

GIFTS AND HOSPITALITY POLICY

Policy Approved: June 2023
Policy Renewal: June 2025

Reviewed by the SLT MAT Board

'The Trustees of Southport Learning Trust are committed to safeguarding and promoting the welfare of children and young people at every opportunity and expect all staff and volunteers to share this commitment'

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1. Aims

This 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 Financial 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 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.

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
- not use their official position to further their private interests or the interests of others
- not solicit gifts or hospitality
- record any gifts or hospitality offered to them or the Trust with a value of over £25 on the Gifts and Hospitality Form (see Appendix 1) within 7 working days, even if declined
- consult with the Chief Financial Officer or the Chief Executive Officer before accepting or offering any gifts or hospitality with a value of over £25.

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 Chief Executive Officer

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

The Chief Executive Officer 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 Financial Officer, that decision on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

4.4 Chief Financial Officer

The Chief Financial Officer 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 Chief Executive Officer are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the Chief Executive Officer, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

4.5 Director of Finance

The Director of Finance is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

5. Acceptable Gifts and Hospitality

5.1 Offers of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of up to £25. 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 Chief Financial Officer or Chief Executive Officer.

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 Chief Financial Officer or Chief Executive Officer.

Any gifts or hospitality offered with a value of over £25 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 Chief Financial Officer or the Chief Executive Officer.

If the Chief Executive Officer 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 (see Appendix 1 – Gifts and Hospitality Form).

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

Any gifts or 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 accordance with the Academies Financial Handbook, **alcohol must not be purchased using the school budget.**

Expense claims, approved by the Chief Financial Officer, should be made to the relevant member of staff, receipts must always be enclosed.

The Chief Financial Officer or Chief Executive Officer must be consulted about any proposal to provide gifts or hospitality with a value of over £25.

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 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.
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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 Chief Executive Officer or Chief Financial Office. The Chief Executive Officer or Chief Financial Officer 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 in the Gifts and Hospitality Register, in line with this policy, will be dealt with as a staff disciplinary matter.

8. Links with other policies

This Gifts and Hospitality Policy is linked to the:

- Staff Code of Conduct
- Staff Disciplinary Procedures
- Financial Handbook
- Academies Financial Handbook.

9. Monitoring and review

This Policy has been approved by the Board of Trustees and is to be reviewed on a biennial basis.

The internal monitoring of the implementation of this policy will be the responsibility of the Executive Director who will produce reports for the Board of Trustees as required.

The responsibility for ensuring that this policy and its associated processes and procedures, remain appropriate and comply with changes in legislation will be held by the Chief Executive Officer.

**SOUTHPORT LEARNING TRUST
GIFTS AND HOSPITALITY APPROVAL FORM**

DATE	NAME	TITLE

DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE

PARTY OFFERING GIFT/HOSPITALITY

ACCEPTED/REJECTED	APPROVED BY (& ROLE)	DATE ENTERED IN REGISTER

COMPLETED FORM TO BE RETURNED TO THE DIRECTOR OF FINANCE FOR INCLUSION IN THE GIFTS & HOSPITALITY REGISTER.