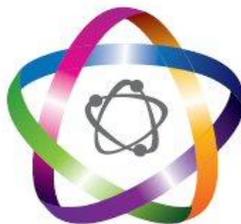


**POLICY DOCUMENT No F05****DEBENHAM HIGH SCHOOL**

A Church of England High Performing Specialist Academy

**GIFTS AND HOSPITALITY POLICY**

This policy is reviewed every two years by the Finance and General Purposes Committee

**History of Document**

Issue No	Author/ Owner	Date Written	Approved by Finance and GP	Comments
Issue 1	Tracy Darby	Jun 11		Updated
Issue 2	Tracy Darby	Jan13	01/02/2013	Updated
Issue 3	Tracy Darby	March 15	20/03/2015	Minor update
Issue 4	Tracy Darby	Feb 2017	18 /03/2017	Minor amendments plus rise in value of threshold
Issue 5	Tracy Willmott	March 2019	15/03/2019	Reference to Data Protection Act 2018

## 1. General

This is the school's approved Code of Conduct relating to the offer and/or acceptance by staff, governors and members, of gifts and hospitality of whatever nature from outside individuals or organisations.

Within the terms of the Code, staff, governors and members are expected to exercise common sense. If they are in any doubt they must consult the Headteacher/Chair of Governors and in every case declare the acceptance of a gift or hospitality in the register kept by the school, using the school's 'Declaration of Gifts and Hospitality' form.

The process set out is designed to safeguard governors, members and staff from any misunderstanding or criticism.

The general principles which govern gifts and hospitality are:

- 1.1 Offers of hospitality should only be accepted if there is a genuine need to represent the school.
- 1.2 Gifts should only be accepted in **exceptional** circumstances.
- 1.3 The Code of Conduct applies to all Governors, members and staff of Debenham High School.
- 1.4 To determine whether a gift or hospitality is acceptable, the 'PROVE IT' test should be applied by staff and referred to the Headteacher/Chair of Governors if in doubt. See Appendix A.
- 1.5 Registers are accessible for viewing by the following appropriate officers: Headteacher, Governors, School Business Manager, External Auditors, and Internal Auditor.
- 1.6 Any request by a member of the public to view the Register of Declarations of Gifts and Hospitality will be referred to the Headteacher. In considering any request, the requirement for the School to be open and transparent will be balanced against the requirements of the Data Protection Act 2018.

## 2. Hospitality

The following principles should be followed in deciding whether or not to accept hospitality.

- 2.1. Staff, governors and members should ask themselves whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered. If the answer is yes, the hospitality should be declined. In making judgements, relevant facts to take into account include the person or organisation offering the hospitality, its scale and nature, and its timing in relation to decisions to be made by the school.

- 2.2 Care should be taken to avoid situations in which an individual governor or member of staff is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation.
- 2.3 Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as follows:-
  - 2.3.1 attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest;
  - 2.3.2 attendance at events or functions where there is a demonstrable need for the school to be represented to either give or to receive information or to participate as part of the school's corporate image;
  - 2.3.3 attendance at events or functions which are part of the civic, cultural or sporting life of the school;
  - 2.3.4 working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.
  - 2.3.5 Overnight hospitality linked to any of the above should not be accepted.

### 3. Gifts

All personal gifts should be refused or donated to charity unless they come within the categories set out in 3.1 or 3.2 below.

- 3.1 Gifts of the following type may be accepted:
  - 3.1.1 modest gifts of a promotional character, eg calendars, diaries and other similar articles. See also point 4;
  - 3.1.2 gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation.
  - 3.1.3 gifts up to **£20** in value.
- 3.2 Gifts which are intended for the school as a corporate body or intended for the school can be accepted but must not be retained by the individual who receives them. Such gifts should be passed to the school as appropriate.

### 4. Registration of Gifts and Hospitality

**Staff, governors and members must, within 28 days of accepting any gift or hospitality with an estimated value in excess of £20, provide written notification to the Headteacher using the**

'Declaration of Gifts and Hospitality' form (Appendix B). All offers accepted should be recorded in case of any queries, in particular through FOI requests.

The Declaration of Gifts and Hospitality form must be completed in full, setting out full details of the offer or the gift and or hospitality received as well as:

- estimated or actual value;
- an indication from the headteacher as to why acceptance of the offer is authorised;
- the employee's/governor's printed full name and signature; and
- the Headteacher's printed full name and signature.

## **5. Monitoring**

The school maintains a register of gifts and hospitality accepted.

The pro-forma (see Appendix B) detailing the individual declarations, should be kept in the Register.

Any concerns/issues identified should be noted and an action plan put in place.

## **6. Penalties for Breaching the Code**

The school's disciplinary procedures may be applied where it is found that breaches of the Code have occurred.

## **7. Monitoring of the Code**

As part of its role in promoting high standards of conduct, the Finance and General Purposes Committee may request to see the register at any time.

## **8. Retention of Documentation**

Documentation in the register will be kept for seven years.

## Managing the Receipt of Gifts and Hospitality

The **PROVE** it test:

Whether or not the offer is acceptable:

<b>Purpose</b>	Token, thanks or seeking a favour? (token or thanks: yes; favour: no)
<b>Rules</b>	What are they? Does this situation conform?
<b>Openness</b>	Is the offer transparent?
<b>Value</b>	Expensive or inexpensive?
<b>Ethics</b>	Does the offer fit with school ethics? Is this an exceptional circumstance?

**Declaration of Gifts or Hospitality Received**

Name:

Description of gift or hospitality provided	
Value/Estimated value of gift or hospitality	
Date of offer and date of receipt of gift or hospitality	
Person / body offering/providing the gift or hospitality:	
Person or body receiving the gift or hospitality (other than/as well as you)	
Any relationship (including potential future relationship) which you or the agency has with the person or body offering the gift or hospitality	
Why accepting it was in the school interests:	
For gifts (including items such as tickets and vouchers): do you seek permission to retain/use it yourself, or will you pass/have you passed it to the Headteacher or other appropriate person to be passed on to charity or deal with it in some other way?	
For hospitality or gifts already enjoyed, used or consumed: Why was prior approval not sought?	

Signed ..... Date .....

Headteacher..... Date .....

Reason for refusal/approval: