



Oratory R.C. Primary and Nursery School

'Shine as to be a light to others'

Gifts and Hospitality Policy

Next Review	Date of this Policy:	Reviewed by:	Date to be next ratified by FGB:	Review Frequency
December 2022	December 2020	Pay, Finance and Staffing Committee	December 2020	Within two years

1. Aims

This policy aims to ensure that: Staff and Governors 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.

2. 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

4.1 Members, trustees and staff

Staff and Governors:

- 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.
- 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 over £25 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Head Teacher or Senior Office Manager accepting or offering any gifts or hospitality with a value of over £25.

4.2 Governance

Governor's 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 Head Teacher

The Head Teacher is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The Head Teacher 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 Senior Office Manager after consultation with the school's Financial Advisor (DRB) that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.

4.4 The Senior Office Manager

The Senior Office Manager will ensure that:

- The school maintains a gifts and hospitality register.
- Figures for transactions relating to gifts made by the trust are disclosed.
- The Governors and Head Teacher are provided with information on gifts and hospitality received and given, as appropriate.

- They will also ensure, alongside the Head Teacher that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £25 are in line with this policy.
- The Senior Office Manager is responsible for maintaining the gifts and hospitality register on a day-to-day basis.

5. Acceptable gifts and hospitality

5.1 Offers of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of [up to £25/other maximum value set by the trust]. 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 doubt governors and staff must consult the Head Teacher or Senior Office Manager.

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 Head Teacher or Senior Office Manager.

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 Governors or member of staff who is offered such gifts or hospitality must consult the Head Teacher or Senior Office Manager before accepting.

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.

5.2 Offers of gifts and hospitality given

To be decided by PFS Committee:

- *Define circumstances when using the school budget to offer particular hospitality to staff or visitors is acceptable*
- *Explain your approach to giving gifts to staff*
- *Provide more detail about the types of expenses that staff can and cannot claim when working off-site (such as when on residential training courses)*
- *Set out more information on your process for claiming expenses*

Any gifts or hospitality provided by the School such as a working lunch for visitors must not be extravagant. A maximum value of £7 per head (max) should be used as a guideline.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Senior Office Manager and receipts must always be enclosed.

The must be consulted about any proposal to provide gifts or hospitality with a value of over £25.

6. 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 [*define what we class as a lavish or extravagant gift*]

This list is not intended to be exhaustive.

7. Declining gifts and hospitality

Any Governor or staff member 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 Head Teacher or Senior Office Manager. The Head Teacher or Senior Office 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. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the Chairman of the Pay, Finance and Staffing Committee.

This policy will be reviewed every two years by the Pay, Finance and Staffing Committee and ratified by the Governing Board.

9. Links with other policies

This gifts and hospitality policy is linked to the:

Staff code of conduct

Staff disciplinary procedures



Appendix 1: Gifts and Hospitality Register



Date	Name	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted/rejected	Approved by