



## 84 Gifts and Hospitality Policy

### **Contents**

1. Aims .....	1
2. Legislation and guidance.....	1
3. Definitions .....	2
4. Roles and responsibilities .....	2
5. Acceptable gifts and hospitality .....	3
6. Unacceptable gifts and hospitality.....	4
7. Declining gifts and hospitality.....	4
8. Monitoring arrangements.....	4
9. Links with other policies.....	4
Appendix 1: gifts and hospitality register.....	5

### **1. 1. Aims**

This policy aims to ensure that:

- The school's funds are used only in accordance with the law
- The school and those associated with it operate in a way that commands broad public support
- The school has due regard to propriety and regularity, and ensures value for money, in the use of public funds
- Governors fulfil their fiduciary duties and wider responsibilities
- Governors and staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same

### **2. Legislation and guidance**

This policy is based on the assumption that schools should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of governors, staff and/or any other representative of the organisation.

### **3. Definitions**

**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.

### **4. Roles and responsibilities**

#### **4.1 Governors and staff**

Governors and 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 school might be placed under any obligation as a result of acceptance
- Must not use their official position to further their private interests or the interests of others
- Must not solicit gifts or hospitality
- Must record any gifts or hospitality offered to them or the school with a value of over £15 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the headteacher before accepting or offering any gifts or hospitality with a value of over £15

#### **4.2 Governors**

Governors will ensure that the school's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

#### **4.3 The headteacher**

The headteacher is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The 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 to those outside the organisation.

They will also ensure, alongside the School Business Manager, that decisions on whether individuals or the school can accept or offer gifts or hospitality with a value of over £15 are in line with this policy.

#### **4.4 The School Business Manager**

The School Business Manager will ensure that:

- The school maintains a gifts and hospitality register
- The Governors and headteacher are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the headteacher, that decisions on whether individuals or the school can accept or offer gifts or hospitality with a value of over £15 are in line with this policy.

#### **4.5 The Finance Administrator**

The Finance Administrator is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

#### **4.6 Parents/Carers**

The following will be shared with parents/carers, at least annually, via newsletter and will be displayed on our website.

*Whilst we do not wish to discourage all gift-giving, Millbrook Junior School has a 'Gifts and Hospitality Policy' to ensure the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of governors, staff and/or any other representative of the organisation. In line with this, small tokens of gratitude are always appreciated. The guidance prevents teachers and other staff from accepting gifts worth over £15.'*

## **5. Acceptable gifts and hospitality**

### **5.1 Offers of gifts and hospitality received**

Governors and staff can accept gifts and hospitality that have a value of up to £15. These do not have to be pre-approved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, governors and staff must consult the School Business Manager or 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 School Business Manager or headteacher.

Any gifts or hospitality offered with a value of over £15 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any governor or member of staff who is offered such gifts or hospitality must consult the School Business Manager or headteacher before accepting.

If the headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the 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.

### **5.2 Offers of gifts and hospitality given**

It may, on occasion be appropriate to use the school budget to offer particular hospitality to staff or visitors, for example, chocolates/cakes for staff/visitors.

When working off site, staff and governors are entitled to claim mileage and parking costs. It would be unlikely that any reimbursement for refreshments can be claimed unless prior authorisation is given by the headteacher.

Any gifts or hospitality provided by the school, such as a working lunch for visitors, must not be extravagant. A maximum value of £15 per head should be used as a guideline.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the School Business Manager and receipts must always be enclosed.

The School Business Manager or headteacher must be consulted about any proposal to provide gifts or hospitality with a value of over £15.

## **6. Unacceptable gifts and hospitality**

The following must never be offered or accepted:

- Monetary gifts
- Gifts or hospitality offered to family members, partners or close friends of governors or 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 their own time

This list is not intended to be exhaustive.

## **7. Declining gifts and hospitality**

Any governor or staff member who is offered any of the unacceptable gifts or hospitality outlined in section 6 above should politely decline the offer.

If they feel it would not be appropriate for them to decline, they should refer the matter to the headteacher or School Business Manager. The headteacher or School Business Manager 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.

## **8. Monitoring arrangements**

The gifts and hospitality register is monitored regularly by the School Business Manager.

This policy will be reviewed every 3 years by the School Business Manager and approved by the governors.

## **9. Links with other policies**

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- SFVS handbook

## 10. Appendix 1: gifts and hospitality register

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