

GIFTS & HOSPITALITY POLICY

Version 4.0

Review by Resources Committee: 21st January 2019
Adopted by Governing Body: 25th February 2019
Next Full Committee Review Due: Spring 2022

Reviewer: S. Waters
Governor Link: Chair Resources Committee
Chair Audit Committee

Gifts & Hospitality Policy

East Barnet School, Chestnut Grove, East Barnet, EN4 8PU

1. Definition

For the purpose of this policy, **School Representative** shall mean: any member of staff, whether in paid or voluntary employment; a governor; and a Parent Teacher Association committee member.

2. Principles

2.1. The School is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas.

2.2. The School will not tolerate any form of bribery by, or of, any person or body acting on its behalf. This includes, but is not limited to members of staff, agents, consultants, governors and volunteers.

2.3. The School is committed to implementing effective measures to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010, and ensuring that all decisions are reached on the basis of value for money.

2.4. All School Representatives must maintain an unimpeachable standard of honesty and integrity and the School's good reputation must be upheld.

2.5. The School must use funds appropriately for the purpose intended and not for irregular expenditure, such as alcohol or excessive gifts.

2.6. All School Representatives must avoid accepting or giving any gift, reward or benefit that:

2.6.1. could be seen as an inducement to affect a business decision,

2.6.2. is disproportionately generous,

2.6.3. is a misappropriation for personal gain.

2.7. Given the context of our working environment, School Representatives may be given small gifts of gratitude by students, other members of staff or the school in appreciation for work or support they have provided.

2.8. As a compassionate School, we feel it appropriate to give small gifts of celebration or condolence to School Representatives.

2.9. Any matter which appears to be in conflict with this policy will be referred to the Headteacher (or the Chair of Governors if the matter relates to the Headteacher).

2.10. Any breach of this Policy must be reported immediately to the Headteacher (or Chair of Governors if relating to the Headteacher) and may constitute misconduct or gross misconduct which could lead to disciplinary or police action.

3. This Policy will be reviewed by the Resources Committee on a 3-yearly cycle and must be signed by the Chair of Governors and Headteacher once agreed by the Full Governing Body.

4. Gifts

4.1. Gifts may not be solicited under any circumstances.

4.2. School Representatives are permitted to accept gifts, rewards or benefits from individual members of the public or organisations the School has official contacts with only where they are isolated and of a low value (maximum £25).

4.3. Any gift received by a School Representatives exceeding £25 must be recorded in the Register of Business Interests, maintained in the Finance Department.

4.4. Gifts should not be accepted if they could be construed as an inducement to affect a business decision.

- 4.5. If a School Representative is offered a gift or other inducement by a third party supplier, in exchange for recommending or supporting a supplier, the incident must be reported to the Headteacher immediately.
- 4.6. Where purchased items include a “free gift”, such gifts should be either used for School business or handed to the School to be used at charity raffles etc.
- 4.7. Gifts which are intended for the School as an academic body can be accepted and retained in the School but not by the individual who receives them. Such gifts and donations should be recorded appropriately.
- 4.8. The School may give a small gift to School Representatives to celebrate or offer condolences, usually up to a value of £50.00 but exceptionally (with the agreement of the Chair of Governors or Headteacher) to a maximum of £100 (including delivery, if appropriate). The events may include the birth of children, marriage, special birthday, long service, illness, bereavement, retirement, leaving after long service. Gifts may include flowers, fruit or chocolates.
- 4.9. Exceptional long service at the school (in excess of 30 years) may be recognised with a special non-cash award of a commemorative gift and/or vouchers to the total value of £500. HMRC regulations state that non-cash awards may be made provided the employee has worked for the school for at least 20 years and the award is less than £50 per year of service and the employee has not received a long-service award in the last 10 years. In the event that a cash award is made within these conditions, the value is tax and NI deductible and will be reported on HMRC form P11D. (HMRC regulations as at May 2018).
- 4.10. Personal gifts for special occasions may be given or received by School Representatives, whether individually or as the result of a collection by colleagues or students.

5. Hospitality

- 5.1. Offers of hospitality should never be solicited by a School Representative and must not be accepted where:
 - 5.1.1. there is no reasonable business justification for doing so;
 - 5.1.2. an invitation is disproportionately generous;
 - 5.1.3. the invitation could be seen as an inducement to affect a business decision or exerting an improper influence over the way the School Representative carries out their duties or role.
- 5.2. Hospitality may be accepted without making any declaration and no taxable benefit incurred where:
 - 5.2.1. A School Representative is representing the School in the community;
 - 5.2.2. an event is clearly part of the life of the School or community;
 - 5.2.3. the hospitality provided is modest and appropriate to the event;
 - 5.2.4. the hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.
- 5.3. Other forms of hospitality up to a maximum value of £25.00 (such as lunches, outings, tickets for events, etc.) may be accepted with the prior agreement of the Headteacher (or Chair of Governors if this hospitality concerns the Headteacher), provided that it is normal and reasonable in the circumstances.
- 5.4. Any hospitality or facilities other than of a reasonable value (up to £25.00) provided during the normal course of business should be reported as an entry in the Register of Business Interests.
- 5.5. Hospitality by the School may be extended to visitors to the School at a reasonable level where appropriate.

- 6. Related policies:
 - 6.1. Staff Expenses Policy
 - 6.2. Governors' Expenses Scheme
 - 6.3. Finance Policy

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John Ireton
Member of the Trust & Chair of Governors

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Leann Swaine
Headteacher