



**CORPUSCHRISTI**  
We are His body, living and learning as one.

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## GIFTS AND HOSPITALITY POLICY



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This policy will be published on the Academy Trust's website

## Contents

- 1 Purpose
- 2 Legislation and Guidance
- 3 Definitions
- 4 Roles and Responsibilities
- 5 Acceptable Gifts and Hospitality
- 6 Unacceptable Gifts and Hospitality
- 7 Declining Gifts and Hospitality
- 8 Breach of this Policy
- 9 Whistleblowing

## 1 PURPOSE

1.1 This policy aims to ensure that:

- a) the funds of Corpus Christi Catholic Academy Trust are used only in accordance with the law, its articles of association, its Funding Agreement and the latest ESFA Academies Financial Handbook
- b) Members, Directors, local governors, 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

2.1 This policy is based on the Academies Handbook which requires the Academy Trust to have a policy and register for the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of Members, Directors, local governors, volunteers, staff and/or any other representative of the Academy Trust.

2.2 This policy also complies with the Funding Agreement between the Academy Trust and DfE and the Academy Trust's Articles of Association and general guidance issued to charities by the Charity Commission.

## 3 DEFINITIONS

3.1 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.

3.2 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, Directors, local governors, volunteers and staff:**

- a) **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 Academy Trust might be placed under any obligation as a result of acceptance, even if such perception is unfounded
- b) **Must not** use their official or implied position with the Academy Trust to further their private interests or the interests of others
- c) **Must not** solicit gifts or hospitality
- d) **Must** consult the Chief Executive (CEO), Chief Finance and Operations Officer (CFOO) or a Headteacher, as appropriate, before accepting or offering any gifts or hospitality with a value of over £25
- e) **Must** report within 7 days any gifts or hospitality with a value of over £25 being offered to them or the Academy Trust, even if declined. The report *should* be made by email directly to the CFOO or via an appropriate Headteacher, who will then

forward it to the CFOO. The CFOO will then ensure that the report is recorded in the Academy Trust's Gifts and Hospitality Register.

#### **4.2 Directors and local Governors**

4.2.1 In addition to the provisions of 4.1, Directors and Local Governors will ensure that the Academy 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**

4.3.1 Headteachers are responsible for ensuring that school-based staff and volunteers are aware of and understand this policy, and that it is being implemented correctly and consistently.

4.3.2 Headteachers **must** act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to schools, the wider Academy Trust, Diocese and to those outside the organisation.

4.3.3 Headteachers will also ensure, alongside the CFOO, that decisions on whether individuals or the Academy Trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

#### **4.4 The Chief Finance and Operations Officer (CFOO)**

4.4.1 The CFOO will ensure that:

- a) a Gifts and Hospitality Register is maintained and available for public inspection
- b) gifts made by the Academy Trust are disclosed in the Academy Trust's audited accounts, in accordance with the Academies Handbook
- c) Directors, Local Governors and Headteachers are provided with information on gifts and hospitality received and given, as appropriate
- d) If the CFOO is offered or has accepted any gifts or hospitality exceeding £25 in value it **must** be reported immediately to the CEO and recorded in the Gifts and Hospitality Register.

4.4.2 The CFOO will ensure, alongside Headteachers or the CEO, as appropriate, that decisions on whether individuals or the Academy Trust can accept or offer gifts or hospitality with a value of £25 are in line with this policy.

### **5 ACCEPTABLE GIFTS AND HOSPITALITY**

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

5.1.1 Directors, Local Governors and staff can accept gifts and hospitality that have a value of less than £25. Whilst these do not have to be pre-approved or recorded on the Gifts and Hospitality Register the same duty of care must be applied. It is advisable therefore not to accept any such gift or hospitality if it is practical not to do so.

5.1.2 Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If there is any doubt the CFOO or an appropriate Headteacher should be consulted.

5.1.3 Hospitality such as working lunches may be accepted in order to maintain good working or business relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the CFOO or an appropriate Headteacher.

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

5.2.1 The Academy Trust encourages and seeks co-operative relationships with stakeholders and external organisations. Accordingly, there can be occasions where it is appropriate for the Academy Trust to provide and fund limited gifts. In almost every occasion this will be for hospitality.

5.2.2 It may also be appropriate for leaving gifts of up to £25 to be provided to staff leaving the employment of the Academy Trust, particularly after a long period of service. Such gifts are often supplemented with private contributions from continuing members of staff.

5.2.3 Any gifts or hospitality provided by the Academy 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.

5.2.4 The CFOO, or a Headteacher, or the CEO, as appropriate, must be consulted in advance about any proposal to provide gifts or hospitality with a value of over £25.

## **6 Unacceptable gifts and hospitality**

6.1 The following must never be offered or accepted:

- a) monetary gifts, including items that have close a monetary value such as vouchers that are redeemable in a variety of retail stores. Furthermore, the giving of monetary consideration could fall foul of HMRC legislation and expose the giver and receiver to financial penalty
- b) Gifts or hospitality offered to family members, partners or close friends of members, Directors, local governors, volunteers or staff
- c) Gifts or hospitality from a potential supplier or tenderer in the period immediately before tenders are to be invited or during the tendering process itself
- d) Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time
- e) Gifts or hospitality that is not consistent with the Academy Trust's or Diocese values

## **7 Declining gifts and hospitality**

7.1 Any Director, Local Governor, volunteer or staff member who is offered any of the unacceptable gifts or hospitality outlined above should politely decline the offer.

7.2 If they feel it would not be appropriate for them to decline the offer, they should refer the matter to the CFOO or an appropriate Headteacher. The CFOO or Headteacher may decline the offer, or decide to donate the gift or hospitality to a worthy cause. It must also be recorded in the Gifts and Hospitality Register.

7.3 Disciplinary action will be taken against anyone who fails to decline gifts or hospitality that the Academy Trust has deemed unacceptable.

## **8 Breach of this policy**

8.1 Any breach of this policy, including failure to declare any gifts or hospitality offered, may be dealt with as a disciplinary matter. If a breach is deemed to be in contravention of a law or statutory regulation then the Academy Trust will bring the matter to the attention of the appropriate authorities.

## **9 Whistleblowing**

9.1 Employees and volunteers who wish to report a breach of this policy should follow the Academy Trust's Whistleblowing Policy

