

Hay-on-Wye Primary School

Gift and Hospitality Policy

**2019-2022**

**Rationale**

The schools are committed to the highest level of integrity, honesty and accountability in all its business dealings. All trustees, 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 Hay-on-Wye Primary School.

**Definition**

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

**Preventions 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 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 schools, and 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 or benefit, in line 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 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 to the good of the school, rather than the individual, then they must be referred to the Head Teacher and if in the case of the Head Teacher, to the Chair of Governors for approval within their discretion. In case of these items, if acceptable, should be added to the 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 schools other than light refreshments, it is their responsibility to discuss this with the Head Teacher before accepting such benefits within 5 days. If acceptable, this would need adding to the register.

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

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

**Instances of non compliance**

In the case where it is believed a member of Staff, Trustees or Governors has not declared a gift or hospitality then a formal investigation will be instigated by the Head Teacher/Chair of Governors.

**Declaration of Gift or Hospitality**

|  |  |
| --- | --- |
| **Name:** | **Position:** |

 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: |
| Place where offered: |

|  |  |  |
| --- | --- | --- |
| Name of organisation/person making the offer and their relationship to the school | Nature of interest/gift/hospitality | Estimate value if applicable |
|  |  |  |
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| --- |
| Reason for accepting/declining gift/hospitality: |

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

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

Head Teacher/Chair of Governors as applicable

On completion, please return this form to the business manager who will keep this and record in the Register in date order

|  |  |  |
| --- | --- | --- |
| Entered in Register | Date: | Reference: |

**Declaration of Gifts and Hospitality Register**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Date of entry** | **Name of trustee, Governor or Staff Member** | **Estimated Value** | **Nature of Gift/Hospitality** | **Supplier of Gift/Hospitality** |
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