**Leading Learners**

**Multi Academy Trust**



Complaints Policy

**Gifts and Hospitality Policy**

**Policy Approved By Trustees:** 25th March 2022

**Policy Review Date:** 25th March 2025

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**Gifts and Hospitality Policy**

**Why do we have guidance on gifts and hospitality?**

Your conduct as an employee of Leading Learners Multi Academy Trust should never lead anyone to question your interests, or lead anyone to think that you have been influenced by gifts and hospitality. This is important because your own personal reputation and that of the Trusts could be seriously affected if you inappropriately accept a gift or hospitality. It is also a criminal offence to demand or accept a gift or reward in return for allowing you to be influenced as a part of the school. This is why the Trust has guidance which applies to all employees on gifts and hospitality.

**What is a gift?**

A gift is any item or service that you receive free of charge. It also includes any goods or services which you personally are offered at a discounted rate or on terms not available to the general public.

**What is hospitality?**

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

**What gifts or hospitality can be accepted without any approval?**

You can accept gifts and hospitality, which are small gestures and have a value of £30 or less, without the approval of the Headteacher or CEO. Gifts and hospitality of this nature do not need to be recorded in the school’s Gifts and Hospitality Register.

**What things should I think about before I decide what to do?**

You should treat with caution any offer of gift or hospitality made to you personally. In particular, think about whether there is a benefit to the school in you accepting, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of your, or the school’s, support or favour.

**What gifts or hospitality need approval from the Headteacher or Chair of Governors?**

Any gift or hospitality which is more than just a token, defined as a having a value of more than £30 should be politely refused or returned. You must have the prior written approval of the Headteacher or CEO if you decide to accept something which has more than this value. This should only be in exceptional circumstances. If you, your Headteacher or CEO have any concerns or doubts about the public perception that might be attached to accepting any gift or hospitality, then it must be referred it to the Trust Board.

**What gifts or hospitality should never be accepted?**

You must never accept;

* cash or monetary gifts.
* gifts or hospitality offered to your husband, wife, partner, family member or friend.
* gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process.
* Lavish or extravagant gifts or hospitality, even if they relate to activities in your own time.

**What should I do if I receive a gift without warning?**

If you estimate that the gift is more than just a token you should politely and courteously decline the gift. If you feel that it would not be appropriate to do this, you should refer the matter as soon as possible to the Headteacher or CEO and let them decide what you should do with the gift. They may decide that you should return the gift, may ask the Trust Board for a view, or may donate the gift to a worthy local cause.

**What should I do if I get offered a gift or hospitality?**

You must make sure that all offers you receive which have a value of more than £30 are recorded in the individual schools’ Gifts and Hospitality Register, which is kept in the school office.

**Do I need to record offers that I decline?**

Yes – all offers of gifts or hospitality, which have a value of more than £30, must be recorded in the school’s register, even if you don’t accept.

**What should I do if I am in doubt?**

If in doubt, always speak to the Headteacher or CEO. It is your responsibility to follow the Trusts guidance on gifts and hospitality and to justify why you chose to accept a gift or hospitality offered to you.

**What would happen to me if I didn’t follow the guidance?**

The Trust may take disciplinary action against you if you fail to follow the guidance. It is also a criminal offence to demand or accept a gift or reward in return for allowing you to be influenced as a part of the Trust. This means you could be prosecuted by the Police.

**THE DO’s and DON’T’s**

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| **DO** | **DON’T** |
| Read and follow the guidance on gifts  and hospitality | Accept any gifts or hospitality which have a value of more than £30 without the approval of the Headteacher the CEO or Chair of Trustees as necessary |
| Seek advice from the Headteacher the CEO if you are in doubt | Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process. |
| Record all offers of gifts and hospitality  which have a value of more than £30 in  the School’s register, whether accepted  or not | Accept cash or monetary gifts |
| Treat with caution any gifts or hospitality  offered to you and think very carefully  before accepting anything | Accept a gift or hospitality as an inducement or reward |
| Take into account what the public’s  perception would be in deciding whether  or not to accept a gift or hospitality | Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time |
| Consider whether the offer is  proportionate in deciding whether or  not to accept hospitality from an outside  body | Accept a gift or hospitality which you or a member of the public would think is lavish, extravagant or excessive, even if the hospitality is taken in your own time |
| Err on the side of caution when deciding  whether to accept a gift or hospitality. If  the thought of the acceptance makes  you uncomfortable, do not accept | Accept gifts or hospitality offered to your  husband, wife, partner, family member or friend |
| Consider paying for yourself if offered  any hospitality by a supplier or third  party |  |

# Monitoring and Evaluation

Staff and Trustees, on a three yearly basis, will review this policy unless circumstances demand an earlier review.

**Review date:** March 2025

**Appendix 1**

**Leading Learners Multi Academy Trust**

**Record of Gifts and Hospitality**

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| This form must be completed by any employee receiving or declining a gift or hospitality, which related to their position in school and has a value of more that £30. If the individual is concerned about the likely “level” of any gift or hospitality that he or she may receive, agreement from the Headteacher, CEO or Chair of Trustees must be obtained in accordance with the Trusts guidance. | |
| **Name:** | **Place of Work:**  **Position Held:** |
| **Individual, company or organisation offering gift or hospitality:** | |
| **Date, time and venue:** | **Gift/Hospitality:**  Accepted\*/Declined\* |
| **Nature and approximate value of hospitality/gift:** | |
| **If accepted, has the gift been retained for personal use or school use?** | |
| **If accepted, reason for accepting hospitality/gift** | |
| **Signed: Date:**  **Approved by:**  **Headteacher / CEO / Chair of Trustees** | |

**PLEASE RETURN COMPLETED FORM TO THE SCHOOL OFFICE.**