



THE PATHWAY ACADEMY TRUST

Registered address: c/o Culverstone Green Primary School,
Wrotham Road, Meopham, Kent DA13 0RF

Registered Company N° 9782388

ACCEPTANCE OF GIFTS AND HOSPITALITY POLICY

Author	Trust Business Manager
Approved by	Finance & Accounting Committee
Version	1.0

Introduction

The Pathway Academy Trust aims to provide the highest standard of service to all of its pupils and to care for the wellbeing of its employees. In return pupils, staff and the public are entitled to expect the highest standards of conduct from all of The Pathway Academy Trust's leaders and employees.

Inevitably some issues will affect senior post holders more than others and some breaches of the policy may be regarded more seriously for those in such positions. This policy should be read in conjunction with the Trust's internal Finance Policy and Procedures Manual and the Anti-Fraud, Corruption and Bribery Policy.

The principle of integrity requires that Members, Directors, Local Governors and staff should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted must be declared and recorded.

Aims

This policy aims to ensure that:

- The Trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academies Financial Handbook
- The Trust and those associated with it operate in a way that commands broad public support
- Those associated with the Trust can meet the aims and core values of The Pathway Academy Trust
- The Trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds
- Officers fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors
- Members, Directors, Local 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
- Individuals are protected from misunderstanding or criticism

Legislation and Guidance

This policy is based on the Academies Financial 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, staff and/or any other representative of the Trust. This policy also complies with our Funding Agreement and Articles of Association.

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.

End of term gifts given to Staff by individual Parents or Pupils as a show of appreciation for teaching and/or support during the academic year of less than £50, are exempt from this policy providing that there is no expectation for preferential treatment for that Parent or Pupil in future years. Individual gifts over £50, or a collective gift of more than £50 per person, must be declared.

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.

Roles and Responsibilities

Members, Directors, Local Governors and all 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 under any circumstances
- Must inform their School Business Manager / responsible Admin Officer of any gifts or hospitality offered to them or the Trust with a value of over £50 within seven working days, even if declined, so that this can be recorded on the Schools's Gifts and Hospitality Register
- Must consult the Trust Business Manager (for central Trust functions) or the Head Teacher (for school staff) before accepting or offering any gifts or hospitality with a value of over £50 (or £50 per head if appropriate)

The Trust Board:

- 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

The Head Teachers:

- Are responsible for ensuring that staff are aware of and understand this policy and that it is being implemented consistently
- 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

The Trust Business Manager 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 Academies Financial Handbook
- The Trust Board and Head Teachers are provided with information on gifts and hospitality received and given, as appropriate
- Decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50 are in line with this policy

Acceptable gifts and hospitality

Offers of gifts and hospitality received

Members, Directors, Local 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 in the Trust or School's Gifts and Hospitality Register. Generally, gifts of such nominal value, such as small tokens of appreciation, or combined class gifts where the value for each participating pupil does not exceed £50 (for example, for a class teacher at Christmas or the end of the school year) or free promotional pens, calendars, diaries and similar items may be accepted.

Similarly, hospitality such as modest working lunches and light refreshments may be accepted without making any declaration in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. Other hospitality may be accepted – for example, where:

- There is a genuine need to impart information or represent The Pathway Academy Trust in the community
- An event is clearly part of the life of the community or where The Pathway Academy Trust should be seen to be represented
- The hospitality concerns attendance at a relevant meeting, conference or course where it is clear the hospitality is corporate rather than personal

You should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. As a general rule, you should not accept hospitality that The Pathway Academy Trust would not reciprocate in similar circumstances.

If in any doubt, Members, Directors, Local Governors and Staff must consult their Head Teacher or the Trust Business Manager.

Any gifts or hospitality received with a value of over £50 must be recorded in the Trust or School's Gifts and Hospitality Register within seven working days, even if declined. Any Member, Director, Local Governor or member of Staff who is offered such gifts or hospitality must consult their Head Teacher or the Trust Business Manager before accepting.

If a Head Teacher, the Trust Business Manager, the Chief Executive Officer or the Director of Education is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the Chair of the Trust Board and ensure that the offer is recorded on the Trust's Gifts and Hospitality Register.

Offers of gifts and hospitality given

Any gifts or hospitality provided by or on behalf of The Pathway Academy Trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £50 per head should be used as a guideline.

The timing of hospitality in relation to procurement or purchasing decisions that The Pathway Academy Trust may be taking is especially sensitive.

Alcohol must not be purchased out of school or central fund budgets.

The Trust Business Manager or Head Teacher (in respect of school staff) must be consulted about any proposal to provide gifts or hospitality with a value of over £50. Only in exceptional circumstances may retrospective approval be obtained.

Sponsorship

Where an outside organisation is seeking to sponsor an activity of The Pathway Academy Trust, whether by invitation, tender or negotiation, or voluntarily, the basic conventions outlined above concerning the award of contracts and acceptance of gifts or hospitality apply.

Other Benefits

These conventions apply to any other benefits presented to any officer or employee of The Pathway Academy Trust.

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, Local Governors and 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 (above the value of £50), even if they relate to activities the recipient undertakes in their own time

This list is not intended to be exhaustive.

Declining Gifts and Hospitality

Any Members, Directors, Local Governors or Staff members who are offered any of the unacceptable gifts or hospitality outlined above should politely but firmly decline the offer, and draw the attention of the person making the offer to the existence of this policy. If necessary, you should pay your share of any costs, and claim these in the ordinary way.

If the individual feels it would not be appropriate for them to decline, they should refer the matter to their Head Teacher or the Trust Business Manager as appropriate. The Head Teacher or Trust Business Manager may decline the offer, or donate the gift or hospitality to a worthy cause, and must also record the offer on the Trust or School's 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 Trust or school's Gifts and Hospitality Register, in line with this policy, will be dealt with as a staff disciplinary matter.

Expense Claims

Claims for reimbursement of expenses should be made on the relevant Expense Claim Form and submitted to their School Business Manager / Finance Officer or the Trust Business Manager if appropriate, for authorisation. Receipts must be attached to the claim form. Schools and the Trust reserve the right not to reimburse expenses claims that are not supported by a valid receipt.

