



**Astrea Academy Trust**  
INSPIRING BEYOND MEASURE

## **Astrea Gifts and Hospitality Policy 2022-25**

Date	September 2022
Written by	Assistant CEO
Approval	Audit and Risk Assurance Committee
Review Date	July 2025, for implementation from September 2025

## Objectives

- To ensure that all members of staff are aware of their obligations in relation to the receipt of gifts and hospitality which could be seen to compromise their personal judgement or integrity
- To ensure that the academy trust has due regard to propriety and regularity of public funds when giving gifts and that the receipt of any gifts are fully documented

## Introduction

This document includes:

- Trust Policy on gifts and hospitality
- Template for gifts and hospitality register for completion locally by the School Operations or Office Manager at school level and the Head of Governance and Legal in the central team (annex 1)

This policy will be applied equally to all members of academy staff. The policy does not apply to donations received by the Trust as a corporate entity.

The intention of the policy is to ensure that the Trust can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the academy trust. Selflessness and objectivity are important principles of public life and the Trust also has a responsibility to avoid the *perception* – not just the fact – of any undue influence.

Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the academy trust by maintaining honesty and integrity in all their business relationships and at all times acting to uphold the interests and good reputation of the academy trust.

## Definitions

A **Gift** is any item or service, award, prize or any other benefit which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public or which might be seen to compromise the personal judgment or integrity of the recipient.

**Hospitality** is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public.

Reference to **the Trust/Astrea** includes reference to the individual school.

## Acceptance of Gifts, Hospitality, Awards and Prizes

The academy trust expects all members of staff and trustees to exercise utmost care when giving and accepting gifts and hospitality in their capacity as employees or Trustees of Astrea. Particular care should be taken when accepting gifts from a person or organisation that has, or is hoping to have, a contract with the Trust.

As a general guideline, gifts and hospitality should not be accepted by any member of staff in their capacity as employees, except as provided for below. In any case of doubt, advice should be sought from the School Operations or Office Manager at school-level, or the Assistant CEO for central team queries.

Members of staff must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that the academy trust might be placed under an obligation.

Isolated gifts of low value (up to £30) such as promotional calendars or diaries, or small tokens of gratitude including gifts from pupils, parents and guardians can be accepted. Gifts should not be

accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business or academic decision.

Conventional hospitality (lunches, outings, tickets for events, etc.) that is modest and reasonable in the circumstances may be accepted. Such invitations should not be accepted where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.

Any gifts or hospitality valued at less than £30 and meeting the above criteria can be accepted without reference to the Register of Business Interests. Gifts or hospitality over £30 should be reported to the School Operations or Office Manager at academy-level, or the Head of Governance and Legal for central team colleagues, for an entry in the Register of Business Interests.

If a member of staff, trustee or governor is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school, it is their responsibility to discuss this with the Operations or Office Manager or Trust Financial Director.

Where purchased items include a "free gift", such gifts should be either used for academy trust business or handed to the academy trust to be used at charity raffles etc. Where a gift is received on behalf of the school, the gift remains the property of the school.

## **Giving of Gifts, Hospitality, Awards and Prizes**

Trustees recognise that directors and senior leaders will occasionally want to send a gift or to offer hospitality on behalf of the Trust. These are subject to the requirements that public money be spent with regularity and propriety and they must not be excessively generous.

Where hospitality is offered, the rates for this are subject to the limits set out in Astrea's central expenses policy.

Where a gift is offered, it should not ordinarily exceed the value of £30. Where the value does exceed this, agreement should be sought from an Executive Director (or a fellow member of the Executive Board where the purchaser is him/herself an ED). All purchases are subject to the limits set out in Financial Scheme of Delegation.

Astrea will grant awards and prizes to employees and volunteers, for example through the annual teaching awards. Subject to the conditions above in relation to propriety and regularity, Trustees encourage this practice.

## **Compliance with the Policy**

The academy trust should be able to show that all decisions are reached on the basis of value for money considerations and for no other reason. Any consideration of whether or not the principles of this policy have been breached will be determined by reference to this provision.

Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.

In line with the Trust's Whistleblowing Policy, any employee who becomes aware of a breach of policy must report this to his or her manager who will instigate investigations as necessary.

Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with the duty owed to the academy trust in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving relatives or

associates of members of staff must supply details of such transactions for entry into the Register of Business Interests.

## Annex 1

### Gifts and Hospitality Register of Business Interests Template

Recipient	Description of Gift/Hospitality	Donor	Date	Estimated Value (£)	Comments

NB

Comments should include the reason the offer/gift was accepted and the use to which any gifts were put e.g. donated to academy raffle etc.