

GIFTS AND HOSPITALITY

May 2025

*Together, creating opportunity
and aspiration for every child*



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First Version Implemented	Revision Level	Current Version Adopted by Trust	Review Date	Responsible Person
December 2016	V4.0	May 2025	May 2027	CFO

Why do we have guidance on gifts and hospitality?

Your conduct as a member of staff, trustee or local governing board member should never lead anyone to question your interests, or lead anyone to think that you have been influenced by gifts and hospitality. This is important because your own personal reputation and that of The Priestley Academy Trust could be seriously affected if you inappropriately accept a gift or hospitality. It is also a criminal offence to demand or accept a gift or reward in return for allowing yourself to be influenced as a part of the Trust. This is why the Trust has guidance which applies to all staff, trustees and local governing board members on gifts and hospitality.

What is a gift?

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

What is hospitality?

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

What gifts or hospitality can be accepted without any approval?

This policy will not prohibit the receipt of normal and appropriate gifts and hospitality, if the following requirements are met:

- It is not given with the intention of:
 - Influencing a third party to obtain or retain business or a business advantage
 - Rewarding the provision or retention of business or a business advantage
- It is not given in exchange for favours or benefits
- It is given to the school or Trust, not to an individual
- It complies with local law
- It does not include cash or cash equivalent, e.g. vouchers or gift certificates
- It is appropriate in the circumstances, e.g. the giving of a small gift at Christmas
- The type or value of the gift or hospitality is reasonable based on the reason it is offered
- It is given openly, not secretly

As long as they are not listed under the paragraph below, 'What gifts or hospitality should never be accepted', you can accept gifts and hospitality, which are small gestures and have a value of £30 or less, without the approval of the Chief Finance Officer (CFO). Gifts and hospitality of this nature do not need to be recorded in The Trust's Gifts and Hospitality Register.

What things should I think about before I decide what to do?

You should treat with caution any offer of gifts or hospitality made to you personally.

In particular, think about whether there is a benefit to the Trust in your accepting, 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 your, or the Trust's, support or favour.

A decision tree is provided as [Appendix 1](#) to this document to support staff in this area, but if in any doubt please ask the CFO for advice.

What gifts or hospitality need approval from the CEO or CFO?

You must have the prior written approval of the CFO if you wish to accept a gift that is more than just a token, defined as a having a value of more than £30. This should only be in exceptional circumstances. If you or the CFO has any concerns or doubts about the public perception that might be attached to accepting any gift or hospitality, then you must refer it to the Chief Executive (CEO).

What gifts or hospitality should never be accepted?

You must **never** accept:

- cash or monetary gifts
- gifts or hospitality offered to your husband, wife, partner, family member or friend
- 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 in your own time.

What should I do if I receive a gift or hospitality without warning?

If you estimate that the gift is more than just a token you should politely and courteously decline the gift. If you feel that it would not be appropriate to do this, you should refer the matter to the CFO as soon as possible for a decision to be made as to what you should do with the gift. The CFO may decide to return the gift, may ask the CEO for their view, or may donate the gift to a worthy local cause.

You must make sure that all offers you receive which have a value of more than £30 are recorded in the Trust's Gifts and Hospitality Register, which is kept in the CFO's office.

Do I need to record offers that I decline?

Yes – *all* offers of gifts or hospitality, which have a value of more than £30, must be recorded in the Trust's register, even if you do not accept.

What should I do if I am in doubt?

If in doubt, always speak to the CFO. It is your responsibility to follow the Trust's guidance on gifts and hospitality and to justify why you chose to accept a gift or hospitality offered to you.

What would happen to me if I did not follow the guidance?

The Trust may take disciplinary action against you if you failed to follow the guidance. It is also a criminal offence to demand or accept a gift or reward in return for allowing yourself to be influenced as a part of the Trust. This means you could be prosecuted by the Police.

Gifts from The Priestley Academy Trust

The Priestley Academy Trust funds will not be used to purchase gifts for staff or third parties.

Appendix 1 – Decision Tree

