



# GIFTS AND HOSPITALITY POLICY

Member of staff responsible: Lorraine Shaw

Ratified by Governors: 19 October 2022

Next Review Date: October 2023

Review Cycle: Annually

## **Introduction**

This guidance explains the meaning of, gives advice on and covers:

- hospitality
- gifts offered to employees
- supplier special offer gifts

## **Relationship to other guidance documents and school policies**

This policy takes into consideration Bush Hill Park's 'Whistle Blowing Policy', 'Code of Conduct for Schools' and is guided by the 'Nolan Committee Report' May 1996, and the requirements under the UK Bribery Act 2010, which came into effect 1 July 2011. The Ministry of Justice has published guidance which provides the basis for inclusion in this policy. This guidance is under section 9 of the Act.

## **Policy aims**

The intention of the policy is to ensure the school 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 the school. The school should be able to show that all decisions are reached on the basis of the proper application of laid down procedure and for no other reason.

The process and guidelines set out in this policy are designed to safeguard employees and governors from any misunderstanding or criticism.

## **Roles and responsibilities of Headteachers, governors and staff**

Staff and governors of Bush Hill Park Primary School, should carry out their duties for the school with integrity and should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any gifts over £30, whether they are accepted or not, must be declared and recorded in the 'Record of Gifts and Hospitality' form found in Teams online and submitted immediately.

Staff and governors must not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the school by:

- a. Maintaining an unimpeachable standard of honesty and integrity in all their business relationships;
- b. Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper; and
- c. Maintain the interests and good reputation of the school in their business relationships at all times.

### ***Raising a concern or reporting a breach of policy***

Any staff or governor who becomes aware of a breach of policy must report the alleged breach immediately to their line manager, the Headteacher or Governing Body who will instigate as necessary.

Any member of staff in any doubt of their duties or unsure of what to do in a situation where a gift or offer of hospitality of some description is being offered and is not covered in this policy should seek guidance from the Headteacher or School Business Manager. If a member of staff is in doubt as to how to report a breach or concern should follow the procedure as set out in our Whistleblowing Policy.

### **Hospitality**

Hospitality is the offer of food, drink functions such as cocktail parties, receptions, accommodation, vouchers with a monetary value, entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

If reasonable, working lunches for staff in specific cases is allowed, as it is for visitors bought from our onsite providers when needed, if the budget allows. Alcohol must never be purchased out of the school budget.

Please note that hospitality gifts of £30 or less, received on a **regular** basis, should also be recorded in the 'Record of Gifts and Hospitality' form' and reported to the Governing Body annually.

#### ***Hospitality worth £30 or less***

You can accept gifts and hospitality, which are small gestures and have a value of £30 or less, without the approval of the Headteacher. Gifts and hospitality of this nature do not need to be recorded on the school's Record of Gifts and Hospitality.

#### ***Hospitality worth over £30***

Any hospitality or facilities provided over £30 received during the normal course of business for the school should be recorded in the 'Record of Gifts and Hospitality' form' and reported to the Governing Body annually. If the gift is worth £50 and over, staff will need to declare and record it, as well as needing the approval of the Headteacher before accepting the gift.

Other hospitality may be accepted where:

- Staff are representing the school in the community or are imparting information about the school to the public.
- The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.

### ***Sporting and cultural events***

Staff attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants is not normally acceptable. Where it is considered that there is a benefit to the school in a member of staff attending a sponsored event, the attendance should be formally approved by the Headteacher and recorded as appropriate.

If necessary, staff should pay their share of any costs and claim these in the usual way.

### ***Hospitality hosted by the school***

Where hospitality is to be provided by the school, it should be approved in advance by the Headteacher who should review the hospitality in light of the UK Bribery Act 2010.

Hospitality is not prohibited by the Act but should be considered in light of it. Claims for reimbursement of expenses should be made on the relevant Expenses Claim Form and receipts and details should always be enclosed.

### **Gifts offered to employees**

A gift is any item, goods or services that you receive free of charge. It also includes any goods or services which you are personally offered at a discounted rate or on terms not available to the general public from suppliers, agencies or contractors.

Staff and governors must not accept cash or personal gifts with a high value but are permitted to accept gifts, rewards or benefits of £30 or less, from members of the public or organisations with which the school has official contacts, where they are isolated gifts for the school of a trivial character, or inexpensive seasonal gifts such as diaries, pens, calendars or similar items.

Gifts should not be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a financial or business decision.

### ***Gifts between staff or from parents, stakeholders and governors***

The School encourages and seeks cooperative relationships between staff, governors, stakeholders and external organisations. Accordingly, there can be occasions where it is appropriate for the school to provide and fund limited gifts, in particular hospitality, which will not exceed a value of £20 per head per occasion to a maximum of three in any one academic year.

