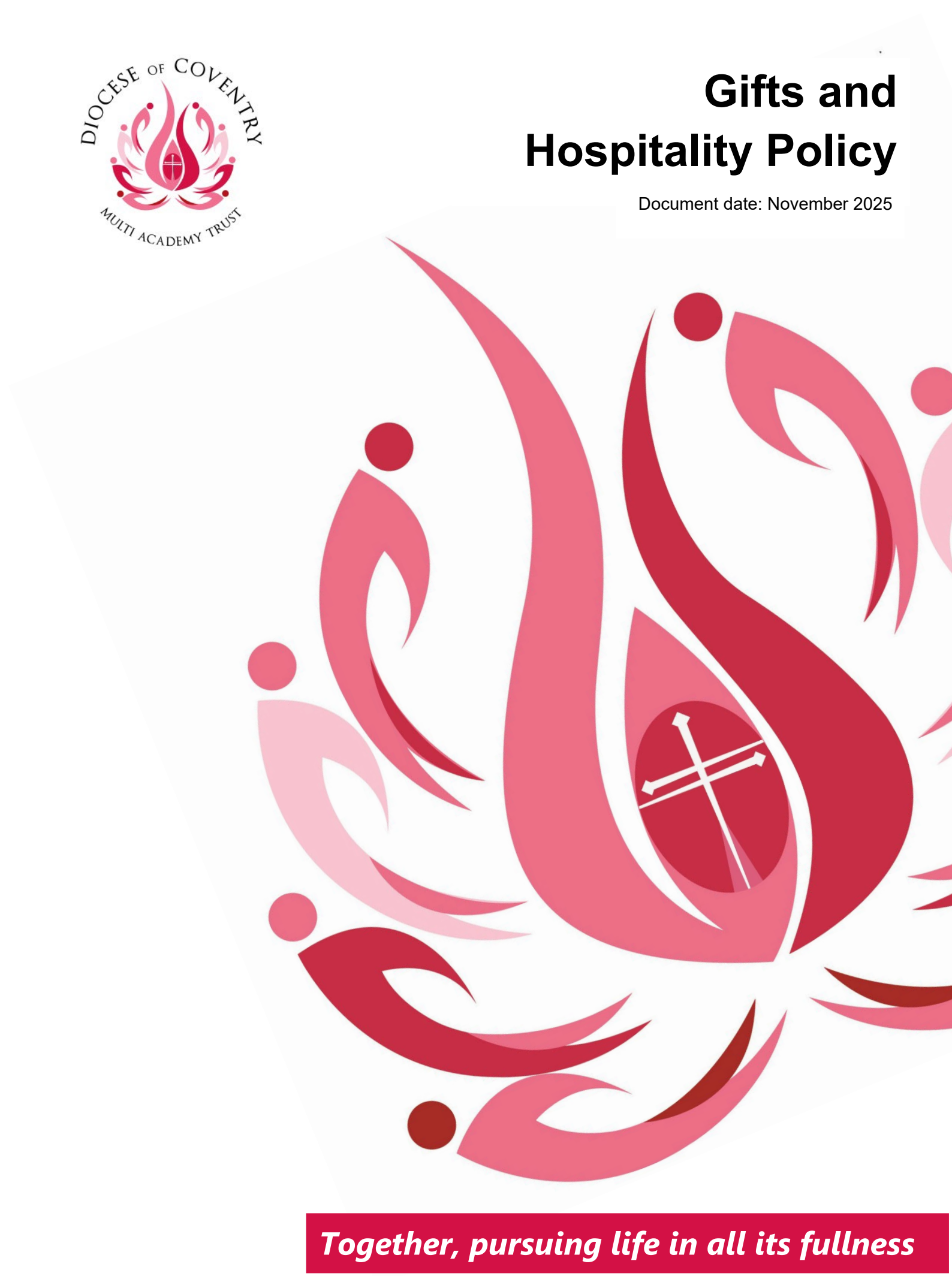
Gifts and Hospitality Policy

Document date: November 2025



Together, pursuing life in all its fullness

Version	Date	Author	Changes
v1.0	Sept 2014	Jo Baker	Approved by MAT Board
v1.1	November 2016	Jo Baker	Addition of instruction (2.5) that a register should be maintained even if there is a nil return.
v2.0	April 2018	Louise Beale	Review
v3.0	January 2022	Louise Beale / Lorna Nix	Updated for academy governance committees. Section 4 re-written. Other minor changes.
V3.1A	February 2024	Louise Beale/ Sarah-Jane Anderson	Minor changes for clarity, inclusion of vouchers in sections 4.10 and 4.11
V3.2	September 2025	Deb Bacon	Removal of vouchers, addition of gifts from a collective of parents, review of gift value, addition of reference to legislation

Review frequency	4 years
Review date	November 2029
Ratified by	Business and Finance Committee
Date of ratification	24th November 2025
Lead/owner	Head Of Operations & Compliance
Target audience	All staff and public
Document reference	POL-FN06

The electronic version is the definitive version of this document.

