



Shires MAT

Gifts and Hospitality Policy

Responsible Officer : Shires MAT Chief Financial Officer (CFO)

Date of Audit & Risk Committee recommendation for approval:
7th February 2023

Approved, ratified and adopted by the Trustees (Trust Board) on
15th February 2023

A handwritten signature in blue ink, appearing to read "m m y l a b e", is written over a horizontal blue line.

Chair of Trustees

This policy will be reviewed 2 yearly on or before 15th February 2025



Contents

1. Introduction and purpose
2. Definitions
3. Gifts and Hospitality from parents, pupils and other third parties including suppliers
4. Gifts and Hospitality to Staff from the School
5. Registration of Gifts and Hospitality
6. Compliance
7. Monitoring and review

Appendix 1 - Declaration of Gifts and Hospitality form - receipt

1. Introduction and Purpose

This policy outlines the approach approved by Shires Multi Academy Trust relating to the acceptance by Trustees, Members, Governors and Staff of gifts and hospitality of any nature from outside the Trust, whether from individuals or organisations. This policy also includes the approved approach to the offering of gifts and hospitality by the Trust.

All Trustees, staff and governors are expected to maintain high standards of professionalism and propriety in all their dealings to make sure they are entirely free from any conflict of interest and at all times act within the vision of the Trust, and not accept a gift or hospitality in circumstances where it could influence, or could be seen to influence, that person's actions or decisions. The Trust and all academies will be open and transparent in declaring all gifts and hospitality whether or not accepted.

This policy has been written in accordance with the Academies Handbook which states:

“Academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or other benefits that might compromise their judgment or integrity and should ensure all staff are aware of it. When making gifts, the trust must ensure the value is reasonable, is within its scheme of delegation, the decision is documented, and achieves propriety and regularity in the use of public funds”.

2. Definitions

A “gift” is generally any item or service, award, prize or any other benefit that is received free of charge, but also includes any goods or services that a member of staff, Governor or Trustee is offered at a discounted rate or on terms not available to the general public.

“Hospitality” is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

3. Gifts and Hospitality from parents, pupils and other third parties including suppliers

Staff, Governors, Members and Trustees should always act with discretion and treat with caution any offers of gifts or hospitality. In particular, they should consider:

- the scale, amount, frequency and source of the offer
- the timing of the offer in relation to forthcoming decisions
- accepting could be misinterpreted as a sign of support or favour

Staff can accept small token gifts and hospitality (defined as having a value of up to £50.00) without the approval of the Headteacher. Gifts and hospitality of this nature do not need to be recorded in the school's gifts and hospitality register. Examples include small tokens of thanks from parents or pupils to teachers or small promotional items from suppliers such as calendars, notepads and pens. If multiple gifts from the same parent/pupil are received but exceeding this value as a whole, this must be brought to the Headteacher's attention where approval may be given.

Any gift or hospitality that is more than just a token (defined as a having a value of more than £50.00) should be considered as to its appropriateness by the individual and the Headteacher.

All offers of gifts or hospitality that have a value of more than £50.00 must be recorded on the gifts and hospitality register (see Appendix 1), even if they are not accepted.

Staff, Governors, Members or Trustees who have any doubts about an offer of gifts or hospitality should refer the matter to the Chief Finance Officer.

If staff, Governors, Members or Trustees have any concerns or doubts about the public perception that might be attached to accepting a particular gift or offer of hospitality, they should refer the matter to the Chief Finance Officer.

Examples of gifts or hospitality that should never be accepted are:

- cash or monetary gifts
- gifts or hospitality offered to husbands, wives, partners, family members or friends
- gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process
- lavish or extravagant gifts or hospitality

Where the offer of a gift or hospitality is politely refused but the giver persists in the offer, it should be referred to the Headteacher/Chair of Governors/Chair Trustees as appropriate. In such cases, it may be appropriate for the Headteacher to discuss the offer with the Chair of the local governing body and with the giver and to agree that the gift should be donated to a worthy cause.

If a staff member, Governor, Member or Trustee receives a gift on behalf of the school, the gift remains the property of the school.

No Governor, Member or Trustee is permitted to give a gift to a pupil at any time.

When school staff wish to give gifts to pupils, e.g. at the end of a school term or year, this should be with the prior approval of the Headteacher.

If the Headteacher or CEO receives a gift, the above conditions apply. If the Headteacher or CEO thinks the gift may breach any part of this policy, they must seek approval from the Chair of Trustees.

4. Gifts and Hospitality to Staff from the School

The Trust and its academies will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented and has regard to the propriety and regularity of the use of public funds.

In exceptional circumstances it may be appropriate to provide a gift of up to £50 in value, for example:

- flowers for a member of staff on long-term sick leave or bereavement
- leaving gifts to a longstanding employee who is retiring
- occasional recognition of staff up to the value of £50 in token value

This does not apply to:

- Milk, tea and coffee for visitors
- Food and/or refreshments provided for one-off occasions e.g. staff retirement, interviews, inset days, year-group celebrations

All of the above must be agreed with the Headteacher prior to purchase.

The school must never gift cash or alcohol.

For long-service awards, please refer to the long-service award policy.

5. Registration of gifts

All staff, governors, members and trustees must, within 14 days of accepting any gift or hospitality (having a value greater than £50) provide written notification to the Chief Finance Officer (Central Trust staff, CEO, Head teachers and Trust Board members) or Head teacher (academy staff and governors) using the 'Gifts and Hospitality' form (Appendix 1). All offers should be recorded, whether accepted or not. The Gifts and Hospitality form must be completed in full, setting out full details of the offer or the gift and or hospitality offered or received. Central Trust staff and Head teacher forms will be retained by the Chief Finance Officer.

6. Compliance

Any employee who becomes aware of a breach of policy must report this immediately to his or her manager who will instigate investigations, as necessary.

Disciplinary action may be taken against staff if they fail to follow this policy. Criminal action may be taken by the police if there is any evidence of fraud, bribery or corruption. It is wholly unacceptable for staff, governors and trustees to solicit for their personal benefit gifts, hospitality or other benefits from organisations or individuals outside the school in the course of performing their duties.

7. Monitoring and Review

The Chief Finance Officer shall maintain a Trust-wide register of all gifts and hospitality and this will be available for inspection by the Trust Audit and Risk Committee and reported to the Committee on an annual basis.

The Chief Finance Officer has overall responsibility for monitoring and reviewing the policy and making recommendations for updates and revisions as needed, or when there are changes in regulations and legislation that the Trust must respond to. The Audit and Risk Committee will review and sign off this policy every two years, unless there are regulatory and legislative changes within the two-year window which require the policy to be updated.

APPENDIX 1

Declaration of Gifts and Hospitality - receipt

Name: _____ Place of work:

Job title: _____

Description of item	Offered by (name and/or organisation)	Date of receipt	Did you accept the item? (Y/N)	Approximate value (£)	Approved by:

I certify that I have listed above all gifts and hospitality which need to be declared under the terms of the Trust's Gifts & Hospitality Policy (with an estimated value in excess of £50).

Signed: _____ Date: _____