



# GIFTS, HOSPITALITY AND ENTERTAINING POLICY

Employer Name:

**The First Federation Trust**

<b>Adopted:</b>	19 <sup>th</sup> March 2026
<b>Review cycle:</b>	Three years
<b>Next review due by:</b>	March 2029

## **PURPOSE**

This outlines The First Federation Trust's policy with regard to the receipt of gifts, hospitality and expenses by its staff from any third parties arising from duties undertaken on behalf of the Trust.

**The First Federation Trust is committed to ensuring that the governance of the Trust is conducted in accordance with the highest standards of integrity, probity and openness.**

## **SCOPE**

This policy applies to:

- Staff
- Trustees
- Volunteers
- Contractors acting on behalf of the Trust

## **RESPONSIBILITIES**

Responsibility for the effective operation and management of this policy are defined as follows:

- Staff
- Head of School / Trust Senior Leadership Group
- CEO / Accounting Officer
- Director of Finance
- Director of Operations
- Trustees

Staff involved in procurement will receive periodic training on conflicts of interest, gifts and hospitality.

## **GENERAL RULES**

The First Federation staff 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. Staff are asked to immediately report any offer or receipt of such gifts to their Link Director / Director of Finance, Director of Operations to be recorded in the Trust central office Register of Gifts and Hospitality.

It is normal practice for Parents, suppliers, contractors or other external parties to issue members of staff with token gifts at various points of the year for example at Christmas or at the end of the academic year. These gifts are tokens of appreciation and it is clear that the items are not intended to influence the progression of their child nor the awarding of a purchasing contract. All gifts from suppliers must be declared regardless of value

Gifts from parents under £25 - £50 may be accepted but should be declared if regular

Single gifts above £50 require SLG approval

For the avoidance of doubt, the following definitions are provided:

- Gift – any item, service or benefit received without payment
- Hospitality – food, drink, accommodation or entertainment provided by a third party

- Token gift – a low-value item such as flowers, chocolates or cards given as a gesture of appreciation.

Staff must not:

- Accept gifts intended to influence decisions
- Accept cash or cash equivalents
- Accept gifts from suppliers during procurement processes

Staff must declare:

- All gifts from suppliers
- Gifts over £50 from any source
- Any hospitality exceeding £50

The First Federation Trust must also ensure it delivers good value in the use of public resources.

Gifts, up to a value of £30 per item may be given at the discretion of the Head of School (a member of the Trust Senior Leadership Group for governance volunteers and non-school based staff) to:

- Volunteers who make a regular or a significant one-off contribution to their school
- Governance volunteers who have made significant contributions to the governance of the First Federation Trust
- Staff, for compassionate reasons such as long-term illness or bereavement
- Staff who have contributed above and beyond their contracted duties

The total value of these gifts will not exceed the following amounts per financial year:

£200 for large schools (300 pupils and above) and £100 for small schools (under 300 pupils).

Any gifts above the stated amounts, or outside these circumstances, must be authorised by a member of the Trust Senior Leadership Group.

Administrators are responsible for recording any gifts given by their school in the school's Register of Gifts and Hospitality. The Director of Finance is responsible for recording any gifts given to governance volunteers and staff who are not school based in the Federation central office Register of Gifts and Hospitality.

The Register of Gifts and Hospitality will be reviewed annually by the Audit and Risk Committee.

## **BREACHES**

The Trust operates a zero-tolerance approach to bribery and corruption and complies with the Bribery Act 2010. Gifts, hospitality or entertainment must never be offered, given, requested or accepted where they could improperly influence a decision.

Failure to comply with this policy may result in disciplinary action being taken.

## **Donations**

There will be on occasion times when donations are given to the First Federation Trust schools, e.g. by the schools' Parents, Teachers and Friends Association. When donations are received, unless there are grounds to decline the donation (as outlined below), the reason for the donation, and who the donation was given by, should be identified and the money should then be allocated against the activity or purpose for which it was originally donated. If a donation is received without a specific area or activity identified, then the matter will be discussed by the Head of School and a member of the Trust Senior Leadership Group to decide how the donation will be spent.

