


Gifts and Hospitality Policy

THE
C  **MPASS**
PARTNERSHIP OF SCHOOLS

Revisions agreed by The Business Committee – 8th October 2020

Revision	Paragraph
Numbering has been included to define each paragraph. Future updates will refer to each paragraph number individually. Text Justification has been applied to the whole document	
Insert 'Introduction clause' to the Gift and Hospitality Policy	1
Insert to reflect regulatory changes	15.2
Record of Gifts & Hospitality template Appendix 1 added to top of page	Appendix 1
Gift and Hospitality Register template changed to landscape and Appendix 2 added to top of page	Appendix 2

Gifts and Hospitality Policy

1. Introduction

1.1 All Employees and trustees are expected to maintain a high standard of conduct with regards to the acceptance of gifts or hospitality of any kind from third parties e.g. suppliers or any other organization with which The Compass Partnership of Schools has a working relationship (including individuals).

2. Why do we have guidance on gifts and hospitality?

2.1 Your conduct as a School Leader or member of staff should never lead anyone to question your interests, or lead anyone to think that you have been influenced by gifts and hospitality. This is important because your own personal reputation and that of the Schools in the Compass Partnership, could be seriously affected if you inappropriately accept a gift or hospitality. It is also a criminal offence to demand or accept a gift or reward in return for allowing you to be influenced as a part of the school/Partnership. This is why the Compass Partnership of Schools has adopted guidance which applies to all School Leaders and staff, in relation to gifts and hospitality. This policy protects you, the School and Partnership from false accusation and situations that may compromise integrity.

3. What is a gift?

3.1 A gift is any item or service that you receive free of charge. It also includes any goods or services which you personally are offered at a discounted rate or on terms not available to the general public.

4. What is hospitality?

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

5. What gifts or hospitality can be accepted without any approval?

5.1 You can accept gifts and hospitality, which are small gestures and have a value of £30 or less, without the approval of the Head Teacher/LGB Chair. Gifts and hospitality of this nature do not need to be recorded in the School's Gifts and Hospitality Register.

6. What gifts or hospitality should not be accepted?

6.1 Do not accept;

- cash or monetary gifts
- gifts or hospitality offered to your husband, wife, partner, family member or friend
- gifts or hospitality from a potential supplier or tenderer

- lavish or extravagant gifts or hospitality, even if they relate to activities in your own time

7. What things should I think about before I decide what to do?

7.1. You should treat with caution any offer of gift or hospitality made to you personally. In particular, think about whether there is a benefit to the School in you accepting, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of your, or the School's, support or favour.

8. What gifts or hospitality need approval from the Head Teacher or Chair of the Local Governing Body?

8.1 Any gift or hospitality which is more than just a token, defined as a having a value of more than £30, should be politely refused or returned. You must have the prior written approval of the Head Teacher if you decide to accept something which has more than this value. This should only be in exceptional circumstances. If you or your Head Teacher has any concerns or doubts about the public perception that might be attached to accepting any gift or hospitality, then you must refer it to the Chair of the Local Governing Body.

9. What should I do if I receive a gift without warning?

9.1 If you estimate that the gift is more than just a token you should politely and courteously decline the gift. If you feel that it would not be appropriate to do this, you should refer the matter to your Head Teacher as soon as possible and let the Head Teacher decide what you should do with the gift. Your Head Teacher may decide to return the gift, may ask the Chair of the Local Governing Body for a view, or may donate the gift to a worthy local cause.

10. What should I do if I get offered a gift or hospitality?

10.1 You must make sure that all offers you receive which have a value of more than £30 are recorded in the School's Gifts and Hospitality Register, which is kept in the School Office.

11. Do I need to record offers that I decline?

11.1 Yes – all offers of gifts or hospitality, which have a value of more than £30, must be recorded in the School's register, even if you don't accept.

12. What should I do if I am in doubt?

12.1 If in doubt, always speak to the Head Teacher. Head Teachers should consult their Local Governing Body Chairs if required. It is the responsibility of all staff members to follow the Partnership's guidance

on gifts and hospitality, and to justify why you chose to accept a gift or hospitality offered to you.

13. What would happen to me if I didn't follow the guidance?

- 13.1 The School will take disciplinary action against you if you failed to follow the guidance. It is also a criminal offence to demand or accept a gift or reward in return for allowing you to be influenced as a part of the school. This means you could be prosecuted by the Police.

14. The giving of gifts and provision of hospitality

- 14.1 The Trust's policy is for funds to be directed to the core purpose of teaching and learning. This means that school funding will not be used to give gifts to staff.
- 14.2 The Trust's policy is that meeting hospitality should be both reasonable and proportionate to the timing and length of meetings. Alcohol will not be provided at school and Trust events.

15. Monitoring

- 15.1 The Board of Trustees will assess the implementation and effectiveness of this policy. The policy will be promoted and implemented throughout the Trust.
- 15.2 The Chief Finance Officer and/or the Director of Finance and Capital Assets will use the register to ensure no unfair benefit has been awarded to a supplier.
- 15.3 This policy was adopted for full implementation on 24th November 2017.
- 15.4 This Policy will be reviewed by the Board of Trustees on a 2-yearly cycle.
- 15.5 Adherence to the policy will be monitored by the school's local governing body who will review the school's gifts and hospitality register on a termly basis.

Policy Reviewed:	October 2020
Next Review:	Autumn term 2023

Dos and Don'ts

Do	Don't
Read and follow the guidance on gifts and hospitality	Accept any gifts or hospitality which have a value of more than £30 without the approval of the Head Teacher, or the Chair of the Local Governing Body as necessary
Seek advice from the Head Teacher or Chair of Local Governing Body if you are in doubt	Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process.
Record all offers of gifts and hospitality which have a value of more than £30 in the School's register, whether accepted or not	Accept cash or monetary gifts
Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything	Accept a gift or hospitality as an inducement or reward
Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality	Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time
Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body	Accept a gift or hospitality which you or a member of the public would think is lavish, extravagant or excessive, even if the hospitality is taken in your own time
Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept	Accept gifts or hospitality offered to your husband, wife, partner, family member or friend
Consider paying for yourself if offered any hospitality by a supplier or third party	

[SCHOOL NAME] RECORD OF GIFTS & HOSPITALITY (accepted*/refused*)

This form must be completed by any member of staff receiving or declining a gift or hospitality, which relates to their position in the School and has a value of more than £30. If the individual is concerned about the likely "level" of any gift or hospitality that he or she may receive, agreement from the Head Teacher or Chair of Local Governing Body must be obtained in accordance with the School's guidance.

Name of staff member:	Position Held:
Individual, company or organisation offering gift or hospitality	
Date, time and venue:	Gift/Hospitality: Accepted*/Declined*
Nature and approximate value of hospitality/gift: If accepted, has the gift been retained for personal use or for School use?	
If accepted, reason for accepting hospitality/gift:	
Signed: Date Approved By: (Head Teacher/ Chair of Local Governing Body signature)	

PLEASE RETURN COMPLETED FORM TO THE SCHOOL OFFICE FOR RETENTION ON THE GIFTS & HOSPITALITY REGISTER

[NAME OF SCHOOL]: Gift and Hospitality Register
Academic year 2020/21

Date	Name	Gift/hospitality offered	Party offering gift/hospitality	Accepted/rejected