1. PURPOSE OF THE POLICY

1.1. The Diocese of Coventry Multi Academy Trust (the 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. The policy applies to all employees, academy governance committee (AGC) Members, directors, contractors and consultants or other associated persons, agents or representatives acting in the name of, or on behalf of, or dealing with the Trust and its academies.

1.3. The purpose of this policy is to ensure that the business conducted by employees, AGC Members and directors of, and those associated with, the Trust and its academies is appropriate and avoids the risk of any perceived or real conflict of interest or allegation of bribery or corruption.

1.4. The policy outlines the approach of the Trust on the receipt of gifts and hospitality by its employees, AGC Members, directors and those associated with the Trust and its academies from any third parties arising from duties undertaken on behalf of the Trust.

2. Legislation and guidance

This policy is based on the Academy Trust 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 compromise their personal judgement or integrity. This should include members, trustees, staff and/or any other representative of the trust. The handbook states that the trust should ensure that all staff are aware of this policy.

This policy also complies with our funding agreement and articles of association.

3. PRINCIPLES OF THE POLICY

3.1. Practices, such as obtaining goods and services which may include an element of private use for employees, AGC Members and directors should be avoided.

3.2. Employees, AGC Members and directors should avoid accepting excessive hospitality, entertainment or other services from existing or prospective suppliers.

3.3. A Register of Gifts and Hospitably should be established at each academy and for the Trust central team, which should be updated as soon as practicably possible where excessive hospitality, entertainment, gifts or other services are offered or received as a result of the position held within the Trust.

3.4. The Registers of Gifts and Hospitality are open documents and must be made available for inspection by the Chief Executive Officer of the Trust and the Auditors.

3.5. It is a mandatory requirement for the Academy to hold a Register of Gifts and Hospitality, even if there is a nil return. It is recommended that the Register of Gifts

and Hospitality is held alongside the Register of Pecuniary and Business interests and is freely available in the academy office.

4. DEFINITION

4.1. The expressions “gifts” and “hospitality” have wide meanings, and no conclusive definition is possible. Gifts and hospitality can include:

- Free gift of any goods or services
- The opportunity to acquire any goods or services at a discount or at terms not available to the general public
- The opportunity to obtain goods or services not available to the general public
- The offer of food, drink, accommodation or entertainment.

4.2. Common gifts include pens, diaries, calendars and other business stationery, articles of clothing, books, wine and flowers. Common hospitality includes lunches provided by external bodies.

4.3. For the purpose of this policy a “gift” is defined as any item, cash or goods or any service, which is offered for personal benefit at no cost, or at a cost that is less than its commercial value.

4.4. “Hospitality” is defined in this policy as any generous or material welcome or reception that is more than an incidental beverage or light refreshment e.g. attendance as a non-paying guest at a cultural, sporting or other event.

4.5. The real test is whether the acceptance of any gift and/or hospitality could be regarded by a third party as compromising or likely to compromise the impartiality and objectivity of a member of the Trust.

5. GENERAL RULES

5.1. Employees, AGC Members and directors must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity. Always say no if you think the giver has an ulterior motive. Be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will elicit a more prompt service or preferential treatment. A gauge of what is acceptable in terms of hospitality is whether the trust or Academy would offer a similar level of hospitality in similar circumstances.

5.2. Academy employees and AGC Members are asked to immediately report any offer or receipt of such gifts to the Academy Office to be recorded in the Register of Gifts and Hospitality. Central team employees or directors of the Trust are asked to

immediately report any offer or receipt of such gifts to the Head of Operations and Compliance to be recorded in the central Register of Gifts and Hospitality.

5.3. Employees, AGC Members and directors shall not use their authority for personal gain and shall seek to uphold and enhance the standing and reputation of the Trust at all times by:

- Maintaining an unimpeachable standard of honesty, integrity and selflessness in all their business relationships;
- Complying with the letter and the spirit of the law and their contractual obligations rejecting any business practice that is deemed improper;
- Acting to maintain the interests and good reputation of the Trust and/or the Academy at all times.

5.4. Employees, AGC Members and directors are permitted to accept isolated gifts of a trivial nature or inexpensive seasonal gifts or corporate branded items (such as diaries, pens, calendars). Such gifts can be accepted without the need to seek approval or formally register receipt.

5.5. Promotional gifts or small items from a supplier, contractor or parents as an expression of gratitude such as boxes of chocolates or a bottle of drink may be accepted.

5.6. Occasional modest meals with people with whom the Academy or Trust conducts business or occasional attendance at modest entertainment, theatre or sporting events is also acceptable provided that there is no expectation or belief that something will be forthcoming in return.

5.7. Never accept a gift or hospitality from anyone who is, or may be in the near future, tendering for any contract with the Trust or the Academy, seeking employment with the Trust or the Academy or is in dispute with the Trust or Academy, even if you are not directly involved in that service area.

5.8. Acceptance of gifts or hospitality with a value exceeding £50 must always be subject to prior approval as per the table below and recorded and reported in the Academy or Trust Gifts and Hospitality Register.

