



**The Park Federation Academy Trust**

**Gifts and Hospitality Policy**

**2018 - 2020**

## Version History

Version	Date	Status and Purpose	Changes overview
1	05 <sup>th</sup> December 2014	Draft for comment	
2	19 <sup>th</sup> December 2014	Approved	
3	22 <sup>nd</sup> September 2018	Reviewed	

## Approval

<b>Chief Executive Officer and Federation Principal approved this policy on behalf of the Board of Directors: Dr. Martin Young.</b>
Approved on <b>9<sup>th</sup> September 2018</b>
Next review: <b>August 2020.</b>

## Notes on Document Control

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Once issued, as a minimum this document shall be reviewed on an annual basis by the originating team/function. Any amendments shall be identified by a vertical line adjacent to the right hand margin.

To enable continuous improvement, all readers encouraged to notify the author of errors, omissions and any other form of feedback.

Unless there is primary legislation relating to this policy or the Academy finds it necessary to make changes, these procedures will be reviewed every three years to ensure they are up to date, reflect current best practice and are working effectively. Any changes that are to be incorporated into instruction and training arrangements will be effectively communicated to employees and other relevant parties.

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### 1. Aims

This policy aims to ensure that:

- The academy trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academies Financial 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, Directors, Academy Council 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 [Academies Financial 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, Directors, Academy Council members and staff

Members, Directors, Academy Council members 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 Chief Operating Officer or Principal before accepting or offering any gifts or hospitality with a value of over £25.

#### 4.2 Academy trustees

Academy Directors 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 Chief Executive Officer (CEO)

The CEO is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The CEO 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 academies and trust and to those outside the organisation.

They will also ensure, alongside the Chief Operating Officer and Principals that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of £25 are in line with this policy.

#### 4.4 The Chief Operating 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 Academies Financial Handbook
- The academy Directors and senior leaders including Principals are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, 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 Senior Finance Manager and Academy Principals**

The Senior Finance Manager is responsible for maintaining the central gifts and hospitality register on a day-to-day basis.

The Academy Principal is responsible for maintaining the local gifts and hospitality register on a day-to-day basis.

#### **4.6 Parents**

- As a Trust we do not wish to discourage all gift-giving, and that small tokens of gratitude are always appreciated by staff. Parents are requested that if they wish to give a gift then this should be of a value below £25. Typical gifts normally include flowers, books or chocolates, with this list not intended to be exhaustive.

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

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

Members, Directors and staff can accept gifts and hospitality that have a value of up to £25. These do not have to be pre-approved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, members, Directors and staff must consult the Chief Operating Officer or Principal.

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 Operating Officer or Principal.

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, Director or member of staff who is offered such gifts or hospitality must consult the Chief Operating Officer or Principal before accepting.

If Senior Leaders are the recipient(s), or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the board of Directors and CEO 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 Offers of gifts and hospitality given**

The Trust provides a gift to staff who receive a long service award. Staff working off site are entitled to claim refreshments (not alcohol) or meals if working away from home.

Any gifts or hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £25 should be used as a guideline and authorization sought from the Principal, Chief Operating Officer or CEO.

Alcohol must not be purchased out of academy funds.

Expense claims should be made to Senior Management and receipts must always be enclosed.

The Chief Operating Officer or Principal must be consulted about any proposal to provide gifts or hospitality with a value of over £25.

## **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.

This list is not intended to be exhaustive.

## **7. Declining gifts and hospitality**

Any members, Directors or staff member who is 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 Operating Officer or Principal. The Chief Executive Officer, Chief Operating Officer or Principal 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 Senior Finance Manager.

This policy will be reviewed and approved every year by the Board of Directors.

## **9. Links with other policies**

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Accounting policy