



GUILTSBOROUGH ACADEMY

GIFTS AND HOSPITALITY POLICY

Policy Name	Gifts and Hospitality Policy
Committee	Finance, Audit and Risk
Owner	Finance Director
Statutory	No
Authorisation	Trustees

Last Ratified	Date Ratified
January 2024	January 2026

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Our trust is responsible for the expenditure of significant sums of money from a variety of public funding bodies. With this in mind, staff must conduct themselves with integrity, impartiality and honesty. Academy staff must maintain high standards of propriety and professionalism, including avoiding laying themselves open to suspicion of dishonesty and not putting themselves in a position of conflict between their official duty and private interest.

Some staff may, out of necessity, spend time with representatives of institutions and other organisations where it is normal business practice or social convention to offer gifts, hospitality or rewards. Offers of this kind can place staff in a difficult position, as refusal may cause misunderstanding or offence. However, to accept may give rise to questions of impropriety, suspicion or conflict of interest, disciplinary action or criminal liability.

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 Trust 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 Trust 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.

Guildsborough Multi Academy Trust has a zero-tolerance policy in relation to bribery and corruption. This includes a commitment to comply with all applicable anti-bribery and corruption laws and regulations and, in particular, the Bribery Act 2010.

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.

Bribery

The Bribery Act 2010 introduces four offences:

The offence of bribing another person. This can occur where a person offers, promises or gives a financial or other advantage to another individual to perform improperly a relevant function or activity.

The offence of being bribed. This is where a person receives or accepts a financial or other advantage to perform a function or activity improperly.

Bribery of a foreign public official. This is where a person directly or through a third party offers, promises or gives any financial or other advantage to a foreign public official in an attempt to influence them.

A corporate offence of failure to prevent bribery. A commercial organisation could be guilty of bribery where a person associated with the organisation, such as an employee, agent or even a sub-contractor, bribes another person intending to obtain or retain business for the organisation.

Corruption

The offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions of any person. Both parties are equally guilty of an offence.

4. Roles and responsibilities

4.1 Members, trustees and staff

Members, trustees 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 or the trust with a value of over £25 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Chief Financial Officer (CFO) or Principal before accepting or offering any gifts or hospitality with a value of over £25.

4.2 Academy 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 Principal

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

The Principal 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 academy and trust and to those outside the organisation.

They will also ensure, alongside the Finance Director (CFO) and Principal that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

4.4 The person appointed as Chief Financial Officer

The CFO 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 Trust Handbook
- The academy trustees and Principal are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Principal that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

4.5 The Business Manager

The Business Manager is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

4.6 Parents/carers

The Trust does not wish to discourage all gift-giving and recognises that small tokens of gratitude are always appreciated. These must not exceed £25 in value per gift from an individual family. Any gift or hospitality that could be deemed as an inducement to influence a student's grade or grade prediction is unacceptable and **must be** reported to the Principal.

5. Acceptable gifts and hospitality

5.1 Offer of gifts and hospitality received

- > Members, trustees and staff can accept gifts and hospitality that would be considered to be of a low intrinsic value such as promotional calendars or diaries, small tokens of gratitude and up to a maximum of £25. These do 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 CFO or Principal.
- > 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 CFO or Principal.
- > Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.
- > Any gifts or hospitality offered with a value of over £25 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 CFO or Principal before accepting.
- > Where a gift is received on behalf of the Academy or Trust the gift remains the property of the Academy or Trust. The gift may be required for departmental display, or it may, with the Principal's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the department on or before the recipient's last working day.
- > Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the Academy and must be used accordingly. They may for example be used as a donation for a raffle to raise funds for a chosen charity.
- > If the Principal is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the board of trustees 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 treated as a staff disciplinary matter and treated in accordance with the Trust Disciplinary Policy.

