



# **Holy Family**

## **Catholic Primary Trust**

### **Gifts and Hospitality Policy**

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|-----------------------------|-----------------|
| <b>Written By:</b>          | <b>SLT</b>      |
| <b>Date Written:</b>        | <b>May 2023</b> |
| <b>Reviewed:</b>            |                 |
| <b>Date to be reviewed:</b> | <b>May 2026</b> |

# 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.
- 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 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 Trustees and staff

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 £20 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the School Business Manager or Head of School before accepting or offering any gifts or hospitality with a value of over £20

## 4.2 Trustees

Trust 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 Head of School

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

The Head of School 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 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 £20 are in line with this policy.

The Head of School is responsible for communicating the trust 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
- The trustees and Executive Headteacher are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Head of School that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £20 are in line with this policy.

#### **4.5 Parents**

Head of School are to ensure parents are aware of the following:

- The trust do not wish to discourage all gift-giving, and that small tokens of gratitude are always appreciated
- Explain that gift-giving is not a requirement, and parents are not expected to buy gifts for class teachers or other trust staff

### **5. Acceptable gifts and hospitality**

#### **5.1 Offer of gifts and hospitality received**

Trustees and staff can accept gifts and hospitality that have a value of up to £20. 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, trustees and staff must consult the School Business Manager or Head of School.

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 Head of School.

Any gifts or hospitality offered with a value of over £20 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any governor or staff who is offered such gifts or hospitality must consult the School Business Manager or Head of School before accepting.

If the Executive Headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair 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 by the trust**

Any gifts or hospitality provided by the Trust such as a working lunch for visitors, must not be extravagant. A maximum value of £25 per head should be used as a guideline.

Alcohol must not be purchased out of the trust budget.

Expense claims should be made to the School Business Manager and receipts must always be enclosed.

The Executive Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £25.

### **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 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.

This list is not intended to be exhaustive.

## **7. Declining gifts and hospitality**

Any trustees or staff member who is offered any of the unacceptable gifts or hospitality should politely decline the offer.

If they feel it would not be appropriate for them to decline, they should refer the matter to the Head of School. The Head of School 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.

## Appendix 1: gifts and hospitality register

| DATE | NAME | DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE | PARTY OFFERING GIFT/HOSPITALITY | ACCEPTED /REJECTED | APPROVED BY |
|------|------|---|---------------------------------|--------------------|-------------|
|      |      |   |                                 |                    |             |
|      |      |   |                                 |                    |             |
|      |      |   |                                 |                    |             |
|      |      |   |                                 |                    |             |
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