PENK VALLEY ACADEMY TRUST

Gifts & Hospitality Policy

A Statement of Policy

Adopted by Trustees:	
Signed:	
Date:	Summer 2026
This policy is reviewed annually by the Audit Finance & Risk Committee.	
Next Review date:	Summer 2027

COLLABORATION CHALLENGE CURIOSITY CARE

POLICY INFORMATION

Date of last review:	Summer 2026	**Review period:**	Annually
Date ratified by Trustees:	Summer 2026	**Trustee committee responsible:**	Audit Finance and Risk
Policy owner:	Chief Finance Officer	**Executive team member responsible:**	Chief Finance Officer

Reviews/revisions

Review date	Changes made	By whom
Spring 2025 Summer 2026	New policy in adherence to Academy Trust Handbook (ATH 2024 5.32) No amendments	CFO CFO

Equality and GDPR

All Penk Valley Academy Trust policies should be read in conjunction with our Equal Opportunities and GDPR policies.

<u>Statement of principle – Equality</u>

We will take all possible steps to ensure that this policy does not discriminate, either directly or indirectly against any individual or group of individuals. When compiling, monitoring and reviewing the policy we will consider the likely impact on the promotion of all aspects of equality as described in the Equality Act 2010.

<u>Statement of principle – GDPR</u>

Penk Valley Academy Trust recognises the serious issues that can occur as a consequence in failing to protect an individual adult's or child's personal and sensitive data. These include emotional distress, physical safety, child protection, loss of assets, fraud and other criminal acts.

Penk Valley Academy Trust is therefore committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the Data Protection Act (DPA)/GDPR.

Penk Valley Academy Trust will be referred to as **PVAT** for the remainder of the document which includes all schools who are members of PVAT, business operations and centralised services.

GIFTS & HOSPITALITY

1. Aim

The aim of this policy is 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 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

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 £30 or over on the gifts and hospitality register within 7 working days, even if declined. A link to the Gifs and Hospitality register can be found on the PVAT HR SharePoint site and also in the Staff Code of Conduct.
- Must consult the Chief Finance Officer or Headteacher before accepting or offering any gifts or hospitality with a value of £30 or over

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 Chief Finance Officer, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £30.00 are in line with this policy.

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

4.4 The Chief Finance 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
- The Gifts and Hospitality register is maintained on a day-to-day basis

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 £30.00 are in line with this policy.

4.5 Parents

It is not the Trust's intention to discourage all gift-giving. To reflect this:

- small tokens of gratitude are always appreciated
- gift-giving is not a requirement; parents are not expected to buy gifts for class teachers or other school staff
- gifts should be appropriate and not exceed the value of £30.00 as the Trust prevents teachers and other staff from accepting gifts worth over a certain amount

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 £30.00. 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 £30.00 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 Chief Executive Officer 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.

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 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 annually by CFO and approved by the Audit, Finance & Risk Committee.

9. Links with other policies

This gifts and hospitality policy is linked to the following documents which can be found on the PVAT HR SharePoint:

- Staff code of conduct
- Staff disciplinary policy
- Trust's Financial procedures