



Gifts and Hospitality Policy

ODBST Level 1 Statutory Policy:	ALL Schools require this policy with no changes allowed to core text. No changes are necessary to personalise this with school name and branding, as this is a Trust level policy for use, without change, by all schools, except where a school contact is required as identified in the content of the policy. LGBs will note adoption in LGB meetings. Review will take place at Trust level, and schools will be notified of updates and review dates as necessary.
Other related ODBST policies and procedures:	ODBST Finance Manual
Committee responsible:	FRAPP
Approved by:	FRAPP
Date Approved:	23 rd September 2025
Date for Next Review:	Summer 2027

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged.

1. Purpose

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
- ODBST will assess and monitor the nature and the extent of its exposure to potential external and internal risks whilst recording and maintaining a register in line with good practice.

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 be seen to compromise the personal judgement or integrity of members, trustees, staff and/or any other representative of the trust. It 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 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
- Token gifts of the kind provided at conferences or trainings courses, such as business pens or stationery, are permitted without further action on the part of the recipient
- Other gifts or hospitality with a value of less than £50 may be accepted provided they are reasonable in the circumstances and consent has been obtained where possible in advance. If in doubt, you should consult with your line manager. This includes a seasonal gift (Christmas box of chocolates)

- Subject to paragraph above, gifts received will be deemed to belong to ODBST and whether the employee will be permitted to keep the gift in particular circumstances, will be at the discretion of the Board of Trustees
 - Gifts of money must never be accepted
 - Invitations to lunch or dinner from an individual or an external organisation may be accepted when the primary reason is to meet with representatives of the hosting organisation or representatives of other organisations who may have business interests or activities in common with the respective Board. Otherwise, please consult the ODBST Chief Finance Officer
 - Corporate hospitality must be approved in advance by the academy Headteacher, ODBST Chief Finance Officer or Accounting Officer
 - On some occasions, it will be appropriate to give a small token of thanks to a volunteer or colleague
 - Hospitality or gifts offered to clients or contractors must be agreed in advance with your Headteacher or the ODBST Chief Finance Officer
- **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 Financial Officer, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of [over £50/other value set by the trust] are in line with this policy.
- **4.4 The Chief Financial Officer (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 headteacher 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 £50/other value set by the trust] are in line with this policy.

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 up to £50. 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 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 CFO or headteacher.
 - Any gifts or hospitality offered with a value of over £50 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 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 Offer of gifts and hospitality given**
 - Alcohol must not be purchased out of the school budget.
 - Expense claims should be made to the [job title of relevant staff member] and receipts must always be enclosed.
 - The CFO or headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £50.
 - Expenditure on hospitality from public funds is only incurred in the provision of education. Hospitality is generally only provided in the workplace and usually restricted to tea/coffee, biscuits, soft drinks or sandwiches. Modest hospitality is occasionally provided outside the workplace. The Finance Officer will maintain a register of the occasions when hospitality is provided, the number of people involved and the costs incurred.
- **5.3 Allowable limits**
 - Local Governing Body**
 - Chair of Governors to approve up to £200.
 - Full LGB to approve £200 to £1,000.
 - Local Governing body refer to the Finance Committee and Chair of Board at ODBST if more than £1,000;
 - ODBST**
 - Chair of Trustees and Accounting Officer up to £1,000.
 - Full Trust Board if more than £1,000.
 - Before Board meetings, a copy of the Register will be circulated for comments on items over £1,000 only.
 - Private Use**
 - The academy does not obtain goods or services for the private use of governors and members of staff.
 - Governors and members of staff may not:
 - hold any interest in any equipment or property held or used for the academy

- acquire any interest in the disposal of academy equipment or property at the end of any contract between the academy and any third party.

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 [you may also wish to define what you class as a lavish or extravagant gift]
- 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 headteacher or CFO.
- The headteacher 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 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 CFO.
- This policy will be reviewed every 2 years by the board of trustees and approved by the board of trustees.
- Links with other policies
- This gifts and hospitality policy is linked to the:
 - Staff code of conduct
 - Staff disciplinary procedures
 - Accounting policy

Appendix 1: gifts and hospitality register

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