

|   |                           |   |
|---|---------------------------|---|
|  | <b>Name of School</b>     | <b>Corbets Tey School</b>   |
|   | <b>Policy Review Date</b> | <b>Autumn Term 2021</b>   |
|   | <b>Next Review Date</b>   | <b>Autumn Term 2022</b>   |
|   | <b>Reviewed by</b>        | <b>Governor Name: Ian Rusha</b><br><b>Governor Signature:</b>  |

**Hospitality and Gifts Policy and Procedure**

**Equality Impact Assessment**

The school aims to design and implement services, policies and procedures that meet the diverse needs of our provision, population and workforce, ensuring that none are placed at an unreasonable or unfair disadvantage over others. We are confident that this policy does not place anyone at an unreasonable or unfair disadvantage, and is compliant with relevant equalities legislation.

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## Section One: Statement and Procedure Overview

### 1. Policy Overview

On occasion, school staff and governors may be offered gifts or hospitality during the course of their work. All employees and governors must abide by the Local Authority's guidelines regarding gifts and hospitality.

This policy is intended to assist employees in making a decision whether or not to accept gifts or offers of hospitality during the course of their work.

Governors and employees who are offered any gift or hospitality exceeding the value of £25 must declare the offer to the Headteacher.

### 2. Policy Guidance

The London Borough of Havering Financial Regulations for Schools 2016: *"It is a criminal offence for any person to use their position within the school to accept or ask for any gift, rewards or other advantage from work done in an official capacity on behalf of the school."*

The School's Safeguarding Code of Conduct requires that staff should *"ensure that gifts received or given in situations which may be misconstrued are declared"*.

The National Joint Council for Local Government Services ("Green Book") refers to official conduct at Part 2, paragraph 2.1 and requires that: *"Employees will maintain conduct of the highest standard such that public confidence in their integrity is sustained."*

### 3. Scope of this document

Any offer, gift, favour or hospitality directed at an employee personally should be treated with caution as the person or organisation making the offer may be doing or hoping to do business with the school. Under no circumstances should employees allow themselves to be put in a position which gives the impression that improper influence has been present in school dealing.

This includes the acceptance of any item/offers that might be regarded as an inducement from clients or contractors of the school. Employees are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible. Minor items, such as pens, diaries or calendars, which are of nominal value, can be accepted.

If an employee is of the opinion that a gift or hospitality offer has been made in order to seek some advantage with the school, then this should be brought immediately to the attention of the Headteacher or Chair of Governors who will inform the Schools Finance Team on 01708 225888.

The policy applies to all governors and employees (permanent, temporary and casual), as well as contractors and those in partnership roles working for the school on school premises, for example, agency staff, builders, drivers. It also covers suppliers and those providing services under a contract with the school.

All employees must adhere to this policy. If an employee breaches the policy, this could lead to disciplinary action and potential dismissal.

**Section Two: Procedure for declaring Gifts and Hospitality exceeding the value of £25**

**1. Procedure overview**

| Stage  | Action   | Responsibility and Timescale  |
|--|--|---|
| Employee receives offer of hospitality or gift of a value over £25. (Whilst inexpensive diaries, pens and calendars, need not be recorded, every other offer of hospitality or gifts must be recorded in the register whether accepted or not. If in doubt, enter it on the register.) | Employee completes a declaration of gifts and hospitality form (Appendix A) and returns it to the Headteacher or Chair of Governors for authorisation.<br><br>If the gift is directed towards the Headteacher this must be forwarded to the Chair of Governors for authorisation.  | Employee to action as soon as offer is received.  |
| Headteacher or Chair of Governors to consider whether offer should be agreed or declined.  | Headteacher or Chair of Governors will reply to the employee concerned within seven working days, indicating whether the offer of gifts/hospitality is approved.   | Headteacher or Chair of Governors to respond within seven working days.   |
| Employee is notified of decision   | Acceptance of the hospitality/gift is agreed<br><br>Acceptance of the hospitality/gift is not authorised on this occasion  | Employee should proceed as appropriate.<br><br>Employee should make immediate arrangements to ensure the hospitality/gift is declined or returned if the gift has already exchanged hands as soon as possible |
| Employee disagrees with decision of Headteacher or Chair of Governors.   | Employee to arrange to discuss decision with Headteacher / Chair of Governors<br><br>If Headteacher or Chair of Governors upholds their original decision – Employee has no right of appeal.<br><br>If Headteacher or Chair of Governors changes their original decision, this will be confirmed to the employee in writing. | Employee to arrange as soon as practicable.<br><br>Headteacher or Chair of Governors to respond as soon as practicable.   |

For more information please contact the Schools Finance Team on (01708) 225888.

