CARWARDEN HOUSE COMMUNITY SCHOOL

GIFTS & HOSPITALITY POLICY

Approved by:	Audit Risk & Resources Committee	**Date:** 19th March 2024
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1. Aims

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 Academy Trust 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. 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 compromise their personal judgement or integrity. This should include members, trustees, staff and/or any other representative of the trust. The handbook states that the trust should ensure that all staff are aware of this policy.

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

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 and responsibilities

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 £30 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined.
- Must consult the headteacher before accepting or offering any gifts or hospitality with a value of £30.

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.

4.3 The Headteacher

The headteacher is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

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 school and trust and to those outside the organisation.

They will also ensure, alongside the School Business Manager, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £30 are in line with this policy.

The headteacher is responsible for communicating the school's rules and expectations about gift-giving to parents.

4.4 The School Business Manager

The School Business Manager will ensure that:

- The trust maintains a gifts and hospitality register and is responsible on a day-to-day basis.
- 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
- The academy trustees and headteacher are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the headteacher, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £30 are in line with this policy.

5. Acceptable gifts and hospitality

5.1 Offer of gifts and hospitality received.

Members, trustees, and staff can accept gifts and hospitality that have a value of up to £30. 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 School Business Manager or Headteacher.

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 School Business Manager or 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 or member of staff who is offered such gifts or hospitality must consult the School Business Manager or Headteacher before accepting.

If the Headteacher 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.

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.

5.2 Offer of gifts and hospitality given

The academy budget can be used for the following, provided that either the School Business Manager or Headteacher has approved the expenditure first.

- When the academy hosts external providers for activities for the students (e.g. Music for Autism), a school lunch can be offered free of charge. The external provider would have to be offering their services free of charge or if it was agreed prior to the booking.
- The academy will send flowers to members of staff who are absent for long-term illness or staff family bereavement. The maximum cost for this (including delivery) should be £40.00. Staff are asked to contribute £10.00 per annum for gifts for staff leavers, big birthdays etc. If they do not contribute, then they will not receive a gift. The Audit, Risk & Resources Committee will approve the Christmas expenditure before any monies are paid out.

- Annually, the academy will pay for all staff to have a free Christmas lunch with the students. The funds for this will be paid from the School Fund.
- A £10.00 contribution towards the staff Christmas party will be paid annually. Staff who do not attend will receive a £10.00 gift voucher. This is paid from the School Fund.
- Staff can claim expenses and should refer to the Expenses Policy for clarification on what can be reclaimed and how to do this.

Any gifts or hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £10 per head should be used as a guideline.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Accounts Assistant and receipts must always be enclosed.

The School Business Manager or Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £25 if the monies are from the academy budget. If the monies are from the staff contributions, the maximum paid towards a gift will be £40.00.

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. (e.g. tickets to a theatre performance for sports venue).

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 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 Headteacher or School Business Manager. The Headteacher or School Business Manager 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.

8. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the School Business Manager.

This policy will be reviewed annually by the School Business Manager and approved by the Audit, Risk and Resources Commttee.

9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff Code of Conduct
- Staff Disciplinary Procedures
- Expenses policy

Appendix 1: gifts and hospitality register

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED /REJECTED	APPROVE DBY