

# Applecroft School



## Gifts and Hospitality Policy

<b>Person Responsible:</b>	<b>Finance &amp; Business Manager</b>
<b>Review Cycle:</b>	<b>Annually</b>
<b>Reviewed Date:</b>	<b>January 2026</b>
<b>Next Review Date:</b>	<b>January 2027</b>

# Gifts and Hospitality Policy

## 1) Introduction:

### **School Vision:**

'To be a positive and inspiring community that nurtures each individual and empowers leaders for life.'

### **School Mission Statement:**

'Nurturing Potential, Inspiring Minds, Changing Lives'

### **School Values:**

- Ambition and Leadership
- Kindness and Supportiveness
- Respect and Honesty
- Determination and Resilience

This Policy was drawn up in accordance with the UK Bribery Act 2010 that came into effect on 1<sup>st</sup> July 2011. The Ministry of Justice has published guidance, under Section 9 of the Act, which provides the basis for inclusion in this policy.

## 2) Purpose:

The intention of the policy is to ensure that the school can demonstrate that no undue influence has been applied or perceived to have been applied, by any supplier or anyone else dealing with the school. The school should be able to show that all decisions are reached on the basis of value for money only 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 principle.

This policy also seeks to protect staff and Trustees from suspicion of dishonesty and ensure that they are free from any conflict of interest with respect to the offer and acceptance or provision of gifts, hospitality or any other inducement from or to suppliers of goods or services to the school.

## 3) Breach of Policy:

Any employee or Trustee who becomes aware of a breach of this policy must report this immediately to the Headteacher who will instigate investigations as necessary.

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

In the case of the allegation being made against a Trustee, the allegation should be reported to the Chair of Trustees and/or the Headteacher, as appropriate. An investigation will be carried out and circumstances assessed to determine if this policy, followed by the Trustee Code of Conduct, has been breached.

#### **4) Principles:**

Employees and Trustees shall not use their authority or office for personal or professional gain and shall seek to uphold and enhance the standing of the school by:

- Exercising the utmost discretion in giving and accepting gifts, hospitality or benefits of any kind, when on school business. Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with the school.
- Not accepting gifts, hospitality or benefits of any kind from a third party where it might be perceived that their own personal integrity is being compromised, or that the school might be placed under an obligation.
- Not allowing their official position to further their private interests or those of others.

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 school in any matter relevant to an employee (such as conflicting business/personal interests) should be declared in writing (see Declaration of Personal & Pecuniary Interests). Any employee 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 and Business Manager for entry into the Register of Business/Personal Interests.

#### **5) Gifts and Hospitality:**

Any gift, given or received, by an employee or Trustee cannot be in the form of cash, cheque or other direct exchange of money. Such actions are prohibited and could be considered bribery, for example, and fall within the scope of any relevant policies concerning those matters it may deem to be. A valid gift would be a purchased item, service or experience, where money is not directly being exchanged.

Employees are permitted to accept gifts, rewards or benefits from members of the public or organizations with which the school has official contacts only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as diaries or calendars) up to the value of £20. Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to effect a business decision. Exceptions are small gifts received explicitly as 'thank you' tokens from students, parents/carers, line managers, for example at Christmas/end of term - see the below section: Gifts to and from Pupils and Parents/Carers.

Any gift or hospitality received with an equivalent value of greater than £20 must be recorded in the Register of Interests.

Where purchased items include a "free gift", such a gift should be either used for school business or handed to the school for general use.

Modest hospitality, provided it is reasonable to the circumstances, for example, lunches in the course of working visits, may be acceptable, though it should be similar to the scale of hospitality which Applecroft School as an employer would be likely to offer and/or reimburse as per the Expenses policy.

Staff or Trustee 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 Applecroft School in a member of staff/a Trustee attending a sponsored event, the attendance should be formally approved by the relevant line manager/ chair of Trustees; it should also be declared as a gift as per this policy, if the value is equivalent or more than specified above.

Business gifts, which include hospitality, may be provided by Applecroft School in connection with third party entertaining but should be regarded as the exception rather than the rule. Gifts and hospitality must not exceed £50 in an academic year (01 September to 31 August) for any one recipient, and must not be provided in expectation of material benefit to Applecroft School.

#### **6) Gifts to and from Pupils and Parents/Carers:**

In the interests of safeguarding children, and to prevent staff from being open to accusation of exerting undue influence, no member of staff is permitted to give a gift to a pupil or parent/carer at any time.

If an individual gift is received from a pupil or the parents/carers of a pupil and the value is £20 or over this gift is to be registered on the Declaration of Personal & Pecuniary Interests form. Gifts received from a group of pupils and/or parents/carers need not be registered, so long as the individual contribution of each individual person would not have been in excess of £20.

#### **7) Register of Gifts:**

In the interests of transparency, the school maintains a Register of Business/Personal Interests (Appendix 1), which is kept in the finance office.

Any member of staff or Trustee who accepts an offer of a gift or hospitality over the value of £20 must ensure this is recorded in this register. To ensure complete transparency the school will, on an annual basis, ask all members of staff to complete a Declaration of Personal & Pecuniary Interests form (Appendix 2) - even if the return is nil. Staff will also be reminded, at key event times during the year, such as Christmas and the end of term to complete a new declaration of personal & pecuniary interests form and submit it to the Finance & Business Manager.

The following should be specified:

- Name of member(s) of staff or Trustee involved.
- Name of firm / individual / organisation concerned.
- Date gift / hospitality accepted.
- Whether it was a gift or hospitality and whether it was accepted or declined
- Nature of gift/hospitality. In the case of a gift, it should be specified whether it is a personal gift for the recipient or a related party, such as a partner; or a corporate gift accepted by the recipient on behalf of the school.
- Value of gift / hospitality. If the exact cost is not known an estimate should be provided.
- Reasons for acceptance

The Register of Business/Personal Interests will be reviewed by the Finance & Premises committee on an annual basis.



## Appendix 2

### Declaration of Personal & Pecuniary Interests Academic Year 25/26

**Name:** \_\_\_\_\_

**School:** \_\_\_\_\_

**Position:** \_\_\_\_\_

I, declare as a Member/Trustee or member of staff at Applecroft School that I hold the following personal and/or pecuniary interest(s):

Pecuniary interests	Please provide details of the interest
Current employment	
Businesses (of which I am a partner or sole proprietor)	
Company directorships - details of all companies of which I am a director	
Trusteeships/Governorships at other Educational Institutions or Charities - details of all institutes of which I am a Trustee/Governor	
Membership of professional bodies, membership organisations, public bodies or special interest groups of which I am a member and have a position of general control or management	
Gifts or hospitality offered to you by external bodies while acting in your position as a governor/trustee and whether this was declined or accepted in the last 12 months	
Contracts offered by you for the supply of goods and/or services to the trust/school	
Any other potential conflicts of interest	

Personal interests	Name	Relationship to me	Organisation	Nature of the interest
Close family relationships (externally to the Trust)				
Close family relationships (internally to the Trust)				

To the best of my knowledge the information supplied above is correct and complete. I understand that it is my responsibility to declare any conflict of interest/loyalty, business or personal that relates directly or indirectly, to myself or any relation in any contract, proposed contract or other matter when present at a meeting at the school where such contract or matter comes under consideration. I understand that I must withdraw from any meeting during the discussion of such contract or matter and must not vote in respect of it.

I agree to review and update this declaration annually and give consent for the information provided to be used in accordance with the trust/school's conflicts of interest policy.

**Signed:** \_\_\_\_\_

**Date:** \_\_\_\_\_