



Gifts and Hospitality Policy

The Diamond Learning Partnership Trust

Approved by:	Chief Executive Officer	Date: February 2026
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Contents

1. Aims	3
2. Legislation and Guidance	3
3. Definitions.....	3
4. Roles and Responsibilities	3
5. Acceptable Gifts and Hospitality	4
6. Unacceptable Gifts and Hospitality	5
7. Declining Gifts and Hospitality	5
8. Monitoring Arrangements	6
9. Links with Other Policies	6
Appendix 1	7

1. Aims

This policy aims to ensure that:

- The Diamond Learning Partnership Trust funds are used only in accordance with the law, its articles of association, its funding agreement and the latest DLPT 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 Academy Trust guidelines and the DLPT Staff 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 judgement or integrity. This should include members, trustees, staff and/or any other representative of the trust. The handbook also states that the trust should ensure that all staff are aware of this policy.

This policy also complies with our 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
- Any hospitality other than of a nominal value (up to £20) or facilities provided during the normal course of business should be reported for an entry in the Register of Gifts and Hospitality held by the Chief Executive Officer's PA
- Where purchased items include a "free gift", such gifts should be either used for Academy business or handed to the Academy to be used at charity raffles etc.
- In relation to conventional hospitality (lunches, outings, tickets for events etc.) provided that it is normal and reasonable in the circumstances they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision

- Employees are permitted to accept gifts, rewards or benefits from members of the public or organisations the Academy has official contacts with only where they are isolated gifts of a trivial character (such as diaries or calendars). Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision.

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 Headteacher

The Headteacher is responsible for ensuring that all 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 Finance Manager, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £20 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 Finance Manager

The Finance Manager will ensure that:

- The trust maintains a gifts and hospitality register which currently sits with the PA to the Chief Executive Officer
- 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 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 £25 are in line with this policy.

4.5 Register of Gifts, Benefits and Hospitality

The register shows gifts, benefits and hospitality, including their value that have been accepted or given by DLPT employees or trustees during the financial year identified. The PA to the CEO is responsible for maintaining the gifts and hospitality register. The register is updated whenever a notification is received.

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 £20. 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 Finance Manager 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 the Finance Manager or Headteacher.

Any gifts or hospitality offered with a value of over £20 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 Finance Manager or Headteacher before accepting.

If the Headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the Chief Executive Officer 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 £20 per head should be used as a guideline.

Alcohol must not be purchased out of the school and/or trust budget.

Expense claims should be made via the Edupay app and receipts must always be enclosed.

The Finance Manager or Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £25.

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 member, trustee or staff member who is offered any of the unacceptable gifts or hospitality, including those 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 Finance Manager. The Headteacher or Finance Manager 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 or refer unacceptable gifts to the Headteacher or Finance Manager.

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.

In some cases, the giving or receiving of unacceptable gifts or hospitality may be an act of fraud. If there is reason to believe that fraud has been committed by any member, trustee or staff, this will be dealt with in accordance with the trust's fraud policy and disciplinary policy.

8. Monitoring Arrangements

The gifts and hospitality register is monitored regularly by the PA to Chief Executive Officer.

This policy will be reviewed annually by the Trust HR & ICT Manager and approved by the Chief Executive Officer.

9. Links with Other Policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Fraud policy and response plan
- Teachers' appraisal
- Staff grievance procedures
- Staff disciplinary procedures
- Staff equality policies

Appendix 1

Register of Gifts, benefits and Hospitality (with value of £20+)

Receipt of gifts, benefits and hospitality by DLPT employees / trustees			
Date of Receipt	Description	Reason for acceptance	Person / organisation offering gift or hospitality