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# GIFTS AND HOSPITALITY

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## PREFACE

Chiltern Hills Academy is a learning environment at the heart of its community. We encourage every person in our community to:

**Create, Aspire and Excel to 'Live life in all its fullness' (John 10:10)**

We achieve this through our dedication to the seven Christian values of love, hope, self-discipline, compassion, forgiveness, respect and honesty.

We are a community in which staff, students and parents work collaboratively to develop a learning environment and organisation which is spiritual, safe, innovative, creative and exciting. All members of the Academy are motivated and inspired by the vision to give their best and to play a full part in the life of the school and in their own developing lives.

The Governors at Chiltern Hills Academy are committed to achieving the vision and values. They oversee and monitor this policy to ensure that this is being achieved.

This policy is intended to provide advice to Academy staff who, in the course of their employment, receive offers of gifts and hospitality and has been compiled with regard to the principles drawn up by the Committee on Standards in Public Life (formerly the known as the Nolan Committee) (see Appendix 2) which governing body members and members of staff at all levels are expected to observe.

In order to protect both staff and the reputation of the Academy from accusations of bribery or corruption, staff are not permitted, directly or indirectly, to accept any gift, hospitality, reward or other benefit from any source, including organisations, pupils, parents, other employees and members of the public except in the following circumstances:

1. Occasional gifts which are regarded as trivial and where the nominal value received by any one person is under £25 e.g. diaries, calendars, pens, flowers, chocolates etc.
2. Conventional hospitality or working lunches in the course of official visits, where the frequency and the total cost of hospitality is reasonable and would not be construed by an impartial observer as affecting the employee's judgement. (It is not possible to define 'reasonable' but in cases of corporate hospitality it would normally be expected to be under £100).
3. Where a more valuable gift or benefit is offered from which the Academy in general might benefit, rather than an individual employee, acceptance will be at the discretion of the Principal and should be referred to the Chair of Governors.

A Register of Gifts and Hospitality is located in the Finance Department and must be completed for all offers, whether accepted or declined, over the value of £25.

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Staff responsible for the purchase of supplies, equipment or services must take particular care to ensure that there can be no criticism that unequal treatment has been given to suppliers involved in tendering processes through the acceptance of gifts or other benefits.

If a member of staff in is any doubt as to the propriety of receiving any gift or hospitality then the employee must consult with the Principal (see Appendix 1).

Employees who are found not to have acted in accordance with the above policy may be disciplined and in serious cases may be dismissed on the grounds of gross misconduct.

## **The Providing of Gifts and Hospitality by the Academy**

The Academy encourages and seeks cooperative relationships between staff, governors, stakeholders and external organisations. Accordingly there can be occasions where it is appropriate for the academy to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house.

It may also be appropriate for leaving gifts to be provided to staff leaving the employment of the academy, particularly after a long period of service. Such gifts are usually funded by private contributions from continuing members of staff from the Staff Voluntary Contribution Fund.

## **MONITORING, EVALUATION AND REVIEW**

This policy will be reviewed when there are changes in the law or annually to assess implementation and effectiveness.

This policy will be promoted and implemented throughout the Academy.

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## APPENDIX 1

### Guidelines for staff regarding Gifts and Hospitality

The following general rules apply and must guide decisions on receipt of gifts and hospitality as an employee of the Academy:

- To accept gifts should be the exception. You may accept small 'thank you' gifts such as diaries, mugs, chocolates or flowers, under £25. You should notify the Finance Manager of any gift or hospitality over this value for entry in the Register of Gifts and Hospitality.
- Always say "no" if you think the giver has an ulterior motive. Be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will elicit a more prompt service or preferential treatment.
- Never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the Academy, seeking employment with the Academy or is in dispute with the Academy, even if you are not directly involved in that service area.
- Where items purchased for the Academy include a 'free gift', such a gift should either be used for Academy business or handed to the PTA to be used for charity raffles.
- If you are in doubt about the acceptability of any gift or offer of hospitality it is your responsibility to consult the Principal.

A gauge of what is acceptable in terms of hospitality is whether this Academy would offer a similar level of hospitality in similar circumstances.

- Occasional working lunches with customers, providers or partners are generally acceptable as a way of doing business provided they are not to an unreasonable level or cost.
- Invitations to corporate hospitality events must each be judged on their merit. Provided the general rules have been taken into account, it may be acceptable to join other company/organisation guests at:
  - a. sponsored cultural and sporting events, or other public performances, as a representative of the Academy;
  - b. special events or celebrations.

Consider the number of these events, and always take into consideration what public perception is likely to be if they knew you were attending.

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- Acceptability depends on the appropriateness of the invitations, in terms of the level of hospitality, the frequency and the status of the invited employee. In all such cases the Principal must be consulted.
- Paid holidays or concessionary travel rates are not acceptable. Neither are offers of hotel accommodation nor the use of company villas/apartments.
- If you are visiting a company to view equipment that the Academy is considering buying, you should ensure that expenses of the trip are paid by the Academy. Acceptance of refreshments and/or a working lunch may be acceptable, but care must be taken to ensure that the Academy's purchasing and/or tender procedures are not compromised.
- Acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to your work are acceptable.
- Offers to speak at corporate dinners and social gatherings, or events organised by, for example, a professional body, where there is a genuine need to impart information or represent the Academy must be agreed in advance with the Principal. Where your spouse or partner is included in the invitation, and approval has been given for you to attend, it will be acceptable for your spouse or partner to attend as well, but if expenses are incurred by your spouse or partner, these must be met personally.
- Any invitation you accept should be made to you in your professional/working capacity as a representative of the Academy.

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## APPENDIX 2

### The Seven Principles of Public Life

**Selflessness** - Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.

**Integrity** - Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

**Objectivity** - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

**Accountability** - Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

**Openness** - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it.

**Honesty** - Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

**Leadership** - Holders of public office should promote and support these principles by leadership and example.