



GIFTS AND HOSPITALITY POLICY

2024-2026

MAT Board Approval:	November 2020
Last Review:	November 2024
Next Review:	Autumn 2026
Member of Staff Responsible:	Mrs C Roberts

Our Vision

'To Love, To Learn, To Serve' sums up the DoWMAT's vision for those who come together to create the MAT, enabling all to flourish both as individuals and in community with each other; living life in all its fullness (John 10:10).

Our Values

To Love

The New Testament sums up the entire law as a call to “love your neighbour as yourself” (Galatians 5:14). The Bible teaches that we are only able to love because God first loved us (1 John 4:10). This love is expected to characterise the way in which the DoWMAT operates, makes decisions, builds relationships, and carries out its day-to-day business: each person putting the needs of others before their own, with a commitment to the flourishing of all. The exposition of love in 1 Corinthians 13 reminds us that love is patient, kind, forgiving, generous, humble, trusting, respectful, hopeful, resilient and enduring. Those who learn and work in the DoWMAT, and all who come into contact with it, can expect to experience that love in the way that they are treated.



To Learn

The DoWMAT is a Christian learning community that is committed to enabling all to live a life of freedom and transformation as a result of the hope and wisdom that learning brings. Learning is at the heart of the Church of England’s vision for and commitment to education. Growing in wisdom is celebrated in the Bible and all are exhorted to listen, to seek guidance, to acquire knowledge and to learn discretion (Proverbs 1: 1-6), largely through human relationships and interactions. Jesus’ teaching, as summed up in the Beatitudes (Matthew 5:3-10), describes human beings who are learning to live a life that is characterised by humility, compassion, mercy, righteousness and peace. The learning that takes place within the DoWMAT is expected to be recognisably rooted in these godly characteristics and focused upon enabling the holistic development of people who are made in the image of God.



To Serve

Service and servant leadership, was a striking feature of the way in which Jesus lived his life. The example he gave to his disciples in washing their feet (John 13:1-17) provides us with a role model for the way in which we should seek to live in community with others. Putting the needs of others before our own, people in their growth and development as holistic human beings, enabling people’s to come to the fore as a result of our service to them are all defining characteristics which the DoWMAT operates. In serving others and meeting their needs through spirit, we manifest God’s grace and love for others (1 Peter 4:8-11).



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These core values underpin all aspects of our Trust as we strive to make a positive difference to the lives of all DoWMAT pupils whilst they are at school and in later life. Through these values, we can be sure our community is one of hope; a place of transformation and trust, where all are treated with respect and dignity.

OUTSTANDING PROFESSIONALS | COLLABORATIVE PARTNERSHIPS | STRONG SYSTEMS | CONFIDENT LEARNERS

1. PURPOSE OF THE POLICY

- 1.1. The Diocese of Worcester Multi Academy 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, local academy board 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, local academy board members and directors of, and those associated with, the Diocese of Worcester Multi Academy 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 Multi Academy Trust on the receipt of gifts and hospitality by its employees, local members, directors and those associated with the Multi Academy Trust and its academies from any third parties arising from duties undertaken on behalf of the Trust.

2. PRINCIPLES OF THE POLICY

- 2.1. Practices, such as obtaining goods and services which may include an element of private use for employees, local academy board members and directors should be avoided.
- 2.2. Employees, local academy board members and directors should avoid accepting excessive hospitality, entertainment or other services from existing or prospective suppliers.
- 2.3. A Register of Gifts and Hospitality should be established at each academy and at the central MAT, 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.
- 2.4. The Registers of Gifts and Hospitality are open documents and must be made available for inspection by the Chief Executive Officer of the Multi Academy Trust and the Auditors.
- 2.5. 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.

3. DEFINITION

- 3.1. 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.

3.2. 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.

3.3. 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.

3.4. “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.

3.5. 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.

4. GENERAL RULES

4.1. Employees, local academy board 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. Academy employees and local academy board members are asked to immediately report any offer or receipt of such gifts to their own Academy Headteacher to be recorded in the individual academy Register of Gifts and Hospitality. Employees of the DoWMAT Central Team or directors of the Multi Academy Trust are asked to immediately report any offer or receipt of such gifts to the Director of Operations to be recorded in the Trust Register of Gifts and Hospitality.

4.2. Employees, local academy board members and directors shall not use their authority for personal gain and shall seek to uphold and enhance the standing and reputation of the Multi Academy 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

4.3. Employees, local academy board 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.

4.4. 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.

4.5. Occasional modest meals with people with whom the Academy or Multi Academy 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.

4.6. Acceptance of gifts or hospitality with a value exceeding £50 must always be subject to prior approval from the Academy Headteacher or the Chief Executive Officer of the Trust or Director of Operations of the Academy Trust Board and must be recorded and reported in the appropriate Gifts and Hospitality Register.

4.7. Employees, local academy board members and directors may accept the following gifts/ hospitality without the need to formally register receipt or seek approval of the Academy or the Multi Academy Trust:

- Courtesy hospitality at business lunches/dinners or attendance in an official capacity at a public function;
- 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 Multi Academy Trust must be sought.

4.8. The following are examples of gifts or hospitality requiring approval and formally recording by the individual Academy Headteacher or the DoWMAT Director of Operations in the appropriate 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
- Promotional gifts exceeding the value of £50
- Other offers of gifts or hospitably

4.9. Unacceptable gifts or hospitality

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

- Gifts of money.
- Free membership or subscriptions (e.g. Sports clubs).
- Foreign travel unless a specific element of a business, academic or research activity is approved by the MAT Board.
- Free goods, services or equipment which are normally provided buy a supplier to the Academy or Trust at a charge.

NB Any offers falling into the above category should be reported immediately to the individual Academy Headteacher or the DoWMAT Director of Operations.

5. GIFTS AND HOSPITALITY GIVEN

- 5.1. Reasonable costs to entertain visitors on Academy or Multi Academy Trust business are acceptable. The cost of a working lunch, sandwiches, finger buffet and non-alcoholic beverages would be considered reasonable.
- 5.2. It is acceptable to provide employees with refreshments at a reasonable cost to the Academy or Multi Academy 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, consultations meeting and general staff developmental activities.
- 5.3. 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 central MAT should consider carefully 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.

6. ROLE OF THE INDIVIDUAL ACADEMY HEADTEACHER OR DOWMAT DIRECTOR OF OPERATIONS

- 6.1. Responsible for ensuring that any offer or receipt of gifts, hospitality or donations is recorded in the appropriate Register of Gifts and Hospitality.
- 6.2. Reporting any possible conflict of interest arising from the offer or receipt of gifts and or hospitality.
- 6.3. Responsible for ensuring that employees, local academy board members, contractors, consultants and agents that work for the academy or the Multi Academy Trust are made aware of the policy.

7. EMPLOYEE, GOVERNOR AND DIRECTOR RESPONSIBILITIES

- 7.1. Employees, local academy board 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 individual Academy Headteacher or the DoWMAT Director of Operations.



Diocese of Worcester Multi Academy Trust
Register of Gifts and Hospitality Received

School Name:

Brief Description of Item	Reason for Hospitality or Gift	Donor	Date Received / Offered	Value of Item	Accepted

Document History

Date	Author	Summary Changes	Approved by
05.11.2024	C Roberts	1. Annual Review 2. School Business Manager changed to Headteacher throughout	F&A Committee
06.12.2022	C Davies	Annual Review	F&A Committee