



Gifts and Hospitality Policy

DISTRIBUTION	This is a Trust-wide policy and applies to all Members, Trustees, Governors and Staff.		
MANDATORY READERSHIP	New staff, all budget holders including Headteachers, all finance staff		
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POLICY REQUIREMENT	STATUTORY		

The Fallibroome Trust, Priory Lane, Macclesfield, Cheshire, SK10 4AF
 Telephone: +44 (0) 1625 813 510 | Email: info@fallibroometrust.com | Web: www.fallibroometrust.com

The Fallibroome Trust (Company number: 07346144). A company incorporated as private limited by guarantee.
 Registered Office situated in England and Wales

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POLICY

This policy covers both the receiving and the giving of gifts and hospitality in The Fallibroome Trust and its constituent schools.

PURPOSE

This policy aims to ensure:

- 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
- The trust complies with relevant tax law in connection with employee benefits

GOVERNANCE

The Local Governing Body is a committee of the Fallibroome Trust. The Local Governing Body will adopt and comply with all policies communicated by the Trust. The Local Governing Body is responsible for setting out the policies and practices for staff. The Local Governing Body may delegate these matters to:

- The Principal/Headteacher;
- A sub-committee of the Local Governing Body; or
- A sub-committee and the Principal/Headteacher.

Where this procedure refers to the Local Governing Body representative this can be any one of the above.

SCOPE

This policy applies to all members, trustees, governors and staff.

WHAT HAS CHANGED IN THIS EDITION

- Lower limit for gift declaration increased from £20 to £25
- Upper limit for staff hospitality increased from £5 to £8
- Guide for gifts and hospitality increased from £30 to £35

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 be seen to compromise the personal judgement or integrity of members, trustees, staff and/or any other representative of the trust. It 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.

DEFINITIONS

For the purposes of this policy, gifts are any items, cash, awards, prizes, goods or services, offered to an individual or group of individuals 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. For the purposes of this policy, the definition of gifts does not include donations to the schools e.g. PTA raffle prizes, sponsorship of awards for pupils or other assets donated to the schools by individuals or companies for the benefit of educational operations.

Hospitality is defined as food, drink, accommodation or entertainment (such as cultural or sporting events) provided free of charge to individuals or groups of individuals, heavily discounted or on terms not generally available to the general public. For the purposes of this policy, hospitality does not include refreshments given to pupils or parents as part of a rewards / awards evening or other celebration.

ROLES AND RESPONSIBILITIES

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 personal gifts or hospitality
- Must record any gifts or hospitality offered to them or the trust with an estimated value of over £25 on the gifts and hospitality register (see appendix 1) within 7 working days, even if

declined. If it is difficult to estimate the value of a gift, after a simple internet search has been completed, the gift should be included in the register.

Must consult the Chief Financial Officer, Headteacher or Business Manager, before accepting or offering any gifts or hospitality with a value of over £25.

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.

HEADTEACHERS AND BUSINESS MANAGERS

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

The Headteachers and Business Managers 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.

CHIEF FINANCIAL OFFICER

The Chief Financial Officer will ensure that:

- The academy trustees are provided with information on gifts and hospitality received and given, as appropriate
- They will also ensure, alongside the Headteachers and Business Managers, 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.

FINANCE DIRECTOR

The Finance Director will ensure that:

- A gifts and hospitality register is maintained for each school and for the Trust central team.
- Figures for transactions relating to gifts made by the trust are disclosed in the trust's audited accounts, if applicable, in accordance with the Academy Trust Handbook

The finance staff in the trust and its constituent schools, are responsible for updating the gifts and hospitality register on a day-to-day basis.

ACCEPTABLE GIFTS AND HOSPITALITY (RECEIVING OF)

Members, trustees, governors and staff can accept gifts and hospitality that have a value of up to £25, where such gifts are unlikely to be considered an inducement to buy a particular product or service. 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. Similarly, promotional gifts from suppliers or potential suppliers that are sent to all customers/potential customers, such as diaries, mugs or biscuits, do not have to be returned or recorded. If in any doubt, or the value of the gift is difficult to estimate, guidance must be sought from the Headteacher, Business Manager or Chief Financial Officer.

Similarly, hospitality such as working lunches in an office or school environment may be accepted provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the Headteacher, Business Manager or Chief Financial Officer.

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, governor or member of staff who is offered such gifts or hospitality must consult the Headteacher, Business Manager or Chief Financial Officer before accepting. Headteachers and Business Managers must consult the Chief Financial Officer. The Chief Financial Officer, Chief Executive Officer or Deputy Chief Executive Officer must consult the Chair of the Board of Trustees

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.

ACCEPTABLE GIFTS AND HOSPITALITY (GIVING OF)

In most cases, gifts for staff will be arranged by staff themselves, through collections. If these are processed through the school or trust bank account the gift purchased must not include alcohol.

Occasionally, it is appropriate for the school or Trust to arrange a gift from unrestricted funds. Examples include:

- Gifts for volunteers
- Gifts for governors or Trustees leaving the school or Trust
- Hospitality to donors or sponsors of a formal award or event
- Gifts for retiring staff with long service

Any gifts or hospitality provided by the trust must not be extravagant. A maximum value of £35 per head should be used as a guideline, for each gift/event. Such gifts and hospitality must never include alcohol.

Refreshments can be provided to staff in their place of work, during working hours (which vary in line with the school calendar), at the Headteacher's discretion. A maximum value of £7 per head should be used as a guideline for a meal. Such refreshments must not include alcohol and should be provided in an open and transparent way.

UNACCEPTABLE GIFTS AND HOSPITALITY

The following must never be offered or accepted:

- Monetary gifts, including gift vouchers (except where these are funded exclusively through staff collections)
- 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

The school or trust bank account must not be used to purchase gifts of alcohol

DECLINING GIFTS AND HOSPITALITY

Any member, governor, trustee or staff member who is offered any of the unacceptable gifts or hospitality outlined 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, Business Manager or Chief Financial Officer. The Headteacher, Business Manager or Chief Financial Officer may decline the offer, or donate the gift or hospitality to a worthy cause.

Offers declined must be recorded in the gifts and hospitality register.

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.

APPENDICES

APPENDIX 1: GIFTS AND HOSPITALITY REGISTER

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED/REJECTED	APPROVED BY