



SMALL GIFTS & HOSPITALITY POLICY

Approval Date	October 2025
Policy owner	Director of Finance
Policy model	Compliance: all RSAT schools to use this policy
Review Date	Autumn 2026
Regulatory Requirements Met	Section 5.31 of "Academy Trust Handbook 2025"

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- Must record any gifts or hospitality offered to them or the Trust with a value of over £20 on the gifts and hospitality register (see Appendix 1) within 7 working days, even if declined.
- Must consult the Director of Finance or Headteacher before accepting or offering any gifts or hospitality with a value of over £20.

4.2 Trustees

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 Director of Finance, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £20 are in line with this policy.

4.4 The Director of Finance

The Director of Finance 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 Academies Financial Handbook
- The Trust's trustees and Headteachers are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Headteacher, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £20 are in line with this policy.

4.5 The Office Manager

The Office Manager for each school is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

5.0 Acceptable Gifts and Hospitality

5.1 Offer of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of up to £20, 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 and staff must consult the Director of Finance 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 Director of Finance or Headteacher.

Any gifts or hospitality offered with a value of over £20 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the Director of Finance 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 Local Governing Body 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 Offer of gifts and hospitality given

Any gifts or hospitality provided by the Trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £20 per head should be used as a guideline.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Headteacher and receipts must always be enclosed. Pre-approval must be acquired before any expenditure is incurred.

The Director of Finance or Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £20.

6.0 Unacceptable Gifts and Hospitality

The following must never be offered or accepted:

- Monetary gifts
- Gifts or hospitality offered to family members, partners or close friends of members, trustees or staff
- Gifts or 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

7.0 Declining Gifts and Hospitality

Any members, trustee 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 Director of Finance. The Headteacher or Director of Finance 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.

8.0 Monitoring Arrangements

The gifts and hospitality register is monitored regularly by the Executive Business Managers (EBM).

This policy will be reviewed annually by the Director of Finance and approved by the Finance Committee.

APPENDIX 1: 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 Business Manager.

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/organisation providing the gift or hospitality	
Relationship to the person/organisation offering the gift or hospitality	
Acceptance of gift / hospitality	Yes / No

Approved by

Signature	
Date	
Name	
Job Title	

Policy History

Policy Date	Summary of change	Contact	Version/ Implementation Date	Review Date
October 2024	No substantive changes.	Finance	October 2024	Autumn 2025
January 2022	Updated template. Addition of "Regulatory Requirements Met" on cover page	Finance	February 2022	Spring 2023
February 2021	New policy implemented	Finance	V1-February 2021	February 2022
October 2025	No substantive changes, updated link to Academy Trust Handbook 2025	Finance	October 2025	Autumn 2026

