



**North Essex
Multi Academy Trust**

Gifts and Hospitality Policy

**Committee: Trust Finance
Committee**

Last reviewed:	March 2019
Next review due:	April 2022
Ratified Trust Board:	April 2019
Designated Postholder:	CFO

Why do we have guidance on gifts and hospitality?

Your conduct as a member of staff or a governor/trustee should never lead anyone to question your interests or lead anyone to think that you have been influenced by gifts and hospitality. This is important because your own personal reputation and that of the Academy could be seriously affected if you inappropriately accept a gift or hospitality. It is also a criminal offence to demand or accept a gift or reward in return for allowing yourself to be influenced as a part of the Academy. This is why the Academy has guidance, which applies to all staff and governors/trustees on gifts and hospitality.

What is a gift?

A gift is any item or service that you receive free of charge. It also includes any goods or services, which you personally are offered at a discounted rate or on terms not available to the general public.

What is hospitality?

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

What gifts or hospitality can be accepted without any approval?

You can accept gifts and hospitality, which are small gestures and have a value of £20 or less, without the approval of the Headteachers. Gifts and hospitality of this nature do not need to be recorded in the Academy's Gifts and Hospitality Register.

What things should I think about before I decide what to do?

You should treat with caution any offer of gift or hospitality made to you personally. In particular, think about whether there is a benefit to the Academy in you accepting, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of your, or the Academy's, support or favour.

What gifts or hospitality need approval from the Headteacher or Chair of Governors?

Any gift or hospitality, which is more than just a token, defined as a having a value of more than £20, should be politely refused or returned. You must have the prior written approval of the Academy Headteacher if you decide to accept something, which has more than this value. This should only be in exceptional circumstances. If you or your Headteacher has any concerns or doubts about the public perception that might be attached to accepting any gift or hospitality, then you must refer it to the Chair of Governors/Trustees.

What gifts or hospitality should never be accepted?

You must never accept:

- cash or monetary gifts
- gifts or hospitality offered to your husband, wife, partner, family member or friend

- gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process
- lavish or extravagant gifts or hospitality, even if they relate to activities in your own time

What should I do if I receive a gift without warning?

If you estimate that the gift is more than just a token you should politely and courteously decline the gift. If you feel that it would not be appropriate to do this, you should refer the matter to the Academy Headteacher as soon as possible and let the Headteacher decide what you should do with the gift. Your Headteacher may decide to return the gift, may ask the Chair of Governors/Trustees for a view, or may donate the gift to a worthy local cause.

What should I do if I get offered a gift or hospitality?

You must make sure that all offers you receive which have a value of more than £20 are recorded in the Academy's Gifts and Hospitality Register, which is kept by the Academy Business Manager.

Do I need to record offers that I decline?

Yes – all offers of gifts or hospitality, which have a value of more than £20 must be recorded in the Academy's register, even if you don't accept.

What should I do if I am in doubt?

If in doubt, always speak to the Headteachers. It is your responsibility to follow the Trust's guidance on gifts and hospitality and to justify why you chose to accept a gift or hospitality offered to you.

What would happen to me if I didn't follow the guidance?

The Trust will take disciplinary action against you if you failed to follow the guidance. It is also a criminal offence to demand or accept a gift or reward in return for allowing yourself to be influenced as a part of the Academy. This means you could be prosecuted by the Police.

Gifts Provided by the Academy

As a general guideline any gifts purchased and provided by the Academy should be:

1. Of a nominal value £20 only.
2. Given to staff or governors/trustees only in relation to specific and relevant personal circumstances (eg illness, bereavement, retirement) or upon leaving the employment or service of the academy.
3. Authorised by the Academy Headteacher (or Chair of Governors/Trustees in respect of any gifts given to the Headteachers).

4. Purchased from the Academy's own unrestricted funds (not from GAG or any other funding provided for specific purposes).
5. Recorded in a Academy's Gifts and Hospitality Register, which should be available for review by the Board of Trustees or external auditors upon request.

This policy will be reviewed by the Trust Finance Committee on a 3-yearly cycle.

SignedDate (Chair of Trustees)

SignedDate (Executive Headteacher)

THE DO'S and DON'T's

DO	DON'T
<ul style="list-style-type: none"> Read and follow the guidance on gifts and hospitality 	<ul style="list-style-type: none"> Accept any gifts or hospitality which have a value of more than £20 without the approval of the Headteachers, or the Chair of Governors/Trustees as necessary
<ul style="list-style-type: none"> Seek advice from the Headteacher or Chair of Governors/Trustees if you are in doubt 	<ul style="list-style-type: none"> Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process
<ul style="list-style-type: none"> Record all offers of gifts and hospitality which have a value of more than £20 in the Academy's register, whether accepted or not 	<ul style="list-style-type: none"> Accept cash or monetary gifts
<ul style="list-style-type: none"> Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything 	<ul style="list-style-type: none"> Accept a gift or hospitality as an inducement or reward
<ul style="list-style-type: none"> Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality 	<ul style="list-style-type: none"> Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time
<ul style="list-style-type: none"> Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body 	<ul style="list-style-type: none"> Accept a gift or hospitality which you or a member of the public would think is lavish, extravagant or excessive, even if the hospitality is taken in your own time
<ul style="list-style-type: none"> Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept 	<ul style="list-style-type: none"> Accept gifts or hospitality offered to your husband, wife, partner, family member or friend
<ul style="list-style-type: none"> Consider paying for yourself if offered any hospitality by a supplier or third party 	