



MULTI  
ACADEMY  
TRUST

## The Queen Katherine School Multi Academy Trust

### GIFTS AND HOSPITALITY POLICY

*This policy does not form part of any employee's contract of employment and we may amend it from time to time.*

<b>Committee:</b>	MAT RAF Committee
<b>Date of adoption:</b>	November 2020
<b>Date of next review:</b>	Autumn Term 2022

## Document Control Sheet

The information in the table below details earlier versions of this document with a brief description of each review and how to distinguish amendments made since the previous version date (if any)

Version Number	Amended by	Purpose	Approved by Trustees (date)
1	CFO	Original	January 2018
2		Trust Board Review	November 2020

## 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 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.

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 [Academies Financial Handbook](#) (section 5.31), which states that 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.

The policy is also based on legislation in the Bribery Act (2010). Under the Bribery Act 2010, a bribe is a financial or other type of advantage offered with the intention of inducing or rewarding improper performance of a function or activity, or knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A criminal offence will be committed under the Act if:

- An employee or associated person acting for, or on behalf of the school, offers, promises, gives, requests, receives or agrees to receive bribes
- An employee or associated person acting for, or on behalf of the school, offers, promises or gives a bribe to a public official with the intention of influencing that official in the performance of his/her duties
- And, in either case, the school does not have the defense that it has adequate procedures in place to prevent bribery.

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, governors and staff

Members, trustees, 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 trust with a value of over £50.00 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined

Must consult the Chief Financial Officer or Headteacher before accepting or offering any gifts or hospitality with a value of over £50.00

## **4.2 Academy trustees and governors**

Academy trustees and governors 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 Chief Financial Officer that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £50.00 are in line with this policy.

## **4.4 The Chief Financial Officer**

The **Chief Financial Officer** will ensure that:

The trust maintains 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

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 £50.00 are in line with this policy.

## **4.5 The School Business Manager**

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

# **5. ACCEPTABLE GIFTS AND HOSPITALITY**

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

Members, trustees, governors and staff can accept gifts and hospitality that have a value of up to £50.00. 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 Financial Officer 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 Chief Financial Officer or Headteacher.

Any gifts or hospitality offered with a value of over £50.00 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee, governor or member of staff who is offered such gifts or hospitality must consult the Chief Financial Officer 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 Offers of gifts and hospitality given**

Staff gifts, such as a weekly staff recognition award, are made at the discretion of the Headteacher, subject to a value up to £50.00.

Any gifts or hospitality provided by the trust, such as a working lunch for visitors in school, must not be extravagant. A maximum value of £10 per head should be used as a guideline. Other gifts awarded to visitors, at the discretion of the Headteacher, are subject to a value up to £50.00.

The Headteacher or Chief Financial Officer must be consulted about any proposal to provide gifts or hospitality with a value of over £50.00.

Staff are entitled to claim travel and subsistence expenses when working off site (such as when attending residential training courses). All bookings for travel or accommodation are subject to the same protocols and procedures as any other expenditure from the school budget. All expenditure must represent value for money, be approved the relevant budget holder before being submitted to the Finance Office for payment (with accompanying receipts). Travel and subsistence claims are subject to the following restrictions:

- Mileage is claimed at the standard HMRC rate of 45p/mile from the school address to the venue
- First class rail travel is not permitted
- Alcohol must not be purchased out of the school budget

## **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

This list is not intended to be exhaustive.

## **7. DECLINING GIFTS AND HOSPITALITY**

Any members, trustee, governor 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 Chief Financial Officer. The Headteacher or Chief Financial Officer 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 Chief Financial Officer and School Business Manager.

This policy will be reviewed biennially by the Chief Financial Officer and approved by the Trust Board.

## **9. LINKS WITH OTHER POLICIES**

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Financial Regulations Manual

