



MULTI-ACADEMY TRUST

# GIFTS & HOSPITALITY POLICY

Responsible for Policy	CEO/Executive Principle
Date	September 2018
Approved	04.10.18
Review Date	September 2019

## 1. Purpose

1.1 LEAP MAT Trustees, Academy Ambassadors and employees should not place themselves in circumstances that might influence, or be *perceived* to influence, the conduct of their duties. Trustees, Academy Ambassadors and employees must, at all times be, and be seen to be, fair, impartial and unbiased. The receipt of gifts (*including awards, prizes or any other benefit*) and hospitality, can create conflicts of interest and may compromise personal judgment and give rise to an adverse inference as to the integrity of the individual and the Trust. Such circumstances could lead to formal/disciplinary action, and, potentially, prosecutions for corruption.

## 2. Scope

2.1 This policy applies to all LEAP MAT Trustees, Academy Ambassadors and employees.

## 3. Gifts & Hospitality – General

3.1 Before accepting **any** gifts or hospitality, regardless of value, consideration should be given to whether it is appropriate in the particular circumstances to accept it. For example, gifts, hospitality or any other benefit regardless of value should not normally be accepted in **ANY** situation where the school is potentially entering into a contractual arrangement or is in dispute with the provider.

3.2 Trustees, Academy Ambassadors and employees must not solicit any organisation which is trading, or is a likely/prospective trader, with the Trust to offer any gifts or hospitality.

3.3 Trustees, Academy Ambassadors and employees should be aware that all gifts or any other benefit received, other than those of a *minor nature*, are the property of the Trust, not the individual, and should be recorded in accordance with this policy. Gifts and hospitality *of a minor nature* are defined as;

- Gifts received from suppliers with an estimated value up to a maximum of £15.00 in any year
- Small gifts from those receiving a services from the school as a token of appreciation (e.g. from parents or pupils to teachers)
- Small promotional items from suppliers that are routinely given to a wide range of people (e.g. calendars, notepads, pens, etc.)
- A working lunch of modest standards. This will be in circumstances where it is incidental to the reason for meeting the provider to conduct legitimate work on behalf of the Trust.

3.4 **The purchase of alcohol/excessive gifts using Trust/Academy budgets is forbidden and is classed as irregular expenditure which auditors' will be required to report findings of such expenditure to the ESFA (Education & Skills Funding Agency).**

## 4. Gifts

4.1 Gifts received of a *minor nature* do not need to be recorded in the '*Register of Gifts and Hospitality*'. Gifts with an estimated value between £15.00 and £50.00 from a supplier should be reported to the Director of Business and recorded in the Register of Gifts and Hospitality. Such gifts must be placed in secure storage by the Director of Business and used for the benefit of the school (e.g. in fundraising events, for raffle prizes, etc.).

4.2 Gifts with an estimated value exceeding £50.00 should be referred to the Chair of the Board of Trustees for a decision as to whether to accept the gift. The decision will be reported to the Director of Business, who will record the outcome in the Register of Gifts and Hospitality.

4.3 When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy. Such circumstances must be recorded in the Register of Gifts and Hospitality.

## **5. Supplier Special Offer Gifts**

- 5.1 Gifts are sometimes offered by suppliers with the purchase of items. All special offer gifts are the property of the Trust and must be given to the Director of Business for use by the school. Such gifts should never be part of the decision as to which supplier to use.

## **6. Receiving Hospitality**

- 6.1 You should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. You must not offer such hospitality to others on behalf of the Trust. You should **never** solicit hospitality.
- 6.2 As a general rule, you should think carefully before accepting hospitality that the school would not reciprocate in similar circumstances. You may accept modest working meals and light refreshments without making any declaration.
- 6.3 When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy. Such circumstances must be recorded in the Register of Gifts and Hospitality.

## **7. Offering External Hospitality**

- 7.1 External hospitality is generally not appropriate. Prior consent must be sought from the Principal or Director of Business.

## LEAP MAT – Register of Gifts and Hospitality

Form for registration of gifts & hospitality received by member of Trustee, Academy Ambassador or employee

<b>From:</b> Name: ..... (please print)	
<b>Record of gift &amp; hospitality accepted</b>	
<b>Date of gift/benefit/hospitality:</b>	
<b>Details of gift/benefit/hospitality</b>	
<b>Estimated value of gift/benefit/hospitality</b>	
<b>Person / body providing gift/benefit hospitality</b>	
<b>Reason for acceptance:</b>	
<b>Signed:</b> ..... <b>Date:</b> .....	

### Chair of Trustees/Chair of Academy Ambassadors/Principal/Director of Business

I confirm that I am **satisfied/not satisfied** that the receipt of the above described gift/hospitality was appropriate for the reason stated. Where it is not considered appropriate the matter will be dealt with by the Chair of Academy Ambassadors (in the case of an Academy Ambassador), Chair of Trustees (in the case of a Trustee) and Principal/Director of Business in the case of an employee.

**Signature of** .....  
**Chair of Trustees/Chair of Academy Ambassadors/Headteacher/Director of Business**

**Date:** .....

In certain circumstances gifts of ANY value are NEVER be acceptable. Gifts with a value below £15 need not be recorded in the G&H Register. See the G&H Policy.

# LEAP MAT

Form for registration of gifts & hospitality declined by member of Trustee, Academy Ambassador or employee

<b>From:</b> Name: ..... (please print)	
<b>Record of gift &amp; hospitality declined</b>	
<b>Date of offer:</b>	
<b>Details of offer:</b>	
<b>Estimated value of offer:</b>	
<b>Person / body offering gift/benefit hospitality</b>	
<b>Reason for decline:</b>	
<b>Signed:</b> ..... <b>Date:</b> .....	