



# Staff Gifts & Hospitality Register Pecuniary & Non-Pecuniary Interests Policy

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Sept 2016

Approved by Governing Body: 11<sup>th</sup> October 2017

Next Review due: Sept 2020



### STAFF GIFTS and HOSPITALITY REGISTER

Kenmore Park Infant & Nursery School is primarily funded by public money from the Government and its agencies. As such, it needs to be accountable for the funds it receives and report its spending accurately and transparently. Gifts and hospitality received by staff are also a form of income and should therefore be reported accordingly. Records should also be kept for audit purposes and could be called upon should the School receive a Freedom of Information (FOI) request. As public employees, school staff are subject to codes of behaviour that require transparency, a requirement to declare conflict of interests, highest standards of public accountability and a commitment to ensure their services are not open to undue influence.

#### 1. Gifts and inducements to and employee

Where a parent/business contact\* offers a personal gift, personal payment or other incentive such as secondary employment to an employee, these should not be accepted. Such offers should be declared to the Governing Body and recorded in the Register of Gifts and Hospitality.

If it is not possible to return gifts then the employee who deals with that supplier should declare the gift to the Governing Body who will keep a record of it and decide how it is to be used. Such gifts remain the property of the school and should be included in the Register of Gifts and Hospitality.

#### The only exceptions to these are:

- Low cost, functional items suitable for business use rather than personal use and displaying the supplier's logo e.g. diaries, calendars and pens. These items may be accepted and do not have to be included in the Register of Gifts and Hospitality.
- Gifts offered by **parents** or **students** to school staff to express their thanks, such as boxes of chocolates. However, only gifts or gift vouchers with an individual value of **£20 or less** may be accepted. Such gifts **do not** have to be declared in writing to the Governing Body or be included in the Register of Gifts and Hospitality. **For the avoidance of doubt employees must always refuse gifts of money.**

#### 2. Hospitality to an employee

Where hospitality in the form of meals and drinks is offered by a business contact, this is only acceptable where it forms part of a normal business meeting (for example, refreshments at training events or meals at evening meetings). Offers of hospitality to specific events, such as a dinner or sporting event, should only be accepted after authorisation from the Governing Body. These would normally only be approved where there is a clear and demonstrable benefit to the school and the hospitality would not expose the school to criticism that the business contact was exerting undue influence. These should be recorded in the **Register of Gifts and Hospitality**. Visits by employees to exhibitions, demonstrations, conferences, business meals and social functions in connection with the school's business and authorised by the school, shall be at the school's expense where previously arranged and instructed by the school.

#### 3. Gifts or hospitality to the school

Where a business contact sends a gift to the school (for example, a stationery supplier sending a gift), these should **not be accepted** and should be returned to the supplier. Such offers of any value should be declared to the Governing Body and recorded in the **Register of Gifts and Hospitality**. If it is not possible to return the gift, the employee who usually deals with the supplier should declare the gift to the Governing Body who will keep a record of it and decide how it is to be used. Such gifts remain the property of the school and should be included in the Register of

Gifts and Hospitality. The only exceptions to this are low cost, functional items suitable for business use (as opposed to personal use), such as diaries, calendars or pens, may be accepted and do not have to be declared on the Register of Gifts and Hospitality.

\* A “business contact” refers to any person, body or organisation with which the school is involved on a financial or charitable basis (including contractors; developers; consultants; regional or national charities). This also includes business contacts who are potential suppliers (e.g. they are, or may, tendering for future business).

## **PECUNIARY & NON-PECUNIARY INTERESTS**

### **1. Relationships**

Employees who engage or supervise contractors or have official relationships with contractors and have previously had or currently have a relationship in a private or domestic capacity with the contractor or one of their employees should declare that relationship to their manager and confirm the relationship in writing.

If staff are related to an applicant for a job it must be declared. This includes both internal staff applying for promotion and external applicants.

