

SCHOOL POLICY

Gifts and Hospitality Policy

Effective Date 13/02/2019	
Last modified : 21/12/2012	
Document no : SP 04.05/002	
Replaces Version : 12/02/2013 -	
Approved: Full Governors Meeting 13 th February 2019	Page 1 of 6

Table of Contents

1. Aims.....	1
2. Legislation	2
3. Gifts and Hospitality.....	2
4. Gifts to and From Students.....	3
5. Register of Gifts and Hospitality	3
a. Acceptable gifts and hospitality that do not have to be declared.....	3
b. Acceptable gifts and hospitality that must be declared	4
c. Unacceptable gifts and hospitality that must be declined and declared	4
6. Monitoring, Approval and Review	5
7. Questions	5
Staff Gifts & Hospitality Register Form	6

1. Aims

The receipt of gifts or excessive hospitality can damage the school’s reputation and in extremis lead to prosecutions for corruption.

The school expects staff and members of the Governing Body to exercise the utmost discretion in giving and accepting gifts and hospitality when on school business. Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with the school.

SCHOOL POLICY

Gifts and Hospitality Policy

Effective Date 13/02/2019	
Last modified : 21/12/2012	
Document no : SP 04.05/002	
Replaces Version : 12/02/2013 -	
Approved: Full Governors Meeting 13 th February 2019	Page 2 of 6

Staff must not accept gifts hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that the school might be placed under an obligation.

Staff must not make use of their official position to further their private interests or those of others.

This policy seeks to 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. It outlines procedures designed to avoid difficulties potentially arising from the receipt of excessive or inappropriate gifts from students or parents.

2. Legislation

The Bribery Act 2010 came into force in April 2011, and governs the law relating to bribery and corruption. The Act covers both the public and private sector.

3. Gifts and Hospitality

Gifts of low intrinsic value such as promotional calendars or diaries, chocolates or flowers or other small tokens of gratitude, can be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, staff should refer the matter to their line manager or simply decline the gift.

Where approval is granted, any gift or hospitality received from external third parties with an equivalent value of £30 or over must be recorded in the Register of Gifts and Hospitality by completing a copy of the attached Staff Gifts and Hospitality Register form.

In cases where a staff member receives a gift on behalf of the school, the gift remains the property of the school. The gift may be required for departmental display or it may, with the line-manager's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the Department on or before the recipient's last working day.

Modest hospitality, provided it is reasonable in the circumstances, for example, lunches in the course of working visits, are acceptable, though it should be broadly similar to the scale of hospitality which Woodford County High School as an employer would be likely to offer.

SCHOOL POLICY

Gifts and Hospitality Policy

Effective Date 13/02/2019	
Last modified : 21/12/2012	
Document no : SP 04.05/002	
Replaces Version : 12/02/2013 -	
Approved: Full Governors Meeting 13 th February 2019	Page 3 of 6

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 Woodford County High School in a member of staff attending a sponsored event, the attendance should be formally approved by the relevant line manager.

Business gifts, which include hospitality, may be provided by Woodford County High School in connection with third party entertaining but should be regarded as the exception rather than the rule. Gift and hospitality must not exceed £50 in a year for any one recipient, and must not be provided in expectation of material benefit to Woodford County High School.

4. Gifts to and From Students

In the interests of Safeguarding Children, and to prevent staff from being open to accusation of exerting undue influence, no member of staff is permitted to give a personal gift to an individual student at any time (competition prizes and awards on prize giving are excluded). If a gift is received from a student or the parents of a student and the value is £20 or over this gift is to be registered in the Register of Gifts and Hospitality by completing a copy of the attached Staff Gifts and Hospitality Register form.

5. Register of Gifts and Hospitality

Staff must be cautious regarding the acceptance of gifts and hospitality as these can easily give the impression of improper behaviour or favour. The notes below provide guidance on how to deal with such offers. This guidance is not exhaustive and if in doubt as to the most appropriate action, employees should consult a member of the Leadership Team or simply refuse any gift or hospitality offered. This guidance applies equally to offers to staff and to members of their immediate family (spouse, partner or child) by any person who has or seeks to have dealings with the School. All offers should be recorded on the Staff Gifts and Hospitality Register form (attached) unless excluded by the guidance detailed below. When dealing with gifts or hospitality, it is always preferable to err on the side of caution.

a. Acceptable gifts and hospitality that do not have to be declared

It is not necessary to declare the following gifts and hospitality:

- Promotional gifts and merchandise sent out as part of a general mailing. For example; Calendars, diaries, pens.
- A working lunch, provided during a meeting or seminar attended on behalf of the school or in the course of carrying out duties for the school.

