

The Crossley Heath School

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Gifts and Hospitality Policy September 2025

Version Control

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1. Aims

This policy aims to ensure that:

- The academy funds are used only in accordance with the law, 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 for 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
- Members, Board of 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 <u>Academy Trust Handbook</u>, 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, Board of Tustees, 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.

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, Board of 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 £50.00 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Multiple gifts from the same source over a 12 month period should be treated in the same way as single gifts over £50 where the cumulative value exceeds £50 and should be recorded on the gifts and hospitality register.
- Must consult the Chief Finance Officer or Headteacher before accepting or offering any gifts or hospitality with a value of over £50.00. The value of items will be determined by the typical market value of the item.

4.2 Academy Board of Trustees

Academy Board of 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 Headteacher

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 Chief Finance Officer, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £50.00 are in line with this policy.

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

4.4 The Chief Finance Officer

The Chief Finance Officer 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 Academy Board of Trustees and Headteacher are provided with information on gifts and hospitality received and given, as appropriate

They 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 £50.00 are in line with this policy.

4.5 The Personal Assistant

The Headteacher's Personal Assistant is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

• The Development Manager and fundraising staff will, by the nature of their role, engage in routine stewardship activities including offering reasonable hospitality (e.g., tea/coffee, lunches, small tokens of appreciation, event invitations) to alumni and stakeholders. These activities are considered part of legitimate fundraising practice, provided they are reasonable, offer clear benefit to the school, and comply with value for money principles."

4.6 Parents

- Crossley Heath School 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
- At Crossley Heath, the Board of Trustees prevents teachers and other staff from accepting gifts worth over £50.00

5. Acceptable gifts and hospitality

5.1 Offer of gifts and hospitality received

Members, Board of Trustees and staff can accept gifts and hospitality that have a value of up to £50.00 maximum value set by the trust. 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, Board of Trustees and staff must consult the Chief Finance Officer or Headteacher.

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

Any gifts or hospitality offered with a value of over £50.00 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the Chief Finance Officer or Headteacher before accepting.

If the Headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the board of trustees and record the offer on the gifts and hospitality register.

The Headteacher receives invitations each year to a small number of long-standing, school-related events. These invitations form part of the school's established traditions and alumni engagement activities.

To ensure transparency while avoiding unnecessary annual administration, the following events are recognised as standard annual invitations. They are therefore pre-declared within this policy and do not require separate annual gift/hospitality declarations, provided that the nature and value of the hospitality offered remain broadly consistent year to year:

- The Heath Old Boys Annual Dinner
- The Old Crossleyan's Annual Reunion
- The Crossley Heath Rugby Development Fund Annual Dinner

If, in any year, the hospitality offered at these events is significantly increased in value or differs materially from past practice, the Headteacher must record the invitation in the Gift and Hospitality Register and seek approval in line with the usual procedure.

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 school, 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 at any time from the school budget.

Expense claims should be made to the staff member, and receipts must always be enclosed.

The Chief Finance Officer or Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £50 as set by the Board of Trustees.

Sponsorship and In-Kind Donations

The school periodically receives sponsorship and non-cash contributions from individuals, community partners, and organisations. These may include, but are not limited to: sponsored sports kit, banners, raffle prizes, refreshments, free transport or venue use, and other forms of in-kind support.

To ensure consistency and transparency, the following principles apply:

Definition

Sponsorship and in-kind contributions are considered gifts for the purposes of this policy where they provide a tangible benefit to the school, its pupils, or its activities.

- Where a reasonable approximate monetary value can be assigned (e.g. donated equipment, raffle prizes, refreshments, or services normally chargeable), the contribution should be recorded in the Gift and Hospitality Register.
- Where a donation has no clear cash value or is given as general goodwill (e.g. minor support, low value materials, or informal community assistance), staff should make a brief note in the register describing the nature of the contribution and marking the value as not applicable or nominal.
- All sponsorships and in-kind donations must be clearly for the benefit of the school and must not
 create or appear to create any obligation or conflict of interest. Any concerns should be referred to
 the Headteacher or appropriate senior leader for guidance.

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, Board of Governors or staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process

This list is not intended to be exhaustive.

7. Declining gifts and hospitality

Any member, board of trustee 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 the headteacher or Chief Finance Officer. The Headteacher or Chief Finance Officer 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 Chief Finance Officer.

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED /REJECTED	APPROVED BY