



Holy Rood Catholic Primary School, Swindon



ality



Gifts, Hospitality and Travel Expenses Policy



School Vision:

Belong

At Holy Rood Catholic Primary School, we aim to provide a nurturing and inclusive environment enthused by the Spirit of Christ to enable everyone to make a positive contribution, both to the school and the wider community. We will show love, compassion and respect for others.

A sense of unity will be created by forming relationships that are based on trust, loyalty, forgiveness and acceptance; we will endeavour to act justly and be peacemakers as Christ's disciples, inspired by the Gospel values.

We will encourage a sense of responsibility and help children learn to appreciate God's world around them through reflection, mission, prayer, healing and peace.

Learn

We resolve to develop a sense of awe and wonder at God's creation for our children - where creativity flourishes and everyone is inspired to learn, demonstrating a curiosity about the world around them.

We will strive to ensure that all of our learners are able to face new challenges with confidence, in a Christian learning environment where informed risk taking and a resilient attitude are welcomed, encouraged and achieved.

Our positive and enthusiastic approach to teaching and learning will motivate every person. Each will know that they are uniquely loved by God. We will continue to enjoy our learning and reflect on our efforts and achievements, inspiring us to always try our best.

Achieve

The children will be determined in their daily challenges, gaining confidence in their own ability, imagining what they could achieve with continued effort and commitment and working to fulfil the exclusive plan God has for each of them.

By fully engaging in all aspects of school, children will have had the opportunity to go on to become ambitious and competent individuals, always striving to achieve their full potential and positively participating in God's world.

Children's Mission Statement:



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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. Legislation and guidance

Under the Bribery Act 2010, it is a criminal offence for Members, Trustees, staff, or any other representative of the Trust to request, agree to receive, or accept a financial or other advantage as an inducement or reward for the improper performance of a relevant function or activity, including:

- a) doing, or refraining from doing, anything; and/or
- b) showing favour or disfavour to any person or persons.

The acceptance of gifts, hospitality or other benefits must therefore not influence, or be intended to influence, the proper performance of an individual's duties or responsibilities.

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.

3. Definitions

Gifts are any items, cash, awards, prizes, goods or services offered to an individual without payment, or at a value or on terms that are more favourable than those generally available to the public. This includes goods or services offered at a discounted rate or on preferential terms that are not available to the general public.

Hospitality includes food, drink, accommodation, travel or entertainment (such as cultural, sporting or other events) provided free of charge, at a significantly discounted rate, or on terms that are not generally available to the public.

For the purposes of this policy, gifts and hospitality should be considered in relation to their actual or perceived value and whether accepting them could create, or appear to create, an obligation, influence, or conflict of interest in relation to the individual's duties.

4. Roles and responsibilities

4.1 Members, Trustees and Staff

Members, Trustees and staff:

- **Must not give or accept gifts or hospitality** where this could, or could reasonably be perceived to, compromise their personal integrity, independence or impartiality, or place the school under an obligation to the provider or recipient.
- **Must not use their official position** to further their own private interests or the interests of others.
- **Must not solicit gifts, hospitality or other benefits** from any individual or organisation.
- **Must record on the Gifts and Hospitality Register** any gift or hospitality offered to them or to the school with a value of **£20 or more**, whether accepted or declined, within **7 working days**.
- **Must consult the Chief Financial Officer or Headteacher** before accepting or offering gifts or hospitality with a value of £20 or more, unless an exception is expressly permitted by this policy.
- **Must declare any actual, potential or perceived conflict of interest** arising from gifts, hospitality or other benefits and follow the school's conflicts of interest procedures where applicable.
- **Must ensure that any gifts or hospitality accepted or offered are reasonable, proportionate and consistent with the proper performance of their duties**, and do not influence, or appear to influence, decision-making on behalf of the school.

4.2 Academy trustees

Academy Trustees will ensure that the Trust's funds are used appropriately, with due regard to **propriety and regularity**, and that expenditure provides **value for money** and is consistent with the Trust's charitable objectives and responsibilities.

Trustees must ensure that decisions relating to gifts, hospitality and other benefits are made transparently, appropriately and in the best interests of the school.

4.3 The Headteacher

The Headteacher is responsible for ensuring that all staff are aware of and understand this policy and that it is implemented consistently across the school.

