



Our Lady of Lourdes Catholic Primary School

Accepting Gifts and Hospitality Policy

2023 to 2025

Signed electronically by Chair of Governors: <i>J Curran</i>	Name: Joan Curran	Date: 12.10.2023
Signed electronically by Headteacher: <i>O Bell</i>	Name: Oliver Bell	Date: 12.10.2023
Ratified: by Governing Body on 12.10.2023	Next Review: First FGB after 30 th November 2025	

1. Equality Impact Assessment (EIA) Part 1: EIA Screening

Policies, Procedures or Practices:	Accepting Gifts and Hospitality Policy	DATE:	07.10.2023
EIA CARRIED OUT BY:	Jayne Russell	EIA APPROVED BY:	Joan Curran

2. Groups that may be affected:

Are there concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for a positive impact
Age (young people, the elderly; issues surrounding protection and welfare, recruitment, training, pay, promotion)	All groups will be treated fairly and equally, with no bias, discrimination or preferential treatment.	All groups will be treated fairly and equally, with no bias, discrimination or preferential treatment.
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication)	As above	As above
Gender reassignment (transsexual)	As above	As above
Marriage and civil partnership	As above	As above
Pregnancy and maternity	As above	As above
Racial groups (consider: language, culture, ethnicity including gypsy/traveller groups and asylum seekers)	As above	As above
Religion or belief (practices of worship, religious or cultural observance, including non-belief)	As above	As above
Sex (male, female)	As above	As above
Sexual orientation (gay, lesbian, bisexual; actual or perceived)	As above	As above

3. Any adverse impacts are explored in a Full Impact Assessment.

Introduction

The principle of integrity requires that staff and Governors of Our Lady of Lourdes Catholic Primary School 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. The process set out in this policy and procedure is designed to safeguard employees from any misunderstanding or criticism.

This policy takes into consideration the requirements under the UK Bribery Act 2010, which came into effect 1 July 2011. The Ministry of Justice has published guidance which provides the basis for inclusion in this policy. This guidance is under section 9 of the Act.

The Chair of Governors is responsible for ensuring compliance with Our Lady of Lourdes Catholic Primary School and Policies and Procedures. This procedure applies to all staff and governors.

UK Bribery Act 2010

It is an offence under Section 7, which can be committed by a commercial organisation which fails to prevent persons associated with them from bribing another person on their behalf.

Facilitation Payments, payments to induce officials to perform routine functions they are otherwise obligated to perform, are bribery under the Act.

The Governors and Headteacher

- Do not tolerate Bribery in any form,
- Considers all organisations which the school does business with, in order to consider the risk.
- Considers all persons or organisations which act on behalf of the school or provide services for the school, in order to consider the risk.

Gifts

Giving Gifts and Hospitality

- You may not, 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 a gift of a nominal value to a member of staff or governor, as agreed by Governors, funded from the hospitably fund of the school budget. This usually takes the form of flowers when a member of staff has been absent from work for an extended period. This would be no more than £40.

Accepting Gifts and Hospitality

- Staff and governors must not accept cash, or personal gifts with a significant monetary value, under any circumstances, although items of nominal value (approximately £30 or below) or free promotional pens, calendars, diaries or similar items may be accepted.
- Gifts which are intended for the school as an academic body can be accepted but must not be retained by the individual who receives them.

Such gifts should be deposited with the School Office, following which they will be allocated as appropriate.

- Personal gifts may not be sought, either by formal request or suggestion, under any circumstances.
- When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.
- Any gift received from parents (for example a Christmas, leaving, maternity or end of year gift) should not exceed £30.
- In the event that parents have 'clubbed together' to purchase a present from the whole class, no monetary amount would be set, as this would not be perceived as giving the appearance of an individual, or individuals, influencing their relationship with the school.
- Seek advice from the Headteacher or Chair of Governors if you are in doubt.

Supplier Special Offer Gifts

Gifts are sometimes offered by suppliers with the purchase of items. All special offer gifts are the property of the school and must be handed into the School Office for use by the school.

Hospitality

Staff 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 individuals offer such hospitality to others on behalf the school. The timing of hospitality in relation to a procurement or purchasing decision that the school may be taking is especially sensitive.

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 school in a member of staff attending a sponsored event, the attendance should be formally approved by the Headteacher and recorded as appropriate.

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

Other hospitality may be accepted where:

- Staff are representing the school in the community or are imparting information about the school to the public.

- The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.

Expense Claims

Where hospitality is to be provided by the school this should be approved in advance by the Headteacher who should review the hospitality in light of the UK Bribery Act 2010. Hospitality is not prohibited by the Act but should be considered in light of it.

Claims for reimbursement of expenses should be made on the relevant Expenses Claim form and receipts should always be enclosed.

The DO's and DON'Ts

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 Headteacher, or the Chair of Governors as necessary.
Seek advice from the Headteacher 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.
Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything	Accept cash or monetary gifts. 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 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.
Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body.	Accept gifts or hospitality offered to your spouse, partner, family member or friend.
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.	