

# Stewards Academy

Parnall Road

Harlow

Essex

CM18 7NQ



<b>POLICY NAME</b>	Gifts and Hospitality Policy			<b>POLICY NO.</b>	
<b>EFFECTIVE DATE</b>	01/09/2022	<b>DATE OF LAST REVISION</b>	19/10/2022	<b>VERSION NO.</b>	8
<b>REVIEW FREQUENCY</b>	Annual				
<b>ADMINISTRATOR RESPONSIBLE</b>	School Business Manager		<b>CONTACT INFORMATION</b>		
<b>APPLIES TO</b> apply group names to define applicable areas of staff					
<b>GROUP 1</b>		<b>GROUP 2</b>		<b>GROUP 3</b>	
<b>GROUP 4</b>		<b>GROUP 5</b>		<b>GROUP 6</b>	

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
1	Finance and General Purposes	December 2015	Created	School Business Manager
2	Finance and General Purposes	March 2016	Reviewed and approved	School Business Manager
3	Finance and General Purposes	December 2016	Reviewed amended and approved	School Business Manager
4	Finance and General Purposes	June 2017	Reviewed amended and approved	School Business Manager
5	Finance and General Purposes	March 2019	Reviewed and approved	School Business Manager
6	Resources	October 2020	Reviewed and approved	School Business Manager
7	Resources	October 2021	Reviewed and approved	School Business Manager
8	Resources	October 2022	Reviewed and approved	School Business Manager

# Gifts and Hospitality Policy

## 1. Introduction

- a. The intention of the Policy is to ensure that Stewards Academy can demonstrate that no undue or improper influence has been applied, or could be perceived to have been applied, by any supplier or anyone else dealing with the Academy. The Academy must be able to show that all decisions made have due regard to propriety and regularity, whether educational, financial or otherwise. It must also evidence that decisions are reached on the basis of the proper application of laid-down procedures and for no other reason.
- b. As a general guideline, gifts, hospitality or other personal benefits (hereinafter referred to as "Gifts") should not be accepted or offered by any member of staff or Governor, except as provided for below.
- c. Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

## 2. The receipt of gifts

- a. The Academy encourages and expects staff and governors to use their networks and contacts for its benefit. It is however a fundamental requirement on all staff and governors, that they must not derive any financial benefits, beyond their agreed salary, from a decision they make or which they contribute to. Financial gain from decisions involving the education of pupils or the spending of significant sums from the Academy's budget would be considered to be gross misconduct, therefore staff and governors shall not use their authority or office for personal gain and will demonstrate that all financial decisions have due regard to propriety and regularity. This will be evidenced by ensuring that staff and governors of the Academy:
  - i. maintain an unimpeachable standard of honesty and integrity in all their business and other relationships.
  - ii. comply with the letter and spirit of the law in contractual obligations, rejecting any business practice that might be deemed improper.
  - iii. at all times in their business and other relationships, act to maintain the interests and good reputation of the Academy.
- b. Any employee who becomes aware of a breach of Policy must refer to the Academy's Whistle Blowing Policy and report the alleged breach immediately to their line manager who will instigate investigations as necessary.
- c. For transparency, any personal interest that may impact, or be seen to impact, 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 shall be declared in writing. Any member of staff or Governor who is aware of any business dealings which could result in financial and/or personal gain for themselves, their relatives or associates must make an appropriate entry in the Register of Business Interests, this includes information on:
  - i. Businesses of which they are partner or sole proprietor.
  - ii. Company directorships including conflicting business interests.
  - iii. Charity trusteeships.
  - iv. Membership of professional bodies, membership organisations, public bodies or special interest groups where they have a position of general control or management.

- v. Details of all gifts or hospitality offered by external bodies whilst acting as a member of staff or a governor and whether this was declined or accepted in the last 12 months.
  - vi. Contracts offered by Staff or governors for the supply of goods and / or services to the trust/school.
  - vii. Company directorships or trusteeships of family members.
- d. Staff and governors are permitted to accept gifts, rewards or benefits from students, students' families, members of the public, or organisations which the Academy has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as chocolates, flowers, diaries or calendars). Therefore, gifts should not be accepted if they appear to be disproportionately generous or could be viewed as an inducement to influence a decision or action, whether business, educational, or other.
- e. Where purchased items include a "free gift", such a gift should either be used for Academy business or handed to the Academy to be used at charity raffles, pupil prizes, etc.
- f. In relation to conventional hospitality (lunches, outings, tickets for events, etc.), it may be accepted provided that it is normal and reasonable in the circumstances. However, invitations should not be accepted where:
- i. there is no reasonable business justification for doing so.
  - ii. an invitation is disproportionately generous.
  - iii. the invitation could be seen as an inducement to influence a business or other decision.
- g. Any hospitality, other than of a nominal value (estimate of £50.00) or facilities provided during the normal course of business, should be reported to the Headteacher, Chair of the Governors or Chair of the Resources Committee as appropriate.

### **3. The providing of gifts**

The Academy encourages and seeks cooperative relationships between staff, governors, stakeholders and external organisations. Accordingly, there can be occasions where it is appropriate for the Academy to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house. These fund limited gifts may include flowers, chocolates or vouchers ie love 2 shop. Likewise, it may be appropriate for leaving gifts to be provided to staff leaving the employment of the Academy, particularly after a long period of service. Other such occasions include long term get-well gifts or thank you gifts for work completed over and above expectation. Such gifts are often supplemented with private contributions from continuing members of staff.

#### Provision of gifts to pupils

To ensure that there is no risk that the behaviour of a governor or employee could be interpreted as a gesture to treat more favourably, bribe or groom, or that there is a perception that a favour of some kind is expected in return, it is only allowed that a gift to a pupil is given as part of an agreed Academy reward system, approved in advance by the Headteacher and/or SLT. Please note - The word 'gift' covers either an object or a monetary donation directly given to benefit the pupil. Also, the words 'charity' or 'reward' equally apply to this scenario if the intention is to benefit an individual child.

#### **4. The providing of hospitality including alcoholic beverage**

The provision of alcohol is no longer recognised as an acceptable Academy expense and its purchase will not be sanctioned.

##### **a. Staff Association**

Currently not applicable