



CASTLE Trust

**Gifts & Hospitality Policy
2018-19**



CASTLE Trust

Gifts & Hospitality Policy

1. This Policy is to be used by all Trust Schools.
2. This Policy is issued under the authority of the Board of Trustees and compliance with these procedures is mandatory for all Trust schools.

Approved by:

Mr R Sanders.
Chair of the Board of Trustees

Approved on:

Date.

This Policy contains the prescribed expectations and standards for CASTLE Trust Staff. However, due to the transition period required for new schools joining the TRUST to conform to the required processes, it may be the case that not all procedures are fully embedded in all schools immediately.

However, in all cases, the principles of the policies, practices, procedures and workplace rules detailed must be adhered to.

CASTLE Trust

Gifts & Hospitality Policy - Record of Amendments

Amendment No.	Nature of Amendment	Page Number	Date of Amendment	Author	Amendments approved & manual re-issued

CASTLE Trust
Gifts and Hospitality Policy

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Introduction:

CASTLE Trust believes that your conduct should never lead anyone to question your interests or lead anyone to think you have been influenced by gifts or hospitality.

This policy aims to ensure that;

- Trust funds are used only in accordance with the law, its articles of association, its funding agreement and the latest version of the 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 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.

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 complies with our funding agreement and articles of association.

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.

Roles and responsibilities:

Members, Trustees 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 an 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 all gifts received on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined;
- May accept gifts or items of nominal value i.e. under £25.00 or if free (pens, calendars, diaries etc).

Academy Trustees

Academy Trustees will ensure that Trust funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

Heads of School

Heads of School are responsible for ensuring that staff are aware of and understand this policy, and that it is implemented consistently.

Heads of School 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 Chief Finance Officer

The Chief Finance Officer 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 Heads of School are provided with information on gifts and hospitality received and given, as appropriate;
- Decisions on whether individuals can accept or offer gifts or hospitality with a value over £25.00 are in line with this policy.

The Trust Business Manager

The Trust Business Manager is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

Safeguarding

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 an individual pupil at any time unless the "gift" relates to a pre-approved award scheme, approved by the Leadership Team, as part of school policy. Small gifts of nominal value e.g. pencil, bookmark etc. purchased for the whole class of children are acceptable on special occasions e.g. birthdays, at the end of the year or at Christmas etc.

Acceptable gifts and hospitality received:

The Trust does not wish to discourage all gift-giving and accepts that small tokens of gratitude are always appreciated therefore;

- Members, Trustees and staff may accept gifts that have a nominal value of up to £25.00, these do not have to be pre-approved or recorded on the gifts and hospitality register;
- Similarly, hospitality such as working lunches may be accepted to maintain good relationships with key contacts and provided the hospitality is reasonable in the circumstances;
- If a gift is received from a pupil or the parent/s of a pupil and the value is under £25.00 this may be accepted and does not have to be pre-approved or registered on the gifts and hospitality register;
- If a gift is received from a pupil or the parent/s of a pupil and the value is over £25.00 this gift is to be registered in the Register of Gifts and Hospitality (refer Appendix 1);
- If a gift is received from a group of pupils or parents (i.e. more than 3 pupils or parents) and the value of the gift is £50.00 or over, this gift is to be registered in the Register of Gifts and Hospitality (refer Appendix 1).

If the Head of School is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the Chief Finance Officer 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.

If in any recipient has any doubt about whether gifts or hospitality may be accepted, they should contact the Chief Finance Officer for guidance.

Acceptable gifts and hospitality given:

Gifts or hospitality provided by the Trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £10.00 per person should be used as a guideline.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Trust HR Manager and receipts must always be enclosed.

The Chief Finance Officer must be consulted about any proposal to provide gifts or hospitality over the £25.00 value set by the Trust.

Unacceptable gifts and hospitality:

The following must never be offered or accepted;

- Monetary gifts;
- Gifts or hospitality offered to family members, partners or close friends of members, Trustees or staff;
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process.