### **2. Dual Employment**

Employees are bound by their conditions of service to devote their full time service to the school/council and are not entitled to engage in any other business or take up any other appointment without the express consent of the Governing Body. Employees covered by this provision must obtain the Governing Body’s express written consent before engaging in any other business or taking up any other additional appointment.

Staff may be permitted to offer their services, e.g. as a tutor without declaration. However, the school recommends they do not tutor pupils from the school where they are employed.

Any additional employment must not conflict with or react detrimentally to the School’s interest or weaken public confidence in the conduct of the School’s business. Where there is any difference of view as to whether or not a particular additional employment would have that effect the Governing Body’s view must prevail.

Employees must also declare to their Headteacher in writing any non-financial interests which they consider could bring about conflict with the School’s interests (e.g. involvement with an organisation or pressure group which may seek to influence the Governing Body’s policies, this does not include recognized unions/trade bodies).

Employees must declare to the Governing Body in writing any financial interests, which could conflict with the School’s interests. A register will be kept of all declarations under the above categories and will be subject to annual review.

### **3. Personal Interests**

Employees must declare to the Governing Body any membership of any organisation, which has secrecy about rules, membership or conduct. Failure to do so could lead to disciplinary action. School staff are required to maintain professional standards in terms of conduct; e.g. to promote equality, pupil safety, upholding standards of behaviour commensurate with those in charge of children. Membership of organisations that conflict with these professional duties must be declared.

### **4. Sponsorship – Giving and Receiving**

Where an outside organisation wishes to sponsor or is seeking to sponsor a school activity, whether by invitation, tender, negotiation or voluntarily, the basic principles and conventions concerning acceptance of gifts or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.

### **Gifts from the school to staff/governors, etc.**

The School may make any gifts to employees and Governors and external organisations under certain circumstances as long as the value of the gift or hospitality does not exceed £30 and is paid for from private unrestricted/unofficial funds.

Examples of acceptable gifts or hospitality are:

- Chocolates, flowers or similar as a thank you, e.g. to staff helping in a production or school event
- Flowers or gift when a member of staff is ill or bereaved
- A retirement gift for a Governor /staff
- Provision of a meal to staff if they are participating in an away training day, the value of which must not exceed £25 per person and not including alcohol.

Any other gifts or hospitality not covered by these examples, or exceeding recommended values, should be discussed with the Chair of Governors.

## Staff Gifts & Hospitality Register Form

**Staff should complete this form and return to the Headteacher for submission to the Governing Body.**

*Section One of this form should be completed in accordance with the Staff Gifts & Hospitality Policy, for all offers of hospitality or gifts either received or offered to staff (with the exception of low value gifts from parents/students only – see Policy for details).*

**SECTION ONE: Details of the offer** – this section must be completed by the Staff Member receiving the offer.

Date of offer

Name of employee

Who offered the gift or hospitality ?

What is your relationship with the individual/organisation offering the gift or hospitality?

Nature of gift or hospitality offered

Details of other staff and Members offered the same gift or hospitality

Proposed action (delete as appropriate)

**Accept / Decline / Already declined**

This form must be authorised by the Governing Body before any offer is accepted.

Employees signature

Date

**Following completion of the above section and before any offer is accepted this form must be authorised by the Governing Body**

**SECTION TWO: Action authorised by the Governing Body**

Chair of Governors' name

Record of action ( delete as appropriate )

Agree acceptance / Acceptance not authorised/

**Agree action to decline**

Please ensure the Staff Member who received the offer is aware of you decision.

Chair of Governors' signature

Date

Please ensure:

(i) The employee is informed of your decision (ii) This form is recorded on your Register of Staff Gifts and Hospitality (iii) This form is filed in the Register of Staff Gifts and Hospitality.

**REGISTER OF STAFF GIFTS AND HOSPITALITY**

	<b>Date of Offer</b>	<b>Name of Employee</b>	<b>Item Description</b>	<b>Accept/Decline / Already Declined</b>
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				