

LT2 Gifts and Hospitality Policy

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1. Introduction

The Trust is committed to all its Members, Trustees, Governors and Staff conducting themselves in an honest and ethical manner and acting professionally, fairly and with integrity in all their dealings and relationships with other staff, any pupils, any pupil's parents and other third parties.

The conduct of all Members, Trustees, Governors and Staff should never lead anyone to question their interests, or lead anyone to think that they may have been influenced by gifts and hospitality.

A staff member's personal reputation and that of the Trust or School could be seriously affected if a staff member inappropriately accepts a gift or hospitality. It is also a criminal offence to demand or accept a gift or reward in return for allowing a member of staff to be influenced as a part of the Trust or school.

1.1 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, Governors and Staff are aware of what constitutes acceptable gifts and hospitality, and the process that should be followed if they are presented with any of the same

This policy applies to all individuals working at all levels and grades, including Trustees and Governors. It applies to all staff including Headteachers, Senior Leadership Teams, teaching and associate staff, consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees. Referred to generally as **Staff** in this policy.

Members, Trustees, Governors and Staff should ensure that they read, understand and comply with this policy and avoid any activity that might lead to, or suggest, a breach of this policy.

This policy does not form part of any employee's contract of employment and it may be amended at any time. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Trust reserves its right to terminate its contractual relationship with other workers if they breach this policy.

1.2 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 staff and/or any other representative of the Trust.

This policy also complies with our funding agreement and articles of association.

1.3 Definitions

Gifts	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	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
Third Party	Any individual or organisation staff come into contact with during the course of their work for the Trust, and includes actual and potential pupils and pupils' parents, Governors, suppliers, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2. Roles and Responsibilities

2.1 The CEO

The CEO of Learning Today leading Tomorrow Trust (LT2) takes overall responsibility for the implementation of policies and procedures and to provide reports as appropriate to Trustees in relation to this policy.

2.2 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.

2.3 The Headteacher

Headteachers of LT2 schools and their Senior Leadership Teams are responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently and identifying training needs where applicable. They 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.

The Headteacher will also ensure, alongside the Chief Financial Officer (CFO), that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of £25 or over are in line with this policy.

2.4 The Chief Financial Officer (CFO)

The CFO 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 and Headteacher 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.

2.5 Members, Trustees, Governors and Staff

Members, Trustees, Governors and Staff should:

- 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
- Not use their official position to further their private interests or the interests of others
- Not solicit gifts or hospitality
- Record any gifts or hospitality offered to them or the trust with a value of over £25 on the gifts and hospitality register (Please see section 5 and Appendix A) within 7 working days, even if declined
- Consult the CFO or Headteacher before accepting or offering any gifts or hospitality with a value of over £25

All staff are required to cooperate fully and positively with the requirements of this Policy and to undertake any training recommended by their line manager.

3. Acceptable gifts and hospitality

3.1 Offer of Gifts and Hospitality

Members, Trustees, Governors and Staff can accept gifts and hospitality that have a value of £25 and under. These do not have to be pre-approved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value such as promotional calendars, diaries or small tokens of appreciation, may be accepted. If in any doubt, staff should consult their Headteacher or the CFO.

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 should be sought from the CFO or Headteacher.

Any gifts or hospitality offered with a value of over £25 should be recorded on the Gifts and Hospitality register within 7 working days, even if declined. Any member of staff who is offered such gifts or hospitality should consult the CFO or Headteacher before accepting. Such gifts remain the property of the Trust. The only exceptions to this are low cost, functional items suitable for business use (as opposed to personal use), such as diaries, calendars or pens and as previously outlined these do not have to be declared on the Register of Gifts and Hospitality Register.

If the headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they should inform the **CEO or Chair of the Trustees** 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.

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 Trust in a member of staff attending a sponsored event, the attendance should be formally approved by the Headteacher or CFO.

3.1.1 Gifts to and from Students

In the interests of safeguarding children, and to prevent staff from being open to accusation of 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 pupil or the parents of a pupil and the value is over £25 this gift is to be registered in the Register of Gifts and Hospitality (Please see section 5 and Appendix A).

3.2 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 £25 should be used as a guideline. The CFO or Headteacher must be consulted about any proposal to provide gifts or hospitality including those with a value of over £25. Prior approval is to be clearly evidenced.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the School Business Manager and receipts must always be enclosed.