Contributions may be requested to assist with the cost of any such occasion. It may be appropriate for leaving gifts to be provided to staff leaving the employment of the school particularly after a long period of service. Such gifts are often supplemented with private contributions from continuing members of staff.

Gifts received as 'thank you' tokens from students, parents or line managers, for example at Christmas or end of term, are an exception and can be accepted.

## **Supplier Special Offer Gifts**

Supplier Special Offer Gifts are sometimes offered by suppliers with the purchase of items. All special offer gifts are the property of the school and must be handed in to the Finance Office for the sole use of the school.

## **Tax implications**

Staff do not pay tax on gifts, of any value, received from pupils.

## **Unacceptable gifts and hospitality**

The following is an example of gifts and hospitality which should never be accepted and is not exhaustive:

- 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.

## **Arrangements for monitoring and evaluation**

The Resources Committee will monitor this policy by receiving on a yearly basis a report of any offers or accepted gifts as recorded in the 'Record of Gifts and Hospitality' form.

Signed: \_\_\_\_\_

**Headteacher**

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

**Chair of Governors**

Dated: \_\_\_\_\_

## Appendix 1: Easy to follow Dos and Don'ts

### THE DO's and DON'T's

DO	DON'T
<ul style="list-style-type: none"> <li>➤ Read and follow the guidance on gifts and hospitality</li> </ul>	<ul style="list-style-type: none"> <li>➤ Accept any gifts or hospitality which have a value of more than £30 without the approval of the Headteacher, or the Chair of Governors as necessary</li> </ul>
<ul style="list-style-type: none"> <li>➤ Seek advice from the Headteacher or Chair of Governors if you are in doubt</li> </ul>	<ul style="list-style-type: none"> <li>➤ Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process.</li> </ul>
<ul style="list-style-type: none"> <li>➤ Record all offers of gifts and hospitality which have a value of more than £30 in the School's register, whether accepted or not</li> </ul>	<ul style="list-style-type: none"> <li>➤ Accept cash or monetary gifts</li> </ul>
<ul style="list-style-type: none"> <li>➤ Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything</li> </ul>	<ul style="list-style-type: none"> <li>➤ Accept a gift or hospitality as an inducement or reward</li> </ul>
<ul style="list-style-type: none"> <li>➤ Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality</li> </ul>	<ul style="list-style-type: none"> <li>➤ Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time</li> </ul>
<ul style="list-style-type: none"> <li>➤ Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body</li> </ul>	<ul style="list-style-type: none"> <li>➤ 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</li> </ul>
<ul style="list-style-type: none"> <li>➤ 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</li> </ul>	<ul style="list-style-type: none"> <li>➤ Accept gifts or hospitality offered to your husband, wife, partner, family member or friend</li> </ul>
<ul style="list-style-type: none"> <li>➤ Consider paying for yourself if offered any hospitality by a supplier or third party</li> </ul>	



### Appendix 3: Record of Gifts and Hospitality Form

Staff must complete the form by clicking on this link <https://forms.office.com/r/81cnjisQX9>

### Appendix 4: template letter to parents and carers

It's important that our parents know that they are not expected to send gifts or feel pressured to do this. The letter template below is to help make parents and carers aware of our policy by way of guidance in its content.

[Insert date]

Dear Parents and Carers

#### Gifts and hospitality guidance

As we near the end of term and the festive season, we know that some of you will be thinking about 'thank you' gifts for staff.

Please do not feel you have to, as our staff do not expect presents, but if you do want to give something, staff appreciate:

- Cards and letters – kind words mean a lot!
- Homemade gifts
- Donations to charity on their behalf
- Paying it forward – volunteering your time to help others

If your gift is a food item, we appreciate the effort and thought. Please also be mindful that we are a nut-free school, so it must be **nut-free** and **wrapped securely**.

Our staff cannot accept:

- Cash gifts
- Gifts over £30

#### Changes due to coronavirus

Due to the current coronavirus situation, please **do not send in gifts** if you or your child are self-isolating, have symptoms of coronavirus or have tested positive. If your child wants to write a card, they can instead send an email or e-card to [admin@bushhillpark.enfield.sch.uk](mailto:admin@bushhillpark.enfield.sch.uk) and we will make sure this reaches their teacher.

If you may be thinking about having gifts delivered to the School Office, please include the staff member's name on the label and have it delivered to Bush Hill Park Primary School, Main Avenue, Enfield, EN1 1DS. Please note that we can only accept deliveries between 8am to 4pm.

We would like to request that any gifts are:

- Brought in **1 week before the end of term**, which is [insert date]
- Clearly marked with the staff member's name

We would like to take this opportunity to wish you and your families well over the holiday season and thank you for your continued support to our school.

Your sincerely

[insert name and signature]