ZENITH
MULTI ACADEMY
TRUST

Gifts and Hospitality Policy

for use by all staff in:
All schools in the Trust
Zenith Minds
Trustees
Members

Approved by:	Finance, Audit and Risk Committee
Date:	September 2022
Last reviewed:	October 2025
Next review due by:	October 2028

This policy is based on a model from The Key

Content	Page No.
1. Introduction	1
2. Legislation and guidance	1
3. Definitions	1
4. Roles and responsibilities:	1
4.1 Trustees, Governors, Members, and staff	1
4.2 Headteachers	2
4.3 Chief Financial Officer	2
4.4 School Business Managers	2
5. Acceptable gifts and hospitality	2
6. Unacceptable gifts and hospitality	3
7. Declining gifts and hospitality	3
8. Monitoring arrangements	4
9. Links with other policies	4
Appendix 1: Gifts and Hospitality register	5

1. Introduction

This policy aims to ensure that:

- The 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
- Trustees, Governors, Members, 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 be seen to compromise the personal judgement or integrity of Trustees, Governors, Members, 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 Trustees, Governors, Members, and Staff

Trustees, Governors, Members, 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 over £50 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Chief Financial Officer, School Business Manager, or Headteacher before accepting or offering any gifts or hospitality with a value of over £50

- 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.

4.2 Headteachers

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 School Business Manager and Chief Financial Officer, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

4.3 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 Trustees and Headteacher are provided with information on gifts and hospitality received and given, as appropriate

The CFO 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 are in line with this policy.

4.4 School Business Managers (SBM)

The SBM is responsible for maintaining their school's gifts and hospitality register on a day-to-day basis.

5. Acceptable gifts and hospitality

5.1 Offer of gifts and hospitality received

Trustees, Governors, Members, 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, Trustees, Governors, Members, and staff must consult the SBM, 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 SBM, 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 Trustees, Governors, Members, or member of staff who is offered such gifts or hospitality must consult the SBM, 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 CEO 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

Any gifts or hospitality provided by the Trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £50 per head should be used as a guideline.

Alcohol must not be purchased out of school or Trust budgets.

Expense claims should be made to the Headteacher or CFO and receipts must always be enclosed.

The SBM, CFO or Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £50.

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 Trustees, Governors, Members, 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 Trustees, Governors, Members, 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 SBM, Headteacher, or CFO. The SBM, 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 SBM and CFO.

This policy will be reviewed every 3 years by the CFO and approved by the Trust's Finance, Audit, and Risk Committee.

9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff Code of Conduct
- Trustees, Governors, Members Code of Conduct
- Staff disciplinary procedures
- Finance regulations

Appendix 1: Gifts and Hospitality Register

Date	Name	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted/rejected	Approved by