



Donations, Gifts and Hospitality Policy

1. Policy Statement

The LAAT is committed to the highest levels of integrity, openness and fairness in all of its business transactions. All employees, Directors and Governors are expected to maintain the high standards of propriety and professionalism in all their dealings and to avoid any conflicts of interest.

Employees, Directors and Governors should take extreme care to ensure that they are not open to accusations of bribery and corruption. The LAAT is committed to complying with the Bribery Act 2010 which makes it a criminal act to:

- Offer, promise or give a bribe
- Request, agree to or accept a bribe
- Fail to prevent bribery by those associated with an organisation who are trying to gain an advantage for that organisation

This policy sets out the Lincoln Anglican Academy Trust's approach to the receipt and offer of donations, gifts and hospitality by employees, Directors and Governors of the Trust. The policy has been drawn up to be consistent with the requirements laid out in the Education Funding Agency's Financial Handbook for Academies.

Non-compliance with this policy is a disciplinary offence and could lead to dismissal without notice.

If there is any doubt about how to apply this policy, guidance should be sought from the Finance Director or Chief Executive.

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

- LAAT Code of Conduct
- Finance Policy
- Donations, Gifts and Hospitality Register
- Schedule of Delegated Authorities

2. Scope

This policy applies to all individuals working in LAAT Schools and to individuals working in LAAT offices, as well as LAAT members, Directors and Governors.



The policy applies to the receipt and offer of donations, gifts, awards, hospitality and benefits. Donations, gifts and hospitality includes those which are offered to an individual or groups of individuals or to the individual school or Academy Trust. Donations and gifts may be in the form of cash, goods or services.

3. Principles

The underlying principles of the policy are as follows:

- The LAAT is happy to accept donations and gifts to an individual school, or to the organisation as a whole, which are in line with its objectives.
- Staff, Directors and Governors should exercise extreme caution when accepting or giving donations, gifts and hospitality whilst conducting LAAT business. They should not use their position for the personal gain of themselves or others.
- Under no circumstance should donations, gifts, awards, hospitality and benefits be accepted where there is a risk that it might be seen as an attempt to influence a business decision, or where personal integrity may be compromised.
- Gifts and hospitality of low value can be accepted by individuals subject to certain conditions. Higher value gifts may be permitted subject to approvals, but must be recorded. Further details are outlined below.

4. Donations

Where an offer of a donation is made, the matter should be referred to the Head Teacher in the first instance. The Head Teacher will determine whether the source of the donation of any conditions attached:

- are consistent with the aims and ethos of the LAAT
- align with the strategic plans for the school
- will not bring the school or Trust into disrepute

If there is any doubt about accepting a donation, the matter should be referred to the Finance Director or Chief Executive.

For donations that are equal to, or greater than, £5,000 in value, the Head Teacher will refer the matter to the Finance Director or Chief Executive for approval.



All donors should be requested, for audit purposes, to put in writing details of their gift.

Donations received and subsequent expenditure will be clearly recorded and cannot be “netted off” against each other in the accounts.

Where a donation has been given for a specific purpose, all expenditure must adhere to the LAAT’s finance policy and purchasing procedures and is subject to the authority levels specified in the LAAT’s Schedule of Delegated Authorities.

5. Gifts

Gifts include items, services, prizes or other benefits which are received free of charge or are offered to the individual on terms which are not available to the general public.

Example of gifts that should not be accepted are gifts of cash and gifts from a supplier immediately before or during a competitive tender exercise.

Gifts that are accepted on behalf of the school/LAAT remain the property of the school/LAAT. Gifts or items that are sent free of charge as part of a special offer when purchasing goods on behalf of the school/LAAT belong to the school/LAAT and must be used accordingly.

Staff must not accept gifts where there is any possibility that their professional integrity may be compromised.

It is common for students and their parents or carers to give gifts as a small token of appreciation or as a thank you to members of staff at certain times throughout the academic year. Staff may accept gifts from students and their parents or carers provided that they meet this definition.

Any member of staff receiving a gift with a value of greater than £25.00 should inform the Chief Executive or Finance Director who will then decide whether the gift can be accepted. If approved, it should then be recorded in the Donations, Gifts and Hospitality Register.

Staff should make the Chief Executive or Finance Director aware of any student who is giving them gifts on a regular basis, or any student or parent or carer who expects something in return for a gift, as this would not be acceptable.



If not accepting a gift could be seen as causing offence, for example for cultural reasons, the item should be accepted. The matter should then be brought to the attention of the LAAT Finance Director as soon as possible who may decide to return the gift, or may donate it to a charitable cause.

If there is any doubt as to the appropriateness of accepting a gift, the matter should be referred to the Chief Executive or Finance Director for further guidance.

It is not the LAAT's standard practice to give gifts to individuals or organisations. If gifts are given, staff must ensure that the reasons for the decision are clearly recorded in the Donations, Gifts and Hospitality Register.

This does not apply to the award of gifts and prizes related to the achievement of pupils.

6. Hospitality

Hospitality includes food, drink, accommodation, entertainment or the opportunity to attend sporting or cultural events provided free of charge or on terms not available to the general public.

It is acceptable to provide and receive hospitality such as teas, coffees and modest working lunches for meetings with visiting staff or business colleagues. These do not need to be recorded in the Donations, Gifts and Hospitality Register.

Hospitality above these levels will require prior authorisation by the Finance Director or Chief Executive Officer and must be recorded in the register.

Staff must not accept gifts where there is any possibility that their professional integrity may be compromised. Hospitality should not be accepted from a supplier immediately before or during a competitive tender exercise.

7. Gifts and Hospitality Register

A Donations, Gifts and Hospitality Register (example shown in Appendix 1) must be maintained in each school and central LAAT offices.

The register must include for each donation, gift or item of hospitality both received and declined, the date received or declined, a description, estimated monetary value, name of the donor and recipient, name of approver and date of approval, along with any supporting comments. Alongside the register, a record should also be kept of the authorisation given and reasons why (for example, a copy of the email confirmation).



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The register must be available for inspection at any time by the Finance Manager, Finance Director, or Chief Executive.

The register must be submitted to the Finance Director at the end of each financial year for review and consolidation.

8. Review

The Finance Committee will review this policy annually and recommend any changes to the Board of Directors.