Mid Essex Anglican Academy Trust

To unlock every child's potential as a unique child of God

Respect – Forgiveness – Trust – Responsibility – Thankfulness – Justice – Humility

Gifts and Hospitality Policy

Policy Reference Number	MEAATGif&Hos
Category	Financial Management
Authorised by:	Trust Board
Status	Approved
Print Name	Mr Andrew Barton
Date Approved:	8th October 2026
Date of Next Review:	Autumn 2027

Contents

Introduction 3
Gifts 3
Hospitality 4
Registration of Gifts and Hospitality 5
Monitoring 5
Penalties for Breaching the Code 5
Retention of Documentation 5
APPENDIX A: Managing the Receipt of Gifts and Hospitality 6
APPENDIX B: Declaration of Gifts and Hospitality Form 7

Introduction

This is the MEAATs approved Code of Conduct relating to the offer and/or acceptance by staff of gifts and hospitality of whatever nature from outside individuals or organisations.

Within the terms of the Code, Staff, Trustees and Governors are expected to exercise common sense. If they are in any doubt they must consult the Trust Business Manager, and if necessary declare the acceptance of a gift or hospitality in the register kept by the Trust, using the 'MEAAT Declaration of Gifts and Hospitality' form. See Appendix B.

The process set out is designed to safeguard Trustees, Governors and Staff from any misunderstanding or criticism.

The general principles which govern gifts and hospitality are:

- Offers of hospitality should only be accepted if there is a genuine need to represent the Trust.
- Gifts should only be accepted in exceptional circumstances.
- The Code of Conduct applies to all Trustees, Governors and Staff.
- To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied by staff and referred to the CEO/Business Manager/Chair of Trustees if in doubt. See Appendix A.
- Registers are accessible for viewing by the following appropriate officers: CEO, Head Teacher, Trustees, External Auditors and Internal Auditors.
- Any request by a member of the public to view the Register of Declarations of Gifts and Hospitality will be referred to the CEO. In considering any request, they will balance the requirement for the Trust to be open and transparent against the requirements of the Data Protection Act 2018.

Gifts

The following may be accepted:

(a) Small gifts from parents/carers (even if they are presented as a collective voucher from all children in the class) to Staff by way of thanks or celebration (i.e. at the end of term or Christmas). Any gifts given by an individual, valued at more than £30, should be declared and recorded on the MEAAT Registration of Gifts and Hospitality form.

All corporate gifts should be refused or donated to charity unless they come within the categories set out below:

- Modest gifts of a promotional character, eg calendars, diaries and other similar articles. All corporate gifts, regardless of value, must be recorded on the MEAAT Registration of Gifts and Hospitality form.

- Gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation. These must also be recorded on the MEAAT Declaration of Gifts and Hospitality form (appendix B).

- Gifts which are intended for the Trust as a corporate body or intended for either school can be accepted, but must not be retained by the individual who receives them. Such gifts should be passed to the Business Trust Manager and recorded on the MEAAT Declaration of Gifts and Hospitality form (appendix B).

NOTE: You must record any gifts that you decline on the MEAAT Declaration of Gifts and Hospitality form (appendix B).

Hospitality

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

1 Staff, Trustees and Governors 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 Trust.

2 Care should be taken to avoid situations in which an individual Director 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:

1 Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest.

2 Attendance at events or functions where there is a demonstrable need for the Trust to be represented to either give or to receive information or to participate as part of the Trust's corporate image.

3 Attendance at events or functions which are part of the civic, cultural or sporting life of the Trust.

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

5 Overnight hospitality linked to any of the above should be declared to either the Executive Headteacher or Chair of Trustees before being accepted.

Registration of Gifts and Hospitality

Staff must, within 28 days of accepting any gift - other than those from parents/carers as outlined in the 'Gifts' section (a) - or hospitality**,** provide written notification to the Executive Headteacher using the MEAAT Declaration of Gifts and Hospitality form (appendix B). All offers accepted should be recorded in case of any queries, in particular through FOI requests.

The MEAAT Declaration of Gifts and Hospitality forms must be completed in full, setting out details of the offer or the gift and/or hospitality received as well as:

- estimated or actual value;
- an indication from the Executive Headteacher to why acceptance of the offer is authorised;
- the Employee's/Trustee's/Governor's printed full name and signature; and
- the Executive Headteacher printed full name and signature.

Monitoring

The Trust Business Manager maintains a register of gifts and hospitality accepted. The Trust Business Manager will report annually the content of the register to the Trust Board. Any concerns/issues identified should be noted and an action plan put in place by the Governing Body.

Penalties for Breaching the Code

The Trust's disciplinary procedures may be applied where it is found that breaches of the Code have occurred.

Retention of Documentation

Documentation in the Register will be kept for seven years.

APPENDIX A: Managing the Receipt of Gifts and Hospitality

The **PROVEIT** test:

Whether or not the offer is acceptable:

Purpose	Token, thanks or seeking a favour? (token or thanks: yes; favour: no)
Rules	What are they? Does this situation conform?
Openness	Is the offer transparent?
Value	Expensive or inexpensive?
Ethics	Does the offer fit with Trust's ethics? Is this an exceptional circumstance?
Identity	Who has made the offer?
Timing	Are you about to make a decision affecting the giver?

APPENDIX B: Declaration of Gifts and Hospitality Form

Receiving benefits, gifts, rewards or hospitality in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. Staff are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible. If you have received or wish to declare a gift or hospitality please complete the form and return to the Executive Headteacher.

Details of employee receiving gift or hospitality

Full Name	
Job Title	
Date of Declaration	

Description of gift or hospitality

Description of gift / hospitality	
Value/estimated value of gift / hospitality	
Purpose of the offer	
Person providing the gift or hospitality	
Relationship to the person offering the gift or hospitality	
Acceptance of gift / hospitality	Yes / No

Approved by

Signature	
Date	
Name	
Job Title	