

# GIFTS AND HOSPITALITY POLICY

V5

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## 1.0 Policy Statement

As a Multi Academy Trust committed to maintaining the highest standards of integrity and ethical conduct, Beckfoot Trust acknowledges the importance of managing gifts and hospitality with utmost transparency and in accordance with applicable laws and regulations.

## 2.0 Scope and Purpose

This Gifts and Hospitality Policy establishes a comprehensive framework for the acceptance and offering of gifts and hospitality, ensuring that all actions are carried out ethically, responsibly, and in alignment with the Trust's mission and values.

This policy applies to all employees / LSC members and Trustees.

This policy has due regard to the following regulatory frameworks:

- Academy Trust Handbook

This policy also links to our Trust policies on:

- Finance

## 3.0 Overarching Principles

**Integrity:** Uphold the highest standards of integrity, avoiding conflicts of interest and ensuring that gifts and hospitality are never used to influence decisions or gain preferential treatment.

**Transparency:** All acceptance and offering of gifts and hospitality should be transparently recorded and reported. Comprehensive documentation, including the nature and value of the gift or hospitality, must be maintained.

**Compliance:** All relevant laws, regulations, and organisational policies concerning gifts and hospitality must be adhered to, rejecting any business practice that might be deemed improper and maintaining the interests and reputation of both individual staff and the Trust.

## 4.0 Responsibilities and Arrangements

### 4.1 Conflicts of Interest

4.1.1 A conflict of interest can occur when personal interests, relationships, or affiliations may influence or appear to influence an individual's decision-making process. All Trustees, LSC members and staff must exercise sound judgment and promptly disclose any conflicts of interest that may arise using the Trust's declaration of interest form.

### 4.2 Receiving Gifts

4.2.1 Employees should not accept a personal gift, commission, discount, allowance, direct or indirect profit, inducement, payment, perk or other benefit from a supplier, potential supplier or other organisations in connection with any professional work undertaken.

4.2.2 In some circumstances it may not be possible to return a gift. In this instance, the gift must be declared on the Gifts and Hospitality Register and should be placed in a raffle for the benefits of students or for perishable items shared amongst a wider group of staff.

4.2.3 Promotional merchandise of a low value (pens, calendars, mugs) can be accepted and do not need to be recorded on the register.

### **4.3 Gifts from Students and Parents**

4.3.1 Gifts of a low value presented from students and parents can be accepted providing it is given in good faith and is not seen to be an attempt to gain advantage. These items should be recorded on the Gifts and Hospitality Register.

Staff should not accept cash under any circumstances.

### **4.4 Alcohol**

4.4.1 On occasion members of staff may receive a gift from a colleague or student that falls under the category of alcohol. Such gifts must not be consumed on site and must be stored out of sight and, where possible, be held in a locked cupboard.

### **4.5 Receiving Hospitality**

4.5.1 Where hospitality is normal or reasonable in the circumstances it may be accepted. Offers of hospitality must be rejected where:

- there is no business justification for accepting a hospitality offer
- an offer of hospitality is disproportionately generous
- the invitation could be seen as inducement to affect a business decision.

Where hospitality is modest, of low value and in the course of normal business, it does not need to be declared on the register. Staff should not accept hospitality that the Trust would not reciprocate in similar circumstances.

### **4.6 Providing Gifts**

4.6.1 The Trust and its schools will not normally give gifts to other individuals or organisations. If gifts are given, they must be recorded in the Gift and Hospitality Register and must have regard for the appropriate and regularity of the use of public funds.

This does not apply to:

- Gifts and prizes related to student achievement
- Recognition awards for staff

4.6.2 Expenditure of staff wellbeing must follow the below principles:

- Leaving gifts – public funds must not be used to purchase leaving gifts for members of staff
- Milestone gifts e.g. birth of a child, operation, close family bereavement – These gifts may be purchased at the Headteacher or Executive Leader's discretion, must be coded as staff wellbeing, must not exceed £30 including delivery and other costs, must come from unrestricted reserves.
- Thank you, gifts, e.g. for voluntary work – follow the same rules as milestone gifts

Where gifts are given, they should be appropriate, not contain alcohol and not call into question the ethical standards of the Trust. Gifts must be recorded in the Gifts and Hospitality Register.

#### **4.7 Providing Hospitality**

4.7.1 On occasion, we may provide hospitality for staff and/or visitors in the normal course of business. When considering if hospitality for a meeting is acceptable the following should be considered:

- length and timings of meetings
- the attendees and their locality to the venue of the meeting

4.7.2 The hospitality of meals food and drink should generally be provided by the Trust's caterers and discretion should be used about the type of hospitality provided. Due consideration should be given to dietary needs, inclusive food choices and value for money. Where the value of the hospitality provided is less than £10 per head, it does not need to be disclosed on the register.

#### **4.8 Gifts and Hospitality Register**

4.8.1 Employees are personally responsible for reporting any gifts or hospitality that has been accepted. This can be done using the Gifts and Hospitality Register Form by **[clicking this link](#)**.

The information will be recorded on the register which is held and maintained by the Finance Team.