

St John Henry Newman Catholic Primary School



Gifts and Hospitality Policy

Approved: April 2022

Next Review Date: April 2025

Aims

This policy aims to ensure that

- The funds of St John Henry Newman Catholic Primary School are used only in accordance with the law
- The school 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.

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.

Roles and responsibilities - Governors and staff

Members, trustees 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 trust 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 trust with a value of over £25 on the gifts and hospitality register (see Appendix 1) within 7 working days, even if declined
- Must consult the Company Secretary or Headteacher before accepting or offering any gifts or hospitality with a value of £35.

Roles and responsibilities - Governors

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

Roles and responsibilities - 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 Trust and to those outside the organisation.
- They will also ensure, alongside the Company Secretary (Director of Finance and Operations), that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of £25 are in line with this policy.

Acceptable gifts and hospitality

- Governors and staff can accept gifts and hospitality that have a value of up to £25. 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 Headteacher.
- Similarly, hospitality such as working lunches may be accepted to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the Headteacher.
- Any gifts or hospitality offered with a value of over £25 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any governor or staff who is offered such gifts or hospitality must consult the Headteacher before accepting.
- If the Headteacher is the recipient, or intended recipient, of gifts or hospitality with a value of £25, they must inform the Chair of Governors, who can at any point inspect the register of gifts and hospitality.
- If the Chair of Governors is the recipient, or intended recipient, of gifts or hospitality with a value of £25 they must inform the Headteacher

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.

Offer of gifts and hospitality given

- The school will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented in the Gift and Hospitality Register and has regard to the propriety and regularity of the use of public funds.
- This does not apply to:
 - the award of gifts, prizes, etc related to the achievement of pupils e.g. attainment
 - recognition awards or long service awards which are paid via payroll.
- To reward staff for carrying out their role is a taxable benefit. Therefore, school funds should not be used to reward staff through giving gifts or flowers as a “thank you” for carrying out their role.
- The schools can fund flowers, up to a value of £35,-
 - For staff who suffer a serious illness or for a funeral of a staff member
 - For all other life events (birthday, marriage, childbirth, leaving, etc)
- Hospitality such as working lunches, coffees, catering on training courses and modest hospitality in the form of meals, etc are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not for their family or friends). These would not be added to the register, but the Headteacher will ensure they are of a reasonable level.
- Alcohol must not be purchased out of the school budget.

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.

Declining gifts and hospitality

- Any members, trustee or staff member who is offered any of the unacceptable gifts or hospitality outlined above should politely decline the offer.
- If they feel it would not be appropriate for them to decline, they should refer the matter to Headteacher. The Headteacher 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.

Monitoring arrangements

- The gifts and hospitality register is monitored regularly by the Governing Body.
- This policy will be reviewed every three years and approved by the Governing Body.

Links with other policies

This gifts and hospitality policy is linked to the:

- Code of conduct policy