

**Plymouth
School of
Creative Arts**

make
discover
perform

Gifts and Hospitality Policy

Date created: March 2016	Reviewed by: Chief Financial Officer/Finance Governors
Reviewed: September 2018	Next Review Due: September 2020

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1. Aims

This policy aims to ensure that:

- Plymouth School of Creative Arts' (PSCA or the academy trust) 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. Legislation and guidance

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 also complies with our funding agreement and articles of association and should be read in conjunction with PSCA's Fraud policy.

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.

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4. Roles and responsibilities

4.1 Members, trustees and staff

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 (see Appendix 1) within 7 working days, even if declined.
- Must consult the Chief Financial Officer or Headteacher before accepting or offering any gifts or hospitality with a value of over £25.

4.2 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.

4.3 The Headteacher

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

The Headteacher 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 trust and to those outside the organisation.

They will also, alongside the Chief Financial Officer, ensure that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

4.4 The Chief Financial Officer

The Chief Financial Officer will ensure that:

- The trust maintains a gifts and hospitality register.

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- 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.
- The academy trustees and Headteacher are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the Headteacher, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

5. Acceptable gifts and hospitality

5.1 Offers of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of up to £25. These do not have to be pre-approved or recorded on the gifts and hospitality register. Examples include:

- 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.
- Receipt of small items from suppliers or contractors as expressions of gratitude such as boxes of chocolates or individual bottles of drink (at a value of less than £25).
- Receipt of small items from parents of students or students as expressions of gratitude such as boxes of chocolates or individual bottles of drink (at a value of less than £25).

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, members, trustees and staff must consult the Chief Financial Officer or Headteacher.

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 Headteacher.

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 Chief Financial Officer or Headteacher before accepting.

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

5.2 Offers of gifts and hospitality given

Any gifts or hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £25 per head should be used as a guideline.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Finance team and receipts must always be enclosed.

The Chief Financial Officer or Headteacher must be consulted about 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:

- Personal monetary gifts (for donations to the school please refer to section 8).
- Free membership or subscriptions.
- Foreign travel unless as a specific element of a business, academic or research activity approved by the School.
- Free goods, services or equipment normally provided by a supplier to the School at a charge.
- 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.

This list is not intended to be exhaustive.

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7. Declining gifts and hospitality

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 Headteacher or Chief Financial Officer. The Headteacher or Chief Financial Officer 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 trust 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. Donations

There will be on occasion times when donations are given to the school. When donations are received, the reason for the donation and the donor should be identified and the money should then be allocated against the activity or purpose for which it was originally donated.

If a donation is received without a specific area or activity identified, then the Headteacher and Chief Financial Officer will discuss the donation and decide whether it can be accepted.

9. Monitoring arrangements

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

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Appendix 1: Gifts and Hospitality Register

Date	Name	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted/rejected	Approved by

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Date	Purpose of changes made	By
12/9/18	<p>General bi-annual review</p> <p>Changes to reflect current practice and current staff structure and ensuring alignment with Fraud Policy</p> <p>Ensuring compliance with Academies Financial Handbook 2018</p>	Kundai Mupunga / Susanne Hose
19/9/18	Approved by Governing Body	

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