



# St. John's Gosport C of E Primary School

## Gifts and Hospitality Policy

<b>Publication Date:</b>	<b>September 2023</b>	<b>Headteacher: Chair of Governors:</b>	<b>Mrs Carolyn Wilkinson Mrs Jean Watson</b>
<b>Reviewed:</b>	<b>September 2024</b>	<b>School reviewed</b>	<b>Mrs Carolyn Wilkinson</b>

### **School Vision:**

St John's Gosport C of E Primary School endeavours to provide a happy, safe, caring community rooted in Christian values; where everyone is valued and grows to their full potential.

*John 10:10 – I came so that they may have life – life in all its fullness*

### **Mission Statement:**

At St John's Gosport C of E Primary School we aim to achieve our vision by providing a broad balanced curriculum and learning experiences that develop our children in body, mind and spirit; setting high standards for all, confident that we can achieve success. Thus ensuring that when our children leave us they are independent learners, who are well equipped to be responsible citizens of the future and reach their potential.

**Safeguarding** at St John's Gosport C of E Primary School is carried out in line with the statutory guidance in 'Keeping Children Safe in Education' published by the Department for Education.

# Contents

1. Aims
2. Principles
3. Definitions
4. Roles and responsibilities
5. Acceptable gifts and hospitality
6. Unacceptable gifts and hospitality
7. Declining gifts and hospitality
8. Raising a concern
9. Monitoring arrangements

## 1. Aims

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.

## 2. Principles

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

## 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. Staff

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 school with a value of over £30 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined.

- › Must consult the headteacher before accepting or offering any gifts or hospitality with a value of over £30

## **4.2 School Governors**

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.

## **4.3 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 to those outside the organisation.

They will also ensure, alongside the School Business Manager that decisions on whether individuals or the school can accept or offer gifts or hospitality with a value of over £30 are in line with this policy.

The headteacher is responsible for communicating the school's rules and expectations about gift-giving to parents.

## **4.4 The School Business Manager**

The School Business Manager will ensure that:

- › The school maintains a gifts and hospitality register
- › The school governors and headteacher are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the headteacher that decisions on whether individuals or the school can accept or offer gifts or hospitality with a value of over £30 are in line with this policy.

## **4.5 The Senior Administrative Officer**

The Senior Administrative Officer is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

## **4.6 Parents**

Parents will be given guidance regarding gifts to staff and the school:

- › The school does not wish to discourage all gift-giving, and that small tokens of gratitude are always appreciated
- › The school considers that £30 is an appropriate maximum value of individual gifts to individual staff as thanks which may be offered at the end of term. Should parents wish to give a gift to the whole school (i.e. all staff and pupils) then a higher amount would be acceptable. This would be recorded on the monitoring log.

## **5. Acceptable Gifts and Hospitality**

### **Gifts**

Gifts of low intrinsic value such as diaries, biscuits etc can be accepted from suppliers of goods or services.

Gifts of low value (Under £30) from parents or children as a token of appreciation to individuals e.g. as a thank you at Christmas or end of year are acceptable. These do not have to be pre-approved or recorded on the gifts and hospitality register. However it is unacceptable to receive gifts of any value on a regular basis.

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 headteacher.

Any gifts or hospitality offered with a value of over £30 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member of staff or governor who is offered such gifts or hospitality must consult the headteacher before accepting.

If the headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the Chair of Governors 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 will be treated as a staff disciplinary matter.

In the interest of Safeguarding Children and to prevent staff from being open to accusation of exerting influence, staff must only give rewards to individual children that are consistent with the established practice in school and they must make a member of the Senior Leadership Team aware of the reward being given.

In the case where staff receive a gift on behalf of the school, the gift remains the property of the school and this will be recorded and documented as a gift to the school. In addition, the headteacher may accept a gift of higher value on behalf of the school but this must be recorded on the monitoring log.

## **Hospitality**

Modest hospitality, provided in reasonable circumstances, e.g. lunches in the context of working visits is acceptable. Hospitality and gifts may be provided by school but this should be the exception rather than the rule. The value of this must not exceed £50 in a year to any one recipient.

- Gifts for staff are not bought out of the school budget
- Staff can claim travel expenses when attending courses or residential but cannot claim for meals.
- A working lunch for visitors may be claimed.
- Alcohol must not be purchased out of the school budget.

Expense claims should be made to the School Business Manager and receipts must always be enclosed.

The Headteacher and/or School Business Manager must be consulted about any proposal to provide gifts or hospitality with a value of over £30.

## **6. Unacceptable gifts and hospitality**

The following must never be offered or accepted:

- Monetary gifts to individuals. The school can accept a monetary gift if it is clearly designated for a purpose (e.g. breakfast for all staff, aprons for the children). This must be recorded on the school log.
- Gifts or hospitality offered to family members, partners or close friends of 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 staff member or governor who is 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 Headteacher or School Business Manager. The Headteacher or School Business Manager 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.

Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the trust 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.Raising a concern**

Members of staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedure set out in our Whistleblowing Policy.

Members of staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The School aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The school is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that he/she has suffered any such treatment, he/she should use the School's Grievance Procedure.

The school will fully investigate any instances of alleged or suspected bribery. Staff suspected of bribery may be suspended from their duties while the investigation is being carried out. The school will invoke its disciplinary procedures where any member of staff is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal.

The school may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the School who are found to have breached this policy. The School may also report any matter to the relevant authorities and the police.

## **9.Monitoring arrangements**

The gifts and hospitality register is monitored regularly by the School Business Manager.

This policy will be reviewed every 2 years by the Headteacher and approved by the governing body.

## **10. Links with other policies**

This gifts and hospitality policy is linked to the:

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

## Appendix I: Gifts and Hospitality Register

<b>Date</b>	<b>Name</b>	<b>Description of gift/hospitality and approx. value</b>	<b>Name of party offering gift/hospitality</b>	<b>Accepted/ Rejected</b>	<b>Approved by</b>