Special Partnership Trust

GIFT & HOSPITALITY GUIDANCE POLICY

Date Last Reviewed: September 2026

Review Date: September 2027

Special Partnership Trust

Gift & Hospitality Guidance

This policy should be read alongside the latest Department for Education Academy Trust Handbook, the Trust's funding agreement and articles of association, the Trust's scheme of delegation, financial regulations, procurement procedures, and staff code of conduct.

Legislation and guidance

This policy is based on the latest Department for Education Academy Trust Handbook, which states that academy trusts should have a policy and register covering the acceptance of gifts, hospitality, awards, prizes or any other benefit that might compromise personal judgement or integrity. The Trust must ensure that members, trustees, governors, staff and any other representatives of the Trust are aware of this policy.

Purpose

Aims

This policy aims to ensure that Trust funds are used only in accordance with the law, the Trust's funding agreement, articles of association and the latest Academy Trust Handbook; that the Trust and those acting on its behalf operate in a way that commands public confidence; that public funds are used with regularity, propriety and value for money; and that members, trustees, governors, staff, contractors and consultants understand what constitutes acceptable gifts and hospitality and the process to follow when an offer is made.

This policy sets out how staff, governors, contractors and consultants must respond to offers of gifts, hospitality or other benefits. It is intended to protect individuals and the Trust from conflicts of interest, perceived impropriety, reputational damage and potential breaches of anti-bribery and public funds requirements.

Definitions

- A Gift is any item, cash, award, prize, goods, service, voucher, discount, loan, fee, reward or other benefit offered or given without expectation of payment or equivalent benefit in return.

- Hospitality means any food, drink, accommodation, travel, entertainment, event attendance or other benefit provided free of charge or at a discounted rate in connection with Trust, academy or professional duties.

- Staff means all permanent, fixed-term, temporary and casual employees of the multi-academy trust, together with members, trustees, governors,

contractors, consultants, volunteers and any other person acting on behalf of The Special Partnership.

Principles

- The multi-academy trust expects staff to exercise the utmost discretion when giving or accepting gifts and hospitality while carrying out school or Trust business. Particular care must be taken where the person or organisation involved has, or is seeking to obtain, a contract with an academy or the Trust.

- Staff must not accept gifts, hospitality, or benefits in kind from a third party where it might be perceived that their personal integrity is being compromised or that an academy might be placed under an obligation.

- Staff must not seek, accept or give any favour, preference or advantage that is not available on normal commercial or professional terms.

- Staff must not make use of their official position to further their private interests or those of others.

- When making gifts, the Trust must ensure that the value is reasonable, that the decision is within its scheme of delegation, that the decision is documented, and that the expenditure demonstrates propriety and regularity in the use of public funds.

Gifts and Hospitality

- The individual should consider carefully whether it is appropriate to accept or decline a gift or hospitality and must seek approval before acceptance wherever practicable, particularly where the offer is from a current or potential supplier, contractor, parent, carer, student or other person who may reasonably be seen to have an interest in Trust decisions.
  If in doubt, staff must seek advice from the CFO, CEO or Headteacher before accepting the gift or hospitality.

- Gifts of low intrinsic value such as promotional calendars or diaries or small tokens of gratitude can be accepted.

- Any gift or hospitality with an estimated value of £25 or over must be recorded in the Register of Gifts and Hospitality, whether accepted or declined. Offers below £25 must also be recorded where they could reasonably be perceived as compromising judgement, creating a conflict of

interest, or forming part of a repeated pattern of offers from the same person or organisation. The CFO will hold the register.

- It is each individual's responsibility to inform the CFO by e-mail of any gift or hospitality offered, whether accepted or declined, as soon as possible and normally within seven working days of the offer.

Unacceptable gifts and hospitality

Staff must not accept cash, cash equivalents, vouchers or personal discounts; gifts or hospitality that could be seen to influence a decision; gifts or hospitality from a supplier involved in a procurement or contract negotiation; repeated or unusually generous offers from the same source; offers connected to admissions, assessment, exclusions, recruitment, employment decisions or complaints; or any offer that would bring the Trust into disrepute if publicly disclosed.

Contracts with Suppliers

Where a gift or hospitality is offered, staff must report it before acceptance wherever practicable. Any acceptance must be approved in line with the Trust's scheme of delegation and recorded promptly in the Register of Gifts and Hospitality, including gifts or hospitality that are declined where the offer could reasonably be perceived as creating a conflict of interest.

- Staff must base all purchasing decisions and negotiations for contracts solely on achieving best value for money.

- The multi-academy trust requires staff who have official dealings with contractors and other suppliers of goods and services to the Trust to avoid conducting any private business with them other than through normal commercial channels.

- Staff should be aware of the Bribery Act 2010 and must not offer, promise, give, request, agree to receive, or accept any financial or other advantage intended to induce or reward improper performance of a relevant function or activity.

Gifts to and From Students

- Given the professional responsibilities of staff, they are strongly advised not to give gifts or hospitality to students, or accept gifts or hospitality from students, where the value exceeds £25 or where the offer could reasonably be perceived as influencing professional judgement, creating favouritism, or compromising safeguarding expectations.

- Any gift or hospitality from students exceeding £25 in value must be entered in the Register of Gifts and Hospitality.

Register of Gifts and Hospitality

The CFO is responsible for maintaining the Register of Gifts and Hospitality and ensuring that reported offers are recorded. Individual staff remain personally responsible for reporting any gift or hospitality offered, whether accepted or declined, and for seeking advice before accepting anything that could reasonably be perceived as compromising their judgement.

The following should be recorded: the nature of the gift or hospitality, its estimated value, the name of the person or organisation offering it, the date it was offered, the date it was accepted or refused, the name of the employee, the decision made, the approving person where approval was required, and any action taken to manage a conflict of interest.

Register
The Register of Gifts and Hospitality should be reviewed at least annually by the CFO and reported to the appropriate Trust governance body in line with the scheme of delegation, so that patterns, conflicts, repeated offers and unusual offers can be identified, challenged and addressed.

Date offered	Staff member	Gift/hospitality description	Company/individual/ organisation	Estimated value	Accepted or declined	Approval obtained	Action taken