

Gifts and Hospitality Policy

Ellesmere Port Catholic High School



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| Approved by: | Mr J Coucill, Chair of Governors  |
| Lead of Review: | Mr C Jones, Business Manager |
| Last reviewed on: | October 2018 |
| Next review due by: | September 2021 |

Status

Recommended

Purpose

This outlines Ellesmere Port Catholic High School's policy with regard to the receipt of gifts and hospitality by its staff from any third parties arising from duties undertaken on behalf of the school. Ellesmere Port Catholic High School is committed to ensuring that the governance of the school is conducted in accordance with the highest standards of integrity, probity and openness.

General Rules

School staff must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity. Staff are asked to immediately report any offer or receipt of such gifts to the Business Manager to be recorded in the Register of Gifts and Hospitality.

It is a serious criminal offence for an employee to receive corruptly a gift (this term covers a range of favours) or benefit in other ways for doing, or not doing, anything for another person. If an allegation is made, it is for the employee to show that any rewards have not been corruptly obtained. If a gift is offered or received, the employee must consider whether it is acceptable within the terms of this policy. If s/he considers it may be accepted, the gift should be declared to the Business Manager. If s/he rejects the gift, this should be done diplomatically and the situation declared to the Business Manager. If the employee is unsure, a request for the Headteacher's decision should be made.

Governors and staff may accept the following gifts without the need to seek the approval of the school or formally register receipt:

- Incidental low value promotional gifts such as calendars, mugs, diaries or pens;
- receipt of small items from suppliers or contractors as expressions of gratitude such as boxes of chocolate or individual bottles of drink (at a value of less than £25)
- NB: Care must always be taken to ensure that whenever such gifts/hospitality are accepted no obligation to the person or organisation in question is accepted. In cases of doubt members should consult the Business Manager

The following examples of gifts/hospitality require approval by the Headteacher and to be formally recorded by the Business Manager in the Register of Gifts and Hospitality:

- Attendance as a non-paying guest of a commercial organisation or individual at a non-work related cultural or sporting event (at a value of more than £25)
- Promotional gifts worth in excess of £25
- Other offers of gifts/ hospitality not falling into any of the above categories.

A Gifts and Hospitality Form must be completed (Appendix1). This form is available electronically in the Staff Folder on the VLE. Completed forms should be returned to the Business Manager.

Employees should only consider offers of hospitality if there is a genuine need to impart information or represent the school in the community (especially where the School should be seen to be represented). Hospitality is likely to be acceptable where it is clear that the invitation is corporate rather than personal – but always provided there is no danger of contractual or other decisions being compromised. Offers aimed directly at employees as individuals must always be refused. All offers of hospitality must be authorised in advance by the Headteacher.

Unacceptable Gifts/Hospitality

The following are examples of offers of gifts/hospitality which should be refused by staff:

- Gifts of money (not including donations to the school)
- Free membership or subscriptions (e.g. sports clubs)
- Foreign travel unless as a specific element of a business, academic or research activity approved by the school
- Free goods, services or equipment which are normally provided by a supplier to the school at a charge
- Any offers of gifts and hospitality falling into any of the above categories should be reported immediately to the Business Manager.

Role of the Business Manager in relation to the Gifts and Hospitality Policy

- Responsible for ensuring that any offer or receipt of gifts, hospitality or donations to staff which are reported by a member of staff is recorded in the school's Register of Gifts and Hospitality. (It the responsibility of all staff to ensure any offer or receipt of gifts, hospitality or donations is reported by completing Gifts & Hospitality Form).
- Reporting any possible conflict of interests arising from the offer or receipt of gifts and or hospitality.

The Headteacher must not provide gifts to suppliers or contractors (other than very modest, low value gifts or other tokens of very low value).

The Headteacher must retain a copy of every request / declaration form which they consider. These forms will be kept with the Gifts/Hospitality register in a hard copy file in the Business Manager's office. The Business Manager will present the register to the governors of the Leadership & Management Committee on an annual basis. The file will be available for inspection by governors and auditors. Records will be retained for 6 years.

Relationship to other policies

This policy relates to the Staff Code of Conduct and Whistleblowing Policy

ELLESMERE PORT CATHOLIC HIGH SCHOOL

CODE OF CONDUCT FOR EMPLOYEES

GIFTS AND HOSPITALITY FORM

APPENDIX 1

| | |
|--------------------|-------------------|
| Full Name: | Job Title: |
| Department: | |

GIFT

I declare that I have received the following gift OR Please note that I have returned / refused the following gift OR I request permission to accept the following gift. (*Delete parts which do not apply*)

| | |
|----------------------------------|--------------------|
| What is the gift? | Estimated value: £ |
| What is the reason for the gift? | |

HOSPITALITY

I request approval to accept the following hospitality.

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| What is the hospitality (plus where and when)? |
| Who is organising it? What is their connection with the School? |
| What is the reason for offering you the hospitality? |
| Names of any other employees or elected members involved in the hospitality: |

To be completed by Headteacher /Business Manager:

Gift: *acceptance approved OR acceptance not approved OR rejection of gift by employee noted.*

Comments:

Hospitality: *approved OR not approved.*

Comments:

| | |
|---------|-------|
| Signed: | Date: |
|---------|-------|

NOTES ABOUT THIS FORM

- ◆ Read what the Code of Conduct/Gifts & Hospitality Policy says about gifts and hospitality before using the form. **It must be completed** for ALL hospitality and gifts (except for very modest gifts/hospitality of low value i.e. £25 or below provided these are still in line with the Standards of the Code). All staff must record refusals.

When you have completed the form –

- ◆ **Employee:** Give it to the Business Manager – they may discuss the information with you. You will get a copy of the form back later showing the decision (or noting your rejection of a gift).
- ◆ **Headteacher / Business Manager:** Discuss any problems with the employee. Make your decision and mark the form. Take two copies – return one to the employee, put the other in your Gifts/Hospitality file with the Central Register of Interests. Explain your decision to the employee if necessary.