## 2. Maintaining the register

It is important for information regarding hospitality & gifts to be recorded consistently. The Business Manager is responsible for managing the Hospitality and Gift Register and should ensure that they:

- Keep all completed declaration forms electronically with the Gifts and Hospitality Register Spreadsheet on the staff network at:  
T:\AAA School Documents\SCHOOLPOLICIES\Other Policies\Finance
- Record relevant information on a spreadsheet using the following headings in each column:
  - Date of offer
  - Name of person receiving the gift or hospitality
  - Description of the Gift/Hospitality offered
  - Value / estimated value of the gift or hospitality
  - Purpose of the offer
  - Person/organisation providing the gift or hospitality
  - Relationship to the person/organisation offering the gift or hospitality
  - Acceptance of the gift or hospitality (Yes / No)
  - Declaration authorised by
  - Outcome (authorised/not authorised/shared)
  - Date of authorisation

## 3. Gifts

Except for minor promotional gifts distributed to a wide range of people and not uniquely given to that individual, (e.g. pens, calendars, diaries, charts, measures etc. usually given at Christmas time for use in the office), employees should refuse any gift offered to them or to members of their family by a person or organisation which has, or seeks, dealings with the school.

## 4. Hospitality

Where an employee is invited to lunch or some other function by a person or organisation, which has, or seeks, dealings with the school, the propriety of accepting the invitation should be considered carefully.

The principal criterion in assessing whether or not to accept hospitality is whether if the matter became known, it would suggest the presence of improper influence or would affect public confidence in the employee or the school. The level of any hospitality accepted should always be of a modest nature.

## 5. Refusal of hospitality and gifts

It is not possible to give a complete list of circumstances where hospitality and/or gifts should be refused. The list set out below provides some examples. However, the rule must be that, if employees are in doubt, they should seek advice from the School's Finance Team.

The following offers of gifts and hospitality should be refused:

- Money
- Holiday or hotel accommodation
- Use of a company flat or car
- Frequent hospitality from one source

## HOSPITALITY AND GIFTS POLICY AND PROCEDURE

- Extravagant meals at expensive restaurants
- Concessionary rates which are not, as a matter of practice, available equally to other organisations/individuals
- Invitations to 'events' where the employee is not attending in an official capacity or the function is clearly not relevant to the school e.g. Wimbledon, golfing tournaments, horse racing etc.

### **6. Monitoring and review**

The Hospitality and Gift Register should be reviewed regularly and reported to the Leadership and Management Committee on request.

### **7. Register responsibility**

The person responsible for the Hospitality and Gifts Register is the Headteacher.

## APPENDIX A: Declaration of Gifts and Hospitality Form

Receiving benefits, gifts, rewards or hospitality can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. Staff are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible.

If you have received or wish to declare an offer of a gift or hospitality benefit please complete the form and return to the Headteacher or the Chair of the Governing Board for approval. If you require assistance completing the form please contact the School's Finance Team on 01708 225888.

### Details of employee receiving gift or hospitality

|                            |  |
|----------------------------|--|
| <b>Full Name</b>           |  |
| <b>Job Title</b>           |  |
| <b>Department</b>          |  |
| <b>Date of Declaration</b> |  |

### Description of gift or hospitality

|   |          |
|---|----------|
| <b>Description of gift / hospitality</b>  |          |
| <b>Value/estimated value of gift / hospitality</b>                              |          |
| <b>Purpose of the offer</b>   |          |
| <b>Person/organisation providing the gift or hospitality</b>                    |          |
| <b>Relationship to the person/organisation offering the gift or hospitality</b> |          |
| <b>Acceptance of gift / hospitality</b>   | Yes / No |

### Approved by

|                  |  |
|------------------|--|
| <b>Signature</b> |  |
| <b>Date</b>      |  |
| <b>Name</b>      |  |
| <b>Job Title</b> |  |