



# Great Sampford Primary School

## Gifts and Hospitality Policy

Updated : March 2024

Review : March 2027

## 1. Aims

This is the school's approved Code of Conduct relating to the offer and/or acceptance by staff, governors and members, of gifts and hospitality of whatever nature from outside individuals or organisations.

Within the terms of the Code, staff, governors and members are expected to exercise common sense. If they are in any doubt they must consult the Head Teacher/Chair of Governors and in every case declare the acceptance of a gift or hospitality in the register kept by the school, using the school's 'Declaration of Gifts and Hospitality' form.

The process set out is designed to safeguard governors and staff from any misunderstanding or criticism.

The general principles which govern gifts and hospitality are:

- Offers of hospitality should only be accepted if there is a genuine need to represent the school.
- Gifts should only be accepted in exceptional circumstances.
- The Code of Conduct applies to all Governors, members and staff of Great Sampford Primary School.
- To determine whether a gift or hospitality is acceptable, the 'Dos & Don'ts' should be applied by staff and referred to the Head Teacher/Chair of Governors if in doubt. See Appendix A.
- Registers are accessible for viewing by the following appropriate officers: Head Teacher, Governors, External Auditors, and Internal Auditor.
- Any request by a member of the public to view the Register of Declarations of Gifts and Hospitality will be referred to the Head Teacher. In considering any request, the requirement for the school to be open and transparent will be balanced against the requirements of the Data Protection Act 2018.

## 2. Legislation and Guidance

This policy is based on the Financial regulations, which state 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 staff and/or any other representative of the school community.

This policy also complies with our funding agreement and articles of association.

## 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 Staff Members:

- 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 £50 on the gifts and hospitality register (kept in school office) within 7 working days, even if declined
- Must consult the Head Teacher before accepting or offering any gifts or hospitality with a value of over £50

#### 4.2 The Head Teacher

The Head Teacher & 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.

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

The Head Teacher 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 of the organisation. They will also ensure, alongside the governors that decisions on whether individuals or the school can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

#### 4.4 The Governors

The Governors will ensure that:

- The school maintains a gifts and hospitality register
- Figures for transactions relating to gifts made by the school are disclosed in the school's audited accounts, in accordance with the Financial regulations
- They are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Head Teacher that decisions on whether individuals or the school can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

#### 4.5 The Office Team

The office team are responsible for maintaining the gifts and hospitality register on a day-to-day basis.

### 5. Acceptable gifts and hospitality

#### 5.1 Offers of gifts and hospitality received

Staff can accept gifts and hospitality that have a value of up to £50. 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, staff must discuss the situation with the Head Teacher. Likewise, the Head Teacher should discuss with the Governing Body as required.

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 Governing Body.

Any gifts or hospitality offered with a value exceeding £50 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 Head Teacher before accepting.

If the Head Teacher is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the Governing Body 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 may result as a staff disciplinary matter.

## 5.2 Offers of gifts and hospitality given

Any gifts or hospitality provided by the school, such as a working lunch for visitors, must not be extravagant. A maximum value of £25 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 office team and receipts must always be enclosed.

The Head Teacher must be consulted about any proposal to provide gifts or hospitality with a value of over £50.

## 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 members, trustees 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 members of staff member who are 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 Head Teacher or Governing Body. They too may decline the offer, or donate the gift or hospitality to a worthy cause. They 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 Governing Body.

This policy will be reviewed every 3 years by the Head Teacher and approved by the Governing Body.

## 9. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Accounting policy

## **Appendix 1 - The 'Dos & Don'ts'**

<b>DO</b>	<b>DON'T</b>
Read and follow the guidance on gifts and hospitality	Accept any gifts or hospitality which have a value of more than £50 without the approval of the Headteacher, or the Chair of Governors/Trustees as necessary
Seek advice from the Headteacher or Chair of Governors if you are in doubt	Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process
Record all offers of gifts and hospitality which have a value of more than £50 in the School's Register, whether accepted or not	Accept cash or monetary gifts
Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything	Accept a gift or hospitality as an inducement or reward
Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality	Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time
Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body	Accept a gift or hospitality which you or a member of the public would think is lavish, extravagant or excessive, even if the hospitality is taken in your own time
Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept	Accept gifts or hospitality offered to your husband, wife, partner, family member or friend
Consider paying for yourself if offered any hospitality by a supplier or third party	