



St Hilary School Gift and Hospitality

Introduction

St Hilary School is committed to the values of probity and accountability. All staff and governors should conduct themselves with integrity, impartiality and honesty at all times. Staff should maintain high standards propriety and professionalism.

Guiding principles:

- The conduct of individuals should not create suspicion or any conflict between their official duty and their private interest.
- The action of individuals acting in an official capacity should not give the impression to any member of the public, to any organisation with whom they deal or to their colleagues that they have been (or may have been) influenced by benefit to show favour or disfavour to any person or organisation.

Definitions

Hospitality is something that is given to an individual or group of people in the form of a gift, entertainment, personal reward, or anything of value. Staff should be aware that all gifts and hospitality accepted (other than those of a minor nature) 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.

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

Statement of policy

Hospitality received from or given to a third party is generally not acceptable.

The exception to this general principle is where there is a genuine need for the development of legitimate and ethically sound business relationships and the hospitality offered will genuinely assist the development of this. Even then, only modest hospitality is acceptable and the following procedures must be complied with at all times.

Gifts or hospitality must be recorded in the Gift and Hospitality Register in accordance with this policy.

Failure to comply with this policy may result in disciplinary action and possibly termination of employment.

Responsibilities

All staff will record gifts or hospitality in accordance in this policy.

The Business Manager will hold and maintain the Register of Gifts and Hospitality, and carry out annual checks to ensure that items recorded in the Register are properly accounted for.

The Finance Committee will review this policy and register on an annual basis.

The Chair of Governors and/or Head Teacher will, where procedures for accepting or declining the gift or hospitality are required or unclear, make the final decision and inform the Business Manager who will record that decision in the Register.

Staff Gifts and Hospitality Register

1. Gifts and inducements to an employee

Where a business contact* offers a personal gift, personal payment or other incentive such as secondary employment to an employee, these should not be accepted and should be returned with a suitable official letter. Such offers should be declared to the Governing Body and recorded in the Register of Gifts and Hospitality.

If it is not possible to return gift(s) then the employee who deals with that supplier should declare the gift(s) to the Governing Body who will keep a record of it and decide how it is to be used. Such gifts remain the property of the academy and should be included in the Register of Gifts and Hospitality.

The only exceptions to these are:

- Low cost, functional items suitable for business use rather than personal use and displaying the supplier's logo e.g. diaries, calendars and pens. These items may be accepted and do not have to be included in the Register of Gifts and Hospitality.
- Gifts offered by parents or students to academy staff to express their thanks, such as boxes of chocolates. However, only gifts or gift vouchers with an individual value of £20 or less may be accepted. Such gifts do not have to be declared in writing to the Governing Body or be included in the Register of Gifts and Hospitality. For the avoidance of doubt employees must always refuse gifts of money.

2. Hospitality to an employee

Where hospitality in the form of meals and drinks is offered by a business contact, this is only acceptable where it forms part of a normal business meeting (for example, refreshments at training events or meals at evening meetings). Offers of hospitality to specific events, such as a dinner or sporting event, should only be accepted after authorisation from the Governing Body. These would normally only be approved where there is a clear and demonstrable benefit to the school and the hospitality would not expose the school to criticism that the business contact was exerting undue influence. These should be recorded in the Register of Gifts and Hospitality. Visits by employees to exhibitions, demonstrations, conferences, business meals and social functions in connection with the school's business and authorised by the school, shall be at the school's expense.

3. Gifts or hospitality to the school

Where a business contact sends a gift to the school (for example, a stationery supplier sending a gift), these should not be accepted and should be returned to the supplier. Such offers of any value should be declared to the Governing Body and recorded in the Register of Gifts and Hospitality. If it is not possible to return the gift, the employee who usually deals with the supplier should declare the gift to the Governing Body who will keep a record of it and decide how it is to be used. Such gifts remain the property of the school and should be included in the Register of Gifts and Hospitality. The only exceptions to this are low cost, functional items suitable for business use (as opposed to personal use), such as diaries, calendars or pens, may be accepted and do not have to be declared on the Register of Gifts and Hospitality.

* A “business contact” refers to any person, body or organisation with which the academy is involved on a financial or charitable basis (including contractors; developers; consultants; regional or national charities). This also includes business contacts who are potential suppliers (e.g. they are, or may, tendering for future business).

Pecuniary & Non-Pecuniary Interests

1. Relationships

Employees who engage or supervise contractors or have official relationships with contractors and have previously had or currently have a relationship in a private or domestic capacity with the contractor or one of their employees should declare that relationship to their manager and confirm the relationship in writing.