The Business Manager is to provide the CFO with a monthly report detailing all gifts and hospitality provided by the school regardless of the value.

4. Unacceptable Gifts and Hospitality

The following should never be offered or accepted:

- Monetary gifts
- Gifts or hospitality offered to family members, partners or close friends of staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
- gift or hospitality from a third party if it is suspected that it is offered or provided with an expectation that a business advantage will be provided by the Trust in return
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time

This list is not exhaustive. If there is any doubt, please speak to the Headteacher or CFO.

5. The Register of Gifts and Hospitality

Any gifts or hospitality over the value of over £25 should be recorded on the Gifts and Hospitality Register within 7 working days, even if declined. The following details should be specified:

- Date offered;
- Name of member(s) of staff involved;
- Description of gift/hospitality. In the case of a gift, it should be specified whether it is a personal gift for the recipient or a related party, such as a partner, or a corporate gift accepted by the recipient on behalf of the Trust;
- Value of gift / hospitality. If the exact cost is not known an estimate should be provided;
- Name of firm / individual offering;
- Whether the gift was accepted or rejected;
- Approver of gift/hospitality; and,
- If accepted, the reason.

The Trust should keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties, and therefore all staff should report all hospitality or gifts offered to their Line Manager, Headteacher or CFO.

Staff should ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the expenses recording the specific for expenditure.

5.1 Monitoring and Maintenance

The Gifts and Hospitality Register is monitored regularly by the CFO.

The following employees are responsible for the day-to-day maintenance the register for each area of the Trust:

Central Trust	Alicia Ford CFO
Rugby Free Secondary School	Brett Shields School Business Manager
Rugby Free Primary School	Suzanna Phillimore Finance and Admin Manager

In the interests of transparency, the Register from each area of the Trust will be considered annually by the Audit and Risk Committee.

6. Declining Gifts and hospitality

Any Member, Trustee, Governor or Staff member who is offered any of the unacceptable gifts or hospitality outlined in section 4 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 CFO. The Headteacher or CFO 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.

7. How to raise a concern

Members, Trustees, Governors and Staff should notify their Line Manager, the Headteacher or the CFO if they believe or suspect that a conflict with this policy has occurred, or may occur in the future such as:

- If staff are offered something to gain a business advantage with the Trust or it is indicated that a payment is required to secure an advantage.
- If the staff member is offered a bribe by a third party, are asked to make one or suspect that there may be one in the future.

Concerns should be reported by following the procedure set out in the LT2 Whistleblowing Policy.

7.1 Protection for those who raise a concern

The Trust aims to encourage openness and will support anyone who raises genuine concerns under this policy. The Trust is committed to ensuring no one suffers any detrimental treatment as a result of raising concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If staff believe that they have suffered any such treatment, they should inform the [Head of HR](#).

If the matter is not remedied, and the individual is an employee, they should raise it formally using the LT2 Grievance Procedure.

8. Review

This policy will be reviewed every 2 years by the CFO and approved by the Audit and Risk Committee.

9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Whistleblowing policy
- Finance Policy

Appendix A – The Register of Gifts and Hospitality

Date offered	Name of Member(s) of staff involved	Description of gift/hospitality. In the case of a gift, it should be specified whether it is a personal gift for the recipient or a related party, such as a partner, or a corporate gift accepted by the recipient on behalf of the Trust.	Value of gift / hospitality. If the exact cost is not known an estimate should be provided.	Accepted / Declined	If accepted – Approved by	Reason for accepting

Gifts & Hospitality are therefore only acceptable where **all** the following conditions are met:

- Approval has been granted in writing from the Headteacher/CFO (depending on your position) as appropriate for all offers of gifts or hospitality with an estimated value of over £25;
- There must be a reasonable business justification for accepting the gift or hospitality;
- The hospitality or gift is reasonable and proportionate to the circumstances and the business purpose for which it is given or received;
- There is no actual or perceived intention that the acceptance of the gift or hospitality will be construed as an inducement to impact on a business decision or to improperly influence the impartiality of the decision maker;
- The gift or hospitality is arranged in good faith;
- Gifts of money must always be refused.
- The gift or hospitality is reported and recorded in the Gifts and Hospitality Register (unless the value is under £25).