

Date ratified at Full
Board Meeting
18 July 2022



Review
Resources
Committee
Autumn 2024

GIFTS AND HOSPITALITY POLICY

THE MAT MISSION STATEMENT

Our family of schools is united in the belief that God's love, peace, truth, and joy is for all. We are dedicated to the achievement of excellence in all we do. We cherish the uniqueness of each of our school communities and celebrate together as one Trust family. By following Jesus' example we bear witness to the greatness of God.

'To think, to feel, to do' Pope Francis

St John the Baptist Catholic MAT
Company No: 7913261
Registered Office: Surrey Street, Norwich NR1 3PB



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Contents

| | |
|--|---|
| 1. Aims | 2 |
| 2. Legislation and guidance | 2 |
| 3. Definitions | 2 |
| 4. Roles and responsibilities | 3 |
| 5. Acceptable gifts and hospitality | 3 |
| 6. Unacceptable gifts and hospitality | 4 |
| 7. Declining gifts and hospitality | 5 |
| 8. Monitoring arrangements..... | 5 |
| 9. Links with other policies..... | 5 |
| Appendix 1: Gifts and hospitality register | 6 |
| Appendix 2: Register of gifts and hospitality purchased from School funds..... | 8 |

1. Aims

This policy aims to ensure that

- The funds of St John the Baptist Catholic Multi Academy Trust (SJB CMAT, or Trust) are used only in accordance with the law, its Articles of Association, its funding agreement and the latest Academy 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 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 Academy Trust Handbook, which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefits, 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 and staff

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 over £50 on the gifts and hospitality register (see Appendix 1) within 7 working days, even if declined
- Must consult the Company Secretary or Headteacher before accepting or offering any gifts or hospitality with a value of over £50.

4.2 Academy trustees

Academy trustees (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 headteacher

The headteachers (incl. Heads of School, Executive headteachers and the CEO) are responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The headteacher 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 Company Secretary (Director of Finance and Operations), that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of £50 are in line with this policy.

4.4 The Company Secretary (Director of Finance and Operations)

The Company Secretary (in our Trust represented by the Director of Finance and Operations) 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 Academy Trust Handbook
- The academy trustees and Headteachers 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 £50 are in line with this policy.

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 £50. 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 Company Secretary or 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 Company Secretary or Headteacher.

Any gifts or hospitality offered with a value of over £50 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 Company Secretary or Headteacher before accepting.

If the Headteacher or Company Secretary is the recipient, or intended recipient, of gifts or hospitality with a value of £50, they must inform the CEO, who can at any point inspect the register of gifts and hospitality.

If the CEO is the recipient, or intended recipient, of gifts or hospitality with a value of £50, they must inform the Company Secretary.

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 Offer of gifts and hospitality given

The Trust and its academies will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented in the Gift and Hospitality Register and has regard to the propriety and regularity of the use of public funds.

This does not apply to:

- the award of gifts, prizes, etc related to the achievement of pupils e.g. attainment or merit awards, nor Trust-wide staff recognition events or activities.
- recognition awards or long service awards which are paid via payroll.

To reward staff for carrying out their role is a taxable benefit. Therefore, Trust funds should not be used to reward staff through giving gifts or flowers as a “thank you” for carrying out their role.

The schools can fund flowers for staff who suffer a serious illness or for a funeral of a staff member up to a value of £35. For all other life events (birthday, marriage, childbirth, leaving, etc) the school has discretion to purchase a card from budget, but this is not mandated. Purchases of flowers for any other life events shall be authorised by the Director of Finance and Operations.

Hospitality such as working lunches, coffees, catering on training courses and modest hospitality in the form of meals, etc are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with staff or business colleagues (but not for their family or friends). These would not be added to the register but the Headteacher will ensure they are of a reasonable level.

As for academy visitors above, working lunches for staff are perfectly acceptable. In exceptional circumstances it may be appropriate for the Trust or its academies to provide a celebratory meal or event. Such expenditure would need to be funded from unrestricted funds and would need to be sanctioned by the Director of Finance and Operations, unless the Director was a beneficiary of such an event in which case approval would be required from the Chair of the Board.

Refreshments such as tea, coffee, milk and sugar for consumption by staff is permitted subject to budget constraints and approval from the governing body.

In approving such an event consideration will be given to both rules on personal taxation from HMRC and the requirement to properly utilise public funds.

Alcohol must not be purchased out of the school budget.

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, 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 Company Secretary or Headteacher. The Company Secretary or 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.

8. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the Company Secretary.

This policy will be reviewed every three years by the Trust Resources Committee and approved by the Board of Directors.

9. Links with other policies

This gifts and hospitality policy is linked to the:

- Code of conduct policy
- Finance policy

Appendix 1: Gifts and hospitality register

| DATE | NAME | DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE | PARTY OFFERING GIFT/HOSPITALITY | ACCEPTED/ REJECTED | APPROVED BY |
|------|------|---|---------------------------------|--------------------|-------------|
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Appendix 2: Register of gifts and hospitality purchased from School funds (e.g. flowers)

| DATE | NAME OF RECIPIENT | DESCRIPTION OF GIFT / HOSPITALITY GIVEN AND VALUE | SCHOOL OFFERING GIFT / HOSPITALITY | NOTE | APPROVED BY |
|------|-------------------|---|------------------------------------|------|-------------|
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