



**FRANCES OLIVE ANDERSON  
Church of England (Aided) School**

*'Being different, Belonging together'*

## **Gifts and Hospitality Policy**

Frances Olive Anderson C of E Primary School is committed to the highest level of integrity, honesty and accountability in all its business dealings. All Staff and Governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the School.

### **Definitions**

**A gift** is any item or service which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public.

**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.

**The Prevention of Fraud and Bribery Act 2010** makes it a criminal offence to:

- offer, promise or give a bribe,
- request, agree to or accept a bribe,
- (by an organisation) fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.

Under this Act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

### **Statement of Policy**

In order to protect all adults involved with the School, and the reputation of the School from accusations of bribery or corruption, staff must take extreme care that none of their dealings, directly, or indirectly, could be deemed as a reward for benefit and must ensure compliance with the Bribery Act 2010. This Act makes it a criminal offence.

The school will hold a gifts and hospitality register.

It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £30 these are perfectly acceptable without reference to senior members of staff. These will not need to be added to the Register.

Where a more valuable gift, benefit or service is offered which is for the good of the School, rather than an individual, then it must be referred to the Headteacher and if in the case of the Headteacher, to the Chair of Governors for approval within their discretion. If approval is given these items should be added to the Gift and Hospitality Register.



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Hospitality in the form of working lunches, coffees etc. is perfectly acceptable and it would be appropriate to offer this to develop relationships with visitors and business colleagues. These would not be added to the Gift and Hospitality Register.

If a member of staff 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 other than light refreshments, it is their responsibility to discuss this with the Headteacher within 5 working days of the offer and before accepting such benefit. If acceptable, this would need to be added to the Gift and Hospitality Register.

If not accepting a gift would be regarded as causing offence, (such as a sudden and unexpected gift, or one where it would cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Headteacher as soon as possible who may decide to return the gift, discuss it with the Chair of Governors, or/and may donate it to a school raffle/fair or a charitable cause.

Examples of gifts or hospitality that should not be accepted are cash or monetary gifts, gifts or hospitality offered to a member of your family, gifts or hospitality from a potential supplier or tendered in the immediate period before tenders are invited or during the tender process.

Where a gift is received on behalf of the School, the gift remains the property of the School.

This Policy also applies to spouses, partners or other associates if it can be suggested that the gift or hospitality is in fact for the benefit of the Staff member or Governor.

All gifts/hospitality over the value of £30 must be recorded in the Gift and Hospitality Register, whether accepted or not.

### **Instances of non-compliance**

In the case where it is believed a member of Staff or a Governor has not declared a gift or hospitality then a formal investigation will be instigated by the Headteacher/Chair of Governors. This may take the form of disciplinary procedures in the case of employees if misconduct is indicated.

### **Monitoring**

This Policy and the Gift and Hospitality Register will be reviewed annually by the Headteacher. Staff and Governors will be reminded periodically of their requirement to declare gifts and hospitality received/accepted/declined in accordance with this Policy.

Approved by P & S Committee: **May 2023**  
To be reviewed: **May 2024**



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**Appendix A**

**Declaration of a Gift or Hospitality**

Name:

Position:

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I have been offered a gift/hospitality which I have declined

I have been offered a gift/hospitality which I have accepted.

Date and time of offer:
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Place where offered:
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Name of organisation/person Making the offer and their relationship with the School	Nature of interest/gift/hospitality	Estimated value if applicable

Reason for accepting/declining gift/hospitality:

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Signed: \_\_\_\_\_ Dated: \_\_\_\_\_

Approved by: \_\_\_\_\_ Dated: \_\_\_\_\_

*Headteacher/Chair of Governors as applicable*



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On completion, please return this form to the School Business Manager who will keep this and make a record in the Register in date order.

Entered in Register	Date:	Reference:
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Declaration of Gifts and Hospitality Register

Date of Entry	Name of Governor or Staff	Estimated Value £	Nature of Gift/Hospitality	Supplier of Gift/Hospitality	Reason for Acceptance/Non	Declaration Form Reference