



## Gifts and Hospitality Policy

<b>Policy Type</b>	Statutory, Trust Policy
<b>Author</b>	Governance and Compliance Manager
<b>Approved By</b>	Trust Board
<b>Approved Date</b>	Spring Term 2025
<b>Date of Next Review</b>	Three Years
<b>Version</b>	2
<b>Description of Changes</b>	Significant changes have been made to this policy, therefore it should be treated as new policy.

## 1. Introduction

This policy aims to ensure that:

SHINE Academies ('the Trust') funds are used only in accordance with the law, the Trust's articles of association, its funding agreement and the latest Academy Trust Handbook.

The Trust operates 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 when representing the Trust or engaged in matters related to the Trust. Staff, volunteers, members, trustees and local governors 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 when it is related to Trust business, or to their role in the Trust, or could reasonably be perceived as such.

## 2. Legislation and Guidance

This policy is based on the current version of the Academy Trust Handbook, which requires the Trust 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 staff, volunteers, members, trustees, local governors, and/or any other representative of the Trust.

This policy also complies with the Trust's funding agreement and articles of association.

## 3. Definitions

**Gifts** are any items, cash, awards, prizes, goods, vouchers 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 Staff, volunteers, members, trustees and local governors

Staff, volunteers, members, trustees and local governors must:

Comply with the conditions set out in this policy.

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.

Not use their official position to further their private interests or the interests of others  
Not solicit gifts or hospitality.

Consult the Trust's Chief Financial Officer (CFO) or a Trust headteacher, as appropriate, before accepting or offering any gifts or hospitality with a value of over £30.

Must report within 7 days any gifts or hospitality with a value of over £30 offered to them or the Trust, even if declined. The report must be made by email directly to the Chief Financial Officer, who will ensure that the report is recorded in 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 Headteachers**

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, in collaboration with the Chief Financial Officer, will ensure that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £30 are in line with this policy.

#### **4.4 The Chief Financial Officer**

The Chief Financial 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 Academy Trust Handbook.

At least once each academic year, the gifts and hospitality register is disclosed to the Board of Trustees, through the Board's Finance and General Purposes Committee.

If she/he has been offered or has accepted any gifts or hospitality exceeding £30 in value, it is reported to the Chief Executive and recorded in the gifts and hospitality register.

The Chief Financial Officer will also ensure, alongside headteachers or the CEO, as appropriate, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of £30 are in line with this policy.

## **5. Acceptable gifts and hospitality**

### **5.1 Offers of gifts and hospitality received**

Staff, volunteers, members, trustees and local governors can accept gifts and hospitality that have a value of up to £30. These do not have to be pre-approved or recorded on the gifts and hospitality register, unless such gifts and hospitality amount to more than £30 from a single person or organisation in a single academic year.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, staff, volunteers, members, trustees and local governors must consult the Chief Financial Officer or an appropriate headteacher at the earliest opportunity.

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 Financial Officer or an appropriate headteacher.

### **5.2 Offers of gifts and hospitality given**

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

Under no circumstance should alcohol be purchased using school/Trust funds.

The Trust encourages and seeks cooperative relationships with external organisations and non-staff stakeholders. Accordingly, there can be occasions where it is appropriate for the Trust to provide hospitality, which should principally be dealt with by in-house catering.

Any hospitality provided by the Trust must not be extravagant. A maximum value of £8 per head for lunch and £15 per head for evening meals should be adhered to. It is expected that in these circumstances the meetings can clearly be defined as contributing towards school improvement. The reimbursement of evening meals should not be standard practice. If in doubt guidance should be sought from the CFO or CEO prior to the expenditure being incurred.

### **5.3 Gifts and Hospitality made to staff using Trust funds**

Subject to Headteacher or CEO approval, it may be appropriate for a leaving gift up to a maximum value of £30 to be provided to a member of staff leaving employment with the Trust after 15 or more years of service. Such gifts are often supplemented with private contributions from other members of staff. If a Headteacher wishes to exceed the £30 maximum, he/she must first seek approval from the CFO or CEO of the Trust.

It may be appropriate, subject to headteacher or CEO approval, to award token hospitality or a token gift up to a value of £10 to a member of staff who has, for example, achieved a significant milestone or made an exceptional contribution to the school/Trust, beyond that normally expected of someone in their position. Such gifts or hospitality would not be expected to be made to more than 20% of staff in each school (or central team) in a single academic year.

Gifts or hospitality for other purposes, such as maternity, birthdays, weddings etc., must not be provided from Trust/school funds. It is expected that items of this nature would be funded from personal contributions.

If a gift is purchased using a Trust credit card, the value of which the Finance Team determines to have exceeded the limits specified above, the Credit card holder is required to reimburse the Trust the value of the overpayment within 7 working days.

## **6. Unacceptable gifts and hospitality**

Staff, volunteers, members, trustees and local governors must never offer or accept any of the following when it is related to Trust business, or to their role in the Trust, or could reasonably be perceived as such:

- 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**

A member of staff, volunteer, member, trustee or local governor 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 an appropriate headteacher or the Chief Financial Officer. 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.

## **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**

A member of staff, volunteer, member, trustee or local governor who wishes to report a breach of this policy should follow the Whistleblowing Procedure, which can be found on the Trust's website or staff shared policy area.

## **10. Links with other policies**

- Staff disciplinary policy
- Whistleblowing policy

**Appendix 1 Declaration of a Gift or Hospitality**

Name:	Position:
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- I have been offered a gift / hospitality which I have declined
- I have been offered a gift / hospitality which I have accepted

Date and time of offer:
Place where offered:

Name of organisation / person making the offer and their relationship with the school	Nature of the interest / gift / hospitality	Estimated value (if applicable)

Reason for accepting / declining gift / hospitality:
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Signed: \_\_\_\_\_  
\_\_\_\_\_

Date:

Approved by: \_\_\_\_\_  
\_\_\_\_\_

Date:

On completion, please return a copy of this form to the Company Secretary who will retain this form in the register in date order.

Entered in register:	Date:	Reference:
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