



Gifts and Hospitality Policy

1. Purpose of the Policy

- 1.1 Holy Family Catholic Multi Academy Trust is committed to ensuring that the leadership and governance of the Trust, and the academies within the Trust, is conducted in accordance with the highest standards of integrity, probity and openness.
- 1.2 HFCMAT is committed to preventing bribery in the workplace. Any form of bribery will not be tolerated. This policy implements effective measures to monitor and prevent bribery. We use the term 'Gifts' in this policy to cover gifts and any other form of hospitality.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business contacts.
- 1.4 The policy outlines the approach of the Multi Academy Trust on the receipt of gifts and hospitality by its employees, local 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. Any questions relating to the content or operation of this policy should be directed to a Headteacher/Head of School or the CEO.

2. Gifts and Hospitality from Parents and Pupils

- 2.1 From time to time, parents and pupils may offer gifts to staff; this is acceptable with conditions (see below). HFC MAT understands that gifts are likely to be offered to members of staff during certain times of the year e.g. Christmas, or end of term. Staff must make a judgment when accepting a gift; any gift must not be excessive and not more than a token of gratitude.
- 2.2 Gifts (which can include gift vouchers) with a value of £25 or less may be accepted without approval from the Headteacher/Head of School.
 - (a) If multiple gifts from the same parent/pupil are received but exceeding this value as a whole, this must be brought to the Headteacher/Head of School's attention where approval may be given.

- (b) If a Gift is received that has been contributed to by multiple parents/pupils and the aggregate value exceeds £150, this must be brought to the Headteacher/Head of School's attention where approval may be given.
- 2.3 Staff must not accept cash regardless of the amount, under any circumstances.
- 2.4 If any of the circumstances in clause 2.2 (a) or (b) apply, staff must make a record of this in the school's gift and hospitality register. A copy of this record must also be sent to the Headteacher/Head of School for their attention.
- 2.5 If staff are unsure whether or not they should accept a gift, they must first speak to the Headteacher/Head of School who will decide on a course of action. The gift may be accepted for the member of staff; accepted but sent to a charity; or politely declined.
- 2.6 If staff believe a gift breaches any part of this policy, they must politely decline the gift. If a parent or pupil requires an explanation, they should be referred to the Headteacher/Head of School.
- 2.7 If the Headteacher/Head of School or CEO receives a gift, the above conditions apply. If the Headteacher/Head of School or CEO thinks the gift may breach any part of this policy, they must seek approval from the Chair of Governors.
- 2.8 This policy should be brought to the attention of all pupils and parents. It should also be easily accessible. If a parent thinks a gift may breach a condition of this policy, please speak to the Headteacher/Head of School before making the gift.

3. Gifts and Hospitality to Staff from the School

- 3.1 From time to time the School may purchase gifts for members of staff. In line with guidance from the ESFA that academies should use their allocated GAG funding for the full benefit of their current pupils, the School and the central MAT should consider carefully the use of their funds to purchase gifts and items such as flowers for members of staff and people outside the academy or Trust. Any such item should be a justifiable and reasonable cost and gifts should not have an individual value exceeding £50.
- 3.2 The Headteacher/Head of School or CEO will make a decision on whether or not a Gift from School to Staff is excessive. If there is any doubt the Headteacher/Head of School or CEO will seek approval from the Chair of Governors or Chair of the Board of Directors.

4. Gifts and hospitality from other third parties and suppliers.

4.1 This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- (a) establishing or maintaining good business relationships;
- (b) improving or maintaining our image or reputation.

4.2 Employees, local 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.

4.3 The following are examples of gifts or hospitality requiring approval from the Headteacher/Head of School or CEO and formal recording in the appropriate 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 £50

4.4 The following are examples of gifts or offers of hospitality which should be refused by employees, governors and directors:

- Gifts of money
- Free membership or subscriptions (e.g. Sports clubs)
- Foreign travel unless a specific element of a business, academic or research activity is approved by the MAT Board
- Free goods, services or equipment which are normally provided by a supplier to the School or Trust at a charge.

NB Any offers falling into the above category should be reported immediately to the Headteacher/Head of School or CEO.

Date of Approval by Directors: 9th February 2021

Date of Review: Spring 2022

by: Operations Manager



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Gift and hospitality register

It is usual for school staff to receive gifts and hospitality from parents, contractors, volunteers and other stakeholders as a gesture of gratitude at times such as Christmas or the end of term. These gifts should not be excessive or high value. Gifts and hospitality that are high in value or excessive may be interpreted as bribery; if this is the case, the school should reject the offering. Bribery and corruption are punishable by up to 10 years' imprisonment; schools could face an unlimited fine and serious damage to their reputation if found guilty. This register has been created to ensure that HFC MAT schools are committed to the highest ethical standards with regard to business activities.

This register is used, in accordance with the Gifts and Hospitality Policy, to record the type of gift or hospitality received, the date it was received, who sent and received the gift or hospitality and whether it was rejected or accepted – reasons for acceptance or rejection should be noted in the final column.



Holy Family Catholic Multi Academy Trust

Name of gift/hospitality	Description	Date gift/hospitality received	Date of hospitality (if applicable)	Who offered the gift/hospitality?	Recipient	Value of gift/hospitality	Was the gift/hospitality accepted? Why?