

## Policy for Gifts, Hospitality, Awards, Prizes and other benefits

Policy Code:	F2
Policy Start Date:	December 2019
Policy Review Date:	December 2021

Please read this policy in conjunction with the documents listed below:

- Finance Manual
- Trust Scheme of Delegated Authority

**Policy Status:** Approved

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## 1 Policy Statement

This policy enables the Trust to monitor and control the distribution and receipt of gifts and other benefits and ensure fairness and transparency in business transactions. It enables the Trust to ensure that the value of gifts, awards, prizes and other benefits is reasonable given the context. This policy helps to support staff in making a judgement and to enable them to apply practically the ESFA Financial Handbook guidelines and provide guidance on some acceptable behaviours around the acceptance or rejection of gifts and awards. The Policy will also deliver some standards of reasonableness in gift and award-giving and prevent instances of bribery.

It is a **criminal offence** for a United Kingdom citizen, resident or company associate to pay or receive a bribe, either directly or indirectly in the UK or abroad.

The Bribery Act 2010 creates three main offences:

- Bribing a person to induce or reward them to perform a relevant function improperly;
- Requesting, accepting or receiving a bribe as a reward for performing a relevant function improperly;
- Using a bribe to influence a foreign official to gain a business advantage.

1.2 References to the Trust or Academy within this policy specifically include all primary, secondary and special academies within the Trust, as well as Robert De Cheney Boarding House, the Early Years setting at the Priory Witham Academy, Priory Training, Priory Apprenticeships, Lincolnshire Teaching School Alliance and Lincolnshire Teaching School Alliance SCITT.

1.3 This policy does not form part of any employee's contract of employment and it may be amended at any time.

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## **2 Roles, Responsibilities and Implementation**

- 2.1 The Policy is applicable to and should be adhered to by all staff, trustees and governors within the Trust. It applies to both receipt and offer of gifts, hospitality, awards and benefits.
- 2.2 The Finance Committee has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Chief Financial Officer.
- 2.3 Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all employee are responsible for supporting colleagues and ensuring its success.
- 2.4 It is all staff members' responsibility to report appropriate gifts and awards.
- 2.5 It is the responsibility of the Headteacher's PA in each Academy to administer each gift and hospitality register.

## **3 Aims**

- 3.1 This policy aims to ensure that:
  - The Trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academies Financial 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.

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## **4 Registering the Transaction**

### *4.1 When to record*

- When the item received or given has a value or estimated value of £30 or above **or**
- when the item, no matter the value, could be deemed unreasonable (see 5).

### *4.2 Where to record*

- An entry should be made for each separate gift or award on the gift and hospitality register. Link:  
<https://sharepoint.prioryacademies.co.uk/sites/admin/federation/la-youts/15/start.aspx#/Gift%20Register/Forms/AllItems.aspx>

### *4.3 When approval is required*

In all and any case - the receiver cannot be the sole approver of a transaction in which they are involved.

<b>Type</b>	<b>Transaction</b>	<b>Head</b>	<b>Head and CFO</b>	<b>Finance Committee</b>
Gift, award, prize or hospitality	Given or received	£31* to £1,000	£1,001 to £2,000	£2,001 and above**

\*Note that if the item is deemed unreasonable (see 5) then all values must be recorded.

\*\*Donations from an Academy's PTA at this value may be approved by the CFO directly and only require escalation to the Trust's Finance Committee for approval if there are issues or irregularities with the Charities' Commission record for the PTA (as verified by the CFO).

## **5 How the register is managed and monitored**

- Each business unit (Academy, Boarding House, Federation, Apprenticeship or Teaching centre) will keep its own register.
- The relevant PA for each site will operationally run the register.

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- The Finance Committee, Trustees, Chief Financial Officer (CFO) and Chief Executive Officer (CEO) can request to view the register at any point in the year.
  - There will be an internal audit on the register once a year, organised and led by the CFO in March of each year.

## **6 Reasonableness**

### **6.1 Ask these questions:**

It is a subjective matter but the following questions should be asked:

- Might the transaction be seen to compromise the employee's personal judgement?
- Might the transaction lead to a compromise of personal integrity?
- Does the gift/award seem too generous or out of the ordinary relative to the context?
- Does the gift/award seem fair?

If any of the above answers are "Yes", then the transaction should be registered and the appropriate approvals should be obtained.

### **6.2 High Risk Areas:**

- Transactions in relation to **Admissions**
- Transactions in relation to **Sales and Invoicing**
- Transactions in relation to **Procurement**
- Transactions in relation to **Local Authority and Government Relations**
- **Cash** transactions

### **6.3 Suggested acceptable/reasonable usage (guidance only):**

- Flowers or a book token are permissible for an event e.g. retirement, milestone service, effort above and beyond the normal call of duty. <£40 suggested.
- Transactions beyond these are **not** prohibited but all entries must follow the appropriate delegated level of authority and the rationale must be recorded in the register
- Events where the hospitality is provided by a third party free of charge – <£100 estimated value per delegate.

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- A prize for best student – <£100.
  - In every case, the reasonableness should be reviewed with the contextual situation and just because the level is written above does not mean it is acceptable/reasonable.

6.4 Scenarios

***A teacher receives the gift of a book voucher (estimated value £40) from a parent at the end of term***

*Action:*

1. *The Teacher must report the gift and provide information necessary to the PA to complete the register.*
2. *The PA must record the item on the register.*
3. *The PA must review for reasonableness and ensure the appropriate approvals are obtained.*

In this case, if there are no other compromising circumstances, the gift seems reasonable and not excessive.

***The Head of Boarding receives the gift of two West End theatre tickets from a parent whose child has applied for admission to boarding, pending decision (estimated value £100). The Head of Boarding advises the PA that they are returning the gift as a matter of principle.***

*Action:*

1. *The teacher must report the offer of the gift and provide information necessary to the PA to complete the register;*
2. *The PA must record the item on the register;*
3. *The PA must review for reasonableness and ensure the appropriate approvals for the action are obtained.*

In this case, there are compromising circumstances, the gift seems unreasonable and excessive, especially given the situational context. The Head of Boarding has picked up on and proceeded with the appropriate course of action, which enables the approver to sign off the action on the register. In this case the Head of Boarding cannot approve his own register entry; an alternative Head must do this.

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**7 Policy Changes**

This policy may only be amended or withdrawn by The Priory Federation of Academies Trust.

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## **The Priory Federation of Academies Trust**

### **Gifts, Hospitality, Awards, Prizes and other benefits Policy**

This Policy has been approved by the Priory Federation of Academies  
Finance Committee

Signed..... Name..... Date:

Trustee

Signed..... Name..... Date:

Chief Executive Officer

Signed..... Name..... Date:

Designated Member of Staff

Please note that a signed copy of this agreement is available via Human  
Resources.