



GIFTS AND HOSPITALITY POLICY

Date Approved and Minuted	MAT Board	15 February 2024
Date of Next Review	MAT Board	February 2027

1. PURPOSE OF THE POLICY

- 1.1 St Edmundsbury and Ipswich Diocesan Multi Academy Trust is committed to ensuring that the leadership and governance of the Trust, and the schools within the Trust, is conducted in accordance with the highest standards of integrity, probity and openness.
- 1.2 The policy applies to all employees, governors, directors, contractors and consultants or other associated persons, agents or representatives acting in the name of, or on behalf of, or dealing with the Trust and its academies.
- 1.3 The purpose of this policy is to ensure that the business conducted by employees, governors and directors of, and those associated with St Edmundsbury and Ipswich Diocesan Multi Academy Trust and its schools is appropriate and avoids the risk of any perceived or real conflict of interest or allegation of bribery or corruption. Schools must act within the MAT's financial policy and procedures.
- 1.4 The policy outlines the approach of the Multi Academy Trust on the receipt of gifts and hospitality by its employees, governors, directors and those associated with the Multi Academy Trust and its academies from any third parties arising from duties undertaken on behalf of the Trust.

2. PRINCIPLES OF THE POLICY

- 2.1. Practices, such as obtaining goods and services which may include an element of private use for employees, governors and directors should be avoided.
- 2.2. Employees, governors and directors should avoid accepting excessive hospitality, entertainment or other services from existing or prospective suppliers
- 2.3. A Register of Gifts and Hospitality should be established at each academy and at the central MAT, which should be updated as soon as practicably possible where excessive hospitality, entertainment, gifts or other services are offered or received as a result of the position held within the Trust.
- 2.4. The Registers of Gifts and Hospitality are open documents and must be made available for inspection by senior managers within the MAT or anyone appointed by the MAT's directors, e.g. auditors.

3. DEFINITION

- 3.1. The expressions "gifts" and "hospitality" have wide meanings and no conclusive definition is possible. Gifts and hospitality can include:
- Free gift of any goods or services
 - The opportunity to acquire any goods or services at a discount or at terms not available to the general public
 - The opportunity to obtain goods or services not available to the general public
 - The offer of food, drink, accommodation or entertainment
- 3.2. Commonly gifts include; pens, diaries, calendars and other business stationery, articles of clothing, books, wine and flowers. Common Hospitality includes lunches provided by external bodies.
- 3.3. For the purpose of this policy a "gift" is defined as any item, cash or goods or any service, which is offered for personal benefit at no cost, or at a cost that is less than its commercial value.
- 3.4. "Hospitality" is defined in this policy as any generous or material welcome or reception that is more than an incidental beverage or light refreshment e.g. attendance as a non-paying guest at a cultural, sporting or other event.
- 3.5. The real test is whether the acceptance of any gift and/or hospitality could be regarded by a third party as compromising or likely to compromise the impartiality and objectivity of an individual within the Trust or acting on the Trust's behalf.

4. GENERAL RULES

- 4.1. Employees, governors and directors must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity. School employees and governors are asked to immediately report any offer or receipt of such gifts to the School Business Manager for it to be recorded in the Register of Gifts and Hospitality. Employees or directors of the Multi Academy Trust are asked to immediately report any offer or receipt of such gifts to the MAT Chief Financial Officer to be recorded in the Register of Gifts and Hospitality. If in any doubt, gifts should be refused.
- 4.2. Employees, governors and directors shall not use their authority for personal gain and shall seek to uphold and enhance the standing and reputation of the Multi Academy Trust at all times by:
- Maintaining an unimpeachable standard of honesty, integrity and selflessness in all their business relationships;
 - Complying with the letter and the spirit of the law and their contractual obligations rejecting any business practice that is be deemed improper
 - Acting to maintain the interests and good reputation of the Trust and/or the school at all times

- 4.3. Employees, governors and directors are permitted to accept isolated gifts of a trivial nature or inexpensive seasonal gifts or corporate branded items (such as diaries, pens, calendars) Such gifts can be accepted without the need to seek approval or formally register receipt.
- 4.4. Promotional gifts or small items from a supplier, contractor or parents as an expression of gratitude such as boxes of chocolates or a bottle of drink may be accepted.
- 4.5. Acceptance of gifts or hospitality with a value exceeding £30 must always be subject to prior approval from the school's headteacher or the CEO or Chair of the Multi Academy Trust Board and must be recorded and reported in the Gifts and Hospitality Register
- 4.6. Employees, governors and directors may accept the following gifts /hospitality without the need to formally register receipt or seek approval of the Academy or the Multi Academy Trust:
- Courtesy hospitality at business lunches/dinners or attendance in an official capacity at a public function
 - Incidental promotional gifts such as calendars, diaries or pens

NB Care must always be taken to ensure that whenever such gifts / hospitality are accepted no obligation to the person or organisation in question is accepted. If there is any doubt the advice of the Multi Academy Trust must be sought.

- 4.7. The following are examples of gifts or hospitality requiring approval and formally recording by the School Business Manager or MAT Chief Financial Officer in the Register of Gifts and Hospitality:
- Attendance as a non-paying guest or a commercial organisation or individual at a non-work related cultural or sporting event
 - Promotional gifts exceeding the value of £30, either individually or cumulatively within a rolling 12 month period
 - Other offers of gifts or hospitably
- 4.8. Unacceptable gifts or hospitality
The following are examples of gifts or offers of hospitality which should be refused by employees, governors and directors:
- Gifts of money even if under £30
 - Free membership or subscriptions (e.g. Sports clubs)
 - Foreign travel
 - Free goods, services or equipment which are normally provided by a supplier to the at a charge.

NB Any offers falling into the above category should be reported immediately to the MAT Chief Financial Officer

5. GIFTS AND HOSPITALITY GIVEN

- 5.1. Reasonable costs to entertain visitors on school or Multi Academy Trust business are acceptable. The cost of sandwiches and non-alcoholic beverages would be considered reasonable.
- 5.2. It is acceptable to provide employees with refreshments at a reasonable cost as part of training or development events.

6. ROLE OF SCHOOL BUSINESS MANAGER / COMPANY SECRETARY

- 6.1. Responsible for ensuring that any offer or receipt of gifts, hospitality or donations is recorded in the local Register of Gifts and Hospitality and sent to the MAT Chief Financial Officer
- 6.2. Reporting any possible conflict of interest arising from the offer or receipt of gifts and or hospitality to the Finance and Audit Committee.

7. MULTI ACADEMY TRUST AND SCHOOLS' RESPONSIBILITIES

- 7.1. The MAT and its schools are responsible for ensuring that employees, governors, contractors, consultants and agents that work for the academy or the Multi Academy Trust are made aware of the policy.

8. EMPLOYEE, GOVERNOR AND DIRECTOR RESPONSIBILITIES

- 8.1. Employees, governors and directors have a responsibility to:
 - Comply with this policy
 - Report gifts or hospitality offered and whether they have been accepted or declined
 - Raise any concerns about the operation of the policy with their line manager in the first instance or the School Business manager / MAT Chief Financial Officer.