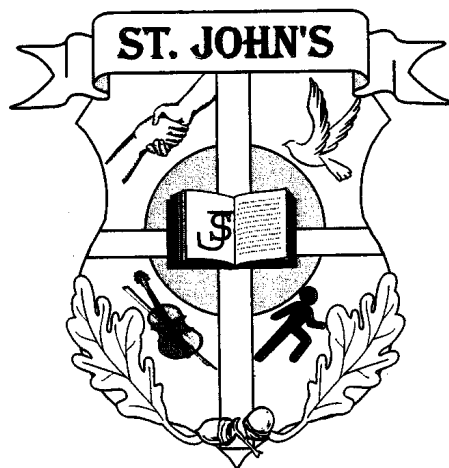


**St. John's Primary School
Bligh's Lane
Derry**

**A Policy for Gifts and Hospitality
2022**



“Learning Together Growing Together”

Contents

1. Introduction	3
2. Aims	3
3. Legislation and guidance.....	3
4. Definitions	4
5. Roles and Responsibilities	4
6. Acceptable Gifts and Hospitality.....	4
7. Unacceptable Gifts and Hospitality	5
8. Declining Gifts and Hospitality.....	6
9. Monitoring Arrangements.....	6
10. Links with Other Policies	6
Appendix 1: Gifts and Hospitality Register.....	7

1. Introduction

St. John's 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 their dealings, ensuring they are free from any conflict of interest through their business in the name of St. John's P.S.

This Policy aims to lay down guidelines, which will enable the school to meet the aims and core values of our school and to protect individuals from misunderstanding or criticism.

The principle of integrity requires that Governors and staff should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties.

In order to protect all individuals associated with the school, Staff and Governors 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 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.

The school will hold a Gifts and Hospitality Register. All gifts/hospitality over the value of £50 must be recorded in the Gifts and Hospitality Register.

2. Aims

This policy aims to ensure that:

- The school's funds are used only in accordance with the law, its articles of association and its funding agreement
- The school operates in a way that commands broad public support
- The school has due regard to propriety and regularity, and ensures value for money, in the use of public funds
- Governors and Staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same.

3. Legislation and Guidance

This policy is based on the EA's Guidance which states that schools should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of Staff and Governors.

4. Definitions

Gifts are any items, cash, awards, prizes, goods or services, offered without expectation of payment or benefit.

Hospitality is defined as food, drink, entertainment (such as cultural or sporting events) provided free of charge, or on terms not widely available to the general public.

5. Roles and Responsibilities

5.1 Governors and Staff

Governors and Staff:

- Must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that the school might be placed under any obligation as a result of acceptance
- Must not use their official position to further their private interests or the interests of others
- Must record any gifts or hospitality offered to them or the school with a value of **over £50** on the gifts and hospitality register (see appendix 1) within 7 school days, even if declined
- Must consult the Principal before accepting or offering any gifts or hospitality with a value of **over £50**.

5.2 The Principal

The Principal is responsible for ensuring that Staff are aware of and understand this policy, and that it is being implemented consistently.

The Principal will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the school and to those outside the organisation.

They will also ensure, alongside the Chairperson of the Board of Governors, that decisions on whether individuals or the school can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

5.3 The Finance Manager

The Finance Manager will ensure that:

- The school maintains a gifts and hospitality register
- Figures for transactions relating to gifts made by the school are disclosed in the school's audited accounts
- The school Principal and Finance Manager are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure that decisions on whether individuals or the school can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

5.4 Parents

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 £50 these are perfectly acceptable. These will not need to be recorded in the register. Where gifts valued over £50 are accepted, these should be recorded in the register.

5.5 Other

Where a more valuable gift, benefit or service is offered which is to the good of the school, rather than an individual, it must be referred to the Finance Manager and

Principal, for approval within their discretion; if acceptable, then these terms must be recorded in the register.

6. Acceptable Gifts and Hospitality

6.1 Offers of Gifts and Hospitality Received

Governors and Staff can accept gifts and hospitality that have a value of up to £50. These do not have to be pre-approved or recorded on the gifts and hospitality register.

Hospitality such as working lunches may be accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. Other hospitality may be accepted for instance where:

- There is a genuine need to impart information or represent the school in the community.
- An event is clearly part of the life of the community or where the school should be seen to be represented.
- The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.

If in doubt, guidance must be sought from the Finance Manager or Principal.

Any gifts or hospitality offered with a value of over £50 must be recorded on the gifts and hospitality register within 7 school days, even if declined. Any Governor or Member of Staff who is offered such gifts or hospitality must consult the Finance Manager or Principal before accepting.

If the Finance Manager is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the Principal and record the offer on the gifts and hospitality register. Likewise, the Principal should inform the Chairperson of the Board of Governors. Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a disciplinary matter.

6.2 Sponsorship

Where an outside organisation wishes to sponsor or is seeking to sponsor the activity of the school, whether by invitation, tender or negotiation, or voluntarily, the basic conventions concerning the award of contracts, and acceptance of gifts or hospitality apply.

6.3 Offers of Gifts and Hospitality

Any gifts or hospitality provided by the school, such as a working lunch for visitors, must not be extravagant. For working visitors, a maximum of £15 per head applies.

Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Finance Manager and receipts must always be enclosed.

The Finance Manager or Principal must be consulted about any proposal to provide gifts or hospitality with a value of over £50. If the Principal should propose to or provide gifts or hospitality over the value of £50 he/she should consult with and/or inform the Chairperson of the Board of Governors.

7. Unacceptable Gifts and Hospitality

The following must never be offered or accepted:

- Monetary gifts
- Gifts or hospitality offered to family members, partners or close friends of members, Governors or Staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time.

This list is not intended to be exhaustive.

8. Declining Gifts and Hospitality

Any Staff or Governors who are offered any of the unacceptable gifts or hospitality outlined in section 6 above should politely decline the offer.

If they feel it would not be appropriate for them to decline, they should refer the matter to the Finance Manager or Principal. The Finance Manager or Principal may decline the offer, or donate the gift or hospitality to a worthy cause, and must also record the offer on the gifts and hospitality register.

Disciplinary action will be taken against anyone who fails to decline or refer the matter to the Finance Manager or Principal, gifts or hospitality the policy has deemed unacceptable.

Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, will be dealt with as a disciplinary matter.

9. Monitoring Arrangements

The gifts and hospitality register is monitored regularly by the Finance Manager and Principal.

This policy will be reviewed every 3 Years by the Finance Manager and Principal, or more often if required, and approved by the School Finance Sub-committee.

10. Links with other policies

This Gifts and Hospitality Policy is linked to the:

- Staff Code of Conduct
- Staff Disciplinary Procedures
- Whistleblowing Policy.

Signed: _____

Kathleen McCallion
(Chairperson of the Board of Governors)

Date: _____

(Ratification Date)

Appendix 1: Gifts and Hospitality Register

Date	Name	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted/rejected	Approved by