



**Our Lady and All Saints**  
Catholic Multi Academy Company  
Strong in Faith

# Gifts and Hospitality Policy

<b>Ratified by:</b>	Board of Directors
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## 1. Aims

This policy aims to ensure that:

- The MAC's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academy Trust Handbook
- The MAC and those associated with it operate in a way that commands broad public support
- The MAC has due regard to propriety and regularity, and ensures value for money, in the use of public funds
- Directors fulfil their fiduciary duties and wider responsibilities as charitable Directors and company directors
- Members, Directors 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. Legislation and guidance

This policy is based on the [Academy MAC Handbook](#), which states that academy MACs should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might compromise their personal judgement or integrity. This should include members, Directors, staff and/or any other representative of the MAC. The handbook states that the MAC should ensure that all staff are aware of this policy.

This policy also complies with our funding agreement and articles of association.

## 3. 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.

## 4. Roles and responsibilities

### 4.1 Members, Directors and staff

Members, Directors 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 MAC 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 MAC with a value of over £20 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Chief Financial Officer before accepting or offering any gifts or hospitality with a value of over £50

## 4.2 Academy Directors

Academy Directors will ensure that the MAC's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

## 4.3 The Head Teacher

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

The Head Teacher 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 MAC and to those outside the organisation.

They will also ensure, alongside the Chief Financial Officer, that decisions on whether individuals or the MAC can accept or offer gifts or hospitality with a value of over £20 are in line with this policy. The Head Teacher is responsible for communicating the school/MAC's rules and expectations about gift-giving to parents.

## 4.4 The Chief Financial Officer

The Chief Financial Officer will ensure that:

- › The MAC maintains a gifts and hospitality register
- › Figures for transactions relating to gifts made by the MAC are disclosed in the MAC's audited accounts, in accordance with the Academy MAC Handbook
- › The academy Directors and Head Teacher re provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Head Teacher that decisions on whether individuals or the MAC can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

## 4.5 The Head Teacher

The Head Teacher is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

# 5. Acceptable gifts and hospitality

## 5.1 Offer of gifts and hospitality received

Members, Directors and staff can accept gifts and hospitality that have a value of up to £50. These 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. If in any doubt, members, Directors and staff must consult the CSEL, Chief Financial Officer or Head Teacher.

Similarly, 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. If in doubt, guidance must be sought from the Chief Financial Officer or Head Teacher.

Any gifts or hospitality offered with a value of over £50, must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, Director or member of staff who is offered such gifts or hospitality must consult the Chief Financial Officer or Head Teacher before accepting.

If the Head Teacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the Chair of the board of Directors 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.

## 5.2 Offer of gifts and hospitality given

Any gifts or hospitality provided by the MAC, such as a working lunch for visitors, must not be extravagant. A maximum value of £20 per head should be used as a guideline.

Alcohol must not be purchased out of the school or MAC budget.

Expense claims should be made to the Head Teacher and receipts must always be enclosed.

The CSEL and Chair of the Board of Directors must be consulted and approve any proposal to provide gifts or hospitality with a value of over £25.

## **6. 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, Directors 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

This list is not intended to be exhaustive.

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

Any members, Director 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 Chief Financial Officer or Head Teacher. The Chief Financial Officer or Head Teacher 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 MAC 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.

## **8. Monitoring arrangements**

The gifts and hospitality register is monitored regularly by the Chief Financial Officer.

This policy will be reviewed every three years by and approved by Board of Directors.

## **9. Links with other policies**

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Accounting policy

**Appendix 1: gifts and hospitality register**

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED /REJECTED	APPROVED BY