



MERCHANT TAYLORS' OXFORDSHIRE ACADEMY TRUST

GIFTS AND HOSPITALITY POLICY

Version 1.0

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St. George's Road, Wallingford, Oxfordshire, OX10 8HH
t: 01491 837115
e: governance@mtoat.co.uk
www.wallingfordschool.com
www.mtoat.co.uk

*Finance and Audit
Committee*

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1. Purpose

This policy sets out the procedure staff, trustees and governors must follow when giving or receiving gifts and hospitality.

2. Scope

This policy applies to all employees, trustees and governors of the Trust and its schools, and to associated persons such as secondees, agency staff, contractors and others employed under a contract of service.

3. Policy Statement

You must declare all offers of gifts and hospitality, made to or by you, **over £25 in value**, in your role as a member of staff, trustee or governor of the Trust or one of its schools.

All such offers must be declared *whether accepted or declined*.

Offers of gifts and hospitality may include items ranging from diaries, wall charts, and boxes of chocolates, to meals and free travel and accommodation.

Declarations must be recorded on the Gifts and Hospitality Register (the register). The register is maintained by the Finance Director and is publicly available on request.

It is your responsibility to ensure that you are not placed in a position that compromises or appears to compromise your role or MTOAT's responsibility for public funds. You should not be seen to be securing valuable gifts and hospitality by virtue of your role. You should not accept or provide any gift or hospitality **of any value** if acceptance/provision could reasonably give the impression that you have been influenced/are deemed to be influencing while acting in an "official capacity".

This policy also applies to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the MTOAT staff member/trustee/governor.

In exercising judgement as to whether to accept a gift or hospitality, the question should be asked what public perception would be if the information was published given your role and circumstances.

It should be noted that the Academy Trust Handbook specifically prohibits Trust money being used to purchase alcohol unless where it is to be used on religious services. The Trust therefore cannot reimburse any stakeholder for any alcohol purchased.

4. Receiving Gifts

You may retain all gifts valued at £50.00 or under, whether given in recognition of presentations or otherwise.

For gifts exceeding a value of £50.00 the following options are suggested:

- Share the gift with all staff;
- Raffle the gift for charity;
- Donate the gift to charity; or
- Make a donation to charity and keep the gift.

5. Accepting Offers of Hospitality – Genuine Business Reasons

Hospitality offered should only be accepted where there is a direct link to working arrangements and a genuine business reason can be demonstrated, for example:

- Attendance or speaking at a conference, which provides complimentary subsistence, travel and accommodation (this does not need to be declared on the register except where a gift was received, see section 4);
- Attending at a free training course; or
- Attending a drinks reception to network.

It is recognised that, in the course of carrying out your duties, you will need on occasion to ensure good relationships with existing and future contractors and stakeholders and that this may involve, for example, the receipt of modest working lunches and dinners. These are acceptable where there is a genuine business reason.

Hospitality invitations to events which are purely social events should be considered very carefully before accepting; in such circumstances it may be much more difficult to substantiate a genuine business reason. You are expected to use annual leave for such events. You may not accept free holidays from a current or potential contractor. These invitations should be recorded in the register whether accepted or declined.

6. Gifts and Hospitality Offered by MTOAT

MTOAT staff must be mindful that the value of all gifts and hospitality offered by MTOAT are sourced from public funding, and the expectation is that such funding will be used for legitimate purposes and demonstrate value for money.

In exceptional circumstances it may be appropriate for MTOAT to provide a gift of up to £50.00 in value, for example:

- Providing a bouquet of flowers to a seriously ill employee, or to a longstanding employee who is retiring;
- Giving book tokens to someone who spoke at a MTOAT conference free of charge; and
- Making a contribution towards staff Christmas festivities from the wellbeing budget.

It is acceptable for MTOAT to provide modest hospitality in the way of working lunches and/or dinners to existing and potential contractors and stakeholders subject to a genuine business reason.

7. Declaration

You should make your declaration as soon as possible after the offer or receipt of gifts or hospitality. All declarations are to be sent to the Trust finance office at Wallingford School in the required format as shown below. The finance team will record the declarations in the register. The register is an annual document and will be maintained on an academic year basis. It is recommended that you make your declaration by email, and retain a copy for your personal records.

Your declaration will need to include the following information:

- Date of offer of gift or hospitality, and date of event where relevant;
- Name, job title and organisation of recipient / provider;
- Nature and purpose of gift or hospitality received or declined;
- The name of any other organisation involved;
- Estimated value.

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For example:

Date received	Recipient (Name & Department)	Received from (Name, position & organisation)	Description of Gift/Hospitality received	Value £ (Estimate if unknown)	Reason given for providing gift/hospitality
12 Dec 2023	Jane Brown (HR)	Josh Smith (AAA Recruitment Consultancy)	Selection of chutneys and biscuits	Approx £30.00	Christmas hamper sent out to all clients