

OWLCOTES MULTI-ACADEMY TRUST

Gifts and Hospitality Policy



January 2019

Reviewed: March 2023

About Owlcotes Multi-Academy Trust (OMAT)

OMAT is committed to the development of inclusive schools, sharing a common purpose to provide excellent education and improved outcomes for pupils.

OMAT strives to provide high-quality education for all children within our local communities by inspiring innovation, creativity and aspiration through an enriched curriculum.

OMAT is committed to the principles of co-operation, collaboration and sharing best practice with a strong focus on staff development.

OMAT is also committed to the preservation of the unique identity of all schools within the trust: each school will have a Local Governing Board (LGB) which is involved in decision making at school level, with autonomy to make decisions for its own school in line with the scheme of delegation.

All trustees and any schools joining must agree to share and uphold all of these principles now and in the future.

Gifts and Hospitality Policy

1. Definitions

A **“gift”** is generally any item or service that is received free of charge, but also includes any goods or services that a member of staff or Trustee/ Governor is offered at a discounted rate or on terms not available to the general public.

“Hospitality” is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

“Official funds” are defined as any fund, provided by the ESFA; DfE; Local Authority or other body to meet the requirements to provide education. Examples of such funds include:

- General Annual Grant (GAG) funding
- Pupil Premium Funding
- Funding for Inclusion (FFI)
- Early Years Funding
- Funding received by schools for specific projects which are required, as conditions of the funds, to be dealt with through the Academy Trust’s official accounting system.

“Unofficial funds” are defined as funds operated, wholly or in part, by any employee of the school because of his/her employment, for which the government/Local Authority does not have a statutory requirement to provide the resources for which the fund is being used. Examples of such funds include:

- School Funds
- PTA Funds
- School-generated income from extended services etc.

2. Guiding Principles

It is important that the conduct of all staff, Governors, and Trustees who represent Owlcotes Multi-Academy Trust and its schools is beyond reproach and reflects the highest possible standards of probity and ethics. Their conduct should never lead anyone to suspect dishonesty or think that they may have been unduly influenced by gifts and hospitality.

3. Gifts and Hospitality Given

The giving of gifts by schools should not be a matter of routine practice. The appropriateness of giving of gifts should only occur within the bounds of agreed protocol. Only unofficial funds may only be used for buying small gifts for school staff, or other people who may assist the school in a voluntary capacity, where the costs and the reasons for giving gifts are justifiable and can stand up to public scrutiny.

Any such gifts should be nominal (no more than £20) and subject to the approval in principle of the Local Governing Board (LGB). They should not be of a 'private' nature (e.g. birthdays, anniversaries etc.) but may be appropriate due to bereavement, condolences, illness etc.

Official or unofficial funds should not be used for providing general hospitality or meals for staff. Exemptions to this include where a member of staff is undertaking specific work or supervision duties outside their normal working day (E.g. lunchtime supervision, attendance at meetings or as part of training requirements).

The provision of refreshments such as tea, coffee, milk and sugar for consumption by visitors to the school is permitted and the purchase of these items can be made through the school budget. Each school in the Owlcotes Multi-Academy Trust should account for 'Hospitality' in their budget so that there is a clear audit trail for expenditure of this type.

The occasional provision of some refreshments such as tea, coffee, milk and sugar for consumption by staff is also permitted subject to budget constraints and specific approval from the LGB. If meetings with visitors to the school extend through the lunch period it is usually acceptable to provide sandwiches or a finger buffet and non-alcoholic drinks, all of which may be purchased through the school budget.

Alcohol should not be purchased using official or unofficial funds. Official or unofficial funds must not be used for the purchase of food or beverages at restaurants or hotels for school staff unless it is agreed in advance by the LGB/Board of Trustees, is purchased in line with the OMAT Expenses Policy, and provides for efficient use of the school budget. It is sometimes appropriate to provide refreshments and a light meal for staff training days or as part of a professional development activity for staff and visitors.

Where school staff are on residential training courses, personal additional expenditure incurred during an overnight stay such as mini bar, newspapers, private telephone calls etc. are the responsibility of the individual employee and must be paid for in full before leaving the hotel/venue.

4. Gifts and Hospitality Received

All staff should consider if the acceptance of any gift and/or hospitality could be regarded by a third party as compromising or likely to compromise the impartiality or integrity of the member of staff. If in doubt, the offer should be declined in a polite manner so as not to offend the giver of the gift and/or hospitality and so that they understand there are ethical standards to be maintained.

During the course of undertaking their duties it is inevitable that school staff will be offered some gifts and/or hospitality at some point and in particular this may apply to staff with financial responsibility – Headteachers, Office Managers, budget holders etc. All such staff should lead by example and uphold high standards of integrity.

