



CHATHAM & CLARENDON GRAMMAR SCHOOL

Acceptance of Gifts Policy

Agreed by Governors: February 2023

1. Aims

The purpose of the policy is to provide a framework for Staff and Governors of Chatham & Clarendon Grammar School so that:

- funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academies Financial Handbook
- those staff and governors associated with it operate in a way that commands broad public support
- staff and governors have due regard to propriety and regularity and ensures value for money in the use of public funds
- staff and governors fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors
- staff and governors are aware of what constitutes acceptable gifts and hospitality and the process that must be followed if they are presented with any of the same

2. Legislation and guidance

This policy is based on the Academies Financial Handbook, which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of governors, staff and/or any other representative of the school. This policy also complies with our funding agreement and articles of association.

3. Definitions

Gifts are any items, (cash, awards, prizes, goods or services), offered without expectation of payment or benefit. Gifts also include goods or services offered at a discounted rate, or on terms not available to the general public.

Hospitality is defined as food, drink, accommodation or entertainment (such as cultural or sporting events) provided free of charge, heavily discounted or on terms not generally available to the general public

4. Roles and responsibilities

Governors and staff

- Must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that the school might be placed under any obligation as a result of acceptance

- Must not use their official position to further their private interests or the interests of others
- Must not solicit gifts or hospitality
- Must record any gifts or hospitality offered to them or the school with a value of over £25 on the gifts and hospitality register within 7 working days, even if declined
- Must consult the Business Manager or Headteacher before accepting or offering any gifts or hospitality with a value of over £50.

Governors

Governors will ensure that the school's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

Headteacher

The Headteacher is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The Headteacher will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the school and to those outside the organisation. They will also ensure, alongside the Business Manager, which decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

Business Manager

The Business Manager will ensure that:

- The school maintains a gifts and hospitality register
- Figures for transactions relating to gifts made by the school are disclosed in the school's audited accounts, in accordance with the Academies Handbook
- The Governors and Headteacher are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the Headteacher, that decisions on whether individuals or the school can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

Parents

Parents will be made aware of this policy and are that:

- Chatham & Clarendon Grammar School does not wish to discourage all gift-giving, and that small tokens of gratitude are always appreciated
- Receive guidance on the appropriate value of gifts and circumstances when they may be offered, or explain that the school prevents teachers and other staff from accepting gifts worth over a certain amount.

5. Acceptable gifts and hospitality

Offers of gifts and hospitality received

Governors and staff can accept gifts and hospitality that have a value of up to £50. These do not have to be pre-approved. Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, Governors and staff must consult the Business Manager or Headteacher.

Similarly, hospitality such as working lunches may be accepted in order to maintain

good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the Business Manager or Headteacher.

Any gifts or hospitality offered with a value exceeding £25 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any Governor or member of staff who is offered such gifts or hospitality exceeding £50 must consult the Business Manager or Headteacher before accepting. If the Headteacher is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the Chair of Governors and record the offer on the gifts and hospitality register. Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a staff disciplinary matter.

Offers of gifts and hospitality given

The Business Manager or Headteacher must be consulted about any proposal to provide gifts or hospitality with a value of £50. Gifts can be given to non members of staff who have provided a service to the school and received no other recompense, for example speaking at a Prize Giving Ceremony.

Members of staff may manage their own self generating staff fund for gifts for the occasion of births, weddings and significant birthdays.

Any gifts or hospitality provided by the school, such as a working lunch for visitors, must not be extravagant. A maximum value of £25 should be used as a guideline. Alcohol must not be purchased out of the school budget.

Expense claims should be made to the Finance Department and receipts must always be enclosed.

6. Unacceptable gifts and hospitality

The following must never be offered or accepted:

- Monetary gifts (unless donated to the school)
- Gifts or hospitality offered to family members, partners or close friends of members or staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time.

This list is not intended to be exhaustive.

7. Declining gifts and hospitality

Any Governors or staff member who is offered any of the unacceptable gifts or hospitality outlined in section 6 above should politely decline the offer.

If they feel it would not be appropriate for them to decline, they should refer the matter to the Headteacher. The Headteacher may decline the offer, or donate the gift or hospitality to a worthy cause, and must also record the offer on the gifts and hospitality register.

Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the school has deemed unacceptable.

Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, will be dealt with as a staff disciplinary matter.

8. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the Business Manager. This policy will be reviewed every four years by the Business Manager and approved by the Finance & Resources Committee.

Reviewed February 2023