



## Lordswood Girls' School & Sixth Form Centre

This policy is called:	<b>Gifts &amp; Hospitality Policy</b>
It applies to:	Lordswood Girls' School and Sixth Form Centre
Person responsible for its revision:	Headteacher
Status:	Part of statutory procedures
Website:	On Website and Staff Launch Page
Approval by:	Finance & Audit Committee
Updated:	January 2020
Review frequency:	Every three years
Date of approval:	8 <sup>th</sup> January 2020
Next approval:	8 <sup>th</sup> January 2023

### 1. Aim

- To ensure that all members of staff are aware of their obligations in relation to the receipt of gifts and hospitality which could be seen to compromise their personal judgement or integrity
- To ensure that Lordswood Academies Trust has due regard to propriety and regularity of public funds when giving gifts and that the receipt of any gifts are fully documented

### 2. Introduction

This policy will be applied equally to all members of staff.

The intention of the policy is to ensure that Lordswood Academies Trust can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the trust.

Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the trust by maintaining honesty and integrity in all their business relationships and at all times acting to uphold the interests and good reputation of the academy trust.

### **3. Definitions**

A gift is any item or service, award, prize or any other benefit which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public or which might be seen to compromise the personal judgment or integrity of the recipient.

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public.

### **4. Guiding Principles**

These are:-

- The conduct of staff must not create suspicion of any conflict of interest between their roles and responsibilities as an employee of the School and their own private interests.
- The actions (or non-actions) of staff on behalf of the School must not create an impression to a third party that they have been influenced by a benefit to show favour to any organisation or person.

### **5. Gifts, Hospitality, Awards and Prizes**

- i. Lordswood Academies Trust expects all members of staff and trustees to exercise utmost discretion when giving and accepting gifts and hospitality in their capacity as members of staff or trustees of Lordswood Academies Trust. Particular care should be taken when accepting gifts from a person or organisation that has, or is hoping to have, a contract with the trust.
- ii. As a general guideline, gifts and hospitality should not be accepted by any member of staff in their capacity as academy trust staff, except as provided for below. In any case of doubt, advice should be sought from the Finance Director.
- iii. Members of staff must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that Lordswood Academies Trust might be placed under an obligation.
- iv. Isolated gifts of low value (up to £15) such as promotional calendars or diaries, or small tokens of gratitude including gifts from pupils, parents and guardians can be accepted. Gifts should not be accepted if they appear to be disproportionately generous or could be construed as an inducement to effect a business decision. A cash gift should never be accepted.
- v. Any gifts or hospitality valued at less than £15 and meeting the above criteria can be accepted without reference to the Register of Business Interest. Gifts or hospitality over £15 should be reported to the Finance Director for an entry in the Register of Business Interest.
- vi. If a member of staff, trustee or governor is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school, it is their responsibility to discuss this with the Finance Director.

- vii. Where purchased items include a “free gift”, such gifts should be either used for academy trust business or handed to the academy trust to be used at charity raffles etc. Where a gift is received on behalf of the school, the gift remains the property of the school.

### **Hospitality**

Hospitality such as meals or refreshments in the normal course of business may be accepted where the cost is no higher than would be provided by the School itself. Offers of hospitality that would be considered expensive or lavish by a reasonable person should be declined. In particular, the following should be declined:-

- Hospitality offered in return for the school entering into a commitment to purchase goods or services.
- Regular or frequent hospitality from the same source.
- Hospitality offered in lieu of the School receiving monies, fees or compensation due to the School.

## **6. Compliance with the Policy**

Any breach of this policy could lead to disciplinary action and may constitute gross misconduct. Any employee who becomes aware of a breach of policy must report this immediately to the Headteacher who will instigate investigations as necessary.

Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee’s impartiality or conflict with the duty owed to the academy trust in any matter relevant to an employee’s duties (such as conflicting business interests) should be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff must supply details of such transactions for entry into the Register of Business Interests.

Gifts which fall outside the guidance in 5.iv. should be declared on the template at Appendix 1.

## **7. Monitoring**

This policy will be reviewed on a 3 yearly cycle by the Finance & Audit Committee and the Finance Director will report annually on any declarations.

## Appendix 1

### Gifts and Hospitality Register of Business Interests

Recipient	Nature of gift/hospitality	Donor	Date	Estimated Value	Comments

**NB Comments should include the reason the offer/gift was accepted and the use to which any gifts were put, e.g. donated to academy raffle, etc.**