



GIFTS & HOSPITALITY POLICY

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1. Gift Register

1. Policy Statement

- 1.1 This Policy is subject to the published Equality Information, in line with the Equality Duty 2011 and is underpinned by the Christian beliefs and values of our Academy Trust.

2. Introduction

- 2.1 This policy sets out the procedure all Peterborough Diocese Education Trust (PDET) staff and Directors must follow when giving or receiving gifts and hospitality.
- 2.2 The policy should read alongside the Register of Business Interests Policy.

3. General principles

- 3.1 The intention of the policy is to ensure that PDET and each Academy can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with PDET and / or each Academy. PDET and each Academy should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this policy have been breached will be determined by reference to this provision.
- 3.2 It is each employee's responsibility to ensure that you are not placed in a position that risks, or appears to risk, compromising your role, PDET's or your Academy's public and statutory duties. You should not be seen to be securing valuable gifts and hospitality by virtue of your job.
- 3.3 You should not accept or provide any gift or hospitality if acceptance / provision will give the impression that you have been influenced / are deemed to be influencing while acting in an 'official capacity'.
- 3.4 The policy also applies to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the employee.
- 3.5 Any employee who becomes aware of a breach of policy must report this immediately to his or her manager who will instigate investigations as necessary. Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.
- 3.6 In exercising judgement as to whether to accept a gift or hospitality the question should be asked what public perception would be if the information was published given your role and circumstances. As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below.

4. Receiving gifts:

- 4.1 Employees are permitted to accept gifts, rewards or benefits from members of the public or organisations PDET and each Academy has official contacts with only where they are isolated gifts of a nominal value (up to £25.00).
- 4.2 Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to effect a business decision. Any gifts other than of a nominal value (up to £25.00) OR facilities provided during the normal course of business should be reported for an entry in the gift register.
- 4.3 Where purchased items include a 'free gift', such gifts should be either used for PDET and / or Academy business or handed to PDET and / or the Academy to be used at charity raffles etc.

5. Receiving hospitality

- 5.1 In relation to conventional hospitality (lunches, outings, tickets for events etc) provided that it is normal and reasonable in the circumstances they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.
- 5.2 Any hospitality other than of a nominal value (up to £25.00) or facilities provided during the nominal course of business should be reported for an entry in the Gift register.

6. Gifts and hospitality offered by PDET and PDET Academies

- 6.1 PDET staff must be mindful that the value of all gifts and hospitality offered by PDET and PDET Academies are sourced from public funding, and the expectation is that such funding will be used for legitimate purposes and demonstrate value for money.
- 6.2 In exceptional circumstances it may be appropriate for PDET or PDET Academies to provide a gift of up to £15.00 in value. PDET and PDET Academies must be able to demonstrate that these gifts are funded from unrestricted funds generated by PDET and / or the Academy.
- 6.3 Exceptional circumstances could be:
 - Providing a bouquet of flowers to a seriously ill employee, or to a longstanding employee who is retiring
 - Giving book tokens to someone who spoke at a conference free of charge

- 6.4 Gifts and hospitality should not be provided as a thank you for a 'job well done'.
- 6.5 It is acceptable for PDET and PDET Academies to provide modest hospitality in the way of working lunches and / or dinners to existing and potential contractors and stakeholders subject to a genuine business reason.

7. Declaration to the Gift Register

- 7.1 You should make your declaration as soon as possible after the offer or receipt of gifts or hospitality. PDET will have its own Gift Register and the Academy's business manager will maintain their Gift Register.
- 7.2 You should consult your Academy's business manager for any guidance required on this policy. In general terms, if you have any doubt about whether an item should or should not be declared, you are advised to declare it.

