



# Lincoln Christ's Hospital School

## Gifts and Hospitality Policy

**Link member of staff:**

**Finance Manager**

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## 1 Introduction

As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below.

The intention of the policy is to ensure that the Academy can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the Academy. The Academy should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

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

## 2 General Principles

Employees 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.

Any employee who becomes aware of a breach of policy must report this immediately to his or her manager who will instigate investigations as necessary.

## 3 Register of Pecuniary and Personal Interests

Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with the duty owed to the Academy in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff must supply details of such transactions to the Finance Manager for entry into the Register of Pecuniary and Personal Interests.

All staff and governors are required to annually complete a Declaration of pecuniary and personal interest.

## 4 General Guidance

Always say "no" if you think the giver has an ulterior motive. Be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will elicit a more prompt service or preferential treatment.

Never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the Academy, seeking employment with the Academy or is in dispute with the Academy, even if you are not directly involved in that service area.

If you are in doubt about the acceptability or provision of any gift or offer of hospitality it is your responsibility to consult the Finance Manager or Headteacher.

## 5 Acceptance of Gifts and Hospitality

Employees are permitted to accept gifts, rewards or benefits from members of the public or organisations the Academy has official contacts with only where they are isolated gifts of a trivial character (such as diaries, calendars or bunch of flowers). Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision.

Any hospitality other than of a nominal value (up to £15) or facilities provided during the normal course of business should be reported to the Finance Manager for entry in the 'Register of Gifts and or Hospitality'.

Where items purchased for the Academy include a 'free gift', such a gift should either be used for Academy business or handed to the Finance Manager to be used for charity raffles.

## 6 Acceptance of Hospitality

In relation to conventional hospitality (lunches, outings, tickets for CPD events etc.) provided that it is normal and reasonable in the circumstances they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.

A gauge of what is acceptable in terms of hospitality is whether this Academy would offer a similar level of hospitality in similar circumstances.

- Occasional working lunches with customers, providers or partners are generally acceptable as a way of doing business provided they are not to an unreasonable level or cost.
- Invitations to corporate hospitality events must each be judged on their merit. Provided the general rules have been taken into account, it may be acceptable to join other company/organisation guests at:
  - a. sponsored cultural and sporting events, or other public performances, as a representative of the Academy;
  - b. special events or celebrations.

But, consider the number of these events, and always take into consideration what public perception is likely to be if they knew you were attending.

- Acceptability depends on the appropriateness of the invitations, in terms of the level of hospitality, the frequency and the status of the invited employee. In all such cases the Headteacher must be consulted.
- Paid holidays or concessionary travel rates are not acceptable. Neither are offers of hotel accommodation nor the use of company villas/apartments.
- If you are visiting a company to view equipment that the Academy is considering buying, you should ensure that expenses of the trip are paid by the Academy. Acceptance of refreshments and/or a working lunch may be acceptable, but care must be taken to ensure that the Academy's purchasing and/or tender procedures are not compromised.

- Acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to your work are acceptable.
- Offers to speak at corporate dinners and social gatherings, or events organised by, for example, a professional body, where there is a genuine need to impart information or represent the Academy must be agreed in advance with the Headteacher. Where your spouse or partner is included in the invitation, and approval has been given for you to attend, it will be acceptable for your spouse or partner to attend as well, but if expenses are incurred, these will be met personally.

Any invitation you accept should be made to you in your professional/working capacity as a representative of the Academy

## 7 Provision of Gifts and Hospitality

- Provision of gifts and/or hospitality should not be regarded as part of the normal conduct of the Academy and should only be a modest expense. It should not be given where there is no business justification for doing so.
- Whilst it is essential to maintain and cultivate contacts with outside groups, members of staff must bear in mind the principles of propriety and correctness when providing gifts of any value. A nominal value (up to £15) should be applied.
- All expenditure on hospitality must be able to withstand both internal and external scrutiny. It should be value for money and incurred in accordance with the principles outlined. It should not be excessive and it is a matter of judgement as to what is appropriate and reasonable in each circumstance.
- To gauge what is acceptable hospitality, expenditure is listed below:
  - Modest lunches provided at meetings with external stakeholders or events (including corporate events)
  - Infrequent working lunches
  - Tea/Coffee and biscuits provided at staff events.
  - Flowers in exceptional circumstances such as; birth of a child, retirement, death subject to the approval of the Finance Manager.