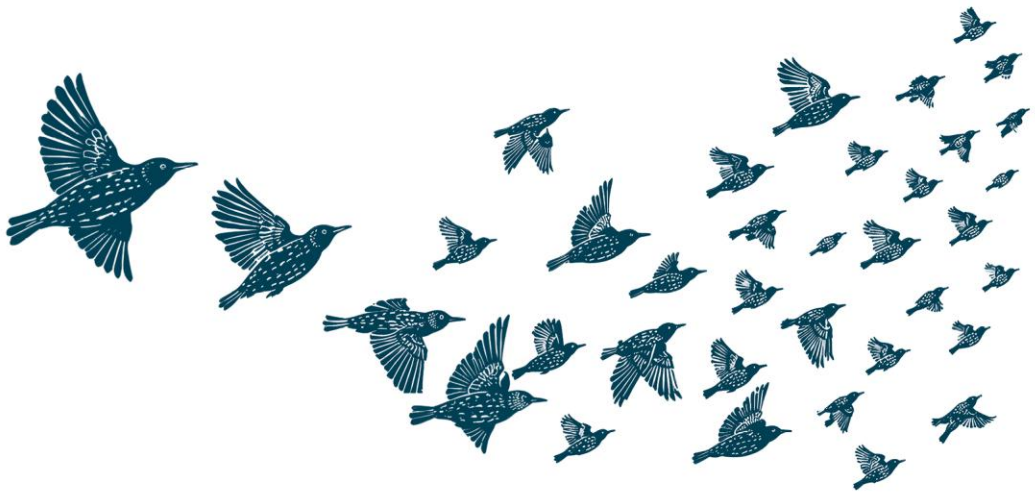
TPAT
Truro and Penwith Academy Trust

# Gifts and Hospitality Policy

**Review Summary**

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| **Approved By:** | **Trustees** |
| **Approval Date:** | **September 2026** |
| **Next Review Date:** | **September 2029** |



This document consists of:

- Trust Policy on gifts and hospitality
- Template for Gifts and Hospitality Register for completion by the Trust Chief Financial Officer for the Trust and by each academy (Annex 1)

**1. Background**

1.1 The Truro and Penwith Academy Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff and governance representatives are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Academy Trust.

1.2 In order to protect all individuals associated with the Trust, and the reputation of the Trust and its academies, from accusations of bribery or corruption staff, governance representatives must take extreme care that none of their dealings, directly or indirectly, could be deemed as a reward or benefit, in line with the Bribery Act 2010. This Act makes it a criminal offence to:

- offer, promise or give a bribe,
- request, agree to or accept a bribe
- (by an organisation) fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.

Under this Act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

1.3 The Trust and each academy will hold a Gifts and Hospitality Register. All gifts/ hospitality over the value of £30 must be recorded in the Gifts and Hospitality Register. Gifts or hospitality from the same source which cumulatively exceed £50 over a 12-month period must also be recorded. The Chair of the Board of Trustees must be notified as soon as practicably possible of any gift or hospitality of significant value (exceeding £250). Entries in the registers will be reviewed annually by the Chair of the Board of Trustees, and the registers will be available for inspection on request. Headteachers and the CFO will ensure all staff are made aware of this policy on induction and annually thereafter.

**Definitions**

2.1 A Gift is any item or service, award, prize or any other benefit which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public or which might be seen to compromise the personal judgment or integrity of the recipient.

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

**3. Dealing with Gifts and Hospitality**

3.1 The Trust expects staff and governance representatives to exercise the utmost discretion in giving and accepting gifts and hospitality when on Trust or academy business. Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with our organisation. In any case of doubt advice should be sought from the Trust Chief Financial Officer (or the Head of Finance on the Chief Financial Officer's behalf).

3.2 Staff and governance representatives must not make use of their official position to further their private interests or those of others.

3.3 Staff and governance representatives must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that the Trust / academy might be placed under an obligation.

3.4 Gifts of low intrinsic value such as promotional calendars or diaries, or small tokens of gratitude, can be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, individuals should decline the gift or refer the matter to the Trust Chief Financial Officer (or the Head of Finance on the Chief Financial Officer's behalf).

3.5 It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £30 these are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register. Where gifts valued over £30 are accepted, these should be recorded in the register.

3.6 Where a more valuable gift, benefit or service is offered which is to the good of the academy, rather than an individual, it must be referred to the Trust Chief Financial Officer or, if in the case of the Trust Chief Financial Officer, to the Chief Executive Officer for approval within their discretion; if acceptable, these items must be recorded in the register.

3.7 Hospitality such as working lunches, coffees etc are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. Modest hospitality, provided it is reasonable in the circumstances, should be similar to the scale of hospitality which the Trust as an employer would be likely to offer. These would not be added to the register. Hospitality received above this level should be recorded in the register.

3.8 If a member of staff or governance representative is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school (other than light refreshments) it is their responsibility to discuss this with the Trust Chief Financial Officer immediately.

3.9 If not accepting a gift would be regarded as causing offence (such as a sudden and unexpected gift or one where refusal could cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Trust Chief Financial Officer as soon as possible who may decide to return the gift, or may donate it to a school raffle/ fair or a charitable cause.

3.10 Examples of gifts or hospitality that should not be accepted are cash or monetary gifts; gifts or hospitality offers to a member of your family; gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process; staff, trustee or governance representative attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants. (Where it is considered that there is a benefit to the Trust or one of its academies in a member of staff or governance representative attending a sponsored event, the attendance must be formally approved and registered by the Trust Chief Financial Officer).

3.11 Where a gift is received on behalf of the school, the gift remains the property of the school. The gift may be required for departmental display or it may, with the Headteacher's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the Department on or before the recipient's last working day.

3.12 Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the academy and must be used accordingly.

**4 Giving Gifts and Hospitality**

4.1 The Trust and its academies will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the value is reasonable, the gift is within the Trust's scheme of delegation (FPM Appendix C), the decision is fully documented in the Gifts and Hospitality Register, and the gift achieves propriety and regularity in the use of public funds. This does not apply to the award of gifts, prizes etc related to the achievement of pupils e.g. attainment or merit awards.

4.2 Where hospitality is provided by the Trust or its academies this should be approved in advance by the Trust Chief Financial Officer. In approving hospitality the Trust Chief Financial Officer should ensure it is not in breach of the Bribery Act 2010 and also that the costs are appropriate for a publically funded organisation. Hospitality such as working lunches, coffees etc and modest hospitality in the form of meals etc are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not for their family or friends). These would not be added to the register. Hospitality provided above this level should be recorded in the register.

**5 Non Compliance**

5.1 In the case where it is believed a member of staff or governance representative has not declared a gift or hospitality then a formal investigation will be instigated by the Chief Financial Officer. If misconduct is indicated, this may take the form of disciplinary procedures in the case of employees.