

## Appendix Six

### South York MAT Gifts and Hospitality Policy

This outlines the Trust's policy with regard to the receipt of gifts and hospitality by its staff from any third parties arising from duties undertaken on behalf of the Trust or its Schools.

The Trust is committed to ensuring that the governance of the Trust is conducted in accordance with the highest standards of integrity, probity and openness.

The Trust encourages and expects staff and trustees to use their networks and contacts for its benefit. It is however a fundamental requirement, that they must not derive any financial benefits, beyond their agreed salary, from decisions they make or contribute to.

Financial gain from decisions involving the education of pupils or the spending of significant sums from the Trust budget would be considered to be gross misconduct. Therefore staff and trustees shall not use their authority or office for personal gain and will demonstrate that all financial decisions have due regard to propriety and regularity.

#### 1. General Rules

Academy staff must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity. Staff are asked to immediately report any offer or receipt of such gifts to the Trust CFO to be recorded in the Register of Gifts and Hospitality. If there is any uncertainty the Trust CFO should be contacted so that a decision can be made to safeguard the interests of all parties.

Any employee who becomes aware of a breach of Policy must refer to the Code of Conduct Policy and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.

For transparency, any personal interest that may impact, or be seen to impact, on an employee's or trustee's impartiality, or conflict with the duty owed to the Trust in any matter relevant to an employee's or trustee's duties shall be declared in writing.

Governors and staff may accept the following gifts/ hospitality without the need to seek the approval of the Academy or formally register receipt:

- Free hospitality at business lunches/dinners or attendance in an official capacity at a public function;
- Incidental promotional gifts such as calendars, diaries or pens;
- Receipt of small items from students, students' families, members of the public, suppliers or contractors as expressions of gratitude such as boxes of chocolate or individual bottles of drink (at a value of less than £40)
- NB: Care must always be taken to ensure that whenever such gifts/hospitality are accepted no obligation to the person or organisation in question is accepted. In cases of doubt members should consult the Trust CFO.

The following examples of gifts/hospitality require approval and to be formally recorded by the Trust CFO in the Register of Gifts and Hospitality:

- Attendance as a non-paying guest of a commercial organisation or individual at a non-work related cultural or sporting event (at a value of more than £40)
- Promotional gifts worth in excess of £40

- Gifts should not be accepted if they appear to be disproportionately generous, or could be viewed as an inducement to influence a decision or action, whether business, educational or otherwise.
- If not accepting a gift would be regarded as causing offence (such as a sudden and unexpected gift or one where refusal could cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Trust CFO as soon as possible, who may decide to return the gift, or may donate it to the Academy raffle/fair or a charitable cause.
- Other offers of gifts/ hospitality not falling into any of the above categories.

## **2. Giving of gifts and Hospitality**

It is not expected that the MAT will give gifts to third parties other than potentially the provision of refreshments at meetings. If the MAT does propose to give other gifts then this will only be done in exceptional circumstances and be at the discretion of the CEO and have prior approval.

## **3. Unacceptable Gifts/Hospitality**

The following are examples of offers of gifts/hospitality which should be refused by staff:

- Gifts of money (excluding donations to the Academy)
- Free membership or subscriptions (e.g. sports clubs)
- Foreign travel unless as a specific element of a business, academic or research activity approved by the Academy
- Free goods, services or equipment which are normally provided by a supplier to the Academy at a charge

Any offers of gifts and hospitality falling into any of the above categories should be reported immediately to the Trust CFO.

## **4. Role of the Trust CFO in relation to the Gifts and Hospitality Policy**

- Responsible for ensuring that any offer or receipt of gifts, hospitality or donations to staff is recorded in the Academy's Register of Gifts and Hospitality.
- Reporting any possible conflict of interests arising from the offer or receipt of gifts and or hospitality.

## **5. Role of the School Heads in relation to the Gifts and Hospitality Policy**

- Responsible for ensuring that any offer or receipt of gifts, hospitality or donations to staff is reported to the Trust CFO.

**Gifts Register**

Date	School	Person receiving gift	Description of Gift	Value of Gift	Decision taken by CFO/CEO	Decision of Trust Board