The Headteacher will act with the highest standards of integrity in all matters relating to gifts and hospitality and will set an appropriate example to staff, Members and Trustees, as well as to individuals and organisations outside the school.

The Headteacher will, alongside the finance manager, ensure that decisions about whether individuals or the school may accept or offer gifts or hospitality with a value of **£20 or more** are made in accordance with this policy.

The Headteacher will also ensure that gifts and hospitality are appropriately recorded on the Gifts and Hospitality Register where required and that any actual, potential or perceived conflicts of interest are appropriately declared and managed.

4.4 The Finance Manager

The Finance Manager will ensure that:

- The **school maintains a Gifts and Hospitality Register** in accordance with this policy.
- Any required disclosures relating to gifts, hospitality and relevant transactions are made appropriately in the Trust's financial records and annual accounts, in accordance with applicable financial reporting requirements and the **Academy Trust Handbook**.
- The Academy Trustees and Headteacher are provided with appropriate information about gifts and hospitality received or offered on behalf of the school or its staff.

The Finance Manager will also, alongside the Headteacher, ensure that decisions about whether individuals or the school may accept or offer gifts or hospitality with a value of £20 or more are made in accordance with this policy.

The Finance Manager will provide appropriate advice to staff, the Headteacher and Trustees where there is uncertainty about whether a gift or hospitality may be accepted or should be recorded.

4.5 The School Office Manager

The School Office Manager is responsible for maintaining the Gifts and Hospitality Register on a day-to-day basis.

The School Office Manager will ensure that:

- entries are recorded accurately and within the timescales set out in this policy;
- both accepted and declined gifts or hospitality are recorded where required;
- the register is retained securely and is available for appropriate review;
- any concerns or unusual entries are brought to the attention of the Headteacher or Chief Financial Officer; and
- the register is reviewed periodically to identify any patterns, potential conflicts of interest or other matters requiring attention.

5. Acceptable gifts and hospitality

5.1 Offers of Gifts and Hospitality Received

Members, Trustees and staff may accept gifts and hospitality of a nominal value below £20, provided that the gift or hospitality is reasonable, proportionate and does not, or could reasonably



be perceived to, influence their judgement or place the school or the individual under any obligation.

Gifts of nominal value, such as small tokens of appreciation, may generally be accepted. However, the value of a gift or hospitality is not the only consideration. If there is any doubt about whether an offer should be accepted, advice must be sought from the Chief Financial Officer or Headteacher before acceptance.

Hospitality, such as a reasonable working lunch, may be accepted where there is a legitimate business or professional purpose and the hospitality is reasonable and proportionate in the circumstances. Hospitality must not be accepted where it could reasonably be perceived as an attempt to influence a decision or obtain preferential treatment.

Any gift or hospitality offered with a value of £20 or more must be recorded on the Gifts and Hospitality Register within 7 working days, whether accepted or declined. Anyone offered a gift or hospitality at or above this threshold must consult the Chief Financial Officer or Headteacher before accepting it.

Where the Headteacher is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the Chair of Governors and ensure that the offer is recorded on the Gifts and Hospitality Register. The Headteacher must not approve their own acceptance of the gift or hospitality.

Where the Finance Manager is the recipient, or intended recipient, of a gift or hospitality requiring approval, they must refer the matter to the Headteacher or Chair of Governors as appropriate.

Failure by a member of staff to declare an offer of gifts or hospitality in accordance with this policy may be considered a disciplinary matter and dealt with in accordance with the school's disciplinary procedures.

The school reserves the right to require the return or refusal of any gift or hospitality where its acceptance would be inappropriate, regardless of its monetary value.

5.2 Offers of Gifts and Hospitality Given

Any gifts or hospitality provided by the school, such as a working lunch for visitors, must be reasonable, proportionate and appropriate to the circumstances. As a general guideline, expenditure should not normally exceed **£10 per person**.

Alcohol **must not** be purchased from the school's funds.

Any expenditure on gifts or hospitality must have a legitimate business or professional purpose, represent appropriate use of School funds and comply with the school's financial procedures.

Expense claims must be submitted in accordance with the school's expenses procedures, with receipts or other appropriate supporting evidence provided where required. Claims should be submitted to the Finance Manager for processing and approval.

The Finance Manager or Headteacher must be consulted before providing gifts or hospitality where the total value is expected to exceed £10 per person, or where there is any uncertainty about whether the expenditure is appropriate.

