

Canonium Learning Trust



Gifts and Hospitality Policy

Adopted: 2020/2021

Next review: 2021/2022

This policy aims to ensure that:

- The MATs funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academies Financial Handbook.
- Members, trustees 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.

Legislation

This policy complies with our funding agreement and articles of association.

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.

Responsibilities

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 £30 or more on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Chief Financial Officer (CFO) before accepting or offering any gifts or hospitality with a value of £30 or more.

Headteachers

The Headteacher of each school in the Trust is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The Headteacher of each school in the Trust 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 CFO that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £30 are in line with this policy.

The CFO/CEO

The CFO/CEO will ensure that:

- The trust maintains a gifts and hospitality register (Appendix 1)
- 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
- Trustees are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside Headteachers of each school in the Trust, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £30 are in line with this policy.

The Financial Controller

The Trust's Financial Controller (FC) is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

Acceptable gifts and hospitality/Offers of gifts and hospitality received

- Members, trustees and staff can accept gifts and hospitality that have a value of under £30. 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, trustees and staff must consult the CFO or respective Headteacher.
- 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 CFO or respective Headteacher.
- Any gifts or hospitality offered with a value of over £30 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 CFO or respective Headteacher before accepting.
- If the Headteacher is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the CFO and record the offer on the gifts and hospitality register.
- If the CFO is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the Chief Executive Officer (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.

Offers of gifts and hospitality given

- The CFO and CEO must be consulted about any proposal to provide gifts or hospitality.
- Any gifts or hospitality provided by the 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.
- Alcohol must not be purchased out of the school budget.
- Expense claims should be made to the FC and receipts must always be enclosed.
- Any gifts or hospitality in excess of £25 per head must be agreed by a Trustee.

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.

Declining gifts and hospitality

- Any members, trustee 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 CFO or their respective Headteacher. The CFO, alongside input from the respective Headteacher, 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.

Monitoring arrangements

The gifts and hospitality register is monitored termly by the FC.

The CFO monitors the gifts and hospitality register periodically, ensuring any abnormal requests are escalated to the CEO, as required.

This policy will be reviewed annually by the CFO and approved by the board of trustees.



Appendix 1: Gifts and hospitality register (copy)

Date	Name	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted/rejected	Approved by