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# Gifts & Hospitality Policy

Updated on 2<sup>nd</sup> March 2026

<b>Policy reference:</b>	A02
<b>This policy is to be reviewed:</b>	3 Yearly
<b>The next review date is:</b>	March 2029
<b>Review is the responsibility of:</b>	F,I and HR Committee

## Review History

<b>Review ratified:</b>	December 2014, November 2015
<b>Review ratified:</b>	January 2018, January 2021
<b>Review ratified:</b>	June 2022, June 2023, September 2025, 2 March 2026

**Authorised by:** Full Trust Board



## Applies to

1. This policy applies to all staff, Governors, Trustees and Members of the Aspire Learning Trust.

## The Purpose

2. To ensure that all staff, Governors, Trustees and Members remain free from any conflict of interest with respect to their acceptance of gifts and hospitality from parties to which they are associated through financial transactions with the Trust. This does not apply to minor gifts of up to £10 worth from students, pupils, parents, and members of the local community.

## Hospitality

- 3.1 The Trust may provide hospitality in connection with its business affairs. The hospitality may be provided to:
  - a. Governors, Trustees and Members;
  - b. Staff;
  - c. Representatives from firms or companies visiting the school/College;
  - d. Any other visitors connected with the business of the school/College
- 3.2 The hospitality provided should normally not exceed the provision of tea/coffee/sandwiches or lunch. Hospitality provided, other than tea/coffee/biscuits or sandwiches shall require the authorisation of the Headteacher / Principal / CEO or their representative.
- 3.3 The budget for hospitality will be determined by the Headteacher/Principal/CEO and should be subject to annual review in accordance with the normal budget setting process.
- 3.4 Restricted or Unrestricted funds must not be used to purchase gifts for school staff or individuals who support the school in a voluntary capacity, except where such expenditure forms part of a formally approved staff reward scheme authorised in advance by the CEO.

In exceptional circumstances — such as the retirement of a long-serving employee, approved staff recognition awards, or significant family events — funds may be used for gifts, but only with prior written approval from the CEO. Where the CEO is the recipient of the gift, approval must be obtained in advance from the Chair of the Trust Board.

All such expenditure must be reasonable, proportionate, transparently recorded, and supported by appropriate documentation.

## Inducements

- 4.1 Gifts, other than items of very small intrinsic value, such as business diaries, calendars, telephone pads etc., shall not be accepted. Items for personal use shall not be accepted.
- 4.2 Modest hospitality is an accepted courtesy of a business relationship. The recipient should, however, be conscious of the need to avoid a position where they might be or appear to be influenced in making a decision by such hospitality. The frequency and scale of hospitality should not be significantly greater than the school/College/Trust would be likely to provide in return.

- 4.3 Where a situation arises when an employee is uncertain whether it would be appropriate to accept an offer of a gift or hospitality, the offer should be declined, or advice sought from the Finance Manager/Deputy Principal or Principal.
- 4.4 Personal inducement in any form from suppliers of goods or services must never be accepted. Any such offers must be reported to the Finance Manager/Headteacher/Principal immediately.

## Gifts and Hospitality Register

- 5.1 High ethical standards, along with open and transparent arrangements, are essential to ensure integrity of all staff employed by the Trust. Accordingly, gifts and/or hospitality must be discussed with the Head of School, trust Director of Finance or the Chair of Governors and if a decision to accept is taken, the details should be recorded in the Gifts and Hospitality Register.
- 5.2 The Gifts and Hospitality Register should be held and maintained by a nominated Finance Officer within the Trust Finance office and should be freely available for inspection by trustees, governors, staff, parents, and external auditors.

## Liability for Income Tax and National Insurance Contributions

- 6.1 In theory, the provision of any gift or reward to an employee may create some form of liability for the employee.
- 6.2 ALL gifts in the form of money or 'cash vouchers' (vouchers which can be exchanged for cash e.g. premium bonds or savings stamps) are subject to deductions of Income Tax and National Insurance Contributions.
- 6.3 'Non Cash Vouchers' (vouchers redeemable for goods and services must be reported on Forms P11D and are also liable to National Insurance Contributions. P11D Forms are completed annually by the school's payroll provider, EPM, and will include details of any gifts which create a tax liability.

***It is the personal responsibility of all staff, Governors, Trustees and Members to declare any receipt of hospitality covered under this policy. The Gifts and Hospitality Register is located in the central Finance Office and looked after by the Senior Finance Officer.***