



DECLARATION OF INTERESTS FOR GIFTS & HOSPITALITY POLICY



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Introduction

The receipt of gifts, money or excessive hospitality can damage the school's or an individual's personal reputation and lead to possible prosecutions for corruption. This policy seeks to protect staff and governors from suspicion of dishonesty and ensure they are free from any conflict of interest with respect to acceptance or provision of gifts, hospitality or any other inducement from or to suppliers of goods or services to the school.

Your conduct as a member of staff or a governor should never lead anyone to question your interests, or lead anyone to think that you have been influenced by gifts and hospitality. It is also a criminal offence to demand or accept a gift or reward in return for allowing you to be influenced as a part of the school. As such the school has guidance which applies to all staff and governors on gifts and hospitality.

Definitions

What is a gift?

A gift is any item or service that you receive free of charge. It also includes any goods or services which you personally are offered at a discounted rate or on terms not available to the general public.

What is hospitality?

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

What is a conflict of interest?

It is a conflict between the private interests and the official responsibilities of a person

What is a declaration of interest?

A disclosure of the conflict between your private interests and your official school responsibilities. For example, your partner may own a grounds maintenance company who may wish to tender for school works.

All members of the school governing body are to complete the register of business interests annually and review it termly. The register is maintained by the School Business Manager.

Any member of staff with a conflict of interest must declare it as soon as it arises and can record it in the staff register of business interests, maintained by the School Business Manager.

Who does this policy apply to?

All staff and governors.

Staff is taken to mean all permanent and fixed term staff employed by Hollinswood Primary School & Nursery and by any other contractors, consultants or other persons (including Governors) acting under Hollinswood Primary School & Nursery.

Governor is taken to mean any individual currently appointed to the governing body of Hollinswood Primary School & Nursery.

Gifts and Hospitality Guidance

What gifts or hospitality can be accepted without any approval?

You can accept gifts and hospitality, which are small gestures and have a value of £30.00 or less, without the approval of the Headteacher. Gifts and hospitality of this nature do not need to be recorded in the school's Gifts and Hospitality Register.

What things should I think about before I decide what to do?

You should treat with caution any offer of gift or hospitality made to you personally. In particular, think about whether there is a benefit to the school in you accepting, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of your, or the school's, support or favour.

What gifts or hospitality need approval from the Headteacher or Chair of Governors?

Any gift or hospitality which is more than just a token, defined as a having a value of more than £30.00, should be politely refused or returned. You must have the prior written approval of the Headteacher if you decide to accept something which has more than this value. This should only be in exceptional circumstances. If you or your Headteacher has any concerns or doubts about the public perception that might be attached to accepting any gift or hospitality, then you must refer it to the Chair of Governors.

What gifts or hospitality should never be accepted?

You must never accept;

- ✗ Cash or monetary gifts.
- ✗ Gifts or hospitality offered to your husband, wife, partner, family member or friend
- ✗ Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process.
- ✗ Lavish or extravagant gifts or hospitality, even if they relate to activities in your own time.

What should I do if I receive a gift without warning?

If you estimate that the gift is more than just a token you should politely and courteously decline the gift. If you feel that it would not be appropriate to do this, you should refer the matter to your Headteacher as soon as possible and let the Headteacher decide what you should do with the gift. Your Headteacher may decide to return the gift, may ask the Chair of Governors for a view, or may donate the gift to a worthy local cause.

What should I do if I get offered a gift or hospitality?

You must make sure that all offers you receive which have a value of more than £30.00 are recorded in the school's Gifts and Hospitality Register, which is kept by the School Business Manager.

Do I need to record offers that I decline?

Yes – *all* offers of gifts or hospitality, which have a value of more than £30.00, must be recorded in the school's register, even if you don't accept.

The Register of Gifts

The School Business Manager has responsibility for the ownership of the policy and the Gift and Hospitality Register. Individual staff are personally responsible for reporting any gifts/hospitality offered and whether these have been accepted or declined. The School Business Manager will record this information in the register.

The following should be recorded:

- ✓ Nature of gift/hospitality
- ✓ Value of gift/hospitality
- ✓ Name of person/company offering the gift/hospitality
- ✓ Date gift/hospitality accepted/refused.
- ✓ Name of employee

What should I do if I am in doubt?

If in doubt, always speak to the Headteacher or School Business Manager. It is your responsibility to follow the school's guidance on gifts and hospitality and to justify why you chose to accept a gift or hospitality offered to you.

Contracts with Suppliers

Staff must base all purchasing decisions and negotiations for contracts solely on achieving best value for money.

Hollinswood Primary School & Nursery requires staff who have official dealings with contractors and other suppliers of goods and services to the School to avoid conducting any private business with them by any means other than through normal commercial channels.

Staff should be aware of the Prevention of Corruption Act 1916 which states that any money, gift or consideration received by an employee in public service, from a person or organisation holding, or seeking to obtain a contract, will be deemed by the courts to have been received corruptly unless the employee proves otherwise.

School Giving Gifts

At times the school may wish to give a gift to a member of staff, governor, parent or other stakeholder. The following circumstances apply:

- Long term absence
- Sudden onset of ill health
- Other substantial life events deemed appropriate by the Headteacher

These gifts will not exceed £20.00, unless prior approval is sought from the Governors.

What would happen to me if I didn't follow the guidance?

The school will take disciplinary action against you if you failed to follow the guidance. It is

also a criminal offence to demand or accept a gift or reward in return for allowing you to be influenced as a part of the school. This means you could be prosecuted by the Police.

Policy Review

This policy will be reviewed every 3 years.

Appendix 1

THE DO's and DON'T's of Gifts and Hospitality

DO	DON'T
✓ Read and follow the guidance on gifts and hospitality	✗ Accept any gifts or hospitality which have a value of more than £30 without the approval of the Headteacher, or the Chair of Governors as necessary
✓ Seek advice from the Headteacher or Chair of Governors if you are in doubt	✗ Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process.
✓ Record all offers of gifts and hospitality which have a value of more than £30 in the School's register, whether accepted or not	✗ Accept cash or monetary gifts
✓ Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything	✗ Accept a gift or hospitality as an inducement or reward
✓ Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality	✗ Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time
✓ Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body	✗ Accept a gift or hospitality which you or a member of the public would think is lavish, extravagant or excessive, even if the hospitality is taken in your own time
✓ Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept	✗ Accept gifts or hospitality offered to your husband, wife, partner, family member or friend
✓ Consider paying for yourself if offered any hospitality by a supplier or third party	

Appendix 2

Hollinswood Primary School & Nursery

RECORD OF GIFTS AND/OR HOSPITALITY

This form must be completed by any member of staff or governor receiving or declining a gift or hospitality, which relates to their position in the School and has a value of more than £30.00. If the individual is concerned about the likely "level" of any gift or hospitality that he or she may receive, agreement from the Headteacher or Chair of Governors must be obtained in accordance with the school's guidance.

Name of Staff/Governor.		Position Held.	
Individual, company or organisation offering gift or hospitality.			
Nature and approximate value of hospitality/gift.			
Date, time and venue of receiving gift/hospitality if applicable			
Gift*/Hospitality* - Accepted*/Declined*			
*Delete as appropriate			
If accepted: Has the gift been retained for personal use or for School use? _____			
Reason for accepting hospitality/gift:			
Signed:		Date:	
Approved By: (Headteacher/ Chair of Governors signature)			

Please return completed form to the School Business Manager for inclusion in the Gifts and Hospitality Register

