



Gifts & Hospitality Policy

For the following:

**Cardinal Newman Catholic Primary School
Holy Family Catholic Primary School
St Alban's Catholic Primary School
St Anne's Catholic Primary School
St Augustine's Catholic Primary School
St Charles Borromeo Catholic Primary School
St Cuthbert Mayne Catholic Primary School
St Hugh of Lincoln Catholic Primary School
St John the Baptist Secondary Catholic School
St Polycarp's Catholic Primary School
St Thomas of Canterbury Catholic Primary School
St Peter's Catholic School
Salesian Catholic Secondary School
The Marist Catholic Primary School
Teach SouthEast**

This Gifts & Hospitality Policy has been approved and adopted by the Xavier Academy Trust in December 2020 and will be reviewed in December 2022.

Committee Responsible: Finance Committee

GIFTS & HOSPITALITY POLICY

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 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.

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.

Gifts and hospitality given

Schools within the Xavier Catholic Education Trust (XCET) may make gifts to staff/trustees/local committee members/volunteers. The circumstances where this might be done are:

- Serious illness
- Recognition of a serious life event
- Recognition of long service
- To express the good wishes and support of the Academy
- To celebrate health and wellbeing

This list is not exhaustive and if there is any doubt, the Chief Financial Officer of the trust should be consulted.

Any gifts made to staff must not be extravagant. A maximum value of £35 per head should be used as a guideline.

The Headteacher must be consulted about any proposal to provide gifts with a value of over £35.

Any hospitality provided by the Trust must not be extravagant. A maximum value of £35 per head should be used as a guideline. Hospitality would include:

- Staff insets
- School events
- Soft/hot beverages in the staffroom
- Drinks and food provided during a meeting

Any gifts or hospitality offered with a value of over £35 must be recorded on the Gifts and Hospitality Register within 7 working days (Appendix 1).

Gifts and hospitality received

Employees of the XCET should take guidance from the following general rules relating to the receipt of gifts and hospitality:

- To accept gifts should be the exception. Small 'thank you' gifts of token value, such as a diary, a coffee mug or bunch of flowers, not over £35 in value may be accepted.
- Gifts should be refused if it is believed the giver has an ulterior motive such as the receipt of a more prompt service or preferential treatment
- Gifts or hospitality should never be accepted from anyone who is, or may be in the foreseeable future, tendering for any contract with the Trust, seeking employment with the Trust or is in dispute with the Trust, even if you are not directly involved in that service area
- Where items purchased for the Trust include a 'free gift', such a gift should either be used for Trust business or handed to the school Business Manager to be used for charity raffles
- If there is any doubt about the acceptability of any gift or offer of hospitality the school's Headteacher or Business Manager must be consulted

A gauge of what is acceptable in terms of hospitality is whether the XCET would offer a similar level of hospitality in similar circumstances.

Occasional working lunches with customers, providers or partners are generally acceptable as a way of doing business provided they are not to an unreasonable level or cost.

Invitations to corporate hospitality events must each be judged on their merit. Provided the general rules have been taken into account, it may be acceptable to join other company/organisation guests at sponsored cultural and sporting events, or other public performances, as a representative of the XCET. But, consider the number of these events, and always take into consideration what public perception is likely to be if they knew you were attending. Acceptability depends on the appropriateness of the invitations, in terms of the level of hospitality, the frequency and the status of the invited employee. In all such cases the school Headteacher or Business Manager must be consulted, or in the case of the Headteacher, the Chair of Governors.

Paid holidays or concessionary travel rates are not acceptable. Neither are offers of hotel accommodation nor the use of company villas/apartments.

If you are visiting a company to view equipment that the Trust is considering buying, you should ensure that expenses of the trip are paid by the XCET. Acceptance of refreshments and/or a working lunch may be acceptable, but care must be taken to ensure that the XCET's purchasing and/or tender procedures are not compromised.

Acceptance of hospitality that is built into the official programme of conferences and seminars related to your work are acceptable.

Any gifts or hospitality offered with a value over £35 must be recorded on the Gifts and Hospitality Register (Appendix 2) within 7 working days .

Appendix 1
Gifts and hospitality given

Name	Description of gift/hospitality	Value	Approved by

Appendix 2
Gifts and hospitality received

Name	Description of gift/hospitality	Value	Approved by