

Gifts and Hospitality Policy and Procedure



**St. Joseph's
Catholic Academy**

Adopted by St Joseph's Catholic Academy: March 2025

Next review by St Joseph's Catholic Academy March 2026

Introduction

The intention of this policy is to ensure that St Joseph's Catholic Academy, can demonstrate that no undue influence has been applied or could be said to have been applied by any stakeholder in their dealings with the Academy.

St Joseph's Academy will be open and transparent in declaring all gifts and hospitality whether or not accepted as provided for within this policy.

Objectives

The objectives of this policy are to:

- Ensure St Josephs can demonstrate that no undue influence has been applied by any person or organisation in its business transactions.
- Set clear requirements for staff regarding the accepting and giving of gifts and hospitality

Scope

All, staff and volunteers are expected to maintain high standards of professionalism and propriety in all their dealings to make sure they are entirely free from any conflict of interest and at all times act within the vision of the Academy and not accept a gift or hospitality in circumstances where it could influence, or could be seen to influence, that person's actions or decisions.

In upholding this policy all parties will be expected to adhere to the seven principles of public life, also known as the [Nolan Principles](#).

Legislation and Regulations

This policy is written in accordance with the requirements as set out in the Academy Trust Handbook (ATH), which is subject to annual review.

This policy complies with the following legislation and regulations:

- The Bribery Act 2010
- The Companies Act 2006, S.176

Definitions

Gifts

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

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

Dealing with Gifts and Hospitality

St Joseph's expects all, staff and volunteers to exercise the utmost discretion in giving and accepting gifts and hospitality when engaged on academy business. Particular care should be taken regarding a gift from a person or organisation that has, or is hoping to have, a contractual engagement with the academy.

In any case of doubt advice should be sought from the Headteacher or Chair of Governors.

Acceptance of Gifts

Gifts of low intrinsic value (not more than £10) such as promotional calendars or diaries, or small tokens of gratitude, can be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, individuals should decline the gift or refer the matter to the Headteacher or Chair of Governors.

It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are deemed to be valued at less than £25 these are perfectly acceptable without further reference.

Items with a deemed value of £25 or less do not need to be recorded, whereas gifts with a deemed value greater than £25 which are accepted must be recorded in the register.

Where a more valuable gift, benefit or service is offered which is to the good of the academy, rather than an individual, it must be referred to the Head teacher for approval within their discretion; if deemed acceptable, these items must be recorded in the Register of Gifts and Hospitality.

Acceptance of Hospitality

Hospitality such as working lunches, tea and coffee etc. are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. Modest hospitality, provided it is reasonable in the circumstances, should be similar to the scale of hospitality which the trust as an employer would be likely to offer. The acceptance of hospitality of a proportionate nature as outlined above

would not need to be recorded in the register. Hospitality offered and received above this level must be recorded in the register.

If staff and/or volunteer are 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 trust (other than light refreshments) it is their responsibility to discuss this with the Head teacher and/or Chair of Governors.

Examples of gifts or hospitality that must not be accepted are as follows:

- cash or monetary gifts;
- gifts or hospitality offers to a member of your family;
- gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process;
- staff and/or volunteers attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants.

Where a gift is received on behalf of St Josephs, the gift remains the property of the academy.

Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the academy and must be used accordingly.

If not accepting a gift or hospitality would be regarded as causing offence (such as a sudden and unexpected gift or one where refusal could cause cultural offence) the item should be accepted. The matter must then be brought to the attention of the head teacher as soon as possible who may decide to return the gift, or may donate it to a raffle/ fair or a charitable cause.

Offer of Gifts and Hospitality

St Josephs will not normally give gifts to other individuals or organisations. If gifts are given, care must be taken to ensure that the decision is fully documented in the register of gifts and hospitality and has due regard to the propriety and regularity of the use of public funds. This does not apply to the award of gifts, prizes etc. related to the achievement of pupils e.g., attainment or merit awards.

Where hospitality is provided by the academy this should be approved in advance by the Headteacher. In approving hospitality, the Headteacher should ensure it is not in breach of the UK Bribery Act 2010 and also that the costs are appropriate for a publicly funded organisation, as a guide the maximum costs should not exceed £25 per head. Hospitality such as working lunches, tea, coffee etc. and modest hospitality in the form of snacks, meals etc. are acceptable where it is appropriate to offer these in support of good working relationships amongst colleagues, visiting staff or business colleagues (but not for their family or friends). These occurrences would not be added to the register. Hospitality provided above this level must be recorded in the register.

Gifts and hospitality provided by the academy outside of those covered above (e.g., gifts to clergy, the Roman Catholic Diocese of Hallam, special events Easter, Christmas, staff retirement and charitable donations) must be provided for out of general fund raising, unrestricted funds and not from public funds.

Non Compliance

In the case where it is believed a staff member or volunteer has not declared a gift or hospitality then a formal investigation will be instigated by the Chair of Governors .If misconduct is proven then this may take the form of disciplinary procedures in the case of an employee.

Responsibilities

All staff and/or volunteers have a responsibility to read, understand and fully adhere to the requirements set out in this policy.

This policy will form part of the induction pack for all new staff and/or volunteers.

All line managers are responsible for ensuring that members of their team understand and act in accordance with the requirements in this policy on a day-to-day basis.

St Josephs will maintain a Register of Gifts and Hospitality.

Appendix 1 Register of Gifts and Hospitality

Use this form to record details of actual or proposed gifts and/or hospitality received from or provided to third parties.

School/Location	Select Location.
Type of entry	

1. Details of Gift or Hospitality

Use this section to specify details of the gift or hospitality actually given or intended to be given			
Brief description			
Reason for gift or hospitality			
Date of gift or hospitality			
Total deemed value		Value per attendee	
Gift received*			

*Summarise what has or will happen to the items in question e.g. 'kept in dept', 'held for charity raffle', retained by the individual.

2. Provider Details

Use this section to specify details of the person or organisation who is providing, planning to provide, the gift or hospitality			
Name of person or organisation			
Contact name			
Contact details	Email		Phone
Relationship			

3. Recipient Details

Use this section to specify details of the person or organisation who is receiving, intended to receive, the gift or hospitality			
Name of person or organisation			
Contact Name			
Contact Details	Email		Phone
Relationship			

4. Authorisation

Prepared by			
Name of approver		Position of approver	
Date of approval			