Gifts or hospitality must not be provided where this could, or could reasonably be perceived to, influence a decision, create an obligation or give rise to an actual, potential or perceived conflict of interest.

6. Unacceptable Gifts and Hospitality

The following gifts and hospitality must not be offered or accepted in connection with School business:

- **Cash or monetary gifts**, including cash equivalents such as vouchers or gift cards, unless specifically authorised under the school's procedures.
- **Gifts or hospitality offered to family members, partners or close friends** of Members, Trustees or staff where the offer is connected to the individual's role or position at the school.
- **Gifts or hospitality from a potential supplier or tenderer** during the period immediately before tenders are invited or during an active tendering or procurement process.
- **Lavish, extravagant or disproportionate gifts or hospitality**, even where the activity is undertaken outside the individual's normal working hours, if the offer is connected to their position or duties at the school.
- **Gifts or hospitality intended, or which could reasonably be perceived as intended, to influence a decision, secure preferential treatment or create an obligation.**
- **Gifts or hospitality where accepting them would create an actual, potential or perceived conflict of interest.**

This list is not exhaustive. Members, Trustees and staff should consider the nature, value, timing, frequency and circumstances of any gift or hospitality when deciding whether it is appropriate to accept or offer it. Where there is any doubt, advice should be sought from the Headteacher or Finance Manager before accepting or offering the gift or hospitality.

7. Declining Gifts and Hospitality

Any Member, Trustee or staff member who is offered a gift or hospitality that is prohibited under Section 6 of this policy must politely decline the offer.

Where an individual considers that declining the gift or hospitality may cause offence, be impractical or otherwise be inappropriate in the circumstances, they must refer the matter to the Headteacher or Finance Manager for advice.

The Headteacher or Finance Manager may determine that the gift should be returned, declined on behalf of the individual, or, where appropriate, donated to a suitable charitable or community organisation. Any such decision must be recorded on the Gifts and Hospitality Register.

Any gift or hospitality that has been accepted inadvertently and subsequently identified as unacceptable must be reported to the Headteacher or Finance Manager as soon as possible. Appropriate action will then be agreed, which may include returning or donating the gift.



Failure by a staff member to comply with this policy, including knowingly accepting prohibited gifts or hospitality or failing to declare gifts or hospitality that are required to be recorded, may constitute a disciplinary matter and will be dealt with in accordance with the school's disciplinary procedures.

Members and Trustees who fail to comply with this policy may be referred to the Chair of Governors for appropriate action.

All gifts and hospitality that are required to be recorded under this policy must be entered on the Gifts and Hospitality Register within the timescales specified in Section 5.

8. Travel Expenses

Staff will not be reimbursed for the ordinary cost of travelling between their home and their normal place of work.

Where staff or Trustees are required to travel on school business, including attending courses, training, meetings or other approved activities, reasonable and proportionate travel expenses may be reimbursed in accordance with the school's expenses procedures.

Travel arrangements should represent appropriate use of school funds and provide value for money. Staff and Trustees should use the most economical and practical means of transport appropriate to the circumstances.

Where travel by rail or other public transport is required, reimbursement will normally be limited to standard class travel. Any exception must be agreed in advance by the Headteacher.

Where appropriate and practicable, car sharing should be encouraged to reduce costs and support the efficient use of School resources.

All travel expense claims must be supported by appropriate receipts or other evidence where required and submitted in accordance with the school's expenses procedures.

8. Monitoring Arrangements

The Gifts and Hospitality Register will be maintained and monitored regularly by the School Office Manager, with any concerns, unusual entries or potential conflicts of interest brought to the attention of the Headteacher and/or Finance Manager.

The Finance Manager and Headteacher will periodically review the Gifts and Hospitality Register to ensure that it is being maintained appropriately and that this policy is being followed.

This policy will be reviewed at least every three years, or sooner where there are significant changes to legislation, government guidance, the Academy Trust Handbook or the School's arrangements.

The policy will be reviewed by the School Office Manager in consultation with the Finance Manager and Headteacher and approved by the Board of Trustees.

Appendix 1: gifts and hospitality register

DATE	NAME OF RECIPIENT	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	REASON/ BUSINESS PURPOSE	ACCEPTED / DECLINED	APPROVED BY	DATE RECORDED