



Saint Ambrose College  
Gifts and Hospitality Policy

Approved by Governors Date	To be reviewed
May 2023	May 2025

## **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 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.

## **2. 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.

## **3. 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 any 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 any gifts or hospitality offered to them or the Trust with a value of over £25 on the gifts and hospitality register within 7 working days, even if declined
- Must consult the Business Manager or Principal before accepting or offering any gifts or hospitality with a value of over £25.

### **Academy 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.

## **The Principal**

The Principal is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

## **The Business Manager**

The Business Manager 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.

### **4. Offer of gifts**

Members, Trustees and staff can accept gifts and hospitality that have a value of up to £25. Gifts up to £25 can only be accepted outside of formal assessment periods. They do not have to be pre-approved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted outside of formal assessment periods. If in any doubt, members, Trustees and staff must consult the Business Manager.

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.

Any gifts or hospitality offered with a value of over £25 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, Trustee or member of staff who is offered such gifts or hospitality must consult the Business Manager or Principal before accepting. Gifts over £25 can only be accepted outside of formal assessment periods.

If the Principal is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of 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.

### **5. Assessment periods**

Gifts of any value, including small tokens of appreciation, must not be accepted during formal assessment periods, as they might lead to accusations of bias.

### **6. Unacceptable gifts**

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

- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time.

## **7. Declining gifts and hospitality**

Gifts offered during formal assessment periods should be politely declined.

Any members, Trustee or staff member who is offered any of the unacceptable gifts or hospitality outlined in section 6 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 Business Manager or Principal.

Disciplinary action may 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, may be dealt with as a staff disciplinary matter.