

ALAMEDA MIDDLE SCHOOL



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Acceptance of Gifts and Hospitality Policy

ACCEPTANCE OF GIFTS AND HOSPITALITY POLICY

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ACCEPTANCE OF GIFTS AND HOSPITALITY POLICY

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ACCEPTANCE OF GIFTS AND HOSPITALITY POLICY

1. Aims

This policy aims to ensure that:

- Alameda middle School funds are used only in accordance with the law, its Articles of Association, its Funding Agreement and the latest Academies Financial Handbook
- The School and those associated with it operate in a way that commands broad public support
- The School 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 Trustees 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 [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, Governors, staff and/or any other representative of the School.

This policy also complies with the 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.

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4. Roles and Responsibilities

4.1 Members, Trustees 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 School 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 School with a value of over £25 on the Gifts and Hospitality Register (see Appendix 1 for the proposed structure) within seven (7) working days, even if declined
- Must consult the Business Manager or Headteacher before accepting or offering any gifts or hospitality with a value of over £25

4.2 Governors

Governors 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 Headteacher

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

The Headteacher 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 Business Manager that decisions on whether individuals or the School can accept or offer gifts or hospitality with a value of £25 are in line with this policy.

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4.4 The Business Manager

The Business Manager will ensure that:

- The School maintains a Gifts and Hospitality Register
- Figures for transactions relating to gifts made by the School are disclosed in the School's audited accounts, in accordance with the Academies Financial Handbook
- The Governors and Headteacher are provided with information on gifts and hospitality received and given, as appropriate

The Business Manager will also ensure, alongside the Headteacher, that decisions on whether individuals or the School can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

4.5 The Finance Lead

The Finance Officer 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, Governors 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, Governors and staff must consult the Business Manager or Headteacher.

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 Business Manager or Headteacher.

Any gifts or hospitality offered with a value of over £25 must be recorded on the Gifts and Hospitality Register within seven (7) working days, even if declined. Any Member, Governor or member of staff who is offered such gifts or hospitality must consult the Business Manager or Headteacher before accepting.

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If the Headteacher 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 Gifts and Hospitality 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 School must conform to the following guidelines:

- No gifts or hospitality may exceed the value of £25 without the explicit consent of Headteacher or Business Manager
- All gifts and hospitality should be capable of being viewed as reasonable in the context in which they are given
- Expenses that are incurred in the undertaking of duties relating to work may be reclaimed so long as they are reasonable and incurred solely and necessarily in the course of the claimant's work. All expense claims must be accompanied by a valid and detailed receipt (credit card receipts are not acceptable) and submitted to the Finance Assistant within one week of being incurred
- Gifts may be given to staff in exceptional circumstances as long as they do not exceed £25 in value and have been approved by the Headteacher or Business Manager
- Any proposal to provide gifts or hospitality in excess of £25 must be approved by the Headteacher or Business Manager in advance
- Alcohol may not be purchased as a gift nor claimed as an expense

6. Unacceptable Gifts and Hospitality

The following must never be offered or accepted:

- Monetary gifts, excluding gift 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

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This list is not intended to be exhaustive.

7. Declining Gifts and Hospitality

Any Member, Governor 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 Headteacher or Business Manager. The Headteacher or Business Manager 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 Business Manager, Headteacher and Chair of the Resources Committee.

This policy will be reviewed every three (3) years by the Business Manager and Resources Committee.

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Appendix 1: Gifts and Hospitality Register Structure

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