



**Highcliffe School**



# Policy on Giving or Accepting Gifts

September 2020



## Purpose

- The receipt of gifts, money or excessive hospitality can damage the school's reputation and lead to possible prosecutions for corruption.
- This policy seeks to protect staff/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.

## Definitions

- A gift is any item, cash, goods or benefit in kind ***given*** or ***offered*** for which no payment or service was given or received in return.
- Hospitality can be defined as any food, drink, accommodation or entertainment provided free of charge or heavily discounted.
- Staff is taken to mean all permanent and fixed term staff employed by Highcliffe School and by any other contractors, consultants or other persons (including Governors) acting under Highcliffe's name.

## Principles

- Highcliffe School expects staff to exercise the utmost discretion in giving and accepting gifts and hospitality when on school business. Particular care should be taken with regard to a person or organisation that has, or is hoping to have, a contract with the school.
- Staff must not accept gifts, hospitality or benefits in kind from a third party where it might be perceived that their personal integrity is being compromised or that Highcliffe School might be placed under an obligation.
- No favour or preference which is not generally available should be sought, accepted or given.
- Staff must not make use of their official position to further their private interests or those of others.

## Accepting Gifts and Hospitality

- The individual should consider carefully whether it is appropriate to accept or decline a gift or hospitality.

If in doubt advice should be sought from the Director of Business and Finance who may in turn liaise with the Head Teacher.

- Gifts of low intrinsic value such as promotional calendars or diaries or small tokens of gratitude can be accepted.
- Any gift or hospitality with a value of £25 or over must be recorded in the Register of Gifts and Hospitality. This will be held by the Director of Business and Finance.
- It is each individual's responsibility to inform the Director of Business and Finance by e-mail of any gifts or hospitality that is offered before it is accepted.



## Contracts with Suppliers

- Staff must base all purchasing decisions and negotiations for contracts solely on achieving best value for money.
- Highcliffe School requires staff who have official dealings with contractors and other suppliers of goods and services to Highcliffe 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.

## Gifts To and From Students

- Given the nature of the professional responsibilities of staff, they are strongly advised not to give or accept gifts/hospitality (exceeding £25 in value) from students during their period of study.
- Any gifts/hospitality from students, exceeding £25 in value must be entered in the Register of Gifts and Hospitality.

## Register of Gifts

The Director of Business and Finance 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 Director of Business and Finance 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

## Giving of Gifts

No member of staff should, directly or through others, offer or give any money, gift, hospitality or other things of value to any employee or representative of any supplier, customer or other organisation, if doing so could reasonably give the appearance of influencing the organisation's relationship with the school.

The Headteacher, may give gifts of a nominal value to a member of staff, governor or other, up to a limit annually agreed with governors, funded by the hospitality fund of the school budget. This will usually take the form of flowers when a member of staff has been ill for more than a two week period or someone who has provided a service to the school and it's student such as judging a competition. This would be no more than £50 in value.



HIGHCLIFFE SCHOOL – REGISTER OF ACCEPTING OR BEING OFFERED GIFTS AND HOSPITALITY

Date	Name	Type of Gift/Hospitality and value	Party offering Gift or Hospitality	Accepted / Rejected