

# **Ysgol Gynradd Herbert Thompson**

## **Herbert Thompson Primary School**



**Gifts and Hospitality Policy**

**Date: September 2023-2024**

## INTRODUCTION

This policy supplements Schools' Financial Procedure Rules. The content of the policy is intended to encourage a consistent approach to the acceptance of gifts and hospitality, and to keep in line with recognised good practice. Any employee seeking to make alternative arrangements should seek advice and approval from the Audit and Risk Manager.

The school has established a gifts and hospitality register. A new register will be started for each academic year. The main aim of the register is to create transparency about any gifts and hospitality received, so that there are no grounds for suspicion about influence on school decisions as a result of gifts/hospitality. If no gifts/hospitality are received by the school in an academic year, the register will be crossed through and marked as "nil".

The school will include information of gifts and hospitality in the Annual Report to Parents.

## DEFINITIONS

**Hospitality received** – any entertainment beyond the offer of non-alcoholic drinks and light refreshments, which would reasonably be regarded as normal social congress, offered to the teacher or officer at the school in his/her official capacity or in the course of their duties as a teacher or employee of the school. Hospitality can include (but not exclusively) entertaining individuals to meals, travel opportunities, hotel accommodation, invitations to events, sporting and theatre tickets.

**Gift** – any tangible item given to a member of the teaching or support staff (including the Headteacher) arising out of his/her official duties and position within the school.

**Hospitality provided** – any hospitality, gifts or other benefits offered to organisations or individuals.

**Other benefits** – any other benefit offered to a member of the teaching or support staff in the course of or arising from their official duties, not covered by the definitions of "Gifts" or "Hospitality" above.

## PROCEDURES

In order to protect both staff and the reputation of the Council from accusations of bribery or corruption, staff are not permitted, directly or indirectly, to accept any gift, hospitality, reward or other benefit from any source (including organisations, students, other employees and members of the public) with whom he/she has been brought into contact or maintains contact only by reason of the duties for which they are employed by the Council/Diocese.

## EXCEPTIONS TO THIS ARE:

- (a) occasional gifts which are regarded as trivial and where the nominal value received by any one person is under £25, such as
- Diaries
  - Calendars
  - Pens
  - Modest gifts given by individuals (such as parents or children) to express gratitude.

In exceptional circumstances, e.g. where a group of parents have contributed together to provide a gift, a Headteacher can approve such items up to a limit of £100 and record this approval in the register.

It is also permissible, where gifts of this nature are regularly received from a variety of sources, for the gifts to be collected and raffled in order to raise money for charity. This is acceptable as long as the Headteacher is agreeable to taking responsibility for ensuring that the administration of such events is properly conducted.

- (b) conventional hospitality e.g. working lunches in the course of official visits, where the frequency and the total cost of hospitality is reasonable and would not be construed by an impartial observer as affecting the employee's judgement regarding the work for which they are employed. It should be clear that the hospitality received is corporate, rather than personal, in nature. This kind of corporate hospitality will often be reciprocated by the school. Employees who are in doubt about the nature, regularity or value of any such hospitality or benefit must receive express written authorisation from the Headteacher/Chair of Governors before accepting the hospitality or benefit. It is not possible to define 'reasonable' and employees must use their discretion. In cases of corporate hospitality it would normally be expected, for example, that any hospitality where the value exceeds £25 be referred for authorisation.
- (c) Where a more valuable gift or benefit is offered from which the school in general might benefit, rather than an individual employee, acceptance will be at the discretion of the Headteacher and should be referred to the Governing Body.
- (d) Occasions when it is necessary for the school to offer hospitality to organisations or individuals. Such arrangements should be made by the Headteacher or Chair of Governors.
- 3.2 More expensive or unique civic gifts from, for example, foreign visitors, may be accepted on behalf of the school and will remain the school's property.
- 3.3 Staff responsible for the purchase of supplies, equipment, services or the commissioning of contractors must take particular care to ensure that there can be no criticism that unequal treatment has been given to suppliers involved in tendering processes through the acceptance of gifts or other benefits.
- 3.4 Any officers specifically responsible for approving contracts must not accept any gifts or hospitality from any contractor which may have an interest in such contracts.

- 3.5 Staff should always bear in mind the need not to behave so that the impression might be given or interpreted by any member of the public, pupil / parent or organisation with whom they deal that they may be influenced by any gift, benefit or behaviour to show favour or disfavour to any person or organisation in respect of the work for which they are employed. If a member of staff is in any doubt as to the propriety of receiving any gift or hospitality then the employee must consult the Headteacher. If the Headteacher is in doubt, the Chair of Governors should be consulted.
- 3.6 Any promotional offers given by suppliers to employees responsible for purchasing goods are the property of the Council.
- 3.7 When hospitality has to be declined, those making the offer should be courteously but firmly informed of the procedures and standards operating within the Council.
- 3.8 When a gift is received, but not authorised for acceptance, it shall be returned to the giver.
- 3.9 In accordance with The School Governor’s Annual Reports (Wales) Regulations 2001, the Governing Body must include details in the annual report to parents of the “application of any gifts made to the school”.
- 3.10 Employees who are found not to have acted in accordance with the above policy may be disciplined and in serious cases this may be treated as gross misconduct.

<b>Date</b>	<b>Review Date</b>
<b>September 2023</b>	<b>September 2024</b>

<b>Chair of Finance Committee:</b>		<b>Date:</b>	
<b>Chair of Governors:</b>		<b>Date:</b>	
<b>Headteacher:</b>		<b>Date:</b>	



**Appendix 2**  
**Herbert Thompson Primary School**  
**GIFTS AND HOSPITALITY REGISTER**  
**2017/2018**

<b>Name</b>	<b>Date</b>	<b>Type of Gift / Hospitality</b>	<b>Name of organisation or individual providing gift or hospitality</b>	<b>Remarks</b>	<b>Signature of employee</b>	<b>Authorisation</b>

