



Children's



Endeavour



Trust

# Gifts and Hospitality Policy

The Children's Endeavour Trust comprises:

Abbot's Hall Community Primary School  
 Bosmere Community Primary School  
 Broke Hall Community Primary School  
 Chilton Community Primary School  
 Combs Ford Primary School  
 Freeman Community Primary School  
 Springfield Junior School  
 Whitehouse Community Primary School

## Document Control

Version	Date	Author	Comments
Issue 1	23 <sup>rd</sup> May '19	Finance & Audit Committee	Includes 'Prove it' test and Declaration of Gifts and Hospitality Form. Review Summer 2021.
	Nov 2020	CFO	Details of Long service Award
	July 2021	CEO	To be reviewed in the Autumn pending advice from auditors.
	Oct 13 <sup>th</sup> 2021	CEO	Updated and adopted
	Sept 2022	CEO	Updated to standardise provision of hospitalities across schools.
	July 2024	CEO/CFO	Detail on tea/coffee added to align with wellbeing policy Amount clarified (no more than £49.99, previously £50). Detail on giving gifts added, as per auditor's advice.
	March '26	CEO/CFO	Update gift giving procedure and limits

**Owner:** CEO

**Approver:** Finance and Audit Committee

**Statutory Policy:** Yes

**Review Cycle:** Biennial

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## 1. Aims

This policy aims to ensure that

- The Trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academies 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 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 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, governors and staff

Members, trustees, governors 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 £49.99 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- School staff must consult their headteacher before accepting any gifts or hospitality with a value of over £49.99.
- School staff must consult their headteacher and gain written approval before offering any gifts or hospitality. This must be reported to the Central Team and recorded on the gifts register.

- Central Trust staff must consult the CEO before accepting any gifts or hospitality with a value of over £49.99
- Central Trust staff must consult the CEO and get written approval before offering any gifts or hospitality. If CEO offers gifts or hospitality, written approval must be obtained from the CFO. This must be recorded on the gifts register.

## **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 headteachers**

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

The headteachers 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 CEO, that decisions on whether individuals or the trust can accept gifts or hospitality with a value of over £49.99 are in line with this policy.

## **4.4 The CEO**

The CEO 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 Trustees are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the headteachers, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £49.99 are in line with this policy.

## **4.5 The Assistant to the CEO**

The Assistant to the CEO is responsible for maintaining the gifts and hospitality register on a day-to-day basis. The assistant will collect information from schools on a termly basis to keep this up to date.

# **5. Acceptable gifts and hospitality**

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

Members, trustees and staff can accept gifts and hospitality that have a value of up to £49.99. 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 CEO or their headteacher as appropriate. 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 CEO or their headteacher as appropriate. Any gifts or hospitality offered with a value of over £49.99 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 CEO or their headteacher as appropriate, before accepting.

If a headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the CEO and record the offer on the gifts and hospitality register.

If the CEO 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 Provision of Hospitality**

### **Teas and Coffees**

Schools should ensure there is a modest supply of tea/coffee and milk for staff and volunteers (including governors) and visitors, in accordance with the Trust rationale based on staffing numbers.

### **Lunches during whole day staff training events**

On inset days designated for whole staff training, schools may provide a buffet lunch for staff members. This should be a basic offering.

## **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. Giving gifts**

It may, on occasion be appropriate for The Trust or schools to give a gift, for example, flowers for an unwell member of staff. All gifts will be recorded on the gifts register.

## **8. 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 CEO or their headteacher as appropriate. The CEO or their 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.

## **9. Long Service Awards**

Schools within the Trust are able to honour the Local Authority's long service award for members of staff who are leaving the Trusts employment on retirement, having worked in Suffolk schools for more than 20 years. The calculation of the amount of the award is calculated using the Suffolk HR calculator and depends on the length of service and if employed is full or part time.

The member of staff is able to choose an item to the value of the award, and the school will purchase it, items can be purchased from any retailer providing they are in the spirit of marking long service.

## **10. Monitoring arrangements**

The gifts and hospitality register is monitored regularly by the CEO.

This policy will be reviewed bi-annually by the CEO and Board of Trustees and approved by the Board of Trustees

## **11. Links with other policies**

This gifts and hospitality policy is linked to the:

- Codes of Conduct
- Staff Disciplinary Procedures
- Finance Policy

Appendix 1 – Gifts and Hospitality Register

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED/REJECTED/GIVEN	APPROVED BY