

	<b>POLICY TITLE:</b>	<b>Gifts &amp; Hospitality</b>
<b>Kingsmead Academy T/A Kingsmead School</b>		
<b>Committee/Person Responsible for Policy:</b>		Director of Finance & Operations  Finance, Strategy & Personnel sub-committee
<b>Date Approved by Governing Body:</b>		June 2021
<b>Date of Last Review:</b>		Term 5 2020-21
<b>Next Review Due:</b>		Term 5 2022-23

### **Introduction**

Section 5.31 of the September 2020 version of the Academies Financial Handbook states that the school:

“should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might compromise their judgement or integrity; and should ensure all members of staff are aware of it. When making gifts, the school must ensure the value is reasonable, is within the school’s scheme of delegation, the decision is documented, and achieves propriety and regularity in the use of public funds.

This policy represents the school’s response to this requirement.

### **Gifts and Hospitality Policy**

As a general guideline, business gifts and hospitality should not be accepted by any member of staff or governor, except as provided for below.

The intention of the policy is to ensure that the Academy 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 Academy. The Academy should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.

Employees and governors shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Academy by:

1. Maintaining an unimpeachable standard of honesty and integrity in all their business relationships.

2. Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
  3. At all times in their business relationships acting to maintain the interests and good reputation of the Academy.
- 
1. Any employee or governor who becomes aware of a breach of policy must report this immediately to his or her manager/ Head teacher/ Chair of Governors who will instigate investigations as necessary. The following general rules apply and must guide decisions on receipt of gifts and hospitality as an employee or governor of the school: Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's or governor's impartiality or conflict with the duty owed to the Academy in any matter relevant to an employee's or governor's duties (such as conflicting business interests) should be declared in writing. Any member of staff or governor who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff or governor must supply details of such transactions for entry into the Register of Business Interests.
  2. Employees and governors are permitted to accept gifts, rewards or benefits from members of the public or organisations the Academy has official contacts with only where they are isolated gifts of a trivial character ( such as diaries or calendars ). Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision.
  3. Where purchased items include a "free gift", such gifts should be either used for Academy business or handed to the Academy to be used at charity raffles etc.
  4. In relation to conventional hospitality (lunches, outings, tickets for events etc.) provided that it is normal and reasonable in the circumstances they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.
  5. Any hospitality other than of a nominal value (up to £15) or facilities provided during the normal course of business should be reported for an entry in the Register of Gifts and Hospitality.
  6. Always say "no" if you think the giver has an ulterior motive. Be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will elicit a more prompt service or preferential treatment.
  7. Never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the school, seeking employment with the school or is in dispute with the school, even if you are not directly involved in that service area.
  8. If you are in doubt about the acceptability of any gift or offer of hospitality it is your responsibility to consult the Director of Finance and Operations or Head Teacher

# DECLARATION OF GIFTS OR HOSPITALITY RECEIVED

NAME: \_\_\_\_\_

Description or gift of hospitality provided	
Value/estimated value of gift or hospitality	
Date of offer and date of receipt of gift or hospitality	
Any relationship (including potential future relationship) which you or the school has with the person or body offering the gift or hospitality	

Employee / Governor Signature: \_\_\_\_\_

Approved by the Head Teacher / Chair of Governors

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

Date: \_\_\_\_\_