



Langley Park Learning Trust

Gifts and Hospitality Policy

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Version	Approval Date	Summary of Changes
1.0	14/01/2019	New Policy
1.1	February 2021	Previous version was “Expenses, Gifts & Hospitality” – it had no contents page, written in context of various transactions. In new version reference is made to other policies – expenses and procurement policy. Section 7 & 8 are new sections.

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1. Definitions

Gifts & Hospitality mean anything of value that you give or accept, either directly or in kind from anyone (suppliers, customers, parents, other staff members etc). Staff is taken to mean all permanent and fixed term staff employed by the Trust and by any other contractors, consultants, or other persons (including Trustees) acting under the Trust's name.

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 favourable terms not available to the 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 public.

2. Purpose and Aims

- To enable users of the policy to identify what is deemed to be acceptable transaction or commitment to enter in to when gifting or undertaking hospitality.
- To protect the reputation of individuals and that of the trust when dealing with receipt or giving of gifts and hospitality.
- To avoid corruption and bribery.
- To protect staff from suspicion of dishonesty and ensure they are free from any conflict of interest with respect to acceptance or provision of gifts, hospitality, or any other inducement from or to suppliers of goods or services to the Trust.
- To demonstrate a system that is fair, equitable and open when gifting others, so that all staff would be subject to the same benefit criteria.
- 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** 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.

This policy does not attempt to cover every aspect of theft, fraud corruption and bribery. It is intended to promote a framework whereby all those associated with the Trust may work constructively together for the good of all who work and learn here.

The Trust depends on its employees, trustees, and others to ensure that the highest standards of ethical conduct are maintained in its business dealings. Our policy is to instil best practice and the highest standards of integrity in all our transactions.

3. 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 enables us to comply with our funding agreement and articles of association.

4. Treatment of gifts and hospitality

4.1 Acceptable gifts and hospitality

This applies to members, trustees, and staff.

To determine the treatment of gifts/hospitality consider:

- Value of the gifts and hospitality received or offered
- There should not be any secrecy around it and particular care should be taken by those in positions of authority to be aware of the perception of others when receiving gifts, be wary of anything that might compromise integrity and judgement
- When offering gift type of gifts given should be considered as some gifts fall under unacceptable gifts & hospitality category (see below)

Type	Value	Treatment	Add to Register (Yes/No)
Receipt of gifts/hospitality from others	Gifts of value up to £25	Acceptable – no prior approval required.	No
	Unbudgeted hospitality working lunches to maintain relationships with key contacts.	Acceptable provided hospitality is reasonable under the circumstance. If in doubt seek further guidance from Head Teacher or the Trust’s Director of Finance	No
	Pooled gifts from parents or colleagues.	Acceptable provided it is within the £25 per head threshold. Schools should make parents aware of this threshold. If in doubt seek guidance from Head Teacher or the Trust’s Director of Finance	No
	Gifts of value greater than £25, other than pooled gifts.	Acceptable – but only after consultation with either the Head Teacher or the Trust’s Director of Finance	Yes, within 7 days even if declined.

Offers of gifts & hospitality to others from school/Trust funds	Gifts of up to £25 per head If working lunch is provided it should not be extravagant	Acceptable – no prior approval required Expenses claim form filled in – with receipts, details of recipients, approved by budget holder as per procurement policy.	No
	Gifts of more than £25 per head	Acceptable in exceptional circumstances, such as bereavement, but should be recorded in register and prior consultation should take place with the Head Teacher or the Trust’s Director of Finance Expenses claim form filled in – with receipts, details of recipients, approved by budget holder as per procurement policy.	Yes

4.2 Unacceptable Gifts and Hospitality

Type	Treatment	Add to Register (Yes/No)
Money	Do not accept Politely decline	Yes – the offer should be declined and then added to the register.
The purchase of alcohol from Trust and school funds	Do not pay out of school or Trust funds. Gifts of alcohol to staff not paid from school or Trust funds, including from parents and carers are acceptable.	n/a
Gifts or hospitality offered to family members, partners or close friends of members, Trustees, or staff	Exception is allowed for bereavement or similar exceptional circumstances. Please seek advice from the Trust’s Director of Finance or the Head Teacher.	Yes
Gifts or hospitality from supplier or tenderer, or potential supplier or tenderer, before and during the tendering process and any subsequent contract period.	Do not accept Politely decline	Yes – the offer should be declined and then added to the register.
Lavish or extravagant gifts or hospitality, from any party supplying goods or services to the trust.	Do not accept Politely decline	Yes – the offer should be declined and then added to the register.

NB: This list is not intended to be exhaustive. Staff should exercise their judgement, and if in doubt consult with either their Head Teacher or the Trust’s Director of Finance.

Disciplinary action may be taken against anyone who gives, tries to give, or accepts gifts or hospitality the Trust has deemed unacceptable.

5. Roles and Responsibilities

5.1 Governance Team – SGB, Trustees and Members

SGB, Trustees and Members:

- 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 £25 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined.
- Must consult the Director of Finance or Headteacher before accepting or offering any gifts or hospitality with a value of over £25, other than pooled gifts.

5.2 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.

5.3 Executive Team – Central Trust Directors, CEO and Headteachers

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

The Headteacher and senior members of the central team 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 academy and Trust and to those outside the organisation.

They will also ensure, alongside the Director of Finance, 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.

5.4 Director of Finance

The Director of Finance will ensure that:

- The Trust maintains a central gifts and hospitality register on SharePoint®.
- 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 Headteachers 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 £25 are in line with this policy.

5.5 Other Staff

School Wide:

On occasion, gifts may be given to staff at times such as the end of the school year or at Christmas. Staff will need to be careful when accepting such gifts in terms of their value and whether they need to be included on the gifts and hospitality register.

Finance Officer:

The school's Finance Officer is responsible for maintaining the gifts and hospitality register on a day-to-day basis. Within the central team, this responsibility sits with the Director of Finance and their team.

6. Monitoring Arrangements

The gifts and hospitality registers of each school are monitored regularly by the Director of Finance.

The most important aspect of our policy and practice is to demonstrate the highest standards of integrity in all we do. Internal and external audit will also scrutinise the adherence to this policy and monitoring arrangements.

This policy will be reviewed every two years and approved by the board of Trustees.

7. Links with other Policies

Policies at either school or Trust level that relate to this policy include policies relating to:

- Staff codes of conduct
- Staff disciplinary procedures
- Scheme of delegation
- Procurement and expenses policies
- Payroll