5.2 Offer of gifts and hospitality given

- > Expenditure on staff wellbeing (flowers, leaving gifts, etc) should be recorded in the gift register and posted as staff hospitality or staff wellbeing in the accounting system.
- > Charitable donations e.g. instead of flowers for a funeral or matching amounts raised by students, should be of a de minimis level in order to comply with the Trust's objects.

- > Where hospitality is provided by the Trust this should be approved in advance by the CFO or Principal.
- > Any gifts or hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £25 per head should be used as a guideline.
- > Alcohol **must not** be purchased out of the academy budget.
- > Expense claims should be made following the expense claim procedure, including being signed by your line manager and returned to the business manager and receipts must always be enclosed. If you are in any doubt of the policy or what is allowable authorisation should be sought before the expense has been incurred. The CFO or Principal must be consulted about any proposal to provide gifts or hospitality with a value of over £25.

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 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 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 Principal or CFO. The Principal 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.

Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, will be dealt with as a staff disciplinary matter.

8. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the CFO and Principal and presented to the Trusts Finance, Audit and Risk Committee at least annually and at any time requested.

9. Links with other policies

This gifts and hospitality policy is linked to the:

[Staff code of conduct](#)

[Staff disciplinary procedure](#)

Notification of acceptance or refusal of gifts, hospitality, prizes and rewards

Any employee or board member who receives a gift or hospitality from any existing or potential supplier or external work-related contact, regardless of the value must disclose the fact of the gift or

hospitality, its nature, and the identity of the sender by registering the gift or hospitality on Guilsborough Multi Academy Trust's Gifts and Hospitality Register.

They should also inform their line manager on receipt of such a gift or hospitality. (This excludes trivial gifts, under £25, given by parents to teachers. However, where the gift given to the teacher exceeds this value, the member of staff should complete the form).

Please fill in the details below and return the completed form to accounts@guilsborough.northants.sch.uk (copying your line manager)

Academy	
Name of Recipient	
Name of Recipient if gift is passed on to someone else	
Date gift offered or date of event if hospitality	
Who gave the gift or made the invitation? (name of individual and organisation)	
How is the individual or organisation linked to the academy? (e.g. we contract their services, they wish to do future business with the academy)	
Description of gift or invitation	
Estimated or actual value of gift / hospitality package:	
Action taken (accepted, accepted and shared amongst colleagues, declined or returned):	
Rationale for decision taken	
Signature of principal (to indicate agreement to the action taken)	

I confirm that this is true to the best of my knowledge and that I am adhering fully to the Trust's policy on gifts and hospitality:

.....(Signature)

..... (Date)

..... (Name)

Request to offer hospitality, gifts, prizes or rewards

Name of staff member offering hospitality / gifts / prizes / rewards to a client	
Name (s) of intended recipient (s)	
Date hospitality / gift offered	
How is the individual linked to the academy? (e.g. we contract their services, they wish to do future business with the academy, they are a visitor from another school)	
Description of hospitality / gift / prize / reward	
Value of gift / hospitality package to be offered:	
Rationale for making this offer (e.g. in the case of important overseas visitors, failing to provide some modest hospitality would be discourteous or embarrassing)	
Signature of principal (to indicate agreement to provide and pay for hospitality / gift / prize / reward) <i>(Please note, the total value should never exceed £25 per head and should be afforded within the budget)</i>	

I confirm that this is true to the best of my knowledge and that I am adhering fully to the Trust's policy on gifts and hospitality:

..... (Signature)
 (Date)
 (Name)

Once signed by the Principal, please email to the Business Manager (accounts@guilsborough.northants.sch.uk) for inclusion in the MAT's gift and hospitality register.

GUILSBOROUGH MULTI ACADEMY TRUST GIFT REGISTER

Ref	Received (R) or Given (G)	Date Received / Given	Recipient	Received from/ Given to (Name, position and organisation)	Description of gift/hospitality received/ given	Value (£) (estimate if unknown)	Reason given for providing gift/hospitality