

# **Gifts & Hospitality Policy**

What is the purpose of this policy?

This policy gives guidance on accepting, declining, declaring and recording offers of gifts and hospitality.

Who approved this policy? The Governing Body

Is this policy statutory? No

When was this policy written / reviewed? November 2022

When will this policy be reviewed next? November 2023

#### Rationale

The Executive Headteacher, Staff and Governors are grateful for donations and help that families give to the school without any thought of advantage arising from the gift. The school does not wish to discourage all gift-giving to staff, as small tokens of gratitude are always appreciated. This policy seeks only to provide guidance on the appropriate value of gifts and the circumstances when they may be offered, or explain that the teachers and other staff are prevented from accepting gifts worth over a certain amount.

#### Aims

This policy aims to ensure that:

- The conduct of Staff and Governors never leads anyone to question their interests.
- Staff, and Governors operate in a way that protects personal and school reputation
- Staff and Governors are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any item

#### **Broad Guidelines**

- Gifts are any items, cash, awards, prizes, goods or services, offered 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.
- Hospitality is defined as food, drink, 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.
- Staff must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that the trust might be placed under any obligation as a result of acceptance
- Staff must not use their official position to further their private interests or the interests of others
- Staff must not solicit gifts or hospitality
- Staff can accept gifts or hospitality offered to them with a value of £20 or less and do not need the approval of the Executive Headteacher or record the items on the gifts and hospitality register
- Staff should treat with caution any offer of gift or hospitality made personally. In particular, think about whether there is a benefit to the school in accepting, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of personal, or the school's, support or favour.
- The Executive Headteacher is responsible for ensuring that staff and governors are aware of and understand this policy, and that it is being implemented consistently.
- The Executive Headteacher will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the school and federation and to those outside the organisation.
- The Executive Headteacher will also ensure, that decisions on whether individuals can accept or offer gifts or hospitality with a value of over £20 are in line with this policy.
- The Administrators will ensure that the gifts and hospitality registers are maintained on a day-to-day basis.
- Staff can accept gifts and hospitality that have a value of up to £20. These do not have to be pre-approved or recorded on the gifts and hospitality register.
- Generally, gifts of a nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, staff must consult the Executive Headteacher.

- Similarly, hospitality such as working lunches may be accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the Executive Headteacher.
- Any gifts or hospitality offered with a value of over £20 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member of staff who is offered such gifts or hospitality must consult the Executive Headteacher before accepting.
- If the Executive Headteacher is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the chair of governors and record the offer on the gifts and hospitality register.
- Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a staff disciplinary matter.
- The following must never be offered or accepted:
  - o Monetary gifts
  - o Gifts or hospitality offered to family members, partners or close friends of staff
  - Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
  - Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in own time
- It is not expected that any governor will accept gifts or hospitality.
- Any member of staff who is offered any of the unacceptable gifts or hospitality should politely decline the offer. If they feel it would not be appropriate for them to decline, they should refer the matter to the Executive Headteacher. The Executive Headteacher may decline the offer, or donate the gift or hospitality to a worthy cause, and must also record the offer on the gifts and hospitality register.
- Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the school has deemed unacceptable.
- Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, will be dealt with as a staff disciplinary matter.

### Conclusion

The receipt of gifts or excessive hospitality can damage the school's reputation and possibly lead to prosecutions for corruption. This policy will protect staff from suspicion of dishonesty and ensure that they are free from any conflict of interest with respect to the acceptance or provision of gifts, hospitality, or any other inducement from or to suppliers of goods or services to the school/s.

## Appendix 1: gifts and hospitality register

Date	Name	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted/ rejected	Approved by