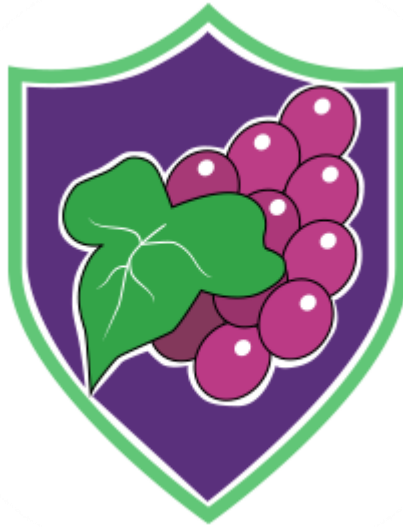


Wincheap Foundation Primary School



Gifts and Hospitality Policy

Version	1
Ratified by	F & P Committee
Date of Approval	Autumn 2024
Author	Headteacher
Responsible Committee / Board	F & P Committee
Review Date	
Target Audience	Parents / Public / Staff

1. Policy Context

The governors of Wincheap Foundation Primary School aim to ensure that:

- The School's funds are used only in accordance with the law and Local Authority (LA) guidance
- The School has due regard to propriety and regularity, and ensures value for money, in the use of public funds
- All School Leaders, Governors and Staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they give or are presented with any to ensure undue influence – or the appearance of undue influence – is avoided.

This Policy has been drawn up in accordance with the Local Authority's (LA) Scheme for Financing Schools, and should also be read in conjunction with our

- Anti-Fraud, Bribery and Corruption policy
- Whistleblowing policy
- Finance policy

2. Legislation and guidance

This policy complies with the Bribery Act 2010 and guidance found within the LA Scheme for Financing Schools and the LA's Financial Controls.

The School is required to have a register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might compromise their integrity or give that appearance. This applies to all School Leaders, Governors and Staff and/or any other representative of the School. This policy has been shared with staff and is available on the School's website.

2.1 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 (with the exception of discounts routinely applied by the provider to all schools or businesses).

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.

3. Roles and responsibilities

3.1 All School 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, or that the school 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
- Where any gift or hospitality is offered to them or the school by an individual child/parent with a value of over £50 (or over £100 if a combined gift from a group of children/parents), they must email the School Business Manager within 7 working days to include it on the Gifts And Hospitality Register, **even if declined**
- Must consult the headteacher before accepting or offering any gifts or hospitality with a value of over the previously mentioned limits.
- For the purpose of this policy handmade gifts will be considered as having no monetary value.

3.2 The Headteacher

In addition to complying with section 3.1, the Headteacher is responsible for ensuring that staff and parents 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 that decisions on whether individuals or the School can give or accept individual gifts or hospitality with a value over the specified limits are in line with this policy.

3.3 The School Business Manager

The School Business Manager will maintain the Gifts and Hospitality Register and ensure, alongside the Headteacher, that decisions on whether individuals or the school can accept or offer gifts or hospitality with a value in excess of the limits herein conform with this policy.

3.4 Parents

The School will advise parents that

- We do not wish to discourage all gift-giving, and that small tokens of gratitude are always appreciated
- Gift-giving is not a requirement, and parents are not expected to buy gifts for class teachers or other school staff
- the appropriate maximum value of individual gifts and when they may be offered, or explain that the school prevents teachers and other staff from accepting gifts worth over a certain amount.

4. Acceptable gifts and hospitality

4.1 Giving Gifts or Hospitality

Any gifts provided by the school will not exceed £25 and must meet the delegation and controls outlined with the school's Finance Policy; the decision will be documented and ensure it achieves propriety and regularity in its use of public funds. The school will not use school budgets to purchase gifts for staff, unless in exceptional circumstances – for example, on compassionate grounds - to a maximum value of £25. The school may provide gifts for voluntary helpers in recognition of exceptional support with the same limiting principles.

School funds will not generally be used for providing hospitality or meals for staff, with the following exceptions

- A light meal and non-alcoholic drinks may be purchased where meetings with visitors to the school extend through the lunchtime period.
- School meals may be provided to staff who are supporting children at lunchtime by eating with them and supporting relationships, particularly where this supports behaviour or SEN needs. This relates to specified children who have been identified as requiring additional lunchtime support.
- It is also reasonable, at the Headteacher's discretion, to provide refreshments and/or a light meal on School premises at staff training days or as part of a development or evening/weekend work activity. Food on such occasions should ideally be provided via the School kitchen but should this be unavailable, alternative comparable arrangements can be made with Governing Body approval.

4.2 Receiving Gifts or Hospitality

Members of staff can accept gifts and hospitality that have a value of up to £50 from individual children/parents or £100 if from a group of children/parents. These do not have to be preapproved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, staff must consult the Headteacher.

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 in excess of the limits above must be recorded on the gifts and hospitality register within 7 working days, **even if declined**. Any member of staff 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.

5. Unacceptable gifts and hospitality

The following must never be offered or accepted:

- Gifts or hospitality offered to family members, partners or close friends of governors or staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited, during the tendering process, or if it gives the appearance of being connected to a specific tender
- Lavish or extravagant gifts or hospitality.

This list is not intended to be exhaustive.

Disciplinary action will be taken against anyone who fails to decline gifts or hospitality that do not align with the principles of this policy.

Failure to declare any gifts or hospitality offered that qualify for inclusion on the gifts and hospitality register will be dealt with as a staff disciplinary matter.

6. Monitoring arrangements

The Gifts & Hospitality Register is maintained by the School Business Manager and monitored regularly by the Headteacher. The Register will be reviewed by the Governors' Finance and Personnel Committee annually.

Signed..... Date.....
(Chair of Governors)

Signed..... Date.....
(Chair of Finance and Premises Committee)

Signed..... Date.....
(Headteacher)

