



## **BORDEN GRAMMAR SCHOOL**

### **Gifts and Hospitality Policy**

<b>Date created:</b>	<b>June 2015</b>
<b>Date last reviewed:</b>	<b>N/A</b>
<b>Revised by:</b>	<b>Julie Argent</b>
<b>Date ratified by Governors:</b>	<b>June 2015</b>
<b>(Finance &amp; Resources committee)</b>	
<b>Frequency of review:</b>	<b>3 Years</b>
<b>Reviewed by LG :</b>	<b>Nov 2018</b>
<b>Next review date:</b>	<b>Nov 2021</b>

## **Gifts and Hospitality Policy**

Unless there is primary legislation relating to this policy or the School finds it necessary to make changes, these procedures will be reviewed every three years to ensure they are up to date, reflect current best practice and are working effectively.

### **Section 1 – Procedure for accepting gifts and hospitality**

The purpose of this procedure is to provide brief guidance to staff only, and does not cover every eventuality. More detailed guidance is given in Section 2, below, but if in any doubt, please contact a member of the Leadership Group for further advice.

#### **Definitions**

A gift is something that is given to an individual. Staff should be aware that all gifts and hospitality received (other than those of a minor nature) are not considered to be the property of the individual, but the property of the School, and should be recorded in accordance with this policy. It is not anticipated that inexpensive gifts would compromise the integrity of staff.

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.

Donations to the School are a separate issue, and are not covered by the scope of this policy.

#### **Gifts and hospitality of a minor nature**

For the purpose of this policy, gifts of a minor nature are considered to be:

- Gifts from suppliers with an estimated value up to a maximum of £10.00
- Small gifts from those receiving a service from the School as a token of appreciation (e.g. from parents or pupils to teachers)
- Small promotional items from suppliers that are routinely given to a wide range of people (e.g. calendars, notepads, pens, etc).
- A working lunch of modest standards to allow the parties to continue to discuss business already started (unless a tender or contract is currently under dispute or being negotiated).

Gifts and hospitality of a minor nature do not need to be recorded in the Register of Gifts and Hospitality.

#### **Other gifts**

Gifts exceeding an estimated value of £10.00 from a supplier should be reported to the Bursar and recorded in the Register of Gifts and Hospitality. Such gifts may not be kept by the individual, but will be placed in storage and used for the benefit of the School or local charities (e.g. in fundraising events, for raffle prizes, etc).

Gifts with an estimated value exceeding £50 should be referred to the Chair of Governors for consideration. The decision will be reported to the Bursar, who will record the outcome in the Register of Gifts and Hospitality.

## **Other hospitality**

Hospitality in excess of a moderate working lunch should not be accepted without the approval of the Chair of Governors. All offers of hospitality, other than those of a minor nature, must be recorded in the Register of Gifts and Hospitality noting if the offer was accepted or declined.

## **Responsibilities**

All staff must record gifts or hospitality in accordance with the procedure above.

The Bursar will hold the Register of Gifts and Hospitality, and carry out annual checks to ensure that items recorded in the Register are properly accounted for and will hold items in storage, and arrange for the disposal/destination section of the Register to be completed when the items are allocated.

A breach of this policy or the inappropriate acceptance of gifts may lead to disciplinary action.

The Finance & Resources Committee will review this policy every three years.

The Chair of Governors will, where procedures for accepting or declining the gift or hospitality are unclear, make the final decision, and inform the Bursar who will record that decision in the Register.

## **Section 2 – Guidance**

The best general advice which can be given about offers of gifts or hospitality is “when in doubt, opt out”. Alternatively, staff should seek the advice of the Leadership Group and/or Chair of Governors if they are unsure.

## **Gifts**

The general convention should be that gifts offered by persons who are providing or seeking to provide goods or services to the School or who are seeking decisions should be politely refused and returned. This applies particularly to personal gifts offered to employees or members of their families. However, there is a need to recognise and provide for items of a very minor nature which come into the work-place as a consequence of normal commercial practice or as a token of appreciation. These are the items of a promotional character which are given to a wide range of people and not personally only to the employee. These gifts are usually given at Christmas time and include calendars, diaries, desk sets, flow charts, tape measures and other minor articles of use in the office or job.

Gifts may also be offered, for example, at the conclusion of a courtesy visit to another organization. If these are of the type normally given by that organisation to visitors and of a minor nature (e.g. small free sample) they can be accepted. Similar arrangements apply where the refusal of a small gift would give needless offence. However, this should not be done if the giver is currently seeking a decision from the school. The small gift should only be accepted if the giver merely wishes to express thanks for advice, help or co-operation received.

It is wise to err on the side of caution, as an obviously expensive gift should be tactfully declined. If a gift is simply delivered it should be returned to the donor and the Bursar advised of the action taken so that a note of the action taken should be placed in the Register.

There must be no individual gain when purchasing items including fuel for work purposes. Advantages such as point schemes/air miles etc. must not be collected under these circumstances.

## **Hospitality**

Common sense should apply in respect of hospitality of insignificant value and on an occasional basis. Hospitality of differing levels might be offered to school staff and accepted at official level because that course of action is reasonable in the circumstances. However, an offer of hospitality to individual

employees calls for special caution particularly if the “host” is doing or trying to do business with the school or hoping to obtain a decision from the school. It is very important to avoid any suggestion of improper influence. It is difficult to give fixed guidelines to be followed on all occasions. It is clearly a matter of individual judgement.

A working lunch of modest standards to allow the parties to continue to discuss business already started would normally be acceptable: this is a case where the modest hospitality is secondary to a specific working arrangement. The employee should be careful not to claim subsistence allowance for the working lunch. On the other hand, it would not be acceptable conduct for an employee to accept a holiday (at home or abroad), or tickets for concerts, theatre or sporting events, the use of a company flat or hotel suite, or expensive hotel meals not connected with official business.

There are occasions when an offer of hospitality of any kind should be declined, e.g. when the person offering the hospitality has a matter currently at issue with the School such as a tender under consideration or a contract dispute.

Offers of conventional hospitality (e.g. working breakfast, lunch or dinner, refreshments provided during the course of attending meetings, seminars or conferences), which are limited to isolated occasions and can be shown to be in the interests of the school are acceptable. These will not need to be recorded in the Register of Gifts and Hospitality.

### **Promotional Offers**

Purchasing inducements are offered in various forms; gifts, vouchers to be used against future orders, the ‘buy one get one free’ type of offer and the misleading offers which results in more goods being ordered than are required.

It is important to remember that when purchasing items for the school, the best possible deal for the school must be obtained in line with other school policies. Any commission vouchers, cash discounts etc offered by a contractor in connection with the order belong to the school not the individual.

If employees receive an approach from a supplier (or prospective supplier) which seems to be unauthorised in any way, or if they receive a gift or voucher from such a supplier, they should immediately inform the Bursar.

### **Section 3 - Register of Gifts and Hospitality**

The Bursar will be responsible for keeping the Register of Gifts and Hospitality up to date. The detail that is required to be recorded is:

- Recipient;
- Nature of gift/hospitality;
- Donor;
- Date of receipt;
- Whether the gift/hospitality is accepted or declined;
- Approximate value;
- Disposal/Destination;
- Full circumstances.

This register could form the basis for publication under a Freedom of Information request.