Pathway Trust

Gifts and Hospitality Policy

Policy effective from	1 September 2026
Policy owner	Director of People
Policy applies to	Berrow Church Primary School Burnham-on-Sea Infant School Castle Batch Primary School Charfield Primary School Cherry Garden Primary School Downend School East Huntspill Primary School Lyde Green Primary School Mangotsfield School Marlwood School Pawlett Primary School Priory Community School Severn Beach Primary School St Andrew's Church Junior School St Anne's Church Primary School The Castle School The King Alfred School Tortworth Primary School West Huntspill Primary School Worle Community School Pathway Partnership Teams
Policy changes since last version	New policy

1. Introduction and purpose

1.1 The Pathway Trust staff and volunteers should act with integrity and be seen to do so. They should avoid situations where the offer and or acceptance of gifts and hospitality might cast doubt on the motivation of those involved, potentially bringing the organisation into disrepute.

2. Scope

2.1 This policy applies to all those employed by or working with the trust including employees, agency workers, self-employed workers, members, trustees, community councillors, contractors, trainees, secondees and visitors.

3. Legislation and regulation

3.1 This policy takes into consideration the requirements under the UK Bribery Act 2010, and the Ministry of Justice guidance.

4. Roles and responsibilities

4.1 The Chief Executive is responsible for ensuring that staff and others adhere to this policy and that declarations are appropriately assessed, and any associated risks are mitigated accordingly.

4.2 The Headteachers/Directors are responsible for ensuring that all staff and volunteers are aware of this policy and procedure. They will also ensure that this policy is implemented fairly and consistently.

4.3 All staff and volunteers must adhere to this policy. If individuals are unsure, they should err on the side of caution and seek advice prior to accepting gifts or hospitality, via their line manager or the Headteacher/Director in the first instance.

4.4 Anyone working with or for the trust, can use the Whistleblowing Policy, should they wish to report a breach of this policy.

5. Aims

This policy aims to ensure that:

5.1 Trust funds are used only in accordance with the law, its articles of association, its funding agreement and the latest trust handbook requirements.

5.2 The trust and those associated with it operate in a way that aligns with the Principles of Public Life, ensuring we serve our communities effectively and appropriately.

5.3 The trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds.

5.4 Trustees fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors.

5.5 People working for and with the trust are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with gifts and/or hospitality.

6. Definitions

6.1 **Gifts** are any items, cash, awards, prizes, goods or services, offered or loaned 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.

6.2 **Hospitality** is defined as food, drink, goods, concessions, 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.

6.3 **Inexpensive** means a lower value item such as a calendar, pen, chocolates or small promotional items, valued at less than around £50.

6.4 **Expensive** means a higher value item such as a hamper or event ticket valued at more than around £50.

7. Expectations

Accepting Gifts or Hospitality

7.1 Gifts of an inexpensive nature may be accepted, but more expensive offerings should be declined.

7.2 Hospitality can be accepted where there it is related to the role of a member of staff and there is a genuine need for the development of legitimate and ethically sound business relationships. Examples of this kind of hospitality include the offer of refreshments at meetings or the offer of lunch or dinner during or at the end of an official engagement.

7.3 Staff may also be offered other forms of hospitality which are not related to their role and are not linked to trust/school business. This might include expensive offers of social functions, travel or accommodation, offers of tickets and invitations to sporting, cultural or social events. These forms of hospitality should always be declined.

7.4 Staff should not accept gifts or hospitality from any organisation or individual with whom they have contact in the course of their work as an inducement either for doing something or not doing something in their official capacity. Particular care should be taken about any gift from a person or organisation which has, or is hoping to have, a contract with the trust.

7.5 Staff should not accept gifts or hospitality offered to family members, partners or close friends.

7.6 Staff must never canvas or seek gifts or hospitality.

7.7 Unsolicited gifts of an expensive nature should be returned with a polite explanation that the trust's policies do not allow their acceptance. If staff feel it would not be appropriate for them to decline, they should refer the matter to the Headteacher/Director, who may decline the offer, donate the gift or hospitality to a worthy cause, or advise whether this can be accepted in exceptional circumstances, ensuring this is recorded on the gifts and hospitality register.

7.8 Staff can accept inexpensive gifts from individual parents, but expensive gifts from parents should be declined. Where parents have contributed to a more expensive collective gift for a member of staff, this can be accepted provided the value of the individual contribution does not exceed £50. These must be recorded in a gifts and hospitality register.

7.9 Offers of gifts or hospitality exceeding £50 in value whether accepted or not must be reported to the Headteacher/Director and will be recorded in a gifts and hospitality register.

7.10 If any member of staff is in doubt about whether it is appropriate to accept any offer of hospitality, the advice of the Headteacher/Director should be sought.

<u>Providing Gifts or Hospitality</u>

7.11 The Trust encourages and seeks cooperative relationships with stakeholders and external organisations. Accordingly, there may be occasions where it is appropriate for the Trust to provide and fund limited gifts or hospitality. Likewise, it may be appropriate for gifts to be provided to staff (e.g. long service awards; recognition and thanks).

7.12 Any gifts or hospitality provided by the Trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £25 per head should be used as a guideline. The purchase of alcohol is expressly prohibited within the DfE Academy Trust Handbook.

7.13 Expense claims should be made to the Finance Team and receipts must always be enclosed.

7.14 The Chief Executive must be consulted in advance about any proposal to provide gifts or hospitality with a value of over £25.

8. Monitoring

8.1 Offers of gifts or hospitality exceeding £50 in value must be reported to the Headteachers/Directors and will be recorded in a gifts and hospitality register.

8.2 Figures for transactions relating to gifts made by the trust are disclosed in the trust's audited accounts (where required), in accordance with the Trust Handbook

8.3 Effectiveness and compliance of this policy will be monitored by the Risk and Audit Committee annually.

9. **Review**

9.1. This policy is reviewed every year by the trust. We will monitor the application and outcomes of this policy to ensure it is working effectively.

Pathway Trust Gifts and Hospitality Register

School:

DATE	DONOR	RECIPIENT NAME/ ROLE	DESCRIPTION OF GIFT/ HOSPITALITY	ESTIMATED VALUE	COMMENT	ACCEPTED Y/N	DECISION DATE / INITIALS (Headteacher or CEO)