

Gifts & Hospitality Policy

March 2024

EXCELLENCE AND EQUITY WITH INTEGRITY

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Consilium
Academies

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1. Aims

This policy aims to ensure that;

- Consilium Academies' funds are used only in accordance with the law, our articles of association, the 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, Local Academy Board members 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 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.

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 and staff

Members, trustees 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 record any gifts or hospitality offered to them or the trust with a value of over £25 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined.
- Must consult the CFOO before accepting or offering any gifts or hospitality with a value of over £25

4.2 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.

4.3 The Head teacher

The Head teacher is responsible for ensuring that staff are aware of and understand this policy, and that

it is being implemented consistently.

The Head teacher 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 CFOO, 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 CFOO

The CFOO will ensure that:

A gifts and hospitality register for the Trust is maintained. The Trust's chosen method of recording gifts and hospitality is through the use of Monday.com

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 academy trustees are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the Head teacher, 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.

4.5 The Head of Finance

The Head of Finance is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

5. Acceptable gifts and hospitality

5.1 Offer of gifts and hospitality received

All personal gifts should be refused, donated to charity, shared among staff or subject to a staff raffle unless they come within one of the following categories:

- Modest gifts of a promotional character, e.g. calendars, diaries and other similar articles.
- Gifts on the conclusion of any courtesy visit to or from an outside organisation, providing these are of a sort normally given by that organisation
- Gifts to teachers from parents of pupils up to £25

Gifts which are intended for the Trust, or any of its constituent academies, may be accepted but must not be retained by the individual who receives them on behalf of these bodies. Such gifts should be forwarded as appropriate.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, members, trustees and staff must consult the Head of Finance, Director of Finance or CFOO.

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 Head of Finance, Director of Finance or CFOO.

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 or member of staff who is offered such gifts or hospitality must consult the Head of Finance, Director of Finance or CFOO before accepting. In all instances any offer of gifts and hospitality must be recorded using the following Monday.Com form: [Monday.comGiftsAndHospitalityForm](#)

If the Chief Executive Officer is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the board of trustees and record the offer on the gifts and hospitality register.

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.

5.2 Offer of gifts and hospitality given

The Trust and its academies will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented in the Gifts and Hospitality Register and has regard to the propriety and regularity of the use of public funds. Staff must enter a 'Monday.com' form prior to committing to the giving of permitted gifts. A link to the form can be found here: [Monday.com Gifts And Hospitality Form](#)

Exclusions:

This does not apply to:

- The award of gifts, prizes etc related to the achievement of pupils
- The award of gifts to individuals who have provided a voluntary service to the Trust or one of its schools (eg Trustee, Governor), where the gift does not exceed £50 and has regard to the propriety and regularity of the use of public funds.

Expenditure on staff gifts such as leaving flowers is deemed as contentious expenditure by ESFA and an improper use of public funds, therefore such expenditure must not be committed to.

Hospitality such as working lunches, coffees, catering on training courses and modest hospitality in the form of meals, etc are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not for their family or friends). These would not be added to the register but would be approved by the Head of Finance, Director of Finance or Head teacher to ensure they are of a reasonable level. Hospitality provided above this level should be recorded in the register.

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 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 (eg VIP event hospitality)

This list is not intended to be exhaustive.

7. Declining gifts and hospitality

Any members, trustee or staff member offered any of the unacceptable gifts or hospitality outlined in section 6 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 Financial and Operating Officer. The CFOO 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.

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.

8. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the CFOO

This policy will be reviewed every 2 years by the CFOO and approved by the Trust Board.