Donations must not be accepted where they could be perceived to influence procurement decisions or admission decisions.

Donations exceeding £5,000 should be reported to the Trust Board.

The First Federation Trust reserves the right to decline a donation if:

- The donation has conditions attached that are inconsistent with the First Federation Trust's Objects;
- The donation has conditions attached that are inconsistent with procurement best practice or legislation;
- The donation has conditions attached that are inconsistent with the principle that a donation is a contribution that voluntarily transferred by one person to another without compensation or benefit flowing from the giver to the receiver.
- The source of the donation or its intended purpose are inconsistent with the characteristics of First Federation Trust Academies as laid out in the Master Funding Agreement or Supplemental Funding Agreements
- The source of the donation or its intended purpose are likely, in the view of the Senior Leadership Team, to draw adverse publicity for the First Federation Trust or bring it into disrepute.

## Hospitality

The following principles should be followed in deciding whether or not to accept hospitality:

1. Staff and governance volunteers should ask themselves whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered. If the answer is yes, the hospitality should be declined. In making judgements, relevant facts to take into account include the person or organisation offering the hospitality, its scale and nature, and its timing in relation to decisions to be made by the school/Trust.
2. Care should be taken to avoid situations in which an individual governance volunteer or member of staff is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation.

Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as follows

- (a) Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest.
- (b) Attendance at events or functions where there is a demonstrable need for the school and/or Trust to be represented to either give or to receive information or to participate as part of the school and/or Trust corporate image.
- (c) Attendance at events or functions which are part of the civic, cultural or sporting life of the school.

- (d) Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

Overnight hospitality linked to any of the above should be declared to either a member of the Trust Senior Leadership Team or the Chair of Directors before being accepted.

Declaration will also be required where:

- Hospitality exceeds £50
- Hospitality is from a supplier / contractor
- Repeated hospitality is offered

## **ENTERTAINING POLICY**

### **Purpose**

This outlines The First Federation Trust policy with regard to the provision of entertaining third parties by its employees and on the use of public funding for the provision of hospitality/entertaining of its staff.

In limited circumstances, the Trust may provide modest hospitality where there is a clear business or partnership purpose. Entertaining must not be made with the purpose of gaining an unfair commercial advantage. We must avoid the situation where entertaining an individual employed by an organisation could breach that organisation's code or cause embarrassment.

The First Federation Trust is committed to ensuring that the governance of The First Federation Trust and its academies is conducted in accordance with the highest standards of integrity, probity and openness.

### ***General Rules***

Provision of entertaining to third parties:

- Where funding is to be used from the First Federation Trust and/or its academies (schools) then all entertaining must be approved and agreed by the CEO/Accounting Officer prior to that expenditure.
- Entertaining will not be reimbursed via monthly expense claims, and the Trust debit card cannot be used for entertaining unless prior approval has been given by the CEO/Accounting Officer.
- If approved all entertaining must be recorded on the Entertaining Expenditure Register held by the Director of Finance at the Federation central office. This should include an assessment of the impact on the recipient, value and the perception this may have within the marketplace.

These policies may be subject to review from time to time. Any subsequent change in the Policy Statement will be notified to affected employees.



**ENTERTAINMENT EXPENSES REGISTER**

This form should be completed and returned to the CEO/Accounting Officer prior to any event.

Section one of this form should be completed (either in electronic or paper form), in accordance with the Gifts, Hospitality and Entertaining Policy.

**SECTION ONE: Details of the entertaining event** – this section must be completed by the Staff Member undertaking the entertaining.

Date of Event:

Name of Employee:

What is the reason for the event:

Employees Signature:

Date:

Authorised by:

.....detach here ✂.....

**SECTION TWO:** Assessment and impact of event. Please give details, venue, cost etc (ensure receipts are attached to this section)

Employees Signature:

Date: