



# **KNOCKAVOE SCHOOL**

## **&**

# **RESOURCE CENTRE**

## ***Gifts and Hospitality Policy***

### **2022**

<b>Position</b>	<b>Signed</b>	<b>Date</b>
Principal	Sharon Cassidy	23 <sup>rd</sup> June 2022
Chair of Board of Governors	June Neill	23 <sup>rd</sup> June 2022

## **KNOCKAVOE SCHOOL AND RESOURCE CENTRE**

### **GIFTS AND HOSPITALITY POLICY**

#### **Introduction**

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, school representative or governors, except as provided for below.

The intention of the Policy is to ensure that Knockavoe School and Resource Centre 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 School. Knockavoe School and Resource Centre 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.

It is also the policy intention to ensure that all employees, school representatives and governors uphold the law.

**Under the Prevention of Fraud and Bribery Act 2010 the following is deemed as a criminal offence to:**

- Offer, promise or give a bribe,
- Request, agree to or accept a bribe,
- (by an organisation) fail to prevent bribery by those acting on its behalf (‘associated persons’) to obtain or retain business or a business advantage for the organisation.

Under this act, a bribe is ‘a financial or other advantage’ offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the school 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 Knockavoe School and Resource Centre.

Any employee who becomes aware of a breach of Policy must refer to the Raising Concerns at Work (Whistle Blowing Policy) and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.

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 school in any matter relevant to an employee's or governors duties (such as conflicting business interests) shall be declared in writing. Any member of staff, school representative or governor who is aware of any business



dealings conferring personal gain, or involving their relatives or associates must complete a Declaration of Interests form and submit to Principal and/or Chair of Governors.

Staff, committee representatives and governors are permitted to accept gifts, rewards or benefits from pupils, pupil's families, members of the public, or organisations which Knockavoe School and Resource Centre 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 affect a decision or action, whether business, educational, or other.

Where purchased items include a "free gift", such a gift should be either used for the school business or handed to the school to be used at charity raffles, pupil prizes, etc. These items are to be entered into each individual school's gift and hospitality register.

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:

1. where there is no reasonable business justification for doing so
2. where an invitation is disproportionately generous
3. where the invitation could be seen as an inducement to affect a business or other decision.

Any hospitality, other than of a nominal value (estimate of £30.00) or facilities provided during the normal course of business should be reported for an entry in the Register of Gifts & Hospitality-see Appendix 3.

**Why do we have guidance on gifts and hospitality?**

Your conduct as a member of staff or governor should never lead anyone to question your interests, or lead anyone to think that you have been influenced by gifts and hospitality. This is important because your own personal reputation and that of the School could be seriously affected if you inappropriately accept a gift or 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. This is why the school has guidance which applies to all staff and governors on gifts and hospitality.

**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 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 or less, without the approval of the Principal. 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 Principal 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 should be politely refused or returned. You must have the prior written approval of the Principal if you decide to accept something which has more than this value. This should only be in exceptional circumstances. If you or your Principal 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 Principal as soon as possible and let the Principal decide what you should do with the gift. Your Principal 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 are recorded in the school's Gifts and Hospitality Register, which is kept in the school office.

**Do I need to record offers that I decline?**

Yes – all offers of gifts or hospitality, which have a value of more than £30, must be recorded in the school's register, even if you don't accept.

**What should I do if I am in doubt?**

If in doubt, always speak to the Principal. 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.

**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.

**Appendix 1: THE DO's and DON'T's**

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 Principal, or the Chair of Governors as necessary.
Seek advice from the Principal 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.	

**\*In the event of a substantial gift or donation being offered to Knockavoe School this will be brought to the attention of the Principal and the Board of Governors and a collective decision will be agreed upon.**

Appendix 2: **KNOCKAVOE SCHOOL AND RESOURCE CENTRE****Record of Gifts and Hospitality (accepted\* / refused\*)**

\*Delete as appropriate

This form must be completed by any member of staff or governor receiving or declining a gift or hospitality, which related to their position in school and has a value of more that £30. If the individual is concerned about the likely "level" of any gift or hospitality that he or she may receive, agreement from the Principal or Chair of Governors must be obtained in accordance with the school's guidance.

<b>Name</b>	<b>Position Held</b>
<b>Individual, company or organisation offering gift or hospitality</b>	
<b>Date, time and venue</b>	<b>Gift/Hospitality</b>  Accepted*/Declined*
<b>Nature and approximate value of hospitality/gift</b>	
<b>If accepted, has the gift been retained for personal use or school use?</b>	



<b>If accepted, reason for accepting hospitality/gift</b>	
<b>Signed:</b>	<b>Date:</b>
<b>Approved by:</b> <b>(Principal/Chair of Governors)</b>	

**PLEASE RETURN COMPLETED FORM TO THE SCHOOL OFFICE.**





