



**BUTTSBURY
PRIMARY SCHOOL**

AN ACADEMY SCHOOL

Gifts and Hospitality Policy

Approved by:	FFMAR Committee
Last reviewed on:	Autumn 2024
Next review due by:	Autumn 2027

Gifts and Hospitality Policy

1. Introduction

- 1.1 The principle of integrity requires that employees of Buttsbury Primary School 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.
- 1.2 The School should be able to show that all purchasing and other financial decisions are reached on the basis of value for money and for no other reason.
- 1.3 The process set out in this policy and procedure is designed to safeguard employees from any misunderstanding or criticism.
- 1.4 A gift is deemed to include
 - goods provided for personal or other private use;
 - personal services;
 - loans of equipment, vehicles etc. for personal use; and
 - the provision of goods and/or services at preferential cost (including loans of money) for personal or other private use.
- 1.5 The term 'hospitality' is deemed to include the offer or receipt of:
 - food and drink;
 - travel;
 - accommodation; and
 - entertainment
- 1.6 As a general guideline, *business* gifts and hospitality should not be accepted by any employees, except as provided for in sections 3 and 4 below.
- 1.7 Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the school by:
 - maintaining an unimpeachable standard of honesty and integrity in all their business relationships;
 - complying with the letter and spirit of the law, and contractual obligations;
 - rejecting any business practice that might be deemed improper;
 - acting to maintain the interests and good reputation of the school at all times in their business relationships.

2. Responsibility

- 2.1 The Finance, Facilities Management, Audit and Risk Committee is responsible for the review of this policy.
- 2.2 The Senior Leadership Team is responsible for its implementation and for ensuring that all staff are aware of the existence of this policy.
- 2.3 The Finance Officer is responsible for maintaining the Gifts and Hospitality Register, which may be held and updated by a member of office administrative staff.
- 2.4 All employees are expected to follow the terms of this policy. Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.

- 2.5 Any employee who becomes aware of a breach of policy must either report this immediately to his or her manager who will instigate investigations as necessary or refer to the school's whistle blowing policy.

3. Receiving Gifts

- 3.1 Employees may accept gifts of nominal value (approximately £100 or below), but never so that a single gift, or accumulation of gifts, could be interpreted as a way of exerting an improper influence over the way they carry out their duties or create a potential conflict of interest.
- 3.2 All gifts received (or declined) above £100 (except where provided for in 3.4) must be recorded in the School's Gifts and Hospitality register, which is maintained by the Finance Officer.
- 3.3 Gifts above £200 may only be accepted after approval from the chair of the Finance, Facilities Management, Audit and Risk Committee or chair of Trustees.
- 3.4 Where a class contributes collectively, gifts greater than a value of £100 may be accepted without need to record on the Gifts and Hospitality Register.
- 3.5 Gifts which are intended for the School as an academic body can be accepted but must not be retained by the individual who receives them. Such gifts should be given to the Head Teacher to determine whether it can be used by the School, donated to charity or used in a charity event.
- 3.6 Personal gifts may not be solicited under any circumstances.
- 3.7 When an employee has to decline a gift, they should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.
- 3.8 Where purchased items include a "free gift", it should be the intention that the gift should be either used for School business or handed to the Head Teacher to determine its alternate use (donation, charity event, etc.).

4. Receiving Hospitality

- 4.1 Employees should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way they carry out their duties. Nor should employees offer such hospitality to others on behalf of the School. The timing of hospitality in relation to a procurement or purchasing decision that the School may be taking is especially sensitive. Employees should never solicit hospitality. As a general rule, employees should not accept hospitality that the School would not reciprocate in similar circumstances.
- 4.2 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.
- 4.3 If necessary, employees should pay their share of any costs and claim these in the usual way.
- 4.4 When an employee has to decline hospitality, they should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.
- 4.5 Employees may accept modest working meals and light refreshments without making any declaration. All other hospitality (except that allowed under 4.6 and under £100) must be recorded in the school's gifts and hospitality register which is maintained by the Finance Officer. Hospitality above £100 may only be accepted after approval from the chair of the Finance, Facilities Management, Audit and Risk

Committee or chair of Trustees.

4.6 Other hospitality may be accepted where:

- Employees are representing the School in the community or are imparting information about the School to the public.
- An event is clearly part of the life of the community or where the School should be seen to be represented.
- The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.
- If there could be any doubt regarding whether or not a specific item of hospitality falls into these categories, then an email confirmation of approval must be received from the Headteacher prior to proceeding.
- Staff may accept hospitality up to £100 under the above conditions. Above this value, staff must inform the Head Teacher who will obtain approval from the chair of Finance, Facilities Management, Audit and Risk Committee (or Chair of Trustees) before entry into the register.

5. Giving Gifts

- 5.1 The Trust Board authorises the Headteacher to purchase non-alcoholic gifts of up to £40. The purchase of alcoholic gifts is not permitted.
- 5.2 Any gifts that fall outside of this remit will require the approval of the Trust Board and will be recorded in the Register of Gifts and Hospitality.

6. Providing Hospitality

- 6.1 The Trust Board authorises the Headteacher to provide hospitality in the form of light refreshments as appropriate to the activity. For example, tea, coffee and biscuits for a meeting and lunch for visitors. The purchase of alcoholic beverages using money from the school budget is not permitted.
- 6.2 Gifts and hospitality will always be funded from unrestricted funds.

7. Register

A sample page from the Register of Gifts and Hospitality, as maintained by the Finance Officer, follows below:

Policy Monitoring:

Policy Date: Autumn 2024

Review Date: Autumn 2027

Register of Gifts and Hospitality

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