



**RAINHILL
HIGH SCHOOL**



RainhillSixth

GIFTS & HOSPITALITY POLICY





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STATUS	NON-STATUTORY
RESPONSIBLE COMMITTEE	FINANCE & AUDIT COMMITTEE
APPROVAL DATE	14/07/2023
RENEWAL DATE	14/07/2024



SCHOOLS IN PARTNERSHIP

STEPHENSON

MULTI ACADEMY TRUST

1. Aims

This policy aims to ensure that:

- Stephenson Multi Academy Trust (the “Trust”) 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, Local Governors, volunteers 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 requires us to 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, Volunteers, Staff and/or any other representative of the Trust.

This policy also complies with our Funding Agreements 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.

Gifts and/or hospitality offered by an existing partner for benefit of the pupils and/or to support the working relationship between the two parties are not deemed to be subject to the rules and regulations below but should, as good practice and to ensure transparency, be recorded in the gifts and hospitality book under ‘existing partners’. The existing partners applicable to this definition are highlighted in ‘Appendix 2’.

4. Roles and responsibilities

4.1 Members, trustees, local governors, volunteers and staff

Members, Trustees, Local Governors, Volunteers 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 consult the Trust’s Chief Operating Officer or the Headteacher, as appropriate, before accepting or offering any gifts or hospitality with a value of over £25.
- Must report within 7 days, any gifts or hospitality with a value of over £25 offered to them or the Trust, even if declined, by signing the Trust’s Gifts and Hospitality Register (see appendix 1 for an

example register).

4.2 Trustees and local governors

In addition to the provisions of 4.1, Trustees and Local Governors 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 Headteacher

Headteachers are responsible for ensuring that school-based staff and volunteers are aware of and understand this policy, and that it is being implemented consistently.

All Headteachers will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to their school, the wider Trust, and to those outside the organisation.

Headteachers will also ensure, alongside the Chief Operating 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.

4.4 The Chief Operating Officer

The Chief Operating Officer 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 Financial Handbook.
- The Trustees and Senior Leadership Team are provided with information on gifts and hospitality received and given, as appropriate.
- If she/he has been offered or has accepted any gifts or hospitality exceeding £25 in value, it is reported to the Chair of Trustees and recorded in the gifts and hospitality register.

The Chief Operating Officer will also ensure, alongside Headteacher(s), as appropriate, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of £25 are in line with this policy.

It should be noted that in the instance of deciding whether the Chief Operating Officer and/or Headteacher(s) can accept offers gifts or hospitality, the Chair of Trustees should be the decision maker.

5. Acceptable gifts and hospitality

5.1 Offers of gifts and hospitality received

Members, Trustees, Local Governors, volunteers 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, Local Governors, volunteers and Staff must consult the Chief Operating Officer 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 Chief Operating Officer or Headteacher.

5.2 Offers of gifts and hospitality given

The Trust encourages and seeks cooperative relationships with stakeholders and external organisations. Accordingly, there can be occasions where it is appropriate for the Trust to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house. Likewise, it may be appropriate for leaving gifts to be provided to staff leaving the employment of the Trust, particularly after a long period of service. Such gifts are often supplemented with private contributions from continuing members of staff.

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.

Expense claims should be made to the finance team and receipts must always be enclosed.

The Chief Operating Officer or Headteacher, as appropriate, must be consulted in advance 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, Local Governors, Volunteers 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, Trustees, Local Governors, volunteers and 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 Chief Operating Officer or Headteacher. The Headteacher or Chief Operating Officer 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.

8. Staff gifts to pupils

While we are aware many pupils and their parents may wish to give gifts to staff, for example, at the end of the school year, gifts from staff to pupils are not acceptable. Members, Trustees, Local Governors, Volunteers and Staff are not permitted to give a gift to a pupil at any time.

9. Breach of this policy

Any breach of this policy, including failure to declare any gifts or hospitality offered, will be dealt with as a disciplinary matter. If a breach is deemed to be in contravention of a law or statutory regulation, then the Trust will bring the matter to the attention of the appropriate authorities.

10. Whistleblowing

Employees and volunteers who wish to report a breach of this policy should follow the Whistleblowing Procedure, which can be found on the Trust's website.

Appendix 1: Gifts and hospitality register – example (actual register is kept by the Academy Business Manager)

Date	Name	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted/rejected	Approved by

Appendix 2: Current 'Partners' of the Trust

ADHD Foundation

Anthony Walker Foundation

Bullough's Cleaning Services

Fowler Education Football Academy

Liverpool Football Club Foundation

Liverpool Institute of Performing Arts

Liverpool John Moores University

Rainhill CIC

St Helens Council

Warwick University

This list will be amended as new partners are added and/or existing partners are removed.