



# **Kings Education Trust: Gifts and Hospitality Policy**

**Approved by: Board of Trustees**

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### 1. Aims

This policy aims to ensure that:

- The Kings Education 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, vouchers, 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, local advisory committee members and staff**

Members, trustees, local advisory committee members 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, the school or the Trust with a value of over £30 from an individual or over £350 from a group of parents / pupils on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Headteacher or Trust CFO / CEO before accepting or offering any gifts or hospitality with a value of over £30 from an individual or over £350 from a group of parents / pupils.

### **4.2 Kings Education Trust trustees**

The 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 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 local governing board, that decisions on whether individuals can accept or offer gifts or hospitality with a value of over £30 from an individual or over £350 from a group of parents / pupils are in line with this policy.

### **4.4 The Trust CFO**

The Trust CFO will ensure that:

- The Trust and each school within 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 £30 from an individual or over £350 from a group of parents / pupils are in line with this policy.

## 4.5 The School Business Manager or Bursar

The School Business Manager / Bursar / Finance Officer is responsible for maintaining the school's Gifts and Hospitality Register on a day-to-day basis.

## 4.6 Gifts from pupil/s or parent/s of pupils

We do not wish to discourage all gift-giving, small tokens of gratitude are always appreciated. It is clear that these items are not intended to influence the progression of a child nor the awarding of a contract. It is normal practice for customers / suppliers / parents to give members of staff token gifts at various points of the year e.g. Christmas and end of the Summer term.

# 5. Acceptable gifts and hospitality

## 5.1 Offers of gifts and hospitality received

Members, trustees, local advisory committee members and staff can accept gifts and hospitality up to the values detailed below:

### Gifts from an individual, parent/s or pupil

- If a gift is received from a pupil or the parent/s of a pupil and the value is over £30 this gift is to be registered in the Gifts and Hospitality Register (Refer to appendix 1)

### Gifts from a group of parents or pupils (i.e. 3 or more individuals)

- If a gift is received from a group of pupils or parents of a pupil and the value is over £350 this gift is to be registered in the Gifts and Hospitality Register (Refer to appendix 1)

If the value of the gift falls below the limits outlined above the gift does 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 headteacher or CFO.

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 Headteacher or CFO.

Any gifts or hospitality offered with a value of over £30 from an individual or over £350 from a group of parents / pupils must be recorded on the Gifts and Hospitality Register within 7 working days, even if declined.

Any member, trustee, governor or employee who is offered such gifts or hospitality must consult the headteacher or CFO before accepting.

If the headteacher is the recipient, or intended recipient, of gifts or hospitality above these values, they must inform the CFO before accepting.

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**

Any gifts or hospitality provided by the Trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £15 per head should be used as a guideline.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the School Business Manager / Bursar / Finance Officer / CFO and receipts or an invoice must always be enclosed.

The headteacher or CFO must be consulted about any proposal to provide gifts or hospitality with a value of over £30.

The following may be provided subject to budget:

- A half day event off site: tea, coffee, juice and biscuits may be provided
- An all day off site event: lunch and refreshments may be provided up to a maximum of £15 per head
- An evening event that does not allow for a break after the working day: light refreshments may be provided up to a maximum of £5 per head
- Day to day refreshments of tea, coffee and milk may be provided by the school or the trust. These should be capped at 20p per day per employee
- Gifts for members of staff, such as flowers should only be funded in exceptional circumstances such as long term absence from work or a close family bereavement and up to a maximum of £30.
- Gifts to mark staff leaving or life events, such as a wedding, birthday or new baby, are not included and will need to be organised outside of this policy and funded by colleagues.
- Gifts for volunteers such as governors who are leaving their role may be given up to a maximum budget of £30 per person.

## **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, local advisory committee members 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 member, 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 CFO. The headteacher or CFO 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.

