



FRAYS

Academy Trust

Frays Academy Trust Gifts and Hospitality Policy

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LBBS Frays Academy Trust is a charitable company limited by guarantee and registered in England and Wales with company number 08335073

Approval

Signed by Chair of Directors	
Date of Approval/Adoption	October 2025
Date of Review	October 2028

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This policy will be subject to ongoing review and may be amended prior to the scheduled date of the next review in order to reflect changes in legislation, statutory guidance, or best practice (where appropriate).

To enable continuous improvement, all readers are encouraged to notify the author of errors, omissions and any other form of feedback.

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1 Aims

This policy aims to ensure that:

- Frays Academy Trust's funds are used only in accordance with the law, our articles of association, funding agreement and the [Academy Trust Handbook](#);
- Frays Academy Trust and those associated with it operate in a way that commands broad public support;
- Frays Academy Trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds. All Trust funds are used solely for the educational benefits of our pupils;
- Directors fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors;
- Members, Directors, Governors 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 be seen to compromise the personal judgement or integrity of Members, Directors, Governors, staff and/or any other representative of an academy trust. The handbook states that the Trust should ensure that all staff are aware of this policy.

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 All Staff, Members, Directors and Governors

- 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 Frays with a value of over £50 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined **and**:
 - School staff and Governors **must** consult the Headteacher before accepting any hospitality with a value of over £50;
 - Headteachers, Directors, Members and Frays central team staff **must** consult with the Chief Operating Officer before accepting any hospitality with a value of over £50;
- No member of staff may offer any gifts or hospitality without first gaining explicit approval, in writing, from the Headteacher or Chief Operating Officer;
- Must adhere to this policy and for staff failing to do so could result in disciplinary action.
- Where a Governor is also a Director or Member, declarations of gifts/hospitality will be held on the Frays Academy Trust register.

4.2 The Board of Directors

Directors will ensure that the Frays Academy 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. The Board of Directors will approve the Gifts and Hospitality Policy.

4.3 Chief Operating Officer (COO) and Headteachers

The Headteacher (for school staff) and Chief Operating Officer (for Frays central team staff) are responsible for ensuring that all are aware of and understand this policy, and that it is being implemented consistently.

The Headteacher and COO 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, the Trust, and to those outside the organisation.

They will also ensure, alongside the Chief Finance Officer, that decisions on whether individuals or Frays can accept gifts or offer gifts or offers or hospitality with a value of over £50 are in line with this policy.

The Headteacher will ensure the school maintains a gifts and hospitality register for all gifts and hospitality relating to staff and Governors for their school.

The Chief Operating Officer will ensure there is a Frays Academy Trust gifts and hospitality register for all Members, Directors and central team staff.

4.4 Chief Finance Officer (CFO)

The Chief Finance Officer will ensure that:

- 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;
- Directors are provided with information on gifts and hospitality received and given, as appropriate;

They will also ensure, alongside the Chief Operating Officer and Headteachers, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of £50 are in line with this policy.

4.5 Parents

Individual schools will offer guidance to parents on the acceptance of gifts or hospitality.

- The Trust does not wish to discourage all gift-giving, and small tokens of gratitude are always appreciated;
- Schools will provide guidance on the appropriate value of gifts and circumstances when they may be offered, or explain that the Trust prevents teachers and other staff from accepting gifts worth over a certain amount;
- Schools may decide to ask parents to donate to the local Parent/Teachers Association instead of gifts at Christmas for staff.

5 Acceptable gifts and hospitality

5.1 Offers of gifts and hospitality received

Members, Directors, Governors 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, staff and Governors will consult their Headteacher. Directors, Members and Frays central team staff will consult the Chief Operating Officer.

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

Any gifts or hospitality received with a value of over £50 must be recorded on the gifts and hospitality register within 7 working days, even if declined or returned.

If a member of staff, Member, Director or Governor 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, it is their responsibility to discuss this with the COO.

Where purchased items include a 'free gift', such gifts should be either used for Trust business or handed to the Trust to be used at charity raffles etc. Where a gift is received on behalf of the school, the gift remains the property of the school.

Members, Directors, Governors or staff may be required to attend residential events or training courses. Where refreshments are not included in the cost of the event/course, reasonable expenses will be reimbursed, however alcohol will not be reimbursed. The anticipated cost should be discussed and approved by the Headteacher (staff and Governors) or Chief Operating Officer (Members, Directors and Frays central team staff) in advance.

If the Headteacher, the Chief Operating Officer, the Chief Finance Officer or the CEO is the recipient, or intended recipient, of **any** offer, regardless of value, of gifts or hospitality, they must inform the Chair of the Board of Directors and record the offer on the gifts and hospitality register held centrally.

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 Offers of gifts and hospitality given

It would be very unusual to use school or Frays funds to buy gifts. If the school is considering using school funds for a gift they should consult with the Chief Operating Officer in advance, and a joint decision would be made about the appropriateness of a gift. Any gift purchased will be recorded on the relevant gifts and hospitality register.

Occasionally, it may be appropriate to offer refreshments (other than tea/coffee) to Directors, Governors, members of staff or visitors; approval from the Headteacher (for staff and Governors) or Chief Operating Officer (for Members, Directors, and Frays central team staff) must be obtained in advance. Examples include:

- An all-day meeting for Directors and Governors;
- Staff working in the evening when Ofsted have called to say there is an Inspection the following day.

Any gifts or hospitality provided by the school or Frays, such as a working lunch for visitors, must not be extravagant. A maximum value of £5 per head should be used as a guideline for refreshments which include food.

Alcohol must not be purchased out of the school or Frays budget.

Expense claims should be made to the relevant finance officer, and receipts must always be enclosed.

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, Directors, 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;
- 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, Director, Governor 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 the Chief Operating Officer. The Headteacher or Chief Operating Officer may decline the offer or donate the gift or hospitality to a worthy cause and must also record the offer on the appropriate gifts and hospitality register.

Disciplinary action may 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 Personal interests

Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with the duty owed to the Trust in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff must supply details of such transactions for entry into the Register of Business Interests. Further information is available in the Code of Conduct.

9 Monitoring arrangements

The gifts and hospitality register is monitored regularly by the Chief Finance Officer and Chief Operating Officer. This policy will be reviewed every three years by and approved by the Board of Directors.

10 Links with other policies

This Gifts and Hospitality Policy is linked to the:

- Code of Conduct
- Disciplinary Policy
- Finance Policy and associated guidance for claiming expenses

Appendix 1 – Declaration of Gifts and Hospitality received

Declaration Form

I wish to declare the following information in accordance with Frays Academy Trust's requirements that a Register of Gifts and Hospitality should be maintained.

Name:

Role:

School (where applicable):

Signature:

Date:

You should provide full details of your declaration below:

Date	From whom	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted/rejected	Approved by

This information will be added to the gifts and hospitality register.

Appendix 2 – Declaration of Gifts and Hospitality offered

Declaration Form

I wish to declare the following information in accordance with Frays Academy Trust's requirements that a Register of Gifts and Hospitality should be maintained.

Name:

Role:

School (where applicable):

Signature:

Date:

You should provide full details below:

Date	Description of gift/hospitality and approximate value	Party offered gift/hospitality	Reason for the offer	Approved by

This information will be added to the gifts and hospitality register.