If staff are related to an applicant for a job it must be declared. This includes both internal staff applying for promotion and external applicants.

2. Dual Employment

All employees are bound by their conditions of service to devote their full time service to the Academy and are not entitled to engage in any other business or take up any other appointment without the express consent of the Governing Body. Employees covered by this provision must obtain the Governing Body’s express written consent before engaging in any other business or taking up any other additional appointment.

Any additional employment must not conflict with or react detrimentally to the Academy’s interest or weaken public confidence in the conduct of the Academy’s business. Where there is any difference of view as to whether or not a particular additional employment would have that effect the Governing Body’s view must prevail.

Employees must also declare to their Principal in writing any non-financial interests which they consider could bring about conflict with the Academy’s interests (e.g. involvement with an organisation or pressure group which may seek to influence the Governing Body’s policies).

Employees must declare to the Governing Body in writing any financial interests, which could conflict with the Academy’s interests. A register will be kept of all declarations under the above categories and will be subject to annual review.

3. Personal Interests

Employees must declare to the Governing Body any membership of any organisation, which has secrecy about rules, membership or conduct. Failure to do so could lead to disciplinary action. The Business Manager will maintain a central register of such declarations.

4. Sponsorship – Giving and Receiving

Where an outside organisation wishes to sponsor or is seeking to sponsor a school activity, whether by invitation, tender, negotiation or voluntarily, the basic principles and conventions concerning acceptance of gifts or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.

Register of gifts and hospitality

In the interest of transparency, a Register of Gifts and Hospitality is to be established and kept in the Business Manager's office (Annex B).

Staff and governors must record the offering or acceptance of any gifts and hospitality by completing a 'Declaration of Gifts and Hospitality' (annex A). in accordance with the following procedures:

- Gifts and hospitality exceeding a value of **£50** may only be accepted with the permission of the Principal or Chair of Governors;
- Gifts and hospitality exceeding a value of **£20** must be recorded in the register;
- Gifts of low intrinsic value may be accepted and are not required to be recorded on the register

Failure to comply

In all instances where there is a reasonable belief that there has been a failure to declare, the Chair of Governors / Principal will conduct a formal investigation. Employees may be subject to disciplinary procedures to pursue potential matters of misconduct.

It is a criminal offence for an employee of the Academy to corruptly accept any inducement or reward for doing, promising or refraining from doing anything in the course of their employment, corruptly showing favour or disfavour, in the handling of contacts. In acting corruptly the employee would demonstrate their intention to purposefully act with a lack of probity and with a disregard for the implications of their actions for the Academy.

Managing the Receipt of Gifts and Hospitality

Whether or not the offer is acceptable:

Purpose	Token, thanks or seeking a favour? (token or thanks: yes; favour: no)
Rules	What are they? Does this situation conform?
Openness	Is the offer transparent?
Value	Expensive or inexpensive?
Ethics	Does the offer fit with academy ethics? Is this an exceptional circumstance?
Identity	Who has made the offer?
Timing	Are you about to make a decision affecting the giver?

Declaration of Gift or Hospitality Form

SECTION ONE

Details of the offer – to be completed by the Staff Member receiving the offer.

Please tick box A or B to indicate that you have been offered and have either accepted or declined a gift or hospitality.

☐ I have been offered a gift / hospitality which I have declined

☐ I have been offered a gift / hospitality which I have accepted

Declaration Details

Date offer was made	
Name of firm or individual	
What is the relationship with the individual/organisation offering the gift/hospitality	
Nature of gift or hospitality	
Estimated value	

I believe my objectivity and independence in relation to the above external organisation has not been impaired in any way by the offer of gifts or hospitality.

Employees signature _____ Date _____

Name _____

SECTION TWO:

Action authorised by the Governing Body

Record of action (delete as appropriate)	<ul style="list-style-type: none"> Acceptance authorised Acceptance Not authorised Agree action to decline <p>Please ensure the Staff Member who received the offer is aware of you decision</p>
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SIGNED _____ DATE _____
 Chair of Governors)

Completed forms should be sent to the Business Manager and entered into the Gift and Hospitality Register

Gift and Hospitality Register

This is a sample of the register, which is held on an electronic spread-sheet.

Date of entry	Name of recipient	Estimated value £	Nature of gift / hospitality	Supplier of gift / hospitality	Accepted / Rejected	Action / comments