



GIFTS AND HOSPITALITY POLICY

Approved By: Trust Board
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1. POLICY PURPOSE

The purpose of this policy is to establish clear guidelines on the acceptance and giving of gifts and hospitality within the Trust, ensuring that all actions align with the Trust's values of transparency, integrity, and public accountability.

The intention of this policy is to ensure that the Trust can demonstrate that no undue influence has been applied or could be perceived to have been applied by any supplier or any other party dealing with the Trust. It is imperative that all business relationships are conducted with transparency and integrity to maintain public trust.

2. LEGISLATION AND GUIDANCE

This policy is developed in accordance with the Bribery Act 2010, ensuring that staff and trustees of the Trust act with integrity and do not accept or offer gifts and hospitality that could influence decisions or create conflicts of interest.

The policy aligns with the Academy Trust Handbook, issued by the Education and Skills Funding Agency (ESFA), which sets expectations for managing financial governance and maintaining transparency.

It also reflects best practice guidance from the Charity Commission regarding the acceptance and declaration of gifts, to ensure ethical conduct and accountability within the Trust.

3. PRINCIPLES AND STANDARDS OF CONDUCT

The following principles underpin this policy:

- **Honesty and Integrity:** All members of staff, trustees, and governors are expected to uphold the highest standards of honesty and integrity in all Trust-related activities. They must ensure that their personal interests do not conflict with the interests of the Trust, and they must act in a manner that preserves the Trust's reputation and standing.
- **Professional Conduct:** Members of staff, trustees, and governors must consistently act in the best interests of the Trust, conducting themselves in a way that reflects the Trust's values and principles. Professional behavior is essential to maintaining the Trust's good reputation and ensuring that all actions contribute positively to its mission.
- **Transparency and Accountability:** All decisions and actions must be carried out with full transparency and accountability. Any potential conflicts of interest must be disclosed immediately to ensure that they are managed appropriately, safeguarding the integrity of the Trust's operations.
- **Prohibition of Personal Gain:** Trust resources, including public monies, must not be used for personal benefit. Members of staff, trustees, and governors must avoid any actions that could be perceived as using their position for personal advantage, including the acceptance of gifts, hospitality, or services that could influence or appear to influence their decisions.
- **Acceptance of Gifts and Hospitality:** The acceptance of gifts or hospitality beyond a modest value is strictly prohibited. All offers of gifts or hospitality must be reported and recorded in accordance with the Trust's established procedures to ensure transparency and to withstand public scrutiny.
- **Conflict of Interest:** Members of staff, trustees, and governors are required to disclose any personal interests that may influence or appear to influence their decision-making. They must

recuse themselves from any discussions or decisions where such conflicts arise, maintaining the Trust's impartiality and fairness.

- **Commitment to Excellence:** All members of staff, trustees, and governors are expected to strive for excellence in their roles. They should seek continuous improvement in their performance and actively contribute to achieving the Trust's strategic objectives and educational mission.
- **Ethical Decision-Making:** Decisions must be guided by the best interests of the Trust, free from undue influence or personal considerations. All actions should adhere strictly to ethical guidelines, ensuring that they support the Trust's long-term goals and uphold its values.

4. ROLES AND RESPONSIBILITIES

Trust Board: The Trust Board is responsible for approving and overseeing the Gifts and Hospitality Policy, ensuring it aligns with the Trust's ethical standards and legal obligations. The Board reviews the policy annually and ensures its consistent application across the Trust.

Finance Committee: The Finance Committee reviews the Gifts and Hospitality Policy annually and recommends it to the Trust Board. The committee monitors compliance and reviews any significant issues related to gifts and hospitality.

Chief Executive Officer (CEO): The CEO is accountable for the effective implementation of the Gifts and Hospitality Policy across the Trust, aligning it with the Trust's ethical principles. The CEO also oversees the reporting and management of any significant gifts or hospitality issues.

Chief Financial Officer (CFO): The CFO is responsible for managing the recording and reporting of gifts and hospitality, ensuring all entries comply with the policy. The CFO maintains the Gifts and Hospitality Register and provides regular updates to the Finance Committee.

Headteachers: Headteachers ensure compliance with the Gifts and Hospitality Policy within their schools. They report any significant gifts or hospitality received or given to the CFO and ensure staff are aware of their obligations under the policy.