This is not an exhaustive list.

Declining gifts and hospitality:

Members, Trustees or staff offered any of the unacceptable gifts or hospitality outlined 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 Head of School or Chief Finance Officer. The Head of School or Chief Finance Officer 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.

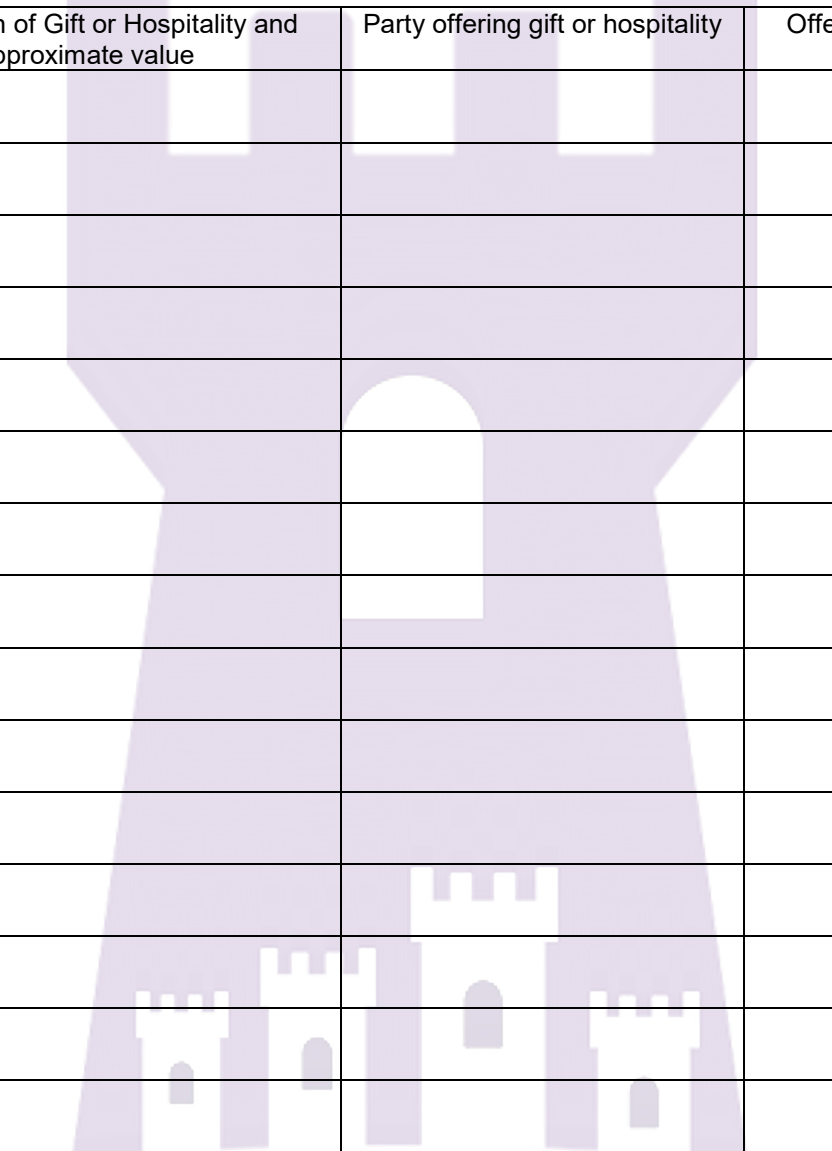
Monitoring Arrangements:

The gifts and hospitality register will be monitored regularly by the Chief Finance Officer.

This policy will be reviewed every 3-years and as necessary by the Chief Finance Officer and approved by the Trust Audit and Resources Committee.

CASTLE Trust

Gifts & Hospitality Register



Date	Name of recipient	Description of Gift or Hospitality and approximate value	Party offering gift or hospitality	Offer accepted / rejected	Approved by