



## **Gifts & Hospitality Policy**

**Updated: September 2023**

**Approved by Trustees: 28 September 2023**

**Review date: Autumn 2026**

*N.B: This policy had a small update September 2025 to change reference to Local Governors to Advisory School Committee Representatives.*

## **1. Aims**

This policy aims to ensure that:

- Elston Hall Learning Trust (the “Trust”) funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academy Trust Handbook;
- The Trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds;
- Members, trustees, Advisory School Committee (ASC) Representatives, 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 Academy Trust 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 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, ASC Representatives, 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 Chief Executive (CE) / Executive Leader (EL) / Trust Business Manager (TBM), as appropriate, before accepting or offering any gifts or hospitality with a value of over £50;
- Must report within 7 days any gifts or hospitality with a value of over £50 offered to them or the Trust, even if declined. The report can be made by email directly to the Trust Central Team

who will ensure that the report is recorded in the Gifts and Hospitality register (an example is included in Appendix 1).

#### 4.2 Trustees

In addition to the provisions of 4.1, 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 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 TBM, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

#### 4.4 The Trust Business Manager will ensure that:

- 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 Trustees and CE 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 £50 in value, it is reported to the CE/EL/TBM and recorded in the gifts and hospitality register;
- The TBM will also ensure, alongside Headteachers or the CE/EL, as appropriate, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of £50 are in line with this policy.

### 5. Acceptable gifts and hospitality

#### 5.1 Offers of gifts and hospitality received

Those in governance roles, volunteers and staff can accept gifts and hospitality that have a value of up to £50. 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, those in governance roles, volunteers and staff must consult the CE/EL/TBM or an appropriate 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 CE/EL/TBM or an appropriate 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 CE, EL, TBM, as appropriate, must be consulted in advance about any proposal to provide gifts or hospitality with a value of over £50.

## **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, ASC Representatives, 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 member, trustee, ASC Representative, volunteer 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 CE/EL/TBM. The CE/EL/TBM 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. 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.

## **9. 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 Central Team)

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