



Wessex
Learning Trust
We Learn Together!

Gifts and Hospitality Policy

Date approved by Trust Board: November 2018
Review Date: September 2021

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Wessex Learning Trust
Gifts and Hospitality Policy

This policy will be reviewed by the Board of Directors every three years.

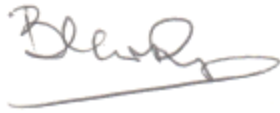
A handwritten signature in black ink that reads "Gavin Ball". The signature is written in a cursive style with a large initial 'G'.

Signature:

Name: Mr Gavin Ball

Position: Executive Headteacher

Date: 15/11/18

A handwritten signature in black ink that reads "Brian Kirkup". The signature is written in a cursive style with a large initial 'B' and a long horizontal stroke at the end.

Signature:

Name: Mr Brian Kirkup

Position: Chair of the Board

Date: 15/11/18

1. Statement of Intent

1.0 This policy aims to ensure that:

- The 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
- Directors fulfil their fiduciary duties
- Members, Directors 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

2.1 This policy is based on the Academies Financial 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. Definitions

3.1 **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.

3.2 **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, Directors 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 £25 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Chief Finance Officer/Chief Operating Officer before accepting or offering any gifts or hospitality with a value of over £25.

4.2 Directors 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 Headteachers are responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently. Staff should sign to confirm that they have read and understood the policy. Headteachers 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 to those outside the organisation. They will also ensure, alongside the Chief Finance Officer/Chief Operating Officer that decisions on whether individuals or the Trust can accept gifts or hospitality with a value of over £25, or offer a gift or hospitality with a value of £25 or under are in line with this policy.

4.4 The Chief Finance Officer/Chief Operating Officer will ensure that:

- Academies and the Trust maintain 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
- Headteachers are provided with information regarding gifts and hospitality and the requirements for recording them
- Decisions on whether individuals or the Trust can accept gifts or hospitality with a value of over £25 are in line with this policy.
- Decisions on whether a gift is made of up to £25 are in line with this policy

4.5 An individual at each Academy, for example the school Business Manager, Finance Officer or PA to the Headteacher shall be appointed by the Headteacher to maintain the gifts and hospitality register on a day-to-day basis.

5. Acceptance of Gifts and Hospitality

5.1 Members, Directors and staff can accept gifts and hospitality that have a value of up to £25. 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 Chief Finance Officer/Chief Operating Officer.

5.2 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 Chief Finance Officer/Chief Operating Officer.

5.3 Any gifts or hospitality offered with a value of over £25 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any Member, Director or member of staff who is offered such gifts or hospitality must consult the Chief Finance Officer/Chief Operating Officer before accepting.

5.4 Gifts may be received from a student or the parent/s of a student provided the gift is of nominal value but below £25.

5.5 Staff attendance at sporting and cultural events when paid for by suppliers, potential suppliers or consultants is **not** normally acceptable. Where it is considered that there is a benefit to the Academy in a member of staff attending a sponsored event, the attendance should be formally approved by the Chief Finance Officer/Chief Operating Officer prior to attendance.

5.6 If a Headteacher or the Chief Finance Officer/Chief Operating Officer is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the Chair of the Board of Directors and record the offer on the gifts and hospitality register.

5.7 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.

6. Offers of Gifts and Hospitality

6.1 The Trust recognises that there may be circumstances when it is appropriate to provide a gift or hospitality to an individual including a staff member. However, the value of the gift must be reasonable and the reason must be documented. Overall the decision to award a gift or hospitality must have due regard to propriety and regularity in the use of public funds.

6.2 The decision to offer a gift will depend on individual circumstances but it may be appropriate to provide for example a gift to a member of staff leaving after many years' of valuable service or to a member of staff in condolence or celebration of a notable event. Such gifts could include, for example a card, flowers, chocolates or a gift card.

6.3 In the interests of safeguarding children and to prevent staff from being open to accusation of exerting undue influence, no member of staff is permitted to give a gift to a student at any time unless this "gift" relates to a pre-approved award scheme approved by the Headteacher. Any gift or hospitality provided by an Academy, such as a working lunch for visitors, must not be extravagant.

6.3 The maximum value for any hospitality or gift to an individual is **£25**. Alcohol must not be provided as a gift/hospitality if purchased out of the school funds (official and unofficial).

6.4 All gifts provided must be recorded in the gifts and hospitality register (see appendix 1) and must be authorised by the Headteacher or if from the Trust, the Chair of the Board of Directors.

6.5 The following must never be offered or accepted:

- Money must never be offered as a gift.
- Gifts or hospitality offered to family members, partners or close friends of Members, Directors or Staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
- Alcohol must never be offered as a gift.
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time

7. Declining Gifts and Hospitality

7.1 Any Member, Director or staff member who is offered any of the unacceptable gifts or hospitality outlined 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 Chief Finance Officer/Chief Operating Officer who 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.

7.2 Disciplinary action may be taken against anyone who fails to decline gifts or hospitality the Trust has deemed unacceptable.

7.3 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. Review of the Policy

The Wessex Learning Trust Board will review this policy every three years or sooner if required.

Gifts and Hospitality Register - (Insert School)

Gifts & Hospitality Received					
Date	Name of Individual Receiving	Description of gift/hospitality and approximate value	Party Offering gift/hospitality	Accepted / Rejected	Approved by

Gifts & Hospitality Offered				
Date	Name of Individual Receiving	Description of gift/hospitality and approximate value	Reason for the gift/hospitality	Approved by