

Policy Title:	Gifts & Hospitality Policy	
Date of Approval:	January 2024	
Approved by:	Trust Board	
Date of next review:	February 2027	
Applies to:	All school & Trust settings	

Change log:

Version	Author	Date	Approved by	Change
1	Nov 2020	C00	Trust Board	Original
1.1	Nov 2022	S00	Trust Board	Amended, minor corrections made
1.2	Nov 2023	CFO	Trust Board	Removal of staff long service or retirements (in line with previous policy)



Gifts & Hospitality Policy

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Introduction to policy

As a public body, the acceptance of gifts and provision and receipt of hospitality by our staff should be such that the general public would find such activity reasonable. The purpose of this policy is to ensure that staff within the Trust adhere to the required standards of conduct in public life and consequently, that there is no perceived or real risk of corruption or conflict of interest.

Scope

The policy has two sections:

- Gifts
- Hospitality (internal & external)

The policy applies to all Trust and school employees, its members, directors and governors and should be read in conjunction with the Trust's Counter-Fraud & Corruption Policy and the Employee Code of Conduct (see Trust website).

Gifts

Offers received by staff

All offers of gifts (or hospitality) should be treated with caution. To determine whether a gift (or hospitality) is acceptable, employees, directors/governors must ask themselves if members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the gift or hospitality. If the answer would be yes, then the gift or hospitality must be politely declined. If employees, directors/governors are in any doubt about the acceptance of a gift or hospitality they should inform the Chief Finance Officer (CFO) in advance and seek advice.

All personal gifts and/or hospitality (over £20) should be declared to the Chief Finance Officer (CFO) and recorded. This minimises the risk of staff and governors being compromised by expectations of reciprocal benefits.

A register of gifts will be maintained in line with the policy and held by the Trust Finance team.

Giving of gifts by Trust/schools

The Trust and headteachers of its schools may occasionally provide gifts, where it can be demonstrated that the use of Trust/School funds is appropriate and has due regard to propriety

and regularity in the use of public funds. A small appropriate gift or gesture of care (usually flowers - not exceeding £50), may be given in the following instances:

- for a new baby
- to an ill member of staff (at Head's discretion in exceptional circumstances)
- in cases of bereavement where:
 - o there is a death in service of an employee
 - o an employee has lost a partner or child

Any gifts for staff long service, or retirement, are not to be funded from school funds. (Schools may choose to seek voluntary staff donations for this.)

All gifts made to staff require the approval of the headteacher (where they are confident that such a gift meets propriety and regularity in the use of public funds). Approval of all such gifts should be documented in a register and made available to the COO/CEO if requested.

Provision of hospitality

The Trust and its schools may provide hospitality as outlined below:

Internal hospitality

Internal school hospitality should be modest and not normally exceed the provision of tea/coffee/sandwiches or working lunch.

The hospitality may be provided to:

- directors
- local Governing Committee members
- staff
- representatives from firms or companies visiting the Trust
- any other visitors connected with the business of the Trust.

INSET Days – Schools may provide beverages, biscuits and main meals on INSET days. Meals should, ordinarily, be provided by in-house/SLA catering providers. Where external catering is required this should be modest.



External hospitality

The provision of hospitality outside of the Trust or school premises **in all cases** requires the authorisation of the CEO/COO. Headteachers should therefore contact the COO in advance where external hospitality may be required.

The ESFA is clear that alcohol purchases of any kind (except those purchased for religious observance) are inappropriate and should be treated as irregular expenditure by the Trust's external auditors. Therefore, no alcohol should be provided as part of either internal or external hospitality, nor be claimed on any expenses of BBCET staff.

Monitoring of Gifts

The central Trust and each individual school's register of gifts (offered and received) will be reviewed periodically by the Finance and Resources Committee.