WULFRUNA
PARTNERSHIP

Gifts and Hospitality Policy

2025 - 2026

Document Management	
Purpose of this statement:	To outline TWP's Gifts and Hospitality Policy
This policy has been approved for operation within:	The Wulfruna Partnership
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Date reviewed:	October 2025
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Approved by:	Finance and General Purposes Committee
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Owner:	TWP Trust
Author:	CFOO
Reviewer:	CFOO

Document Log		
Version	Date	Note of Revisions
V1	October 2025	New Policy

Dissemination					
Staff	CEO/CFOO/ Headteacher/ School Staff	Website	No	On-Request	Yes

1. Aims

This policy aims to ensure that:

- The academy 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
- Members, trustees 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 compromise their personal judgement or integrity. This should include members, trustees, staff and/or any other representative of the trust. The handbook 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 Members, trustees and staff

Members, trustees 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 Finance and Operations Officer (CFOO) or Chief Executive Officer (CEO) before accepting or offering any gifts or hospitality with a value of over £50.

4.2 Academy trustees

Academy 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.

4.3 The Chief Executive Officer (CEO)/Headteacher

The CEO/Headteacher is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The CEO/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 CFOO, 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.

The CEO/Headteacher is responsible for communicating the Trusts/school's rules and expectations about gift-giving to parents.

4.4 The Chief Financial and Operations Officer (CFOO)

The Chief Financial and Operations Officer will ensure that:

- The Trust maintains a gifts and hospitality register on the TWP sharepoint.
- 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 academy trustees and CEO/Headteacher are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the CEO/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.

4.5 The School Business Manager/Office Manager/PA to Headteacher

The School Business Manager/Office Manager/PA to Headteacher is responsible for maintaining the gifts and hospitality register on a day-to-day basis in each school.

4.6 Parents

- The Trust does not wish to discourage all gift-giving, and that small tokens of gratitude are always appreciated
- Gift-giving is not a requirement, and parents are not expected to buy gifts for class teachers or other school staff
- The Trust prevents teachers and other staff from accepting gifts worth over £50

5. Acceptable Gifts and Hospitality

5.1 Offer of gifts and hospitality received

Members, trustees 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, members, trustees and staff must consult the CEO/Headteacher or CFOO.

Similarly, hospitality such as working lunches may be accepted to maintain good relationships with key contacts, provided hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the CEO/Headteacher or CFOO.

Any gifts or hospitality offered with a value of over £50 must be recorded on the gifts and hospitality register within 7 working days by the CFOO, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the CEO/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.

If the CEO is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the Chair of Trust Board 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. An appropriate cost for entertaining is £15 per head for lunch and £50 for dinner, and for gratuities. Expense claims should be made in line with the Trust expenses policy and receipts must always be enclosed. Alcohol must not be purchased out of the school and/or trust budget. The CEO or CFOO must be consulted about any proposal to provide gifts or hospitality with a value of £50 and over.

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 members, trustees 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 Members, Trustee or staff member who are 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 the CEO/Headteacher. The CEO/Headteacher may decline the offer or donate the gift or hospitality to a worthy cause, and the offer will be recorded 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 CFOO.

This policy will be reviewed every term by the CFOO and approved by the Finance and General Purposes Committee.

9. Links with other Policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Accounting policy
- Expenses policy

APPENDIX 1

Gifts & Hospitality Register			
Trust or School			
CEO/Headteacher			
Reviewed (Date)			
Signed			

Date	Name of Staff Member/Trustee	Description & Value	Party Offering Gift	Accepted Rejected	Approved By