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# Gifts and Hospitality Policy

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This policy has been adopted by the Board of Directors of Pathfinder Multi Academy Trust and is applicable across all schools that make up the Trust. In line with the MAT's Scheme of Delegation, this Policy must be duly applied by each Local Governing Committee and the Headteacher of each school that is part of Pathfinder Multi Academy Trust.

Where there are specific details or any discretions in the policy that apply to an individual school or Local Governing Committee this has been made clear within the wording of the policy.

This policy will be reviewed formally by the MAT Board of Directors in line with the agreed timetable for policy review or sooner as events or legislation changes require.

Date Adopted: **April 2019**

Date for Review: **April 2021**

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This policy seeks to protect staff from suspicion of dishonesty and ensure that they are free from any conflict of interest with respect to the acceptance or provision of gifts, hospitality, or any other inducement from or to suppliers of goods or services to the Trust and each of its academies.

As a general guideline, business gifts and hospitality should not be accepted by any member of staff.

Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.

This policy is available to view on the Pathfinder website.

This policy has been agreed by Directors and is reviewed every two years by the MAT Finance and Resources Committee.

Signed: \_\_\_\_\_

(Chair of MAT Finance and Resources Committee)

Signed: \_\_\_\_\_

(Headteacher/Manager)

Date: \_\_\_\_\_

## 1 Introduction

- 1.1 The receipt of gifts or excessive hospitality can damage the Trust's reputation and possibly lead to prosecutions for corruption.
- 1.2 This policy seeks to protect staff from suspicion of dishonesty and ensure that they are free from any conflict of interest with respect to the acceptance or provision of gifts, hospitality, or any other inducement from or to suppliers of goods or services to the Trust and each of its academies.
- 1.3 As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below.
- 1.4 Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.

## 2 General principles

- 2.1 Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of Pathfinder Multi Academy Trust by:
  - 2.1.1 Maintaining an unimpeachable standard of honesty and integrity in all their business relationships;
  - 2.1.2 Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper;
  - 2.1.3 At all times in their business relationships acting to maintain the interests and good reputation of Pathfinder Multi Academy Trust;
- 2.2 Any employee who becomes aware of a breach of policy must either report this immediately to his or her manager who will instigate investigations as necessary, or refer to the Whistleblowing Policy.

## 3 Register of Business Interests

- 3.1 The Trust board and local governing committee of each academy are required to keep a register of business interests. The register must list for each member of the Trust, governing body, the Headteacher and any member of academy staff involved in purchasing decisions any business interests they or any member of their immediate family have.
- 3.2 Anybody with a business interest should not participate in discussions relating to those interests.
- 3.3 The Register of Business Interests should be used to identify any business, commercial or financial interests they have which might give rise to a potential conflict of interest. For example: that they, or a close friend, or relative, are an owner, director, or employee of a supplier to the academy.
- 3.4 Potential conflicts of interest might conceivably extend to other situations; such as if a relationship existed between two people where one could influence the appointment, advancement, or pay of another.
- 3.5 Essentially all staff should consider whether they have any interests (or relationships) which could in some circumstances lead to suggestions that their objectivity and

integrity is compromised, and record these confidentially for consideration by the Headteacher and Governors.

- 3.6 Register of business interest forms can be obtained from the PA to the Head of the Trust and will be retained by the Clerk to Governors.

## 4 Register of Gifts

- 4.1 In the interests of transparency, a Register of Gifts and Hospitality is to be established and kept in the Finance Office.
- 4.2 Any member of staff who accepts an offer of a gift or hospitality over the value of £30 must ensure this is recorded in this register using the form attached.
- 4.3 The following should be specified:
- 4.3.1 nature of gift/hospitality: in the case of a gift, it should be specified whether it is a personal gift for the recipient or a related party, such as a partner, or a corporate gift accepted by the recipient on behalf of the Trust or academy;
- 4.3.2 value of gift/hospitality: if the exact cost is not known, an estimate should be provided;
- 4.3.3 name of firm / individual concerned;
- 4.3.4 date gift/hospitality accepted;
- 4.3.5 name of member(s) of staff involved.

## 5 Principles

- 5.1 The Trust expects staff, directors and governors to exercise the utmost discretion in giving and accepting gifts and hospitality when on academy business. Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with the Trust or one of its academies.
- 5.2 Staff must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that the Trust might be placed under an obligation.
- 5.3 Staff must not make use of their official position to further their private interests or those of others.

## 6 Gifts and Hospitality

- 6.1 Gifts of low intrinsic value such as promotional calendars or diaries, or small tokens of gratitude, can be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, staff should decline the gift or refer the matter to their Line Manager or central Finance/HR.
- 6.2 Where approval is granted, any gift or hospitality received with an equivalent value of £30 or over must be recorded in the Register of Gifts and Hospitality.
- 6.3 Where purchased items include a 'free gift' such gifts should be either used for Academy business or handed to the Schools Head Teacher, or central Finance/HR to be used at a charity raffle etc.
- 6.4 In cases where a staff member receives a gift on behalf of the Trust, the gift remains the property of the Trust. The gift may be required for departmental display or it may,

with the Line Manager's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the Department on or before the recipient's last working day.

- 6.5 Modest hospitality, provided it is reasonable in the circumstances, for example, lunches in the course of working visits, may be acceptable, though it should be similar to the scale of hospitality which Pathfinder Multi Academy Trust as an employer would be likely to offer.
- 6.6 Staff attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants is not normally acceptable. Where it is considered that there is a benefit to Pathfinder Multi Academy Trust in a member of staff attending a sponsored event, the attendance should be formally approved by the Head, in conjunction with HR.
- 6.7 Business gifts, which include hospitality, may be provided by the Trust in connection with third party entertaining but should be regarded as the exception rather than the rule. Gifts and hospitality must not exceed £50 in a year for any one recipient, and must not be provided in expectation of material benefit to the Trust or one of its academies.
- 6.8 For information relating to Trust purchase of hospitality, gifts or rewards please refer to the Expenses policy.

## 7 Gifts to and from Students

- 7.1 In the interests of Safeguarding Children, and to prevent staff from being open to accusation of exerting undue influence, no member of staff is permitted to give a gift to a student. The only exception to this would be where members of staff wish to give all students in a class a token gift of low value e.g. at Christmas.
- 7.2 If a gift is received from a student or the parents' of a student and the value is £15 or over, this gift is to be registered in the Register of Gifts and Hospitality

## Declaration of Offer/Receipt of a Gift or Hospitality

In accordance with the Gifts and Hospitality Policy, I wish to make the following declaration:-

### 1 OFFER OF GIFT/HOSPITALITY OFFERED OR RECEIVED

Nature of Gift/Hospitality and Reason for Offer	By Whom Gift Was Offered	Approximate Value	Date of Offer