



## Gifts and Hospitality Policy

**Date policy adopted: 8<sup>th</sup> December 2025**

**Due for review: Autumn 2026**

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**1.0 Confirmation that the Gifts and Hospitality Policy in respect of The Learning Partnership Trust has been discussed and formally adopted by the Board of Trustees**

Signed by:

Chair of Trustees: ..... Date: 8<sup>th</sup> December 2025

Print name: Diane Hancock

Agreed at the Board of Trustees Meeting on: 8<sup>th</sup> December 2025

## 2. Guidance on Gifts and Hospitality

The conduct of members of staff or governors/trustees should never lead anyone to question their interests or lead anyone to think that they have been influenced by gifts and hospitality. Their own personal reputation and that of the Academy could be seriously affected if they inappropriately accept a gift or hospitality.

Staff & governors/trustees should treat with caution any offer of a gift or hospitality made to them personally; considering, in particular, whether the acceptance is a benefit to the Trust/Academy, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of their personal, or the trust's/academy's, support or favour.

If in doubt, the prospective recipient should always speak to the Headteacher or Chair of Governors/Trustees. It is the recipient's responsibility to follow the trust's guidance on gifts and hospitality and to justify why they chose to accept a gift or hospitality offered to them.

The trust will take disciplinary action against any member of staff or governor/trustee if they fail to follow the guidance. It is also a criminal offence to demand or accept a gift or reward in return for being influenced on any decision as a part of the academy, which could result in you being prosecuted by the Police.

This guidance applies to all staff and governors/trustees without exception.

## 3. Definition of a Gift

A gift is any item or service that an individual receives free of charge. It also includes any goods or services, which are offered to the individual at a discounted rate or on terms not available to the general public.

## 4. Definition of Hospitality

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event provided free of charge, discounted or on terms not generally available to the general public.

## 5. Prohibited Gifts

The accepting of gifts from, or the giving of gifts to, a third party in the following circumstances:

- it is made with the intention of influencing a third party to obtain or retain business, or a business advantage, or to reward the provision or retention of business, or a business advantage, or in explicit or implicit exchange for favours or benefits,
- it contravenes the law,
- it is given in your name, not in the name of the Trust or one of the Trust schools (other than as permitted via parental collections),
- it includes cash or a cash equivalent, such as gift certificates or vouchers (other than as permitted via parental collections) (made to an individual rather than the school direct)
- considering the reason for the gift, it is of an inappropriate type and value and given at an inappropriate time,

- it is given secretly,
- where a third party is a government official or a representative, or a politician or a political party.

## 6. Value limit on gifts or hospitality that can be accepted without any approval

Staff and governors/trustees can accept gifts and hospitality which are small gestures and have a value of £50 or less, without the relevant approval. Gifts and hospitality of this nature do not need to be recorded in the academy's Gifts and Hospitality Register.

## 7. Approval from the Headteacher or Chair of Governors/Trustees

- Any gift or hospitality, which is more than just a token, defined as a having a value of more than £50, should be politely refused or returned. However, it is recognised that some staff may receive cash or a monetary gift from a classroom/parent collection and therefore is greater than £50 but from multiple persons - approval to accept is not required in these instances but a declaration must be made (see section 12). Where a gift is from one source for more than £50, then the policy should be followed as set out within. Staff must have the prior written approval of the Headteacher (CEO for central staff) to accept something which has more than this value which, in any event, should only be in exceptional circumstances.
- The Headteacher, CEO or any trustee or local governor must have the prior written approval of the Chair of Trustees.
- Any gifts or hospitality accepted by the Chair of Trustees must be referred to the Trust Board for prior approval; any gifts or hospitality accepted by a Member, must be referred to the Board of Trustees for prior approval.

If there is any doubt or concern about the public perception that might be attached to accepting any gift or hospitality, then this must be referred to the Board of Trustees.

## 8. Declaring offers of Gifts and Hospitality

A declaration should be made as soon as possible after the offer or receipt of gifts or hospitality, even if the gift is not accepted. All declarations are to go to Headteacher (academy staff)/CFO (central staff and governors/trustees) who will ensure these are approved by the relevant person. Once approved they will be forwarded to the CFO who will record the declaration in the register.

The declaration will need to include the following information:

- date of offer of gift or hospitality, and date of event where relevant
- name, job title and organisation of recipient/provider
- nature and purpose of gift or hospitality received or declined
- the name of any other organisation involved
- estimated value
- Name and title of person approving the declaration

Where a conflict of interest with a supplier exists, or two or more gifts exceeding £50 are received in the same academic year from the same source, staff must make a declaration.

## 9. Register of Gifts and Hospitality

All offers received which have a value of more than £50 must be recorded in the Gifts and Hospitality Register, which is kept at Hatfield Heath Primary School. It should be noted in the register whether or not the offer has been accepted or declined.

## 10. Gifts or hospitality that should never be accepted

The following must never be accepted (subject to the comment on classroom collections):

- cash or monetary gifts
- gifts or hospitality offered to a husband, wife, partner, family member or friend of a member of staff or governor/trustee.
- gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process
- lavish or extravagant gifts or hospitality, even if they relate to activities taking place outside of working hours

## 11. Hospitality

Hospitality offered should only be accepted where there is a direct link to working arrangements and a genuine business reason can be demonstrated, for example:

- attendance or speaking at a conference, which provides complimentary subsistence, travel and accommodation (this does not need to be declared on the register except where a gift was received)
- attendance at a free training course
- attendance at a drinks reception to network

It is recognised that there is a need to ensure good relationships with existing and future contractors and stakeholders and that this may involve for example, the receipt of modest working lunches and dinners. These are acceptable where there is a genuine business reason.

