



# **The Chalfonts Community College**

## **Gifts and Hospitality Policy**

### **2022-2025**

Approved by:	RFL Committee	Date: 22.11.22
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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 Academy Trust 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
- Governors fulfil their fiduciary duties and wider responsibilities as charitable governors and company directors
- Members, 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

## 2. Legislation and guidance

This policy is based on the [Academy Trust 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, governors, staff and/or any other representative of the trust. It states that the trust should ensure that all staff are aware of this policy.

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, governors and staff

Members, 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 The Director of Finance and Operations or Principal before accepting or offering any gifts or hospitality with a value of £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 The Principal**

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

The Principal 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 Director of Finance and Operations, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of £50 are in line with this policy.

#### **4.4 The Director of Finance and Operations**

The Director of Finance and Operations 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 Academy Trust Handbook
- The academy governors and principal are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the principal, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of £50 are in line with this policy.

#### **4.5 The Senior Team Administrator**

The senior team administrator is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

#### **4.6 Parents and Students**

In the interests of Safeguarding Children, and to prevent staff from being open to accusation for exerting undue influence, no member of staff is permitted to give a gift to a student at any time. If a gift is received from a student or the parents' of a student and the value is £25 or over this gift is to be registered in the Register of Gifts and Hospitality.

## 5. Acceptable gifts and hospitality

### 5.1 Offer of gifts and hospitality received

- Members, governors 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 line manager, Director of Finance and Operations or Principal.
- 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 line manager, Director of Finance and Operations or Principal
- 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 or member of staff who is offered such gifts or hospitality must consult the Director of Finance and Operation or Principal before accepting.
- If the Principal is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the board of governors 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 Offer of gifts and hospitality given

- 5.2.1 Gifts of low intrinsic value such as promotional calendars or diaries, or small tokens of gratitude, can be accepted. If there is any doubt as to whether the acceptance of such an item is inappropriate, staff should decline the gift or refer the matter to their line manager.
- 5.2.2 Where approval is granted, any gift or hospitality received with an equivalent value of £50 or over must be recorded in the Register of Gifts and Hospitality.
- 5.2.3 In cases where a staff member receives a gift on behalf of the school, the gift remains property of the school. The gift may be required for departmental display or it may, with the line-manager's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the Department on or before the recipient's last working day.
- 5.2.4 Modest hospitality, provided it is reasonable in the circumstances, for example, lunches in the course of working visits, are acceptable, though it should be similar to the scale of hospitality which The Chalfonts Community College as an employer would be likely to offer.
- 5.2.5 Staff attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants is not normally acceptable. Where it is considered that there is a benefit to The Chalfonts Community College in a

member of staff attending a sponsored event, the attendance should be formally approved by the relevant line manager.

- 5.2.6 Business gifts, which include hospitality, may not be provided by The ChalfontsCommunity College without the prior approval of the Principal.
- 5.2.7 The purchase of alcohol using College funds is not permitted. (NB This includes tripsand visits and any other College events).
- 5.2.8 Expense claims should be made to the Line manager and authorized by the Director of Finance and Operations and / or Principal and receipts must always be enclosed.
- 5.2.9 The Director of Finance and Operations or Principal must be consulted about any proposal to provide gifts or hospitality with a value of £25 or greater.

## **6. Unacceptable gifts and hospitality**

The following must never be offered or accepted:

- Monetary gifts, gift cards or vouchers
- Gifts or hospitality offered to family members, partners or close friends of members, 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.

## **7. Declining gifts and hospitality**

- Any members, governors 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 Principal or Director of Finance and Operations. The Principal or Director of Finance and Operations 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 Director of Finance and Operations. This policy will be reviewed every 3 years by the Resources for Learning Committee and approved by the Board of Governors.

## 9. Links with other policies

This gifts and hospitality policy is linked to the:

Staff code of conduct

Staff disciplinary procedures

Accounting policy

### History

Date	Issue	Status	Comments
October 2022	1	New	

**Appendix 1: Gifts and Hospitality Register**

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED/ REJECTED	APPROVED BY