

MAST

Gifts and Hospitality Policy

11/08/2026



MAST

Moving Ahead, Serving Together

Belong • Be Safe • Flourish

This policy reflects the core aims and purpose of MAST. At MAST, we are committed to ensuring that every child is known and every child is enabled. Guided by our values of Belong, Be Safe, Flourish, we create inclusive and nurturing school communities where every individual is recognised, valued and supported. Inspired by the belief that each person is known and called by name, we work together to provide the relationships, opportunities and support that enable all children to grow, achieve and flourish.

1. Purpose

Medway Anglican Schools Trust (MAST) is committed to maintaining the highest standards of integrity, transparency and accountability in the use of public funds.

The Trust must be able to demonstrate that decisions, particularly procurement and financial decisions, are made objectively and on the basis of value for money and the interests of the Trust.

This policy sets out the requirements for accepting gifts and hospitality and managing conflicts of interest.

2. General principles

Staff, trustees and governors must not use their position or authority for personal gain.

As a general rule, gifts and hospitality from suppliers, contractors or other organisations dealing with MAST should **not** be accepted where they could influence, or reasonably be perceived to influence, a decision or business relationship.

All individuals covered by this policy must:

- act with honesty and integrity;
- comply with applicable laws, regulations and Trust policies;
- act in the best interests of MAST;
- maintain the Trust's reputation;
- avoid actual, potential or perceived conflicts of interest; and
- declare any relevant interests in accordance with the Trust's procedures.

3. Gifts

Gifts should not normally be accepted from suppliers, contractors or organisations seeking to do business with MAST.

The following may generally be accepted where they are isolated and of modest value:

- diaries, calendars or similar promotional items;
- small items of a nominal value; and
- other items where refusal would be impractical or cause offence and there is no suggestion of improper influence.

Gifts must not be accepted where they:

- are disproportionately generous;
- are cash or cash equivalents;
- are given during a procurement or tender process;
- could influence or be perceived to influence a business decision; or
- create an obligation or expectation on the recipient.

Where a gift is considered inappropriate, it should be politely declined or, where appropriate, returned.

Where purchased items include a free gift, the gift should either be used for Trust purposes or handed to the Trust for an appropriate Trust or charitable use.

4. Hospitality

Reasonable and proportionate hospitality may be accepted where there is a genuine business purpose and no actual or perceived conflict of interest.

Hospitality should not be accepted where:

- there is no reasonable business justification;
- it is disproportionately generous;
- it is provided during a tender or procurement process;
- it could influence, or reasonably be perceived to influence, a decision;
- the provider is seeking preferential treatment; or
- accepting it could damage the reputation of MAST.

Particular care must be taken where hospitality is offered by a current or prospective supplier.

Hospitality which is more than nominal or routine should be declared and recorded in the Register of Gifts and Hospitality.

5. Procurement and tendering

Gifts or hospitality must not be accepted from suppliers or potential suppliers during an active procurement or tendering process where this could compromise, or be perceived to compromise, the independence or objectivity of the process.

Staff involved in procurement must ensure that decisions are based on the published evaluation criteria, value for money and the requirements of the Trust.

Any concern that a gift or hospitality may be intended to influence a procurement decision must be reported immediately to the CFO or CEO.

6. Conflicts of interest

Any actual, potential or perceived conflict of interest must be declared.

This includes interests involving:

- suppliers or contractors;
- businesses or organisations with which the Trust has dealings;
- family members or close associates;
- financial interests; or
- any other relationship which could reasonably be perceived to affect an individual's impartiality.

An individual with a material conflict of interest must withdraw from relevant decision-making where appropriate.

7. Register of Gifts and Hospitality

MAST will maintain a Register of Gifts and Hospitality.

Staff, trustees and governors must declare gifts and hospitality where:

- the value is more than nominal;
- there is any doubt about whether it should be accepted;
- it is offered by a supplier or prospective supplier;
- it is connected to a procurement or business decision; or

- the circumstances could reasonably give rise to a perception of undue influence.

The declaration should include:

- date;
- recipient;
- provider;
- description of the gift or hospitality;
- estimated value;
- reason for the gift or hospitality; and
- whether it was accepted or declined.

The CFO will oversee the register and ensure that declarations are appropriately reviewed.

8. Reporting concerns

Any employee who becomes aware of a potential breach of this policy must report it promptly to their line manager, the CFO or CEO.

Where appropriate, the matter will be investigated in accordance with the Trust's relevant procedures.

9. Breaches

Employees must not use their position or authority for personal gain.

A breach of this policy may result in disciplinary action and, depending on the circumstances, may constitute gross misconduct.

For trustees and governors, breaches may be dealt with under the Trust's governance and conduct procedures.