

Gifts and Hospitality Policy



This policy was approved by the Governors of Southfield Primary School on Thursday 25 March 2021.

Review Due; March 2023

1. Aims

Southfield Primary School is committed to the highest level of integrity, honesty and accountability in all its business dealings. All Members of Southfield Primary school, Governors and staff are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Academy Trust.

2. Objectives

- To ensure the Academy's legal responsibilities as outlined in the Academies Financial Handbook are met.
- To ensure all members of the Academy Trust understand when gifts and hospitality can be accepted and when they can not.
- To ensure a register of gifts and hospitality is maintained and reviewed.

3. Legislation and Guidance

This policy is based on the [Academies Financial Handbook](#), which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of members, trustees, staff and/or any other representative of the trust.

This policy also complies with our funding agreement and articles of association.

4. Definitions

A gift is any item or service which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public. All gifts and hospitality received (other than those of a minor nature; see section 6 of this policy) are not considered to be the property of the individual, but the property of the Academy, and should be recorded in accordance with this policy.

Hospitality is the offer of free drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public

Donations to Southfield Primary School are a separate issue, and are not covered by the scope of this policy.

5. Roles and responsibilities

Governors

- The Governors must ensure the policy is reviewed regularly and kept up to date with legal changes.

Staff and Governors

- Must ensure that they are familiar with, understand and comply with this policy.
- Must report to the head teacher within 7 days any gifts or hospitality offered that fall outside of the definition of "minor nature" even when the offer has been declined.

Head Teacher

- Must ensure that staff are aware of and understand this policy and ensure that it is being consistently implemented.
- Will ensure that decisions on whether individuals or the trust can accept gifts or hospitality are in line with this policy.
- Report to the Governors any gifts or hospitality offered to any member of their Staff with rationale for accepting or declining, so that it can be recorded on the Southfield Primary School Gifts and Hospitality Register.

- Report to the Governors any gifts or hospitality offered to themselves

The Chair of Governors

- where procedures for accepting or declining the gift or hospitality are unclear, will make the final decision, and will ask the Finance Administrator to record that decision in the Register.

Finance Administrator

- must maintain a register of gifts and hospitality for the Trust. (Annex 1)
- must carry out annual checks to ensure that items recorded in the Register are properly accounted for.

6. Gifts and hospitality of a minor nature

For the purpose of this policy, gifts of a minor nature are considered to be:

- Gifts from suppliers with an estimated value up to a maximum of £10.00
- Small gifts from those receiving a service from the Academy as a token of appreciation (e.g. from parents or pupils to teachers). It is common for appreciative parents and students to register their thanks for the work of staff in the form of a small personal gift. Gifts valued at under £30 can be accepted by the member of staff without reference to the Head Teacher or Governing Body. Such gifts do not need to be added to the Gifts and Hospitality Register.
- Small promotional items from suppliers that are routinely given to a wide range of people (e.g. calendars, notepads, pens, etc).
- A working lunch of modest standards (less than £30 per head) to allow the parties to continue to discuss business already started (unless a tender or contract is currently under dispute or being negotiated).

Gifts and hospitality of a minor nature do not need to be recorded in the 'Register of Gifts and Hospitality'.

7. Other gifts and hospitality

Gifts which fall outside the definition of "minor gifts" outlined above should be politely declined but MUST still be reported and recorded on the Gift and hospitality register.

If not accepting a gift would cause offence, (such as a sudden and unexpected gift, or one where it would cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Head Teacher and Finance Administrator as soon as possible who may decide to return the gift, or donate it to a school raffle or other charitable cause.

If a gift or hospitality is offered whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with Southfield Primary School, for anything other than light refreshments the offer must be referred to the Head Teacher for consideration. Gifts or Hospitality offered to the Head Teacher must be referred to the Chair of Governors and Finance Administrator. If approved, this would need to be added to the register.

Examples of gifts or hospitality that should not be accepted in any circumstances are cash or monetary gifts; gifts or hospitality offers to a member of your family; gifts or hospitality from a potential supplier if tendered in the immediate period before tenders are invited or during the tender process.

8. Non compliance

If it is believed that a Member of Southfield Primary School, a Governor or a member of staff has not declared a gift or hospitality a formal investigation will be carried out and formal procedures, including disciplinary procedures where appropriate, may be instigated.

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Annex 1

Southfield Primary School Gifts and Hospitality Register

All gifts and hospitality offer to staff, governors or directors, not defined as minor in the gift and hospitality policy, must be recorded. Gifts accepted must be used for the benefit of the WMAT or given to charity and are not to be kept by the individual.

Date	Estimated value of gift/hospitality	Recipient	Donor	Nature of Gift/hospitality	Decision to accept/decline referred to?	Outcome of referred decision	Gift allocated to