



**KALEIDOSCOPE**  
Multi Academy Trust

# Gifts and Hospitality Policy

**February 2023**  
**(Reviewed every 3 years)**

**Approved by:** Kaleidoscope Trust Board  
**Next Review:** February 2026

**Date:** February 2023

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### 1. Aims

This policy aims to ensure that:

- Kaleidoscope Multi-Academy Trust's (KMAT) funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academy Trust 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 [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 be seen to compromise the 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. 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.

## 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 Finance Officer (CFO) or Headteacher/Executive Headteacher/Head of School 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/Executive Headteacher/Head of School

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

The Headteacher/Executive Headteacher/Head of School 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 ensure, alongside the CFO, 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.

The Headteacher/Executive Headteacher/Head of School is responsible for communicating the school/trust's rules and expectations about gift-giving to parents.

### 4.4 The Chief Finance Officer (CFO)

The CFO will ensure that:

- The trust maintains a gifts and hospitality register
- Figures for transactions relating to gifts made by the trust are disclosed in the trust's audited accounts, in accordance with the Academies Trust Handbook
- The academy trustees and Headteacher/Executive Headteacher/Head of School are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Headteacher/Executive Headteacher/Head of School, 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.

### 4.5 The MAT Office

The MAT Office is responsible for maintaining the gifts and hospitality register on a day-to-day basis. Staff should inform the Headteacher/Executive Headteacher/Head of School of the school they work at of the details of the gift/hospitality received if it is over £25. The Headteacher/Executive Headteacher/Head of School will inform the MAT office, who will then record the information on the Gifts and Hospitality Register.

## 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.

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 CFO or Headteacher/Executive Headteacher/Head of School.

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 CFO or Headteacher/Executive Headteacher/Head of School.

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 CFO or Headteacher/Executive Headteacher/Head of School before accepting.

If the Headteacher/Executive Headteacher/Head of School is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the CEO who will ensure the details are recorded 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 Bursar/Administrator at each KMAT School and receipts must always be enclosed. The exception to this are travel expenses which should be entered onto the Access system by the claimant. Receipts (including petrol) receipts must be added to the claim for it to be authorised.

The CFO or Headteacher/Executive Headteacher/Head of School 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:

- Monetary gifts
- 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.

## **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/Executive Headteacher/Head of School or CFO. The Headteacher/Executive Headteacher/Head of School or CFO 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. Monitoring arrangements**

The gifts and hospitality register is monitored regularly by the CFO and Chief Executive Officer (CEO). This policy will be reviewed every three years by the Trust Board.

## 9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Accounting policy
- Kaleidoscope Financial Handbook

Appendix 1: gifts and hospitality register

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



Trustee Board Chair

18/1/2023