



**Cabot**  
Learning  
Federation

Gifts and  
Hospitality  
Policy

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Date Adopted: 25 May 2022  
Implementation Date: 1 September 2022



History of most recent Policy changes

Date	Page	Change	Origin of Change e.g. TU request, Change in legislation
May 2022	Whole document	Formal writing of Policy	Policy not previously formally documented in one area

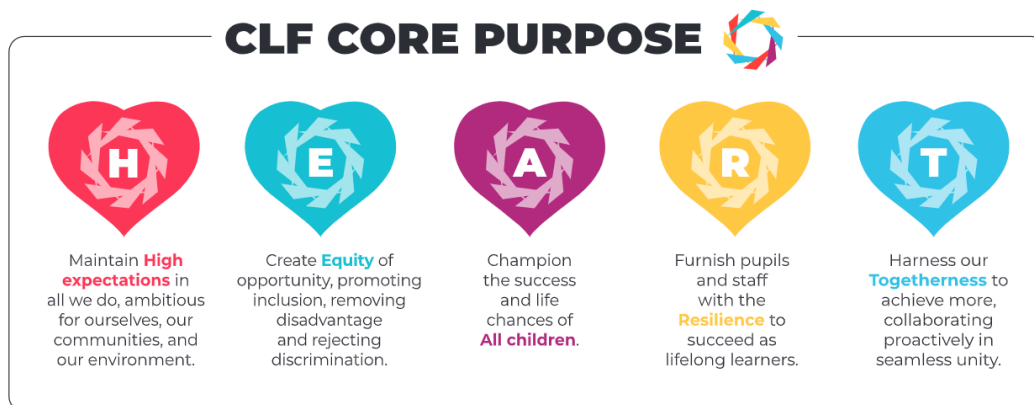
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## 1 Introduction

This policy refers to the acceptance of gifts and hospitality only. There is a separate policy underway in relation to providing gifts and claiming expenses. This policy applies to all staff, members, directors/trustees, academy councillor, volunteers, and any other individual acting as a representative of the Cabot Learning Federation (CLF).

The CLF is committed to upholding the Nolan Principles, the seven principles of public life that apply to anyone who works as a public-office holder. These are: Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership. Representatives of the Trust are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Trust and hold the CLF Heart Values in high regard.



The Gifts and Hospitality Policy seeks to protect the reputation of the Trust and its representatives from suspicion of dishonesty, accusations of bribery or corruption and ensure that they are free from any conflict of interest with respect to the acceptance or provision of gifts, hospitality, or any other inducement from any suppliers of goods or services to the Trust.

**All representatives must take extreme care that none of their dealings, directly or indirectly, could be deemed as a reward or benefit, in line with the Bribery Act 2010.**

This policy is reviewed by the Audit Committee and approved by the CLF Trustees. The policy will be reviewed on a biennial basis or where required from 2022/23.

## 2 Objectives

The objectives of this policy are to ensure that the CLF:

- has due regard to propriety and regularity and its duties under the Bribery Act
- continues to operate and act in a manner that stands up to public scrutiny.

- prohibits the receipt of gifts, hospitality or other expenses that could influence, or be perceived to be capable of influencing, Trust decision making
- ensures all representatives of the Trust 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.

### 3 Regulations

This policy aligns with the requirements in the Academy Trust Handbook 2022 which dictates:

The academy trust should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or other benefits that might compromise their judgment or integrity and should ensure all staff are aware of it.

It also aligns with the requirements included in the CLF Financial Regulations and the CLF Employment Manual.

### 4 Definitions

The following definitions apply when accepting gifts or hospitality:

Heading	Definition
Gifts	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 public
Hospitality	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 public.

This policy refers to all gifts offered from the following groups. This is not an exhaustive list.

Heading	Definition
Groups	Parents, Pupils, Suppliers, Potential Suppliers, Customers, Partners, Community Groups, Charities, Organisations or Other Public sector bodies.

### 5 Roles and responsibilities

The following section outlines the roles and responsibilities for all representatives across the Trust.

#### 5.1 All representatives

- Must not accept gifts or hospitality 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 because 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 not accept any gift or hospitality that contravenes the law.
- Must not accept gifts of cash or a cash equivalent such as gift certificates or vouchers.

## 5.2 The Principals and Executive Team will:

- Ensure that staff, volunteers, academy councillors, trustees and members are aware of and understand this policy, and that it is being implemented consistently.
- 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 academy or Trust and to those outside the organisation.
- Ensure that decisions on whether individuals or the Trust can accept gifts or hospitality with a value of over £40 are in line with this policy.