SCHOOL POLICY

Gifts and Hospitality Policy

Effective Date 13/02/2019	
Last modified : 21/12/2012	
Document no : SP 04.05/002	
Replaces Version : 12/02/2013 -	
Approved: Full Governors Meeting 13 th February 2019	Page 4 of 6

- Any external third party gift or hospitality received with an equivalent value of £30 or less
- Any gift from a student or the parents of a student with an equivalent value of £20 or less

b. Acceptable gifts and hospitality that must be declared

Any gift or hospitality received with an equivalent value of £30 or more (£20 or more in the case of a gift from a student or parents of a student) must be declared using the Staff Gifts and Hospitality Register form in accordance with Appendix A to this policy. Completed forms must be returned to the School Business Manager for entry into the Register

Where a gift (other than a promotional gift) cannot be returned, it is the property of the School and must be declared.

Staff may only accept offers of hospitality if there is a genuine need to exchange information or represent the School. Offers to attend purely social or sporting functions should be accepted only when they are part of the life of the community and where the school should be seen to be represented. All such hospitality must be declared and authorised by the relevant member of the Senior Leadership Team / Head Teacher prior to acceptance.

Hospitality received through attendance at relevant subsidised or free of charge conferences and courses is acceptable where it is clear that purchasing decisions are not compromised.

Judgement is required. If you believe that something could be perceived as being beyond normal/realistic expectations then you must adopt a cautious approach and declare the hospitality. As a guide, consider what hospitality the school might provide on similar occasions.

c. Unacceptable gifts and hospitality that must be declined and declared

Examples are provided below of gifts or hospitality that must not be accepted, but must be declared on the attached form to ensure such offers are properly recorded.

- Gifts or hospitality of a high intrinsic or resale value. For example; expensive presents, theatre tickets, or invitations to prestigious sporting events etc.
- Provision of holiday or weekend hospitality or the use of company flats etc.
- Lunch with a developer/contractor whose planning application is awaiting consideration by the School.
- Hospitality from a consultant or potential contractor/tenderer during contract negotiations / tendering period (unless this is purely incidental such as sampling a product as part of the contract evaluation process. For example; food tasting for a catering contract.)



SCHOOL POLICY

Gifts and Hospitality Policy

Effective Date
13/02/2019

Last modified :
21/12/2012

Document no : **SP**
04.05/002

Replaces Version :
12/02/2013 -

Approved:
Full Governors
Meeting 13th
February 2019

Page 5 of 6

Gifts or hospitality, which might be deemed acceptable on a 'one-off' basis, may become unacceptable if provided on a regular basis or during a sensitive period.

6. Monitoring, Approval and Review

This policy is approved by the Governing Body of Woodford County High School. Any amendments to this policy require approval by the Governing Body of Woodford County High School.

7. Questions

If you have any questions about this policy, please contact the School Business Manager, Woodford County High School, High Road, Woodford Green, Essex, IG8 9LA

Staff Gifts & Hospitality Register Form

Section one of this form should be completed for any offers of hospitality or gifts either received or offered to staff. Please read the notes on the following page before completing this form

SECTION ONE: Details of the offer – this section must be completed by the staff member receiving the offer	
Date of Offer	
Name of employee	
Service / section / department	
Who offered the gift or hospitality	
What is your relationship with the individual/organisation offering the gift or hospitality?	
Nature of the gift or hospitality offered	
Details of other staff and governors offered the same gift or hospitality	
Proposed action (delete as appropriate)	
Employee's signature	
Date	
Following completion of the above section and before the offer is accepted, this form must be sent to the relevant individual for authorisation	

SECTION TWO: Action authorised by Head Teacher – upward agreement is required. Peer level	
sign off is not acceptable	
Offers received by Staff members must be authorised by Senior Leadership Team	
Offers received by Senior Leadership Team must be authorised by Head Teacher	
Offers received by Head Teacher must be authorised by Chair of Governors	
Name of Authorising Officer	
Record of Authorising Officer's action (delete as appropriate)	Agree acceptance / Acceptance not authorised / Agree action to decline Please ensure the staff member who received the offer is aware of your decision
Authorising Officer's signature	
Date	
Authorising Officers please ensure: (i) The employee is informed of your decision (ii) The form is indexed and recorded in the Register of Staff Gifts and Hospitality (iii) The form is filed in the Register of Staff Gifts and Hospitality held by the School Business Manager	

Any unusual or repeat entries will be questioned and reviewed