



ACET GIFTS & HOSPITALITY POLICY

DATE: November 2025

POLICY LEAD: CFP

APPROVED BY: Trustees/FRAP



Excellence



Equity



Empowerment

DOCUMENT CONTROL

Policy Level	Trust	
Approved By	FRAP	
Approval Date	November 2025	
<p>This policy remains valid until it is reviewed and replaced; it does not expire by date alone. Policies are reviewed annually, or sooner if required by statutory or legislative changes, in line with best practice</p>		
Policy Lead / Author	CFO	
Version Number	Date Issued	Updated Information
<p>Please complete this section with a brief summary of the changes you have made or if this is a full re-write / new policy. The contents of this version control box will be shared with trustees / the LGB as part of the approval process – Thank you</p>		
V1	January 2023	First issued
V2	November 2024	Inclusion of section 8 – gifts/hospitality to staff, members, trustees and governors.
V3	November 2025	No changes

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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.

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 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 public.

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 because of acceptance
- Must not use their official position to further their private interests or the interests of others
- Must not ask for gifts or hospitality

- Must record any gifts or hospitality offered to them or the trust with a value of over £35 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the CFO before accepting or offering any gifts or hospitality with a value of over £35

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 academy and trust and to those outside the organisation.

They will also ensure, alongside the CFO, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £35 are in line with this policy.

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

4.4 The CFO

The CFO 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 £35 are in line with this policy.

4.5 The Finance Manager

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

5. Acceptable gifts and hospitality

Offer of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of up to £35. 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 CFO or principal.

Similarly, hospitality such as working lunches may be accepted to support good relationships with key contacts, provided it is reasonable in the circumstances. If in doubt, guidance must be sought from the CFO or principal.

Any gifts or hospitality offered with a value of over £35 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 CFO or principal before accepting.

If the principal is the recipient, or intended recipient, of **any** offer of gifts or hospitality, the chair of the board of trustees will be informed by the CEO/CFO and the offer recorded 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.

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 offered any unacceptable gifts or hospitality outlined in section 6 above should politely decline the offer.

If they feel it would not be proper for them to decline, they should refer the matter to the principal or CFO. The principal or CFO 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 does not decline gifts or hospitality the trust has considered 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. Gifts and hospitality to staff/governors/trustees and members

Subject to CEO approval, it may be proper for a gift/donation of up to a maximum value of £35 to be provided to a member of staff. This may include but it not limited to:

- Staff leaving employment with the trust after 15 or more years of service
- ➤ Funeral of staff

Such gifts are often supplemented with private contributions from other members of staff.

It may be appropriate, subject to principal or CEO approval, to award token hospitality or a token gift up to a value of £10 to a member of staff who has, for example, achieved a significant milestone or made an exceptional contribution to the academy/Trust, beyond that normally expected of someone in their position. Such gifts or hospitality would not be expected to be given to more than 20% of staff in each academy or central team in a single academic year.

Gifts or hospitality for other purposes, such as maternity, birthdays, weddings etc., must not be provided from trust/academy funds. It is expected that items of this nature would be funded from personal contributions.

Use of trust funds is not allowed for celebratory staff events without prior approval from the CEO. Where approval is granted, the cost must not exceed £5 per staff member per annum.

It is acceptable to provide staff with lunches for full-day training events or meetings only with prior approval from the principal, budgets permitting.

9. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the CFO.

This policy will be reviewed annually by the CFO and approved by the Finance, Audit, People and Risk Committee.

10. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Governor Code of Conduct
- Staff disciplinary procedures
- Financial Regulations