

**DARRICK WOOD SCHOOL
GIFTS AND HOSPITALITY POLICY**

Reviewed:	November 2022
Agreed:	November 2022
Next Review Due:	November 2024
Person Responsible:	The Head Teacher

MISSION STATEMENT:

To ensure the proper and regular use of public funds.

CUSTOMER GOAL:

To ensure honesty in the use of public funds.

CURRICULUM GOAL:

To ensure that all pupils receive an effective curriculum.

SCHOOL COMMUNITY GOAL:

To provide clear guidelines for gifts and hospitality.

QUALITY GOAL:

To ensure that proper procedures are adhered to in all business transactions.

1. Introduction

- 1.1 As a general guideline, expensive gifts, hospitality or other personal benefits 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 School 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. The School must be able to show that all decisions, whether educational, financial or otherwise are reached on the basis of the proper application of procedures and for no other reason.

2. The receipt of gifts

- 2.1 Staff and Governors shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the School by:
- maintaining a high 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 School

- 2.2 Any employee who becomes aware of a breach of Policy must refer to the School's Reporting Concerns Policy and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.
- 2.3 Staff and Governors are permitted to accept gifts, rewards or benefits from pupils, pupils' families, members of the public, or organisations which the School has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts. Therefore, gifts should not be accepted if they appear to be disproportionately generous e.g. over £100; or could be construed as an inducement to affect a decision or action, whether business, educational, or other. Exceptions are small gifts received as 'thank you' tokens from pupils, parents, line managers, for example at Christmas/end of term.
- 2.4 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 reasonable 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.
- 2.5 Any hospitality, other than of a nominal value (£100) or facilities provided during the normal course of business, should be reported to the Head Teacher or Business Manager as appropriate.
- 2.6 All gifts over £100 are recorded in the Academy's gifts and hospitality register which is maintained by the Finance Manager.

2. The providing of gifts

- 2.1 The School encourages and seeks cooperative relationships between staff, Governors, stakeholders and external organisations. Accordingly, there can be occasions where it is appropriate for the School to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house. Likewise, it may be appropriate for leaving gifts to be provided to staff leaving the employment of the School, particularly after a long period of service.

3. Training for the Senior Leadership Team

- 3.1 The Governors have agreed that the budget for the Senior Leadership Team training weekend should be at the discretion of the Head Teacher, but must not exceed £5,000. This amount will be reviewed in line with inflation or if the team expands.

4. UK Bribery Act 2010

- A commercial organisation commits an offence under section 7 of the Act if it fails to prevent an associated person or organisation from making or receiving a bribe with the aim of obtaining a business advantage. It is a defence for a commercial organisation to show that it has implemented – and applies effectively – procedures that are adequate to prevent bribery.
- Facilitation Payments (payments to induce officials to perform routine functions they are otherwise obligated to perform) are bribery under the Act.
- The Governors and the Senior Leadership Team do not tolerate bribery in any form, and have in place procedures to prevent bribery, including by associated persons, which it considers to be adequate for this purpose.
- The Senior Leadership Team, in order to minimise the risk of an offence under the Bribery Act, carries out a due diligence check on all organisations with which the School does business.

- Suppliers – and potential suppliers of goods and services to the School must not attempt to bribe any member of the School staff or Governors. Any organisation doing so may be reported to the police.