Hospitality invitations to events which are purely social events should be considered very carefully before accepting; in such circumstances it may be much more difficult to substantiate a genuine business reason. If acceptance is agreed, staff are expected to use annual leave for such events. Staff or governors/trustees must not accept free holidays from a current or potential contractor; these invitations should be recorded in the register whether received or declined.

## 12. Gifts from pupils or parents/guardians

Gifts and hospitality received by members of staff from pupils or parents/guardians must comply with the rules laid down in this policy and if in excess of the token value, be recorded in the register

If parents/guardians form a collective in order to present a member of staff with a gift, that is acceptable, provided the individual contributions do not exceed the relevant token amount in section 5.0 if such information is shared. Such gifts must be recorded in the register and their acceptance ratified by the relevant approver.

## **13. Gifts received without warning/Declining a Gift or Hospitality**

If the gift is more than just a token it should be politely and courteously declined; where it would not be appropriate to do this, the matter must be referred to the Headteacher or Chair of Governors/Trustees as soon as possible, who will decide on the next steps to take. The Headteacher/Chair of Governors/Trustees may decide to return the gift or may donate the gift to a worthy local cause.

This must also be recorded on the Gifts and Hospitality register.

## **14. Gifts Provided by the Academy/Trust**

Any gifts purchased and provided by the academy/trust should be:

- Of a nominal value not exceeding £50.
- Alcohol should not be given as a gift in any circumstances.
- Given to staff or governors/trustees only in relation to specific and relevant personal circumstances (e.g. illness, bereavement, retirement) or upon leaving the employment or service of the academy. Gifts for long service can only be given after 20 years as for under 20 years any gifts would be taxable. Service awards are required to be declared on the annual P11D
- Authorised by the Headteacher for academy staff, CEO for central staff, Chair of Governors for the Headteacher, Chair of Trustees for Governors and Trustees and the Trust Board for the Chair of Trustees.
- Purchased from the academy's/trust's own unrestricted funds and not from DfE funding or any other funding provided for specific purposes.
- Recorded in the Gifts and Hospitality Register, which should be available for review by the Governing Board or external auditors upon request.

## **15. Monitoring arrangements**

The Gifts and Hospitality register is maintained by the Executive Assistant and regularly monitored by the CEO and Trust Board.

### THE DOS and DON'Ts

DO	DON'T
<ul style="list-style-type: none"> <li>Read and follow the guidance on gifts and hospitality</li> </ul>	<ul style="list-style-type: none"> <li>Accept any gifts or hospitality which have a value of more than £50 without the approval of the Headteacher, or the Chair of Governors/Trustees as necessary</li> </ul>
<ul style="list-style-type: none"> <li>Seek advice from the Headteacher or Chair of Governors if you are in doubt</li> </ul>	<ul style="list-style-type: none"> <li>Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process</li> </ul>
<ul style="list-style-type: none"> <li>Record all offers of gifts and hospitality which have a value of more than £50 in the Academy's Register, whether accepted or not</li> </ul>	<ul style="list-style-type: none"> <li>Accept cash or monetary gifts except when purchased by parents in accordance with this policy</li> </ul>
<ul style="list-style-type: none"> <li>Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything</li> </ul>	<ul style="list-style-type: none"> <li>Accept a gift or hospitality as an inducement or reward</li> </ul>
<ul style="list-style-type: none"> <li>Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality</li> </ul>	<ul style="list-style-type: none"> <li>Accept gifts or hospitality offered to your husband, wife, partner, family member or friend if there may be a conflict of interest or attempt to influence your work role.</li> </ul>
<ul style="list-style-type: none"> <li>Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body</li> </ul>	
<ul style="list-style-type: none"> <li>Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept</li> </ul>	
<ul style="list-style-type: none"> <li>Consider paying for yourself if offered any hospitality by a supplier or third party</li> </ul>	

## APPENDIX 2: Declaration of Receiving 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 your headteacher/CFO.

### Details of employee receiving gift or hospitality

Full Name	
Job Title	
Department	
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	

## APPENDIX 3: Declaration of Giving of Gifts and Hospitality Form

- Giving benefits, gifts, rewards or hospitality can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. However, the Trust accepts that the giving of gifts is permitted in relation to specific and relevant personal circumstances (e.g. illness, bereavement, retirement) or upon leaving the employment or service of the academy.

However, due regard to propriety and regularity in the use of public funds must always be considered. All gifts must be recorded in the register by the CFO. If you wish to declare giving a gift or hospitality, please complete the form and return to your Headteacher/CFO.

### Details of employee giving a gift or hospitality

Full Name	
Job Title	
Department	
Date of Declaration	

### Description of gift or hospitality

Description of gift / hospitality	
Value/estimated value of gift / hospitality	
Purpose of the offer	
Person/organisation receiving the gift or hospitality	
Relationship to the person/organisation giving the gift or hospitality	
Acceptance of gift / hospitality	Yes / No

### Approved by

Signature	
Date	
Name	
Job Title	