



Gifts & Hospitality Policy

This policy outlines Discovery Schools Academy Trust's approach to the acceptance of gifts and hospitality from potential external stakeholders (including parents) and Trust staff to achieve propriety and regularity in the use of public funds.

This policy was approved as follows:

| | | | |
|-------------------------|------------------|--------------------------|-----------|
| Approver: | Trust Board | Date: | 18/9/2019 |
| DSAT owner: | Finance Director | Version: | 1.0 |
| JCG review date: | N/A | Review frequency: | 3 years |
| Status: | Mandatory | Next review date: | Sept 2022 |

This policy applies to all Trust staff (including full time, part time, agency, temporary and casual) and all individuals in a governance role.

Document History

| Version | Version Date | Author | Summary of Changes |
|---------|--------------|----------|---|
| V1.0 | 07/08/19 | E Clarke | Complete re-write to include providing gifts and hospitality as well as receiving to include from external stakeholders (including parents) and staff. Increasing the acceptable limit to £30, recognising gifts that are under £30 but could result in being over £30 and providing template Gifts & Hospitality Register. |

Contents

1. Aims..... 1

2. Legislation and Guidance 1

3. Definitions 1

4. Roles and Responsibilities..... 1

5. Acceptable Gifts and Hospitality..... 2

6. Unacceptable Gifts and Hospitality 3

7. Declining Gifts and Hospitality..... 3

8. Review 4

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, 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

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, advisory boards and staff:

- Must ensure that they read, understand and comply with this policy
- Must not give or accept gifts or hospitality to or from a third party or member of Trust staff 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 £30 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined

- Must consult the Finance Director or CEO/Headteacher before accepting any gifts or hospitality with a value of over £30 (or could result in a value of over £30 i.e. scratch card or lottery ticket) or offering any hospitality with a value of over £5 per head.

4.2 Trustees

Academy trustees 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 CEO/Headteacher

The CEO/Headteacher is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The CEO/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 Finance Director, that decisions on whether individuals or the trust can accept gifts or hospitality with a value of over £30 or offer hospitality with a value of over £5 per head are in line with this policy.

4.4 Finance Director

The Finance Director 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, CEO and Headteachers are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the CEO/Headteacher, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £30 are in line with this policy.

4.5 Office Manager

The Office 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 and staff can accept gifts and hospitality that have a value of up to £30. These do not have to be pre-approved or recorded on the gifts and hospitality register unless they could result in a value of over £30 i.e. scratch card or lottery ticket.
- 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 Finance Director or CEO/Headteacher.
- 'Free gifts' should be treated in line this policy at their resale value.

- 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 Finance Director or CEO/Headteacher.
- Any gifts or hospitality offered with a value of over £30 or could result in a value of over £30 i.e. scratch card or lottery ticket must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the Finance Director or CEO/Headteacher before accepting.
- If the CEO/Headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the board of trustees/COE 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 managed in line with the disciplinary policy.

5.2 Offers of Gifts and Hospitality Given

- Trust funds should not be used to purchase gifts of any value.
- Any hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £5 per head should be used as a guideline.
- Alcohol must not be purchased.
- The Finance Director or CEO/Headteacher must be consulted about any proposal to provide hospitality with a value of over £5 per head.
- Refer to the trust Expenses Policy for expenses that can be claimed when working off-site

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 foreseeable future, seeking employment with the trust or is in dispute with the trust, even if you are not directly involved in the dispute.
- 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 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 Finance Director or CEO/Headteacher. The Finance Director or CEO/Headteacher may decline the offer or raffle the gift or hospitality with proceeds donated to the Trust and must also record the offer on the gifts and hospitality register.
- Anyone who fails to decline gifts or hospitality the trust has deemed unacceptable will be managed in line with the disciplinary policy.
- Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, will be managed in line with the disciplinary policy.

8. Review

The gifts and hospitality register is monitored regularly by the Finance Director.

This policy will be reviewed annually by DSAT to assess its effectiveness and will be updated as necessary. Significant changes will be presented to the Finance, Audit & Risk Committee for approval.

