



MARISH



Academy Trust

Gifts and Hospitality Policy

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Author: Deputy Headteacher

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1. 1. Aims

Marish Academy Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All trustees, staff and governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Academy Trust.

This policy aims to ensure that:

- The Academy trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest 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
- 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. 2. Legislation and Guidance

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 Trust.

This policy also complies with our funding agreement and articles of association.

3. 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. 4. Roles and responsibilities

1. 4.1 Members, trustees and staff

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

- Must not use their official position to further their private interests or the interests of others
- Must not solicit gifts or hospitality
- Must record any gifts or hospitality offered to them or the Trust with a value of over £50 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Executive Head teacher before accepting or offering any gifts or hospitality with a value of over £50

2. 4.2 Academy Trustees

Academy trustees 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.

3. 4.3 The Executive Head teacher & Substantive Head teacher

The Executive Head teacher and the Substantive Head teacher are responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The Executive Head teacher and the Substantive Head teacher 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.

They will also ensure, alongside the chief financial officer that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

4. 4.4 The Chief Financial Officer/Finance Director

The Chief Financial Officer (CFO)/finance director will ensure that:

- The Trust maintains a 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
- The Academy trustees, Executive Head teacher and/or the Substantive Head teacher are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Executive Head teacher and/or Substantive Head teacher, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

5. 4.5 The Finance Lead

The Finance Lead is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

6. 4.6 Parents

This policy does not discourage all gift-giving but instead clarifies that small tokens of gratitude are always appreciated from parents. If parents offer gifts over the value of £50 then the Trust will prevent teachers and other staff from accepting these.

5. Acceptable gifts and hospitality

1. 5.1 Offers of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of up to £50. 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 and staff must consult the Executive Head teacher or the Substantive Head teacher.

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 Executive Head teacher or the Substantive Head teacher.

Any gifts or hospitality offered with a value of over £50 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 Executive Head teacher or the Substantive Head teacher before accepting.

If a member of staff 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 Trust, other than light refreshments, it is their responsibility to discuss this with the Executive Headteacher or the Substantive Head teacher before accepting such benefit within 5 days. If acceptable, this would need adding to the register.

If the Executive Head teacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the board of trustees and record the offer on the gifts and hospitality register.

Where a gift is received on behalf of Marish Academy Trust, the gift remains the property of the trust.

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

2. 5.2 Offers of gifts and hospitality given

Any gifts or hospitality provided by the Trust, such as a working lunch for visitors are perfectly acceptable in order to support positive working relationships with visiting staff or business colleagues. However, this should not be extravagant and a maximum value of £20 per head should be used as a guideline.

The Executive Head or Substantive Head teacher do not routinely purchase gifts for staff on occasions such as birthdays and weddings. However, as a responsible employer interested in maintaining staff wellbeing and morale, the Executive Head or the Substantive Head teacher may purchase flowers or gift baskets of fruit for example: a staff member leaving, on the birth of a new child or serious illness/close bereavement.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the HR Lead and receipts must always be enclosed.

The Executive Head Teacher or the Substantive Head teacher must be consulted about any proposal to provide gifts or hospitality with a value of over £50

6. Unacceptable gifts and hospitality

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

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 above should politely decline the offer.

If they feel it would not be appropriate for them to decline, they should refer the matter to the Executive Head teacher or the Substantive Head Teacher. The Executive Head teacher, the Substantive Head teacher or finance lead 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.

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 on the gifts and hospitality register, in line with this policy, will be dealt with as a staff disciplinary matter instigated by the Executive Headteacher/Chair of Trustees.

8. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the Finance Lead and the Executive Headteacher.

9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Accounting policy

10. Policy Reviews

This policy will be reviewed every year. Next Strategic Board review due: September 2024.

Revision History

Version	Date	Author(s)	Comments
1.0	05/10/15	Executive Finance Lead	
2.0	05/10/16	Executive Finance Lead	
3.0	05/10/17	Executive Finance Lead	

4.0	20/09/18	Executive Headteacher	
5.0	August 2019	Executive Headteacher	
6.0	August 2020	Deputy Headteacher	
7.0	September 2021	Executive Headteacher	
8.0	September 2022	Finance Lead	
9.0	August 2023	Finance Lead	

Approval History

Version	Approved	Comments
1.0	Strategic Board	September 15 (No gifts added to register)
2.0	Strategic Board	September 16 (No gifts added to register)
3.0	Strategic Board	September 17 (No gifts added to register)
4.0	Strategic Board	September 18 (No gifts added to register)
5.0	Strategic Board	September 19 (No gifts added to register)
6.0	Strategic Board	September 20 (No gifts added to register)
7.0	Strategic Board	September 21 (No gifts added to register)
8.0	Strategic Board	September 22 (No gifts added to the register)
9.0	Strategic Board	September 23 (No gifts added to the register)

Appendix A

Declaration of a Gift or Hospitality

Name:	Position:
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- I have been offered a gift/hospitality which I have declined
- I have been offered a gift/hospitality which I have accepted

Date and time of offer:	
Place where offered:	

Name of organisation/person making the offer and their relationship with the school	Nature of interest / gift / hospitality	Estimate value if applicable

Reason for accepting / declining gift / hospitality:
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Signed: _____ Date: _____

Approved by: _____ Date: _____

Executive Headteacher/Chair of Trustees as applicable

On completion, please return this form to the Executive Finance Lead who will keep this and record in the Register in date order.

<input type="checkbox"/> Entered in Register	Date:	Reference:
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11. **12. Appendix B**

Declaration of Gifts and Hospitality Register

Date of entry	Name of Trustee, Governor or Staff Member	Estimated Value £	Nature of Gift / Hospitality	Supplier of Gift / Hospitality	Reason for Acceptance / Non- Acceptance	Declaration form reference