



## TOLWORTH GIRLS' SCHOOL & SIXTH FORM

### GIFTS AND HOSPITALITY POLICY

**Governing Body Committee:** Finance, Assets & Audit (F, A & A)

**Date approved:** F, A & A (14 Mar 22), FGB (30 March 22)

**Next review:** March 24

#### Introduction

1.1 The principle of integrity requires that employees and governors of Tolworth Girls' School & Sixth Form should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted must be declared and recorded.

1.2 The Academy should be able to show that all purchasing and other financial decisions are reached on the basis of value for money and for no other reason.

1.3 The process set out in this policy and procedure is designed to safeguard employees and governors from any misunderstanding or criticism.

1.4 As a general guideline, business gifts and hospitality should not be accepted by any employees and governors, except as provided for below.

1.5 Employees and governors shall not use their authority or office for personal gain 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 relationships;
- complying with the letter and spirit of the law, and contractual obligations;
- rejecting any business practice that might be deemed improper;
- at all times in their business relationships acting to maintain the interests and good reputation of the Academy.

#### 2. Responsibility

2.1 The Finance, Assets & Audit Committee is responsible for the review of this policy and for recommending it to the full Governing Body for approval.

2.2 The Senior Leadership Team is responsible for its implementation and for ensuring that all staff are aware of the existence of this policy.

2.3 The Finance Manager is responsible for maintaining the Gifts and Hospitality Register, which may be held and updated by a member of finance office administrative staff.

2.4 All employees and governors are expected to follow the terms of this policy. Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.

2.5 Any employee or governor who becomes aware of a breach of policy must report this immediately to the Headteacher/Finance Manager who will instigate investigations as necessary or refer to the Academy's Whistle Blowing policy.

### **3. Gifts**

3.1 Employees and governors must not accept cash, or personal gifts with a significant monetary value, under any circumstances, although items of nominal value (up to £40) or free promotional pens, calendars, diaries or similar items of a trivial or seasonal character may be accepted. Multiple class gifts or leaving presents in excess of this are exempt.

3.2 Gifts which are intended for the Academy as an academic body can be accepted but must not be retained by the individual who receives them. Such gifts should be given to the Finance Manager to determine whether it can be used by the Academy, donated to charity or used in a charity event.

3.3 Personal gifts may not be solicited under any circumstances.

3.4 When an employee has to decline a gift, they should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.

3.5 All gifts received (other than those allowed under 3.1) must be recorded in the Academy's Gifts and Hospitality register, which is maintained by the Finance Manager

3.6 Where purchased items include a "free gift", it should be the intention that the gift should be either used for Academy business or handed to the Finance Manager to determine its alternate use (donation, charity event, etc.).

### **4. Hospitality**

4.1 Employees and governors should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way they carry out their duties. Nor should employees and governors offer such hospitality to others on behalf of the Academy. The timing of hospitality in relation to procurement or purchasing decision that the Academy may be taking is especially sensitive.

Employees and governor should never solicit hospitality. As a general rule, employees and governors should not accept hospitality that the Academy would not reciprocate in similar circumstances.

4.2 Staff attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants is not normally acceptable. Where it is considered that there is a benefit to the Academy in a member of staff attending a sponsored event, the attendance should be formally approved by the Headteacher.

4.3 If necessary, employees should pay their share of any costs and claim these in the usual way.

4.4 When an employee has to decline hospitality, they should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.

4.5 Employees and governors may accept modest working meals and light refreshments without making any declaration. All other hospitality (except that allowed under 4.6 and under £100 must be recorded in the Academy's gifts and hospitality register which is maintained by the Finance Manager.

4.6 Other hospitality may be accepted where:

- Employees and governors are representing the Academy in the community or are imparting information about the Academy to the public;
- An event is clearly part of the life of the community or where the Academy should be seen to be represented;
- The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal;
- If there could be any doubt regarding whether or not a specific item of hospitality falls into these categories, then an email confirmation of approval must be received from the Headteacher or Finance Manager prior to proceeding;
- Staff may accept hospitality up to £100 under the above conditions;
- Above this value, staff must inform the Finance Manager who will obtain approval from the chair of Finance, Assets & Audit committee before entry into the register.

***This policy should be read in conjunction with the Register of business/pecuniary interests, Anti-Bribery & Corruption, and Whistleblowing, policies***



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### GIFTS & HOSPITALITY REGISTER

#### 5. Register

A sample page from the Register of Gifts and Hospitality, as maintained by the Finance Manager follows below:

<b>Register of Gifts and Hospitality Employee Name</b>	<b>Nature of gift/hospitality</b>	<b>Value</b>	<b>Name of Company or individual</b>	<b>Date</b>	<b>Headteacher approval (or Finance Manager as alternate)</b>