Yesoiday HaTorah Multi Academy Trust

Gifts and Hospitality Policy

Policy owner	Yesoiday HaTorah Multi Academy Trust
Original policy date	July 2020
Last reviewed	October 2026
Next review due	October 2027

1. Introduction and purpose

As a general rule, gifts, hospitality or other personal benefits ("gifts") should not be offered or accepted by any member of staff, trustee or governor, except as permitted by this policy. The Trust must be able to demonstrate that decisions—educational, financial and otherwise—are made objectively, in accordance with proper procedures and without improper influence.

This policy applies to employees, trustees and governors of Yesoiday HaTorah Multi Academy Trust and its academies. It should be read alongside the YHMAT Conflict of Interest Policy, YHMAT Register of Business Interests, YHMAT Recruitment Procedure, YHMAT Recruitment Staff Relatives Policy and YHMAT Whistleblowing Policy.

A breach may lead to disciplinary action and, depending on the circumstances, may constitute gross misconduct.

2. Core principles

- No one may use their position or authority for personal gain beyond their agreed salary or other properly authorised remuneration.
- Gifts or hospitality must never be solicited, and must not be accepted where they could reasonably be seen as influencing, rewarding or inducing a decision or action.
- Staff, trustees and governors must act honestly, with integrity, and in the interests and good reputation of the Trust.
- Actual, potential or perceived conflicts of interest must be declared in writing and managed in line with the Conflict of Interest Policy.
- Where in doubt, the offer should be declined or advice sought before accepting it. The circumstances and decision should be recorded where appropriate.

3. Receiving gifts

Staff, trustees and governors may accept only isolated gifts of a trivial character or inexpensive seasonal gifts (for example, chocolates, flowers, diaries or calendars), provided acceptance would not create an actual, potential or perceived conflict or improper obligation.

- A gift must be refused if it is disproportionately generous, frequent, offered in connection with a procurement or recruitment decision, or could be construed as an inducement to influence a business, educational or other decision.
- Gifts of money, cash equivalents, personal discounts or benefits that provide a personal financial advantage must not be accepted.
- Where an item purchased for Trust use includes a "free gift", it must be used for Trust business or handed to the Trust for an appropriate Trust purpose, such as a charity raffle or pupil prize.
- Any business dealings that confer personal gain or involve relatives or associates must also be declared and recorded in the Register of Business and Pecuniary Interests, as appropriate.

4. Receiving hospitality

Reasonable, conventional hospitality (such as a working lunch or attendance at a relevant professional event) may be accepted only where there is a genuine business or educational purpose, the hospitality is proportionate, and acceptance would not compromise or appear to compromise impartiality.

- Hospitality must not be accepted where there is no reasonable business justification, it is disproportionately generous, or it could be seen as an inducement to affect a decision.
- Particular care is required where the provider is a current or prospective supplier, contractor, recruitment agency, service provider or other party seeking a decision from the Trust.
- Hospitality should normally be declined while a relevant tender, procurement, recruitment or other decision involving the provider is active.

Hospitality or facilities other than nominal hospitality (the Trust's existing reference point is an estimated value of £40) or facilities provided in the normal course of business must be reported to the Bursar, Headteacher or Chair of Governors, as appropriate, and entered in the Gifts and Hospitality Register. If an offer below £40 could create a conflict or concern, it must still be declared and recorded.

5. Providing gifts and hospitality

The Trust values cooperative relationships with staff, governors, stakeholders and external organisations. In limited circumstances, it may be appropriate for the Trust to fund modest gifts or hospitality, principally for legitimate Trust business. Leaving gifts for staff, particularly after long service, may be appropriate and may be supplemented by private staff contributions.

- Any gift or hospitality paid for from Trust funds must have a clear and legitimate purpose, be reasonable and proportionate, and be permitted under the Trust's scheme of delegation and financial procedures.
- The decision, purpose, recipient and cost must be documented, and the expenditure must demonstrate propriety and the proper use of public funds.
- Trust funds must not be used for gifts or hospitality that are excessive, primarily personal, or intended to influence a decision improperly.
- Where approval is required under the Trust's existing financial or delegated approval arrangements, it must be obtained before the commitment is made.

6. Reporting, recording and review

Offers that must be reported should be referred to the Bursar, Headteacher or Chair of Governors, as appropriate. Entries should identify the recipient, donor or provider, date, nature and estimated value of the gift or hospitality, whether it was accepted or declined, the business reason and any action taken.

Ongoing interests must also be recorded in the appropriate Register of Business Interests. The Gifts and Hospitality Register should be kept up to date and reviewed as part of the Trust's financial oversight arrangements.

The existing Trust arrangement for reporting an alleged breach remains in place: an employee who becomes aware of a breach should follow the Trust's Whistleblowing Policy and report the concern immediately to their line manager, who will arrange investigation as necessary.

The Trust's existing appointed Governor will continue to review payments made to individuals or companies where an interest has been declared, to help ensure this policy is upheld.

This policy will be reviewed annually, and sooner if relevant requirements or Trust arrangements change.

7. Advice and queries

Anyone who is unsure whether an offer should be accepted or declared should seek confidential guidance from the Trust Business Manager or the appropriate reporting contact before accepting it. If the circumstances are uncertain, the safer course is to decline the offer until advice has been obtained.

Appendix 1: YHMAT Gifts and Hospitality Register

The Trust will maintain its existing register. Each entry should include, as applicable: recipient; nature of gift or hospitality; donor/provider; date; estimated value; whether accepted or declined; business purpose/comment; and any action taken.

Recipient	Gift / hospitality	Donor / provider	Date	Est. value (£)	Accepted / declined	Comment / action
YHMAT	Jewish library books, tapes and posters	London philanthropist	Ongoing	Annual £5,000	Donation to Trust	Forms a library of Jewish learning resources

Related policies and guidance

- YHMAT Conflict of Interest Policy
- YHMAT Register of Business Interests
- YHMAT Recruitment Procedure
- YHMAT Recruitment Staff Relatives Policy
- YHMAT Whistleblowing Policy