





To inspire, enrich and nurture so each individual reaches their full potential

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The HCFS is a company limited by Guarantee Registration number 07648654

Gifts and Hospitality Policy

September 2025

To be reviewed every two years in the Autumn Term

Next Review: September 2027

History of Document

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Issue 1	Sep 2021	Lauretta Baker	Victoria Hobson	Policy Created
Issue 2	Sep 2023	Rachel Robinson	Trust Board	Policy updated to reflect any changes in guidance
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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](#), 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.

The school’s policy is to conduct all of its business in an honest and ethical manner. The School takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery. The School will comply with the Bribery Act 2010 in respect of its conduct.

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.

Bribery is an inducement or reward offered, promised or provided in order to gain any business or personal advantage.

Third Party means any individual or organization that staff come into contact with during the course of their work and includes actual and prospective pupils and parents, suppliers, business contacts, agents, advisers and government and public bodies.

4. Roles and responsibilities

4.1 Members, trustees and staff

Members, trustees 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 £40 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the School Business Manager or Principal before accepting or offering any gifts or hospitality with a value of £40 and over.

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 Principal

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

The Principal 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 School Business Manager that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of £40 or over are in line with this policy.

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

4.4 The School Business Manager (Chief Financial Officer)

The School Business Manager 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
- The academy trustees and Principal are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the Principal that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of £40 or over are in line with this policy.

4.5 The PA to the Principal and SBM

The PA to the Principal and SBM is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

4.6 Parents

Our staff do not expect gifts, but if you wish to give something, small tokens of gratitude are always appreciated, such as:

- Cards and letters – kind words mean a lot!
- Donations to charities on their behalf or volunteering your time to help others.
- Homemade gifts (homemade food must be nut free and wrapped securely)

5. 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 under £40. 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 SBM or Principal.

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 SBM or Principal.

Any gifts or hospitality offered with a value of £40 or over 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 SBM or Principal before accepting.

If the Principal 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 Offer of gifts and hospitality given

Any gifts or hospitality provided by the trust, such as working lunch for visitors, must not be extravagant. A maximum value of £15 per head should be used as a guideline.

Alcohol must not be purchased with School funds..

Expense claims should be made to the SBM and receipts must always be enclosed.

The Principal must be consulted about any proposal to provide gifts or hospitality with a value over £15 per head.

6. 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.

This list is not intended to be exhaustive.

7. 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 Principal. The Principal 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 SBM. This policy will be reviewed every two years by the SBM and approved by the Board of Trustees.

9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Financial Handbook

10. How to raise a concern

Members of staff are encouraged to raise concerns about any issues or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedures set out in our Whistleblowing Policy.



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Appendix One – gifts and hospitality register

Date	Name	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted /rejected	Approved by