



Gifts and Hospitality Policy

1. Aims

This policy aims to ensure that:

- The school's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academy Trust Handbook;
- The school and those associated with it operate in a way that commands broad public support;
- The school has due regard to propriety and regularity, and ensures value for money, in the use of public funds;
- Governors 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 be seen to compromise the personal judgement or integrity of members, trustees, governors, staff and/or any other representative of the school or trust. It 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 Governors and staff

Governors 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 school, beyond those of a trivial nature (e.g. calendars, pens, small boxes of chocolates etc.), on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined;
- Must consult the Chief Finance Officer or Headteacher before accepting or offering any gifts or hospitality with a value beyond those of a trivial nature as described above.

4.2 Governors

Governors will ensure that the school'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 Chief Finance Officer, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value beyond that of a trivial nature are in line with this policy.

4.4 The Chief Finance Officer

The Chief Finance Officer (CFO) will ensure that:

- The school maintains a gifts and hospitality register;
- Figures for transactions relating to gifts made by the school are disclosed in the trust's audited accounts, in accordance with the Academy Trust Handbook;
- The Governors 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 beyond those of a trivial nature are in line with this policy.

4.5 The Office Manager

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

5. Acceptable gifts and hospitality

5.1 Offer of gifts and hospitality received

Governors and staff can accept gifts and hospitality that have a value of a trivial nature. 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 CFO 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 CFO or Headteacher.

Any gifts or hospitality offered with a value beyond that of a trivial nature must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any governor or member of staff who is offered such gifts or hospitality must consult the CFO or Headteacher before accepting.

If the Headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality beyond those of a trivial nature, they must inform the chair of governors 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

Any gifts or hospitality provided by the school, such as a working lunch for visitors, must not be extravagant.

Gifts may be purchased with a maximum value of £30 from the school budget in exceptional circumstances and with the approval of the Headteacher. This is not an exhaustive list, but may include flowers for long service, bereavement, special occasions (e.g. 50th birthday), thank you to volunteers giving exceptional amounts of time.

Alcohol must not be purchased out of the school budget.

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

The CFO or Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £30.

6. Unacceptable gifts and hospitality

The following must never be offered or accepted:

- Monetary gifts. (Gift vouchers may be offered in exceptional circumstances and with approval from the CFO or Headteacher;
- Gifts or hospitality offered to family members, partners or close friends of Governors 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 Governors or staff member who are 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 CFO. The Headteacher or CFO 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 CFO and Office Manager.

Signed:	Signed
	
Mr Richard Isley Chair of Governors	Mr Nick File Acting Headteacher
Date: Spring 2022	REVIEW DATE: Spring 2025



Appendix A

REGISTER OF GIFTS AND/OR HOSPITALITY

Please use this sheet to record any gift or hospitality received as defined in the Gifts and Hospitality Policy.

Date upon which the Gift and/or Hospitality was offered / received	Person / Organisation offering or providing the Gift and/or Hospitality	Brief details of Gift and/or Hospitality offered / received	Estimated or actual value of the Gift and/or Hospitality	Any reasons for accepting the Gift and/or Hospitality

Name of person: Date placed on Register

Appendix B

OWN TRUST

**SCHOOLS' ANNUAL RETURN FOR HM REVENUE & CUSTOMS
PROVISION OF GIFTS AND REWARDS FOR EMPLOYEES**

SCHOOL: Nene Valley Primary School

RETURN FOR ACCOUNTING YEAR:

During the accounting year shown above, the following employees were provided with gifts and/or rewards, the details of which are set out below:

Name of Employee	National Insurance Number	Pay Reference	Date Gift / Reward Provided	Details of Gift / Reward Provided	Value of Gift / Reward Provided

Completed forms should be returned to Schools & Settings Finance Team **by no later than 31st April.**

Signed: Designation: Date: