

# GIFTS & HOSPITALITY POLICY

## 1. Introduction

- 1.1. 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

- 1.2. The intention of the Policy is to ensure that the 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, whether educational, financial or otherwise are reached on the basis of the proper application of laid-down procedures and for no other reason.
- 1.3. Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

## **2. Receipt of Gifts or Hospitality**

- 2.1. 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**, the contravention of which would be considered to be gross misconduct, that they must not derive any financial benefit beyond their agreed salary from the decisions they make or contribute to, which involve the education of students, or the spending of the significant sums of public money that are entrusted to **The Albany School**. Therefore staff and **Governors** shall not use their authority or office for personal gain beyond their agreed salary and shall seek to uphold and enhance the standing of the Academy by:
  - maintaining an unimpeachable standard of honesty and integrity in all their business and other relationships
  - complying with the letter and spirit of the law in contractual obligations, rejecting any business practice that might be deemed improper
  - at all times in their business and other relationships, act to maintain the interests and good reputation of the Academy
- 2.2. Any employee who becomes aware of a breach of Policy must refer to the Academy's Whistleblowing Policy and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.
- 2.3. Any personal interest that may impinge, or might reasonably be deemed by others to impinge, 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 (such as conflicting business interests) shall be declared in writing. Any member of staff or **Governor** who is aware of any business dealings conferring personal gain, or involving their relatives or associates must make an appropriate entry in the Pecuniary Interest Register. **A nil return must be made where this is appropriate.**
- 2.4. 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 construed as an inducement to effect a decision or action, whether business, educational, or other.

- 2.5. Where any items purchased include a "free gift", such gifts should be either used for Academy business or handed to the Academy to be used at charity raffles, pupil prizes, etc.
- 2.6. Where, 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 for the following should not be accepted:
  - where there is no real business justification for doing so
  - where an invitation is disproportionately generous
  - where the invitation could be seen as an inducement to affect a business or other decision.
- 2.7. All gifts or hospitality offered, other than of a nominal value (estimated at less than £20) or facilities provided during the normal course of business, must be reported by email to the Headteacher for recording in the Gifts and Hospitality Register, regardless of whether they have been accepted or not. Any receipt of alcoholic drinks regardless of value should be recorded in the Gifts and Hospitality Register.

### 3. The providing of Gifts

- 3.1. 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 gifts may include alcoholic drinks at the Headteacher's discretion.
- 3.2. 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. Such gifts are often supplemented with private contributions from continuing members of staff. These gifts may include alcoholic drinks at the Headteacher's discretion..
- 3.3. The value of any such gifts or hospitality will be at the discretion of the Head Teacher.
- 3.4. Any donation or gift given to a member of staff that is funded by the Academy which exceeds £25 must be recorded and reported to HMRC as a 'benefit in kind' to the employee.