All Staff: All staff are responsible for adhering to the policy and maintaining high standards of conduct in line with the Trust's values. Staff must report any suspicions of impropriety to their line manager, Headteacher, or CFO, and should pro-actively avoid any activity that could create or suggest a conflict of interest.

5. DEFINITIONS

A gift is any item or service, award, prize or any other benefit which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public or which might be seen to compromise the personal judgment or integrity of the recipient.

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public.

6. RECEIPT OF GIFTS & HOSPITALITY

The Trust expects all members of staff, trustees and governors to exercise utmost discretion when giving and accepting gifts and hospitality in their capacity as representatives of the Trust. Particular care should be taken when accepting gifts from a person or organisation that has, or is hoping to have, a contract with the Trust.

However, it is recognised that members of staff, trustees and governors may receive hospitality and/or gifts from time to time. In general, gifts and hospitality should not be accepted, except as provided for below. If in doubt, advice should be sought from the Chief Financial Officer or Chief Executive Officer.

Members of staff, trustees and governors must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that the Trust might be placed under an obligation.

Isolated gifts of low value (up to £50) such as promotional calendars or diaries, or small tokens of gratitude including gifts from pupils, parents and guardians can be accepted. Gifts should not be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision.

Conventional hospitality (lunches, outings, tickets for events etc.) that is modest and reasonable in the circumstances may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.

Any gifts or hospitality valued at less than £50, and meeting the above criteria, can be accepted. Gifts or hospitality over £50 in value must be reported to the CFO for an entry in the Gifts & Hospitality Received Register. The entry must include the nature of the hospitality/gift, the date on which it was received, the name of the organisation/person who gave the hospitality/gift and its approximate value.

If a member of staff, trustee or governor is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school, it is their responsibility to discuss this with the CFO (similarly the CFO should raise concerns with the CEO, the CEO with the Chair of the Trust and the Chair with the Trust Board).

Where purchased items include a “free gift”, such gifts should be either used for Trust business or handed to the Trust to be used at charity raffles etc. Where a gift is received on behalf of the school, the gift remains the property of the school.

7. GIVING GIFTS & HOSPITALITY

From time-to-time, it may be appropriate to use public money to reflect the school’s thanks and appreciation to members of staff, trustees and governing body members, and/or guest speakers/visitors.

For the avoidance of doubt, the Department of Education has made it clear that it regards all alcohol as ‘irregular expenditure’ i.e. not for the purposes identified for public money. In light of this, as a Trust, we will not purchase alcohol.

The arrangements for gifts and hospitality are as follows:

- To members of staff, the Trust will allocate a fixed sum per year to each school (and a pro-rata amount to the GLT Shared Services functions) for the purposes of staff hospitality and celebration events. These will reflect the special characteristics and circumstances of the school or function. In addition, from time-to-time, the Trust may also send small gifts to individual members of staff, capped at £50 per person, such as flowers on bereavement. This

will be approved by the CEO, CFO or Headteacher.

- To trustees, governing body members and other volunteers that, in the opinion of the Trust Board, have made a significant contribution to the trust and who have completed at least one term of office (or at least 4 years in the case of volunteer), the Trust may make a gift up to a value of £50. This will be approved by the Chair or Vice Chair of the Trust Board.
- To guest speakers, school production volunteers, and other volunteers and visitors, the Trust may make a small gift to acknowledge the individual's contribution, capped at £50 per person, such as flowers. This will be approved by the CEO, CFO or Headteacher.

8. MONITORING

This Policy will be published on the Trust website in the interests of transparency and good governance. Trust expenditure on gifts and hospitality, and the register, will be monitored routinely through the accounts commentary submitted to the Trust Finance Committee.

The Trust must be able to show that all decisions are reached on the basis of value for money considerations and for no other reason. Any consideration of whether or not the principles of this policy have been breached will be determined by reference to this provision.

Any breach of this policy could lead to disciplinary action and may constitute gross misconduct. Any employee, trustee or governor who becomes aware of a breach of this policy must report it immediately to the CEO, CFO or Chair of Trust Board, who will instigate investigations as necessary.

Any personal interest that may impinge, or might reasonably be deemed by others to impinge, on an employee, trustee or governor's impartiality or conflict with the duty owed to the Trust in any matter relevant to the individual's duties (such as conflicting business interests) should be declared in writing. Anyone who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff must supply details of such transactions for entry into the Register of Business Interests.

The two registers will be held centrally by the CFO on behalf of the Trust:

- Register of Business Interests
- Gifts & Hospitality Register