



The Tiffin Girls' School

GIFTS AND HOSPITALITY POLICY

REVISED JUNE 2019
REVIEWED MAY 2021

Introduction

1. The principle of integrity requires that staff of The Tiffin Girls' 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 offered must be declared and recorded.
2. The School should be able to show that all purchasing and other financial decisions are reached on the basis of value for money and for no other reason.
3. The process set out in this policy and procedure is designed to safeguard staff from any misunderstanding or criticism.
4. As a general guideline, business gifts and hospitality should not be accepted by any staff, except as provided for below.
5. Staff shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the school 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 school

Responsibility

6. The Governor Audit and Risk Group is responsible for the review of this policy and for recommending it to the Governing Board for approval.
7. The Senior Leadership Team is responsible for its implementation and for ensuring that all staff are aware of the existence of this policy.
8. A register of gifts and hospitality offered and whether these were accepted or rejected is kept by the Finance Office and monitored by the Headteacher.
9. All staff are expected to follow the terms of this policy. Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.
10. Any staff member who becomes aware of a breach of policy must either report this immediately to his or her manager who will instigate investigations as necessary or refer to the school's whistle blowing policy.

Gifts

11. Staff must not accept cash, or personal gifts with a significant monetary value, under any circumstances, although items of nominal value (approximately £40 or below) or free promotional pens, calendars, diaries or similar items of a trivial or seasonal character may be accepted.

12. The showing of appreciation to staff from either a parent/carer or student through small, token gifts (to a maximum value of £40 per parent/carer/student) is not affected by this policy since such gifts are not, in any way, a bribe.
13. 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 given to the Headteacher to determine whether it can be used by the School, donated to charity or used in a charity event.
14. Personal gifts may not be solicited under any circumstances.
15. When a staff member has to decline a gift, they should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.
16. All gifts offered (other than those allowed under paragraphs 11 and 12 above) must be reported to the Finance Director for recording in the School's Gifts and Hospitality register.
17. Where purchased items include a "free gift", it should be the intention that the gift should be either used for School business or handed to the Headteacher to determine its alternate use (donation, charity event, etc.).
18. Staff who have queries on receiving or declining gifts should speak to the Deputy Headteacher or the Finance Director.

Hospitality

19. Staff 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 staff offer such hospitality to others on behalf of the School. The timing of hospitality in relation to a procurement or purchasing decision that the School may be taking is especially sensitive. Staff should never solicit hospitality. As a general rule, staff should not accept hospitality that the School would not reciprocate in similar circumstances.
20. 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 staff member attending a sponsored event, the attendance should be formally approved by the Headteacher.
21. If necessary, staff should pay their share of any costs and claim these in the usual way.
22. When a staff member has to decline hospitality, they should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.
23. Staff may accept modest working meals and light refreshments without making any declaration. All other hospitality (except that allowed under paragraph 24 below and under £100) must be recorded in the school's gifts and hospitality register.
24. Other hospitality may be accepted where:
 - Staff are representing the School in the community or are imparting information about the School to the public.
 - An event is clearly part of the life of the community or where the School should be seen to be represented.
 - The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.
 - If there could be any doubt regarding whether or not a specific item of hospitality falls into these categories, then an email confirmation of approval must be received from the Headteacher.
 - Staff may accept hospitality up to £100 under the above conditions. Above this value, staff must inform the Headteacher who will obtain approval from the Chair of the Finance and Contracts Committee before entry into the register.

Expenditure on gifts

25. The purchase of gifts from restricted funds is not permitted.
26. The purchase of gifts up to a value of £40 from unrestricted funds is permitted with the prior approval of the Headteacher.
27. The purchase of alcohol from either restricted or unrestricted funds is not permitted.

Register

28. A sample page from the Register of Gifts and Hospitality follows below.
29. The Register of Gifts and Hospitality may be reviewed by the Chair of the Finance and Contracts Committee or the Chair of Governors at their request.

