted or provided:

- Cash or cash-equivalent gifts (including vouchers that can be readily exchanged for cash).
- Gifts or hospitality offered to family members or partners of members, trustees, governors or employees.
- Gifts or hospitality from a potential supplier or tenderer immediately before tenders are invited or during a procurement or tendering process.
- Gifts, hospitality or benefits that could reasonably be perceived as influencing, or seeking to influence, a business, procurement or governance decision.

This list is not intended to be exhaustive.

7. Declining gifts and hospitality

Any member, trustee, governor or employee who is offered an unacceptable gift or hospitality as outlined in section 6 must politely decline the offer.

Where declining a gift or hospitality may be considered discourteous, culturally insensitive, or otherwise inappropriate, the recipient should notify the Headteacher or CFO as soon as reasonably practicable. The circumstances will be considered, and an appropriate course of action agreed. This may include the individual retaining the gift, the gift being shared within



the school or Trust, or it being treated as the property of the Trust. Full details should be recorded on the Gifts and Hospitality Register.

Failure to decline gifts or hospitality deemed unacceptable under this policy may result in disciplinary action.

Failure to declare gifts or hospitality in accordance with this policy may also be treated as a disciplinary matter.

