



Gifts and Hospitality Policy

The Ivy Learning Trust's gifts and hospitality policy is agreed by the Board of Trustees and monitored by the Local Governing Body and the Board of Trustees. It will be reviewed triennially.

Date Agreed: 12 July 2018

Agreed by: Ivy Learning Trust Board

Review Date: July 2021

Inclusion

The Ivy Learning Trust carefully considers all policies with respect to the impact on equality and the possible implications for pupils and staff with protected characteristics.

Aims

This policy aims to ensure that:

- The Ivy Learning 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 Ivy Learning Trust's and those associated with it operate in a way that commands broad public support
- The Ivy Learning Trust's 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, local governors 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

The Nolan Principles of Public Life

All Trustees and those with delegated responsibility are required to observe the Nolan Principles which are:-

1. Selflessness

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

2. Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

3. Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

4. Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

5. Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

6. Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

7. Leadership

Holders of public office should promote and support these principles by leadership and example.

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.

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.

Roles and responsibilities

a) Members, trustees, local governors and staff

Members, trustees, local 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 £50 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the chief operations officer or headteacher before accepting or offering any gifts or hospitality with a value of over £50.

b) 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.

c) The headteacher

The headteacher is 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 chief operations officer, 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.

d) The chief operations officer

The chief operations officer (COO) 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 trustees and headteacher are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the headteacher, 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.

e) Gifts and hospitality register

The governance manager is responsible for maintaining the gifts and hospitality register on a day-to-day basis for Members, Trustees and staff within the Central Team.

The headteacher is responsible for ensuring the gifts and hospitality register is maintained on a day-to-day basis for their staff and their local governors.

Acceptable gifts and hospitality

a) Offers 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 COO or headteacher.

The Ivy Learning Trust understands that staff may be given gifts from parents and families at the end of term. These gifts do not have to be pre-approved or recorded on the gifts and hospitality register.

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 COO 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, local governor or member of staff who is offered such gifts or hospitality must consult the COO or headteacher before accepting.

If the headteacher 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.

b) Offers of gifts and hospitality given

Any hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £10 per head should be used as a guideline.

In exceptional circumstances, such as serious illness or bereavement, a gift may be purchased from the budget. The headteacher must be consulted about any such purchase.

Gifts for weddings and births, for example, must not be purchased out of the budget.

Alcohol must not be purchased out of the budget.

Any discount scheme arrangements for staff will be available to all staff within a school.

Expense claims should be made to the Headteacher for approval and receipts must always be enclosed.

The COO or headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £10.

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, local governors 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, local governor or staff member who is offered any of the unacceptable gifts or hospitality outlined 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 COO or headteacher. The COO 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.

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 regularly by the COO.

Links with other policies

This gifts and hospitality policy is linked to the:

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



Appendix 1: gifts and hospitality register

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