



FOSSE MULTI ACADEMY TRUST

Gift and Hospitality Policy and Register

Adopted by the Trust Board: November 2021

1. Guidance on Gifts and Hospitality

- 1.1 The conduct of members of staff and Trustees/governors at the Fosse MAT should never lead anyone to question their interests or lead anyone to think that they have been influenced by gifts and hospitality. Their own personal reputation and that of the school could be seriously affected if they inappropriately accept a gift or hospitality.
- 1.2 Staff and Trustees/governors at the Fosse MAT should treat with caution any offer of a gift or hospitality made to them personally; considering, in particular, whether the acceptance is a benefit to the school, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of their personal, or the school's, support or favour.
- 1.3 If in doubt, the prospective recipient should always speak to the *Head teacher the CEO or Chair of Trustees*. It is the recipient's responsibility to follow the Trust's guidance on gifts and hospitality and to justify why they chose to accept a gift or hospitality offered to them. The Trust will take disciplinary action against any member of staff or governor/Trustee if they fail to follow the guidance. It is also a criminal offence to demand or accept a gift or reward in return for being influenced on any decision as a part of the school/Trust, this could result in a prosecution.
- 1.4 This guidance applies to **all** staff and governors/Trustees at the Fosse MAT without exception.

2. Definition of a Gift

- 2.1 A gift is any item or service that an individual receives free of charge. It also includes any goods or services which are offered to the individual at a discounted rate or on terms not available to the general public.

3. Definition of Hospitality

- 3.1 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. Alcohol can not be bought under the terms of the Academy Trust Handbook.

4. GIFTS AND HOSPITALITY FROM PARENTS AND PUPILS

- 4.1 It is permissible for staff at the Fosse MAT to accept gifts from parents and pupils, for example, before Christmas and at the end of term / year.
- 4.2 Gifts of an individual value of **£30.00** or less can be accepted from parents and pupils without approval from the Head teacher or, in the case of Trust staff, the CEO. (providing that these gifts do not satisfy the conditions outlined in 4.4). These gifts **do not** need to be recorded in the *Gifts and Hospitality Register*.

- 4.3 Staff are permitted to accept gifts from groups of pupils or parents up to the value of **£100.00** (providing that these gifts do not satisfy the conditions outlined in 4.4). These gifts **do not** need to be recorded in the Gifts and Hospitality Register.
- 4.4 Staff will **not** accept:
- Cash
 - Gifts or hospitality offered to their spouse, partner, family member or friend.
 - Gifts or hospitality from a potential supplier or tenderer.
 - Lavish or extravagant gifts or hospitality.
- 4.5 Staff will consider the following before accepting gifts or hospitality:
- Whether there is any benefit to the Fosse MAT in them accepting the scale, amount, frequency and source of the offer.
 - The timing of the offer in relation to forthcoming decisions.
 - Whether accepting the offer could be misinterpreted as a sign of their, or the school or Trust's, support or favour.
- 4.6 Where staff believe the offer satisfies one of the conditions in 4.4 or is above the values outlined in 4.2 or 4.3, staff will seek approval from the Head teacher or, in the case of Trust staff, the CEO
- 4.7 In accordance with 4.6, details of the offer will be recorded as outlined in the Record Keeping section of this policy.
- 4.8 Staff will not accept any gifts that they believe to be excessive or more than simply a token gift of gratitude at an acceptable time of year, such as Christmas or end of term / year.
- 4.9 In accordance with 4.6, the Head teacher or, in the case of Trust staff, the CEO may decide to return the gift, ask the Chair of Governors or Chair of Trustees for their view, or donate the gift to a charity / other local cause.
- 4.10 If staff are unsure whether to accept a gift in any situation, they will speak to the Head teacher or, in the case of Trust staff, the CEO.
- 4.11 Parents and pupils will be informed of the school's policy regarding gifts and hospitality and will be encouraged to speak to the Head teacher or, in the case of Trust staff, the CEO if they want to give a staff member a gift which is of high value or may satisfy any of the conditions outlined in 4.4.

5. Approval from the Head teacher or the CEO and the Chair of Governors or Chair of Trustees

- 5.1 If there is any doubt or concern about the public perception that might be attached to accepting any gift or hospitality, then this must be referred to the Chair of Governors or Chair of Trustees.
- 5.2 In accordance with 4.9 the Chair of Governors and Chair of Trustees have the final decision

6. Declaring offers of Gifts and Hospitality

- 6.1 Where gifts exceed the limits set in 4.2 and 4.3, a declaration should be made as soon as possible after the offer or receipt of gifts or hospitality. All declarations are to go to the Head teacher or in the case of Trust staff, the CEO. The School Business Manager will record the declaration in the register.

The declaration will need to include the following information:

- date of offer of gift or hospitality, and date of event where relevant
- name, job title and organisation of recipient / provider
- nature and purpose of gift or hospitality received or declined
- the name of any other organisation involved
- estimated value

7. Register of Gifts and Hospitality

- 7.1 All offers declared in accordance with 6.1 must be recorded in the school's Gifts and Hospitality Register, which is kept in the School Office. It should be noted in the register whether the offer has been accepted or declined.

8. Hospitality

- 8.1 Hospitality offered should only be accepted where there is a direct link to working arrangements and a genuine business reason can be demonstrated, for example:
- attendance or speaking at a conference, which provides complimentary subsistence, travel and accommodation (this does not need to be declared on the register except where a gift was received)
 - attendance at a free training course
- 8.2 It is recognised that there is a need to ensure good relationships with existing and future contractors and stakeholders and that this may involve for example, the receipt of modest working lunches and dinners. These are acceptable where there is a genuine business reason.
- 8.3 Hospitality invitations to events which are purely social events should be considered very carefully before accepting; in such circumstances it may be much more difficult to substantiate a genuine business reason. If acceptance is agreed, staff are expected to use annual leave for such events. Staff or governors must not accept free holidays from a current or potential contractor; these invitations should be recorded in the register whether received or declined.

9. Gifts Provided by the School

- 9.1 Any gifts purchased and provided by the school should be:
- Of a nominal value *up to £50.00* only.
 - Given to staff or governors only in relation to specific and relevant personal circumstances (e.g. illness, bereavement, retirement) or upon leaving the employment or service of the school.

- Authorised by the Head teacher or Chair of Governors or, in the case of Trust staff, the CEO or Chair of Trustees in respect of any gifts given to the Head teacher / the CEO, or local / governing board in respect of any gifts given to the Chair of Governors.
 - Purchased from the school's own unrestricted funds and not from LA funding or any other funding provided for specific purposes.
 - **Recorded in a school's Gifts and Hospitality Register**, which should be available for review by the Governing Board/ Trustees or external auditors upon request.
- 9.2 When schools intend to use a credit card to purchase gift cards for members of staff, they should be mindful that gift cards are seen as a potential contentious transaction.

10. Charitable donations

10.1 The Fosse MAT may support fundraising events but does not make any financial contribution.

11. Out of Pocket Expenses

11.1 We do not expect employees to incur expenses claims relating to hospitality, gifts or expenses incurred to third parties.

12. POLICY REVIEW

12.1 This policy is reviewed every two years by the Trust.

12.2 The scheduled review date for this policy is November 2023.