Recipient	**Approver**
Academy based staff	Headteacher, CEO
Central staff	CEO
CEO and members of the Board	Chair of the Board
Chair of the Board	A Member

5.9. Employees, AGC Members and directors may accept the following gifts/ hospitality without the need to formally register receipt or seek approval of the Academy or the Trust:

- Attendance in an official capacity at a public function;

- Working lunches/dinners with customers, providers or partners are generally acceptable as a way of doing business provided they are not to an unreasonable level or cost;
- Sponsored hospitality that is built into the official programme of conferences and seminars related to your work
- 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 Trust central team must be sought.

5.10. The following are examples of gifts or hospitality requiring approval and formally recording by the Academy Office or Head of Operations and Compliance in the 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
- Sponsored cultural and sporting events, or other public performances as a representative of the Trust or Academy
- Promotional gifts exceeding the value of £50
- Other offers of gifts or hospitality exceeding the value of £50.

5.11 Gifts from parents / pupils

- Gifts up to £25: small gifts valued at £25 or less can be accepted without formal approval from the headteacher. These gifts do not need to be recorded on the Gifts and Hospitality register.
- Individual gifts with a value over £25 but under £50, a member of staff must let the headteacher know but do not need to record on the Gifts and Hospitality register.
- Cash / vouchers / gift cards: Staff are not allowed to accept cash / vouchers or gift cards of any amount.
- Collective gifts: Gifts from a group of pupils or parents up to £50 can be accepted without being recorded on the Gifts and Hospitality Register.
- Gifts whether individual or collective over the value of £50 will require approval of the headteacher before a member of staff can accept and must be recorded on the Gifts and Hospitality Register.
- Extravagant Gifts: lavish or extravagant gifts or hospitality will not be accepted.

5.12 The following are examples of gifts or offers of hospitality which should be refused by employees, AGC Members and directors:

- Gifts of money / cash / vouchers / gift cards
- Free membership or subscriptions (e.g. Sports clubs)
- Foreign travel or concessionary travel rates unless a specific element of a business, academic or research activity is approved by the Trust
- Hotel accommodation or use of company villas/apartments
- Free goods, services or equipment which are normally provided by a supplier to the Academy or Trust at a charge.
- Extravagant gifts: lavish or extravagant gifts or hospitality.

NB Any offers falling into the above category should be reported immediately to the Academy Office or the Head of Operations and Compliance.

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

5.14 Where items purchased for the Trust or Academy include a 'free gift', such a gift should either be used for Trust or Academy business or handed to an Academy Office to be used for charity raffles.

5.16 Offers to speak at corporate dinners and social gatherings, or events organised by, for example, a professional body, where there is a genuine need to impart information or represent the Trust or Academy must be agreed in advance with the Headteacher or Head of Finance in the case of central staff. Where your spouse or partner is included in the invitation, and approval has been given for you to attend, it will be acceptable for your spouse or partner to attend as well, but if expenses are incurred, these will be met personally.

5.17 Any invitation you accept should be made to you in your professional/working capacity as a representative of the Trust or Academy.

5.18 If in doubt about the acceptability of any gift or offer of hospitality, it is your responsibility to consult the Headteacher or Head of Finance.

6. GIFTS AND HOSPITALITY GIVEN

6.1. Reasonable costs to entertain visitors on Academy or Trust business are acceptable. The cost of a working lunch, sandwiches, finger buffet and non-alcoholic beverages would be considered reasonable.

6.2. It is acceptable to provide employees with refreshments at a reasonable cost to the Academy or Trust as part of training or development events. For this purpose, training and development is taken to cover not only training courses but also developmental meetings including for example departmental meetings, consultation meetings and general staff developmental activities.

6.3. In line with guidance from the ESFA that academies should use their allocated GAG funding for the full benefit of their current pupils, the Academies and the Trust central team should carefully consider 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.

7. ROLE OF ACADEMY OFFICE / HEAD OF OPERATIONS AND COMPLIANCE

7.1. Responsible for ensuring that any offer or receipt of gifts, hospitality or donations is recorded in the Register of Gifts and Hospitality.

7.2. Reporting any possible conflict of interest arising from the offer or receipt of gifts and or hospitality.

7.3. Responsible for ensuring that employees, AGC Members, contractors, consultants and agents that work for the academy or the Trust are made aware of the policy.

8. EMPLOYEE, AGC MEMBER AND DIRECTOR RESPONSIBILITIES

8.1. Employees, AGC Members and directors have a responsibility to:

- Comply with this policy
- Report gifts or hospitality offered and whether they have been accepted or declined
- Raise any concerns about the operation of the policy with their line manager in the first instance or the Head of Operations and Compliance.

APPENDIX – REGISTER OF GIFTS AND HOSPITALITY RECEIVED.

The Register of Gifts and Hospitality is an electronic format.

The link can be found in the folder via this link: https://forms.cloud.microsoft/e/RpE8jHYBZi