

GIFTS AND HOSPITALITY GUIDANCE

Policy Author	Principal Business Manager/CFO
Date	September 2021
Trust Key Reader	MG
Approved by the Board	21.10.21
Review Date	20.10.24

1. Purpose

- 1.1 LEAP MAT Trustees, Local Governing Bodies (LGB) and employees should not place themselves in circumstances that might influence, or be perceived to influence, the conduct of their duties. Trustees, Governors 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, Governors 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 Trust is potentially entering into a contractual arrangement or is in dispute with the provider.
- 3.2 Trustees, Governors 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, Governors 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 below £15.00 in any year
 - Small gifts from those receiving a services from the Trust as a token of appreciation (e.g. from parents or students 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 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, such as flowers and thank you gifts, given by the Trust to an employee or volunteer with a value of £50 or more on each occasion or with a cumulative value of £50 or more in a school year must be recorded in the '*Register of Gifts & Hospitality*'. When making gifts, the person(s)/committee identified in the scheme of delegation must ensure the value is reasonable, the decision is documented, and achieves propriety and regularity in the use of public funds.
- 4.2 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 below £50.00 from a supplier should be reported to the Chief Finance Officer/Principal Business Manager (CFO/PBM) and recorded in the Register of Gifts and Hospitality. Such gifts must be placed in secure storage by the CFO/PBM and used for the benefit of the Academy/Trust (e.g. in fundraising events, for raffle prizes, etc.).
- 4.2 Gifts with an estimated value of £50 or more 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 CFO/PBM, who will record the outcome in the Register of Gifts and Hospitality.

- 4.3 When declining a gift, Trustees, Governors and employees 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 CFO/PBM for use by the Academy/Trust. Such gifts should never be part of the decision as to which supplier to use.
- 6. Receiving Hospitality**
- 6.1 Trustees, Governors and employees should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way they carry out their duties. Likewise, Trustees, Governors and employees must not offer such hospitality to others on behalf of the Trust. Hospitality should **never** solicited.
- 6.2 As a general rule, Trustees, Governors and employees should think carefully before accepting hospitality that the Trust would not reciprocate in similar circumstances. Modest working meals and light refreshments may be accepted without making any declaration.
- 6.3 When Trustees, Governors and employees have to decline hospitality, they 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 CFO/PBM.

Gifts and Hospitality Forms

Please print out, complete and pass to the school Principal/Chief Executive (central team) via your line manager. Line managers must pass the form to the Academy Principal/Chief Executive who will scan the document and place in the following server folder which is only accessible to the CEO/Principal and CFO:

Brinsworth Academy – **L:\Gifts and Hospitality\Brinsworth**

Dinnington High School – **L:\Gifts and Hospitality\Dinnington**

Eckington School – **L:\Gifts and Hospitality\Eckington**

Documents will be shared with the Chair of Trustees, as appropriate

LEAP MAT – Register of Gifts and Hospitality

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

From: Name: (please print)	
Record of gift & hospitality accepted	
Date of gift/benefit/hospitality:	
Details of gift/benefit/hospitality	
Estimated value of gift/benefit/hospitality	
Person / body providing gift/benefit hospitality	
Reason for acceptance:	
<p>Signed:..... Date:</p>	
<p>Chair of Trustees / Chair of LGB / Principal / CFO & Principal Business Manager</p> <p>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 LGB (in the case of a Governor), Chair of Trustees (in the case of a Trustee) and Principal, CFO/PBM in the case of an employee.</p> <p>Signature of</p> <p>Chair of Trustees / Chair of LGB / Principal / CFO/PBM</p> <p>Date:</p>	

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

LEAP MAT

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

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