## 5.3 The Deputy Finance Director will ensure that:

- The Trust maintains a gifts and hospitality register.
- Trustees and Principals are provided with information on gifts and hospitality received on an annual basis
- Decisions are made on whether individuals or the Trust can accept gifts or hospitality with a value of over £40 are in line with this policy.

# 6 General Guidance, Approval and Record Keeping

## 6.1 Approval

The general principles for the acceptance of gifts are:

- The gift must be of a nominal or notional value.
- The gift must be given for an appropriate reason.
- The gift must be given at an appropriate time (e.g. not in advance of the issuing of an opinion or determination, or in advance of the award of a contract).
- The gift must be of a “one-off” or very occasional nature

A gift or hospitality offered under the value of £40 can be accepted providing it complies with this policy and does not fall into the unacceptable gifts list in section 6.2. 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.

Similarly, hospitality such as working lunches may be accepted to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances.

Gifts from pupils generally fall under the £40 limit and can be accepted, provided they do not fall into the unacceptable gifts list in section 6.2. A gift from a class not an individual pupil over £40, would be classed as a single gift and will require approval.

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All gifts or hospitality over £40 must be approved as follows:

Value	Approval
Over £40 but under £60	Approval to be sought from Principal/Central Team Lead and the relevant Finance Manager
Over £60 but under £100	As above plus the Deputy Finance Director
Over £100	As above plus Chief Operating Officer

All gifts and hospitality to the Chief Executive Officer or Chair of the Board (in carrying out Trust duties) above £40 must be approved by the Chief Operating Officer.

All gifts and hospitality to the Chief Operating Officer (in carrying out Trust duties) above £40 must be approved by the Chair of the Finance Executive Group.

Approval to accept gifts or hospitality can be completed through the Operations Manager which will be first sent to the Finance Manager and then the Principal/Central Team Lead for approval.

## 6.2 Assessing Value

It is not always straight forward to determine the value of a gift. If the value cannot be ascertained, seek approval from your Finance Manager or Deputy Finance Director who can support to identify and agree a value.

## 6.3 Unacceptable gifts and hospitality

The following must never be accepted:

Unacceptable gifts and hospitality
Monetary gifts (including gift cards)
Gifts or hospitality offered to family members, partners or close friends of representatives of the Trust.
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.

## 6.4 Gifts and Hospitality Register

All gifts or hospitality above £40 **must be** recorded on the Trust gifts and hospitality register. This must also include any gifts that are **refused/returned** based on non-compliance with this policy. This is to ensure all data is captured, even when a gift is returned/not accepted.

The register is maintained centrally and is completed via the Academy Operations Manager.

The form requires a minimum of two approvals. Please select the relevant Finance Manager from the drop-down list to seek finance approval. The next stage of approval is the Principal/Central Team Lead. Further approval may be required based on the limits listed in 6.1.

### 6.5 Declining Gifts and Hospitality

Any Representative of the Trust who is offered any of the unacceptable gifts or hospitality outlined in the section above that are over the £40 value, should politely decline the offer and complete a form for inclusion on the gifts and hospitality register.

If they feel it would not be appropriate for them to decline, they should refer the matter to the Deputy Finance Director who may decline the offer or donate the gift or hospitality to a worthy cause. For example, to use as an end of year pupil reward or prize within an academy or donate to the charity supported by the CLF/academy. The item must also be recorded on the gifts and hospitality register.

### 7 Examples of Gifts or Hospitality

To support with decision making, the following provide some examples of gifts or hospitality previously provided to the CLF:

Example	Action
End of year gift to a teacher – box of chocolates	Providing under £40, gift can be accepted and no need to log on the register.
2 tickets to Bristol Bears	Likely to be over £40. Consider reason for the hospitality and if it is appropriate to accept. Seek support from the finance team
Branded umbrellas or stationery from a supplier	Providing it is under the value of £40 and does not affect the tender or procurement process nor leads to increased purchases from the supplier, this is fine to accept.

### 8 Policy Requirements

The following policy principles will be adhered to:

- The Trust commits to ensuring the contents of this policy is communicated to CLF representatives on a timely basis through annual training.
- The gifts and hospitality register will be shared annually with the Audit Committee at the first meeting of the academic year.
- This policy will be reviewed every 2 years or where appropriate.