



Gifts and Hospitality Policy

Contents

1) Scope	2
2) Aims	3
3) Definitions	3
4) Roles and responsibilities	3
4.1 Members, Trustees, Academy Council Members and Staff	3
4.2 Trustees	4
4.3 Principal/ Head of School	4
4.4 Head of Finance/ Chief Financial Officer	4
4.5 School Administrators/ Business Partners/ Trust Administration Manager	5
4.6 Parents	5
4.7 Other	5
5) Acceptable Gifts and Hospitality	5
5.1 Offers of gifts and hospitality received	5
5.2 Sponsorship	6
5.3 Offers of gifts and hospitality given	6
6) Unacceptable Gifts and Hospitality	7
7) Declining Gifts and Hospitality	7
8) Monitoring Arrangements	7
Appendix 1 – Gifts and Hospitality Register	8

1) Scope

This policy is based on the Academies Trust Handbook, which states that academy trusts should have a policy or register on the acceptance of gifts, hospitality, awards, prizes or other benefits that might compromise their judgement or integrity and should ensure all staff are aware of it.

When making gifts, the trust must ensure the value is reasonable, is within its Scheme of Delegation, the decision is documented, and achieves propriety and regularity in the use of public funds. This policy also complies with our funding agreement and articles of association.

DBAT is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff, trustees, members and academy council members are expected to maintain high standards of propriety and professionalism, ensuring they are free from any conflict of interest through their business in the name of DBAT or any of the academies within the Trust. The

principle of integrity requires that trustees, staff, members and academy council members should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted must be declared and recorded.

The Trust and each academy will hold a Gifts and Hospitality register. All gifts/ hospitality over the value of £30 must be recorded in the Gifts and Hospitality Register.

2) Aims

The 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 Trust 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, 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.

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, Academy Council Members and Staff

Members, trustees, 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 £30 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined.
- Must consult the Principal/ Head of School or Head of Finance/ CFO before accepting or offering any gifts or hospitality with a value of over £30.

4.2 Trustees

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 Principal/ Head of School

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

The Principal/ Head of School 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 ensure, alongside the Head of Finance/ 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.

4.4 Head of Finance/ Chief Financial Officer

The Head of Finance/ Chief Financial Officer will ensure that:

- The Trust and each academy maintain a single central 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 Trust Handbook.
- The Trustees and Principals/ Heads of School are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the Principals/ Head of School, 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.

4.5 School Administrators/ Business Partners/ Trust Administration Manager

School Administrators and Business Partners are responsible for maintaining the gifts and hospitality register on a day-to-day basis.

School Administrators should maintain the register in relation to the School Staff. Business Partners should maintain the register in relation to senior and central Trust Employees (Headteachers and all Central Trust employees, other than SLT). The Trust Administration Manager should maintain the register for the whole Trust and complete it in relation to the Trust SLT.

4.6 Parents

It is not the Trust's wish to discourage all gift-giving and the Trust recognises that small gifts of gratitude are always appreciated. If these are valued at less than £30 these are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register. Where gifts valued over £30 are accepted, these should be recorded in the register.

4.7 Other

Where a more valuable gift, benefit or service is offered which is to the good of the Academy, rather than an individual, it must be referred to the Head of Finance or Principal/ Head of School, for approval within their discretion; if acceptable, then these terms must be recorded in the register.

5) Acceptable Gifts and Hospitality

5.1 Offers of gifts and hospitality received

Members, trustees, academy council members and staff can accept gifts and hospitality that have a value of up to £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 or free promotional pens, calendars, diaries or similar items, may be accepted. If in any doubt, individuals must consult the Head of Finance or Principal/ Head of School.

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.

Other hospitality may be accepted for instance where:

- There is a genuine need to impart information or represent DBAT in the community
- An event is clearly part of the life of the community or where DBAT should be seen to be represented
- The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal

If in doubt, guidance must be sought from the Head of Finance or Principal/ Head of School.

The overriding rules governing the acceptance of gifts and hospitality are that:

- 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 members, trustees, academy council member or staff member who is offered such gifts or hospitality must consult the Head of Finance or Principal/ Head of School.
- Your conduct in a private capacity must not foster the suspicion of any conflict between your official duty and your private interests.
- Your conduct whilst acting in an official capacity must not give the impression to any member of the public or to any organisation with whom you deal or to your colleagues that you have been (or may have been) influenced by a gift or consideration to show favour or disfavour to any person or organisation.
- You must not accept gifts or hospitality either directly or through a third party (i.e. a family member or friend) that would, or might appear to:
 - Place you under any obligation to an individual or organisation making the offer
 - Compromise your impartiality or otherwise be improper.
- Any gifts or hospitality must be refused if either you or the Trust are in any doubt about the propriety of accepting them.
- The CEO is the final arbiter on the advisability of acceptance or refusal of gifts and hospitality.

If the CEO/ Principal/ Head of School is the recipient, or intended recipient, of **any** gifts or hospitality, they must inform the Chair 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 Sponsorship

Where an outside organisation wishes to sponsor or is seeking to sponsor the activity of DBAT, whether by invitation, tender or negotiation, or voluntarily, the basic conventions concerning the award of contract, and acceptance of gifts and hospitality, apply.

5.3 Offers of gifts and hospitality given

Any gifts or hospitality provided by the Trust, such as a working lunch for visitors, must not be extravagant. For visitors, a maximum value of £10 per head should be used as a guidance.

Alcohol must not be purchased out of the school budget in any circumstance.

Expense claims should be made to the Trust finance team and receipts must always be enclosed.

The Head of Finance or Principal/ Head of School must be consulted about any proposal to provide gifts or hospitality with a value of over £10 per head.

6) Unacceptable Gifts and Hospitality

The following must never be offered or accepted:

- Monetary gifts
- Gifts of hospitality offered to family members, partners or close friends of members, trustees, academy council members, or staff members
- 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, trustees, academy council members or staff members 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 Principal/ Head of School or the Head of Finance. The Principal/ Head of School or the Head of Finance 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 Head of Finance and will be subject to periodic inspection by the Trust's Internal and External auditors.

This policy will be reviewed every three years by the Audit and Risk committee.

Appendix 1 – Gifts and Hospitality Register

The Gifts and Hospitality register can be found here: [Gifts and Hospitality Register.docx](#)

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

History of most recent Policy changes (must be completed)

Date	Page	Change	Origin of Change e.g. TU request, Change in legislation
Nov 2021	Whole document	New policy	Required by Academies Trust Handbook

Policy Owner	Main Board (Audit and Risk committee)
Date Adopted	January 2022
Review Date	January 2025
Level	Level 1
DBAT Policy levels:	
LEVEL 1	DBAT policy for adoption (no changes can be made by the Academy Council; the Academy Council must adopt the policy)
LEVEL 2	DBAT policy for adoption and local approval, with areas for the Academy to update regarding local practice (the main body of the policy cannot be changed)
LEVEL 3	DBAT model policy that the Academy can adopt if it wishes
LEVEL 4	Local policy to be approved by the Academy Council