



GIFTS & HOSPITALITY POLICY

March 2021-2023

Passmores Co-operative Learning Community

PCLC Gifts and Hospitality Policy

1. Introduction

- a. The intention of the Policy is to ensure that the Passmores Co-operative Learning Community (PCLC) can demonstrate that no undue or improper influence has been applied, or could be perceived to have been applied, by any supplier or anyone else dealing with the PCLC. The PCLC must be able to show that all decisions made have due regard to propriety and regularity, whether educational, financial or otherwise. It must also evidence that decisions are reached on the basis of the proper application of laid-down procedures and for no other reason.
- b. As a general guideline, gifts, hospitality or other personal benefits (hereinafter referred to as "Gifts") should not be accepted or offered by any member of staff, trustee or local governor, except as provided for below.
- c. Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

2. The receipt of gifts

- a. The PCLC encourages and expects staff, trustees, and local governors to use their networks and contacts for its benefit. It is however a fundamental requirement on all staff, trustees, and local governors, that they must not derive any financial benefits, beyond their agreed salary, from decision they make or contribute to. Financial gain from decisions involving the education of pupils or the spending of significant sums from the PCLC's budget would be considered to be gross misconduct. Therefore staff, trustees, and local governors shall not use their authority or office for personal gain, and will demonstrate that all financial decisions have due regard to propriety and regularity. This will be evidenced by ensuring that staff, trustees, and local governors of the PCLC:
 - i. maintain an unimpeachable standard of honesty and integrity in all their business and other relationships.
 - ii. comply with the letter and spirit of the law in contractual obligations, rejecting any business practice that might be deemed improper.
 - iii. at all times in their business and other relationships, act to maintain the interests and good reputation of the PCLC.
- b. Any employee who becomes aware of a breach of Policy must refer to the PCLC's Whistle Blowing Policy (contained in the PCLC Staff Code of Conduct policy) and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.
- c. For transparency, any personal interest that may impact, or be seen to impact, on an employee's or trustee/local governor's impartiality, or conflict with the duty owed to the PCLC in any matter relevant to an employee's or governor's duties shall be declared in writing. Any member of staff, trustee or local governor who is aware of any business dealings which could result in financial and/or personal gain for themselves, their relatives or associates must make an appropriate entry in the Register of Business Interests, this includes information on:

- i. Businesses of which they are partner or sole proprietor.
 - ii. Company directorships including conflicting business interests.
 - iii. Charity trusteeships.
 - iv. Membership of professional bodies, membership organisations, public bodies or special interest groups where they have a position of general control or management.
 - v. Details of all gifts or hospitality offered by external bodies whilst acting as a member of staff, trustee or local governor and whether this was declined or accepted in the last 12 months.
 - vi. Contracts offered by staff, trustees or local governors for the supply of goods and / or services to the trust/school.
 - vii. Company directorships or trusteeships of family members.
- d. Staff, trustees and local governors are permitted to accept gifts, rewards or benefits from students, students' families, members of the public, or organisations which the PCLC has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as chocolates, flowers, diaries or calendars). Therefore, 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 other.
- e. Where purchased items include a "free gift", such a gift should either be used for PCLC business or handed to the PCLC to be used at charity raffles, pupil prizes, etc.
- f. In relation to conventional hospitality (lunches, outings, tickets for events, etc), it may be accepted provided that it is normal and reasonable in the circumstances. However, invitations for the following should not be accepted where:
- i. there is no reasonable business justification for doing so.
 - ii. an invitation is disproportionately generous.
 - iii. the invitation could be seen as an inducement to influence a business or other decision.
- g. Any hospitality, other than of a nominal value (estimate of £50.00) or facilities provided during the normal course of business, should be reported to the principal/headteacher, chair of the Local Governing Body, or chair of the Finance and Audit Committee, as appropriate.

3. The providing of gifts

The PCLC encourages and seeks cooperative relationships between staff, trustees, local governors, stakeholders, and external organisations. Accordingly, there can be occasions where it is appropriate for the PCLC to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house.

It may be appropriate for leaving gifts to be provided to staff leaving the employment of the PCLC, particularly after a long period of service. Gifts for length of service are all paid for with private contributions that are held by the Trust in a ringfenced fund. Funds are collected directly from staff

salaries, however permission from each member of staff is required before the funds are taken. The limits for these gifts are:

1-4 - £50

5-9 – £100

10-14 - £150

15-19 - £200

20-24 - £250

Other such occasions can include long term get-well gifts, wellbeing gifts for staff, close family bereavement flowers or thank you gifts. Gifts are supplemented with private contributions from continuing members of staff. However, some gifts are paid out of revenue funding, for example flowers for external volunteers who come in to support a specific curriculum day. The PCLC trustees have set the following limits for providing single gifts:

Flowers £40

Vouchers £30

Chocolates £20

General Wellbeing Gifts £20

The purchasing of excessive or alcoholic gifts is regarded as irregular expenditure.

This policy was reviewed and approved by the PCLC Finance, Audit and Risk Committee on 11th March 2021. It will be reviewed at least every two years.