



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:

*'The academy trust should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit that might be seen to compromise their judgment 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 of financial powers, the decision is documented, and has due regard to 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 Senior Finance & Compliance Officer

The Senior Finance & Compliance Officer 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 can accept gifts and hospitality that have a value of £30 per person and below. 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, governors and employees must consult the CFO/ Headteacher.

Similarly, hospitality such as working lunches maybe accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in any doubt, guidance must be sought from the CFO/ Headteacher.

Any gifts or hospitality offered with a value of over £30 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee, governor or employee who is offered such gifts or hospitality must gain approval from either the CFO or Headteacher before accepting. This approval would need disclosing on the Gifts & Hospitality Form (Appendix 1).

If the Headteacher is the recipient, or intended recipient, of any offer of gifts or hospitality, they must seek approval from the chair of the board of the local governing body. This approval would need disclosing on the Gifts & Hospitality Form (Appendix 1).

Failure to declare any offer of gifts or hospitality 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 or schools, such as a working lunch with visitors, must not be extravagant. A maximum value of £15 per head should be used as a guideline. Prior approval for any gift would need to be sought from the CFO/ Headteacher.

If the school is providing a gift directly to an employee/governor for such things as long service then approval such be obtained by the chair of the board of the local governing body. This approval would need disclosing on the Gifts & Hospitality Form (Appendix 1).

Alcohol must not be purchased out of the school budget.

6. Unacceptable gifts and hospitality

The following must never be offered or accepted:



- Cash gifts
- Gifts or hospitality offered to family members or partners of members, trustees, governors or employees
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process

This list is not intended to be exhaustive.

7. Declining gifts and hospitality

Any members, trustee or staff member who is offered any of the unacceptable gifts or hospitality outlined in section 6 should politely decline the offer.

If they feel it would be inappropriate for them to decline, they should refer the matter to the Headteacher. The Headteacher will then decline the offer and pass the information to the Senior Finance & Compliance Officer so the gift and hospitality register can be updated.

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, in line with this policy, will be dealt with as a staff disciplinary matter.

