



GIFTS & HOSPITALITY POLICY

Review Date: February 2027
Agreed Date: February 2026
Approved by: Trust Board
Owner: CFOO
Source: The Key

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Change control

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| 4.1 | Removal of offering of gifts (was up to £50.00) Offer of hospitality is within agreed budgets |
| 4.3 | Removal of offering of gifts (was up to £50.00) Offer of hospitality is within agreed budgets |
| 4.4 | Note regarding transactions that may take place before policy was approved. Removal of offering of gifts (was up to £50.00) Offer of hospitality is within agreed budgets |
| 5.2 | Removal of working lunch wording to align with agreed budgets, removing the proposed threshold. |
| 5.2 | Removal of consultation with CFOO for hospitality above a threshold. |

1. Aims

This policy aims to ensure that:

- The academy trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academy Trust Handbook
- The trust and those associated with it operate in a way that commands broad public support
- The trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds
- Trustees fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors
- Members, trustees and staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same

2. Legislation and guidance

This policy is based on the [Academy Trust Handbook 2025](#), which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might compromise their personal judgement or integrity. This should include members, trustees, staff and/or any other representative of the trust. The handbook states that the trust should ensure that all staff are aware of this policy.

This policy also complies with our funding agreement and articles of association.

3. Definitions

Gifts are any items, cash, awards, prizes, goods or services, offered without expectation of payment or benefit. Gifts also include goods or services offered at a discounted rate, or on terms not available to the general public.

Hospitality is defined as food, drink, accommodation or entertainment (such as cultural or sporting events) provided free of charge, heavily discounted or on terms not generally available to the general public.

4. Roles and responsibilities

4.1 Members, trustees, governors and staff

Members, trustees, governors and staff:

- Must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that the trust might be placed under any obligation as a result of acceptance
- Must not use their official position to further their private interests or the interests of others
- Must not solicit gifts or hospitality
- Must record any gifts or hospitality offered to them or the trust with a value of over £50.00 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined

- Must consult the Chief Finance & Operations Officer (in the case of Trust Central Team staff via their line manager) (or via the Headteacher in the case of school staff) , before accepting any gifts or hospitality with a value of over £50.00.
- Must not offer gifts of any value.
- Must ensure that any offer of hospitality is within agreed budgets (agreed annually) e.g. staff refreshments.

4.2 Academy trustees

Academy trustees will ensure that the trust's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

4.3 The Headteacher

The headteacher is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The headteacher will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the school and trust and to those outside the organisation.

They will also ensure, alongside the Chief Finance & Operations Officer, that decisions on whether individuals or the trust can accept gifts or hospitality with a value of over £50.00 are in line with this policy.

Must not offer gifts of any value.

Must ensure that any offer of hospitality is within agreed budgets (agreed annually) e.g. staff refreshments.

The headteacher is responsible for communicating the school/trust's rules and expectations about gift-giving to parents.

4.4 The Chief Finance & Operations Officer

The Chief Finance & Operations Officer will ensure that:

- The trust maintains a gifts and hospitality register
- Figures for transactions relating to gifts made by the trust are disclosed in the trust's audited accounts, in accordance with the Academy Trust Handbook (note – due to the date of this policy coming into effect, there may be some transactions in the 2025/2026 audited accounts).
- The academy trustees and headteachers are provided with information on gifts and hospitality received as appropriate
- There are no offers made for gifts of any value.
- Must ensure that any offer of hospitality is within agreed budgets (agreed annually) e.g. staff refreshments.

4.5 Parents

As a Trust, we do not wish to discourage all gift-giving, and small tokens of gratitude are always appreciated. Please note that gift-giving is not a requirement, and parents are not expected to buy gifts for class teachers or other school staff. However, parents should be mindful that the trust prevents teachers and other staff from accepting individual gifts worth over £50.00. This limit does not apply to gifts that are collectively contributed to by a class or group.

5. Acceptable gifts and hospitality

5.1 Offer of gifts and hospitality received

Members, trustees, governors and staff can accept gifts and hospitality that have a value of up to £50.00. These do not have to be pre-approved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, members, trustees, governors and staff must consult the Chief Finance & Operations Officer or Headteacher.

Similarly, hospitality such as working lunches may be accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the Chief Finance & Operations Officer or headteacher.

Any gifts or hospitality offered with a value of over £50.00 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee, governor or member of staff who is offered such gifts or hospitality must consult the Chief Finance & Operations Officer or headteacher before accepting.

If the headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the board of trustees and record the offer on the gifts and hospitality register.

Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a staff disciplinary matter.

5.2 Offers of hospitality given

Any hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant and be within the agreed annual budget.

Alcohol, or any products containing alcohol, must not be purchased out of the school or trust budget.

Expense claims should be made to the Finance Team, approved by the Headteacher/Line Manager and receipts must always be enclosed.

6. Unacceptable gifts and hospitality

The following must **never** be offered or accepted:

- Gifts must not be purchased from school or trust budget
- Hospitality offered to family members, partners or close friends of members, trustees, governors or staff
- Gifts and hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time.
- Acknowledgement of out of hours working for staff must be processed through payroll.

This list is not intended to be exhaustive.

Gift vouchers must not be purchased from school or trust budgets without prior approval from the Chief Finance & Operations Officer.

7. Declining gifts and hospitality

Any members, trustee, governor or staff member who is offered any of the unacceptable gifts or hospitality outlined in section 6 above should politely decline the offer.

If they feel it would not be appropriate for them to decline, they should refer the matter to the headteacher or Chief Finance & Operations Officer. The headteacher or Chief Finance & Operations Officer may decline the offer, or donate the gift or hospitality to a worthy cause, and must also record the offer on the gifts and hospitality register.

Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the trust has deemed unacceptable.

Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, will be dealt with as a staff disciplinary matter.

8. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the Chief Finance & Operations Officer

This policy will be reviewed annually and approved by the Trust Board.

9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Finance policy

Appendix 1: gifts and hospitality register

| DATE | NAME | DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE | PARTY OFFERING GIFT/HOSPITALITY | ACCEPTED /REJECTED | APPROVED BY |
|------|------|---|---------------------------------|--------------------|-------------|
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