



# The Fernwood School

*High Achievement with Care & Discipline for All"*

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## Gifts and Hospitality Policy

This policy will be monitored regularly and evaluated so that it remains responsive to current issues. This will be co-ordinated by the Chief Financial Officer.

Approved: February 2026  
Next review: February 2027  
Status: Statutory

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## 1.0 Policy Statement

As an academy trust committed to maintaining the highest standards of integrity and ethical conduct, The Fernwood Academy Trust acknowledges the importance of managing gifts and hospitality with utmost transparency and in accordance with applicable laws and regulations.

## 2.0 Scope and Purpose

This Gifts and Hospitality Policy establishes a comprehensive framework for the acceptance and offering of gifts and hospitality, ensuring that all actions are carried out ethically, responsibly, and in alignment with the Trust's mission and values.

This policy applies to all employees, members, and trustees.

This policy has due regard to the following regulatory frameworks:

- 🦁 Academy Trust Handbook
- 🦁 Managing Public Money
- 🦁 HMRC- Expenses & Benefits for Employees

This policy also links to our Trust policies on:

- 🦁 Finance
- 🦁 Conflict of Interest
- 🦁 Corporate Multipay Card
- 🦁 Code of Conduct

## 3.0 Overarching Principles

**Integrity:** Uphold the highest standards of integrity, avoiding conflicts of interest and ensuring that gifts and hospitality are never used to influence decisions or gain preferential treatment.

**Transparency:** All acceptance and offering of gifts and hospitality should be transparently recorded and reported. Comprehensive documentation, including the nature and value of the gift or hospitality, must be maintained.

**Compliance:** All relevant laws, regulations, and organisational policies concerning gifts and hospitality must be adhered to, rejecting any business practice that might be deemed improper and maintaining the interests and reputation of both individual staff and the trust.

## 4.0 Responsibilities and Arrangements

### 4.1 Conflicts of Interest

4.1.1 A conflict of interest can occur when personal interests, relationships, or affiliations may influence or appear to influence an individual's decision-making process. All trustees, members, volunteers, and employees must exercise sound judgment and promptly disclose any conflicts of interest that may arise using the trust's declaration of interest form available from the CFO or Clerk of Trustees.



## 4.2 Receiving Gifts

### 4.2.1 Employees, members and trustees:

- ❧ 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 because of acceptance
- ❧ Must not use their official position to further their private interests or the interests of others
- ❧ Must not solicit gifts or hospitality
- ❧ Employees should not accept a personal gift, commission, discount, allowance, direct or indirect profit, inducement, payment, perk or other benefit from a supplier, potential supplier, or other organisations in connection with any professional work undertaken
- ❧ Trust leaders and academy leadership 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 to those outside the organisation. They will also ensure, alongside the CFO 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 and HMRC regulations.

### 4.2.2 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 Academies Trust Handbook
- ❧ The trustees are provided with information on gifts and hospitality received and given, as appropriate

## 4.3 Gifts from Students and Parents

4.3.1 Gifts of a low value presented from students and parents can be accepted providing it is given in good faith and is not seen to be an attempt to gain advantage. These items should be recorded on the Gifts and Hospitality Register if the purchase value is deemed to be in excess of £50.00.

**Members, trustees and employees should not accept cash gifts under any circumstances.**

4.3.2 Promotional merchandise of a low value (pens, calendars, mugs) can be accepted and do not need to be recorded on the register.

## 4.4 Alcohol

4.4.1 On occasion, members, trustees and employees may receive a gift from a colleague or student that falls under the category of alcohol. Such gifts must not be consumed on site and must be stored out of sight and, where possible, be held in a locked cupboard.

## 4.5 Receiving Hospitality

4.5.1 Where hospitality is normal or reasonable in the circumstances it may be accepted. Offers of hospitality must be rejected where:

- ❧ There is no business justification for accepting a hospitality offer



- 🦁 An offer of hospitality is disproportionately generous
- 🦁 The invitation could be seen as inducement to affect a business decision

Where hospitality is modest, of low value and in the course of normal business, it does not need to be declared on the register. Members, trustees and employees should not accept hospitality that the trust would not reciprocate in similar circumstances.

## 4.6 Providing Gifts

4.6.1 The trust will not normally give gifts to other individuals or organisations. If gifts are given, they must be recorded in the Gift and Hospitality Register and must have regard for the appropriate and regularity of the use of public funds.

This does not apply to:

- 🦁 Gifts and prizes related to student achievement

4.6.2 Expenditure on Employees wellbeing must follow the below principles:

- 🦁 Must be coded as staff wellbeing, must not exceed £50 including delivery and other costs, must come from unrestricted reserves
- 🦁 Gifts for members, trustees and employees or volunteers should not be purchased from public monies. This includes flowers or gifts on birthdays, when children are born, or when members, trustees step down or when employees leave. Alternatively, such gifts can be funded through staff collections or from the Headteacher's or leadership's own monies.
- 🦁 Consideration will be given to funding a retirement gift to an employee who has a significant continuous length of service record with the trust, this gift must not exceed £50 in value for each year of service, must be approved by the CFO, and follow the guidelines.

**Where gifts are given, they should be appropriate, not contain alcohol and not call into question the ethical standards of the Trust. Gifts must be recorded in the Gifts and Hospitality Register.**

## 4.7 Providing Hospitality

4.7.1 On occasion, we may provide hospitality for members, trustees, staff and/or visitors in the normal course of business. When considering if hospitality for a meeting is acceptable the following should be considered:

- 🦁 Length and timings of meetings
- 🦁 The attendees and their locality to the venue of the meeting

4.7.2 The hospitality of meals food and drink should generally be provided by the trust's caterers and discretion should be used about the type of hospitality provided. Due consideration should be given to dietary needs, inclusive food choices and value for money. Where the value of the hospitality provided is less than £10 per head, it does not need to be disclosed on the register.



## 4.8 Gifts and Hospitality Register

4.8.1 Members, trustees and employees are personally responsible for reporting any gifts or hospitality that has been offered or accepted above the acceptable conditions in this policy. This can be done using the Gifts and Hospitality Form in Appendix 1. Also available on the Staff Hub.

The information will be recorded on the register which is held and maintained by the finance team.

## 4.9 Declining Gifts and Hospitality

4.9.1 Any member, trustee, or employee who is offered any of the unacceptable gifts or hospitality outlined above should politely decline the offer but for transparency must still log the offer. If a member, trustee, or employee feels it would not be appropriate for them to decline, they should refer the matter to the CFO. The 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.

4.9.2 It may also be possible that any gift or hospitality offered to family members, partners or close friends of members, trustees and employees are inappropriate. An exception might include offering flowers in the case of bereavement. If in doubt, please seek advice from the CFO or CEO before purchase.

4.9.3 Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, may be dealt with as a staff disciplinary matter or under the Governance Code of Conduct in the case of members or trustees.



## Appendix 1 - Gift & Hospitality Declaration Form

Gift and Hospitality Declaration Form	
Name	
Role	
Description of Gift or Hospitality	
Approximate Value	
Party Offering Gift or Hospitality	
Date of Offer	
Accepted or declined	
Date of Declaration	
Approved By	
Comments – please add any comments or explanations as appropriate	
Date Added to Register (by CFO)	