Gifts and Hospitality Policy

This policy has been adopted by 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 in 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 in line with the agreed timetable for policy review or sooner as events or legislation changes require.

Date Adopted: **October 2026**

Date for Review: **October 2028**

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2026-28 changes to this policy:

- Section 1.1 added to include the Trust actively discourages receipt of gifts and reordered existing points further down in sequential order.
- Section 2.1 added a general principle that gifts should not be accepted.

2024-26 changes to this policy:

- Section 4.1 - Amended to include reference to the Gifts and Hospitality Declaration Form.
- Section 4.2 - Expanded to include the different thresholds for registering gifts and hospitality from either a single benefactor (£30 and above) or a collective of benefactors (£60 and above).
- Section 6.2 - Expanded to include the same as above.
- Section 6.7 - Business gifts and hospitality value changed to £150.
- Section 7.2 - Expanded to include the different thresholds for registering gifts and hospitality from either a single student or parent (£30 and above) or a collective of students and parents (£60 and above).

1 Introduction

1.1 As a general principle the Trust discourages employees from giving or receiving gifts or hospitality in connection with their employment.

1.2 The receipt of gifts or excessive hospitality can damage the Trust's reputation and possibly lead to prosecutions for corruption.

1.3 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 schools.

1.4 As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below.

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

2 General principles

2.1 As a general principle, gifts should not be accepted. 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:

- Maintaining an unimpeachable standard of honesty and integrity in all their business relationships;
- Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper;
- At all times in their business relationships acting to maintain the interests and good reputation of Pathfinder Multi Academy Trust and its schools;
- Any employee who becomes aware of a breach of policy must either report this immediately to their line 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 school are required to keep a register of business interests. The register must list for each member of the Trust, Local Governing Committee, the Headteacher and any member of 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 Trust or one of its schools.

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 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 Trust's Governance Advisor.

4 Register of Gifts

4.1 In the interests of transparency, a Register of Gifts and Hospitality is to be established and held by the Trust's Finance Team via submissions made using the Gifts and Hospitality Declaration Form.

4.2 Any member of staff who accepts an offer of a gift or hospitality over the value of £30 from a single benefactor or £60 from a collective of benefactors (i.e. multiple parents arranging a collection for a gift) must ensure this is recorded in this register using the Gifts and Hospitality Declaration Form.

4.3 The following should be specified:

- 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;
- value of gift/hospitality: if the exact cost is not known, an estimate should be provided;
- name of firm / individual concerned;
- date gift/hospitality accepted;
- 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 Trust or school 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 schools.

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 the Trust's Finance Team.

6.2 Where approval is granted, any gift or hospitality received with an equivalent value or in excess of £30 from a single benefactor or £60 from a collective of benefactors or over must be recorded in this register using the Gifts and Hospitality Declaration Form.

6.3 Where purchased items include a ‘free gift’ such gifts should be either used for Trust or school business or handed to the Headteacher, or the Trust’s Finance Team 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 Trust or school 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 Headteacher, in conjunction with the Trust’s Executive Team.

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 £150 in a year for any one recipient, and must not be provided in expectation of material benefit to the Trust or one of its schools.

6.8 For information relating to the Trust’s 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 £30 or over, this gift is to be registered using the Gifts and Hospitality Declaration Form. If a gift is received as a collective from either students or parents of a student and is over £60, this gift is to be registered using the Gifts and Hospitality Declaration Form.

Declaration of Offer/Receipt of a Gift or Hospitality

In accordance with the Gifts and Hospitality Policy, staff must make any declarations using the Gifts and Hospitality Declaration Form.