

The Spire Church of England Learning Trust

Gifts and Hospitality Policy 2023 - 2025

This policy is reviewed and updated by Sarah Spence, Chief Financial Officer and is approved every 2 years by the Trust Board, unless there are any statutory alterations during this time. Once ratified this will be shared with all schools within the Trust. The next Trust meeting will be held on 24th October 2023.

This policy has been written in conjunction with The Key.

Reviewed: September 2023

Ratified: December 2023

Next review date: September 2025

In collaboration with



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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 Academy 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 Academy 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 compromise their personal judgement or integrity. This should include members, trustees, staff and/or any other representative of the trust. The handbook states that the trust should ensure that all staff are aware of this policy.

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 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 14 working days, even if declined
- Must consult the chief financial officer/ or headteacher 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 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 chief financial officer, 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.

The headteacher is responsible for communicating the school/trust's rules and expectations about gift-giving to parents.

4.4 The Chief Financial Officer

The Chief Financial Officer (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 Academy Trust 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 £25 are in line with this policy.

4.5 The School Business Manager

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

5. Acceptable gifts and hospitality

5.1 Offer of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of up to £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 headteacher.

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 headteacher.

Any gifts or hospitality offered with a value of over £25 must be recorded on the gifts and hospitality register within 14 working days, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the CFO or headteacher before accepting.

If the headteacher 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.

5.2 Offer of gifts and hospitality given

Any gifts or hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant and the CFO must be consulted before for approval.

Alcohol must not be purchased out of any bank accounts.

The CFO and headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £25.

When school staff wish to give gifts to pupils, e.g. at the end of a school term or year, this should be with the prior approval of the Headteacher.

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.
- No Governor, Member or Trustee is permitted to give a gift to a pupil at any time

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 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.

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. Gifts and Hospitality to Staff from the School

The Trust and its academies will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented and has regard to the propriety and regularity of the use of public funds.

In exceptional circumstances it may be appropriate to provide a gift of up to £40 in value for example:

- Flowers for a member of staff on long-term sick leave or bereavement
- Leaving gifts to a longstanding employee who is retiring

This does not apply to:

- Milk, tea and coffee for visitors
- Food and/or refreshments provided for one-off occasions e.g. staff retirement, interviews, inset days, year-group celebrations

All of the above must be agreed with the Headteacher and CFO prior to purchase. The school must never gift cash or alcohol.

9. Monitoring arrangements

The CFO shall maintain a Trust-wide register of all gifts and hospitality and this will be available for inspection at any time by the Trustees.

The CFO has overall responsibility for monitoring and reviewing the policy and making recommendations for updates and revisions as needed. The policy will be reviewed every two years, unless there are regulatory and legislative changes within the two – year window which will require the policy to be updated.

10. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff Code of Conduct
- Staff disciplinary procedures
- Finance policy

APPENDIX 1

Gifts and hospitality register

Name: _____

Place of work: _____

Job title: _____

Description of Item	Offered by (name and/or organisation)	Date of receipt	Did you accept the item? (Y/N)	Approximate value £	Approved by:

I certify that I have listed above all gifts and hospitality which need to be declared under the terms of the Trust's Gifts and Hospitality Policy (with an estimated value in excess of £25).

Signed: _____

Date: _____