



# Horizon Academy Trust

Where anything is possible

## **Gifts and Hospitality Policy**

Approved and signed by the Board of Trustees' Finance, Resources & Operations Committee

28 November 2019

**Autumn 2019**

Date of next review: Autumn 2022

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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
- 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 CEO or Head/ Head of School before accepting or offering any gifts or hospitality with a value of over £50

### 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 Heads/Heads of School**

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

The Heads/Heads 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 also ensure, alongside the CEO 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.

### **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 academy trustees are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside Heads/Heads of School 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.

### **4.5 The Finance Team**

The finance team 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 £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 CEO or 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. If in doubt, guidance must be sought from the CEO or Head of School.

Any gifts or hospitality offered with a value of £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 CEO or Head before accepting.

If the Head 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.

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 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. A maximum value of £30 per head should be used as a guideline.

Alcohol must not be purchased out of the school budget.

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

The CEO or Head must be consulted about any proposal to provide gifts or hospitality with a value of over £50.

## **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 Head or CEO. The Head or CEO 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 CFO on behalf of the CEO.

This policy will be reviewed every 3 years by the CEO and approved by board of trustees.

## Appendix 1: gifts and hospitality register

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