Staff can accept small token gifts and hospitality (defined as having a value of up to £25) without the approval of the Headteacher. Gifts and hospitality of this nature would not need to be recorded in the school's gifts and hospitality register. Examples include small tokens of thanks from parents or pupils, small promotional items from suppliers such as calendars, notepads and pens.

Any gift or hospitality that is more than just a token (defined as a having a value of more than £25) should be considered as to its appropriateness by the individual and the Headteacher.

All offers of gifts or hospitality that have a value of more than £25 must be recorded on the gifts and hospitality register, even if they are not accepted.

Staff or Governors/Trustees who have any doubts about an offer of gifts or hospitality should refer the matter to the Headteacher who may seek advice from the CFO/CEO.

Where any gift and/or hospitality is offered by a person or organisation seeking to do business with the school, particularly where the offer is made to an individual member of staff, it is necessary to exercise extreme caution. The expectation is that as a minimum the individual should consult either the Headteacher or in the case of the offer being made to the Headteacher, the Chair of Governors and CEO.

Hospitality is sometimes offered to representatives of schools and in such cases extreme caution is needed particularly where the host is seeking to do business with the school to obtain a decision from it. It is important to avoid any suggestion of improper influence. A working lunch of a modest standard may be acceptable to allow parties to continue a business discussion but extreme caution is needed if any such working lunches are taken with the same company on a frequent basis. Any such hospitality should be recorded in the Gifts and Hospitality Register.

It is not acceptable to receive hospitality in the form of holidays or weekends away, tickets to theatres or other entertainment events or hospitality boxes at sporting and other events.

If any gift and/or hospitality, other than 'trivial gifts', are accepted they must be recorded, within seven days of the offer of the gift and/or hospitality being made, within the schools Gifts and Hospitality Register. This Register should be presented to the LGB. Failure to record the receipt of any gifts or hospitality will be deemed as a disciplinary matter.

Please note that where hospitality is provided at an official function of the DfE or Local Authority there will be no need to declare it within the Gifts and Hospitality Register. If schools are in any doubt over any gift or offer of hospitality they should seek appropriate advice from the CFO / CEO.

5. Gifts and Hospitality Register

High ethical standards, along with open and transparent arrangements, are essential to ensure integrity of all staff employed by OMAT. Accordingly, gifts and/or hospitality that are not of a 'trivial' nature must be discussed with the Chair of Governors and CFO/CEO.

If a decision to accept is taken, the details should be recorded in the Gifts and Hospitality Register (Appendix 1).

All staff/Governors/Trustees must, within 14 days of accepting any gift or hospitality, provide written notification to the School Office Manager or OMAT CFO, using Appendix 1. All offers should be recorded, whether accepted or not.

The Gifts and Hospitality Register should be held and maintained by the Office Manager within the school and should be freely available for inspection by Trustees/governors, staff, parents and external auditors.

Appendix 1: Gifts and Hospitality Register (Receipt)

Gifts and Hospitality Register

Staff/Governor/Trustee Name:

School/Trust:

Job Title:

Description of Item Received	Offered By (Person Name and/or Organisation Represented)	Date of Receipt	Did you accept the item? (Y/N)	Approximate value (£)

I certify that I have listed above all gifts and hospitality which need to be declared under the terms of the Owlcotes Multi-Academy Trust Gifts and Hospitality Policy.

Signed: Date:

Appendix 2: Gifts and Hospitality Register (Given)

Gifts and Hospitality Register – Given by the Trust/school

Staff/Governor/Trustee Name:

School/Trust:

Job Title:

Description of Item	Offered To (Person Name and/or Organisation)	Approved by (CEO/CFO/Headteacher)	Date	Was the item accepted? (Y/N)	Approximate Value (£)

I certify that I have listed above all gifts and hospitality which need to be declared under the terms of the Owlcotes Multi-Academy Trust Gifts and Hospitality Policy that I have offered on behalf of the Trust in connection with my role.

Signed:

Date:

This Gifts and Hospitality Policy was adopted by Owlcotes Multi Academy Trust on 31/01/2019

Chair of Trustees: Mrs Judith Norfolk		
Signature:		Judith Norfolk
Frequency of review:	3 years	
To be reviewed by:	FRAC	
To be approved by:	OMAT Full Board	
Date of next review:	March 2026	

REVIEW RECORD

Date of review	Reason for review	Date of next review
09/12/2020	Agreed review schedule.	December 2023

Name:		Signature:	
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on behalf of OMAT Full Board

Date of review	Reason for review	Date of next review
23/03/2023	Amendments to section 5, appendix 1 and appendix 2.	March 2026

Name:			
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on behalf of OMAT Full Board

Date of review	Reason for review	Date of next review

Name:		Signature:	
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on behalf of OMAT Full Board

