Ladygrove Primary School

Gifts And Hospitality Policy and Declaration of Interests

February 2025

To be reviewed February 2027

Gifts & Hospitality, Pecuniary & Non-Pecuniary Interests

Ladygrove Primary & Nursery School has adopted a Code of Governance which reinforces the requirements that all gifts and hospitality should be recorded in addition to all pecuniary and nonpecuniary interests. It is essential that the advice provided is followed rigorously.

The arrangements are as follow: -

Gifts & Hospitality

The pro-forma attached provides detailed advice about the procedures to be followed in respect of the offering to employees of gifts and hospitality. The advice makes it clear what acceptable gifts or hospitality do not have to be declared, what does and what is unacceptable and must be refused. The pro-forma requires that in all cases, before any offer is accepted, necessary authorisation as described in Section Two must be obtained.

Pecuniary & Non-Pecuniary Interests

There are amended guidance notes and a pro-forma in respect of: -

a) Declaration of Relationships
b) Dual Employment Issues
c) Personal Interest – membership of any organisation which has secrecy about rules, membership or conduct
d) Sponsorship – giving & receiving

The purpose of these arrangements is to re-enforce and support the principles that “Since the decisions of the school often affect those lives of individuals, families or neighbourhoods, everyone has the right to expect that they are made fairly and consistently”.

Gifts & Inducements to an employee

Where a business contact* offers a personal gift, personal payment or other incentive such as secondary employment to an employee these should not be accepted and should be returned with a suitable official letter. 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 or 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 of 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 vouchers with an individual value of £8.00 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.

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 beat the school's expense.

Gifts and 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).

Gifts or hospitality, which might be deemed acceptable on a 'one-off' basis, may become unacceptable if provided on a regular basis or during a sensitive period.

Gifts or hospitality from the school

The Governing body allows the Headteacher as part of their virement arrangements to authorise the purchase of suitable gifts or hospitality for employees as he sees fit in the event of significant events e.g. retirement. Such expenditure may be purchased via the school budget and will be re-imbursed via collections from staff members.

Staff Gifts Protocol

For leaving gifts, sickness, longer service and special occasions - school to purchase flowers and where applicable, top up staff collections, which are generally encouraged and undertaken. Length of service etc. would be considered where any purchases are made.

Staff Gifts & Hospitality Register Form

Section One of this form should be completed (either in electronic or paper form), in accordance with the staff code of conduct, for any offers or hospitality of gifts either received or offered to staff. Please read the relevant notes before completing the form.

Section One: Details of the offer- this section must be completed by member of staff	
Date of offer	
Name of employee	
Service / Section	
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 offered the same gift or hospitality	
Proposed action See noted overleaf and delete as appropriate	Accept/Decline/Already declined. This form must be authorised by before any offer is accepted.
Employees Signature	
Date:	

Following completion on the above section and before any offer is accepted, this form must be given to the Headteacher for authorisation.

Section Two: Action authorised by Headteacher	
Name of Authorising Officer	
Record of Authorising Officer's Action. See notes overleaf and delete as appropriate	Agree acceptance / Acceptance not authorised / Agree action to decline Please ensure member of staff who received the offer is aware of your decision.
Authorising Officer's signature	
Date:	

Authorising Officers please ensure:

1. The employee is informed of your decision
2. This form is indexed and recorded on your Register of Staff Gifts and Hospitality
3. This form is filed in the in the Register of Staff Gifts and Hospitality

REGISTER OF PECUNIARY & NON-PECUNIARY INTERESTS

GUIDANCE & PROCEDURE NOTES

INTRODUCTION

Employees should avoid putting themselves in a position where their integrity is called into question because of any perceived or actual financial or other obligation that could influence their role/position within the Council. One means of demonstrating this principle is a clear policy and procedure for dealing with pecuniary and non- pecuniary interests and offers of gifts or hospitality. The guidance and procedures set out below are designed to achieve this.

The code of conduct for employees sets out the Council's requirements for employees and can be found within the section on the constitution (part 4). This general guidance reflects the code and covers all employees under a contract of employment with the school, although parts of it will inevitably apply more to individuals in senior jobs.

It does not set out to be exhaustive or exclusive. You should therefore familiarise yourself with regulations, guidance or rules, which apply specifically to your job, services or profession etc.

In the case of the offer/acceptance of gifts and hospitality there are specific legal requirements that you should be aware of if such offers are made to you: -

1. The Public Bodies Corrupt Practices Act 1889 provides that it is an offence for any employee or member to corruptly receive or agree or receive any gift, loan, fee, reward or advantage for doing, or not doing, something in connection with the work of the school.

2. The Prevention of Corruption Act 1916 provides that where such a gift, loan etc. is received by an employee or member from a person seeking a contract with the school, then the gift or loan is deemed to have been received corruptly. This would place the giver and the receiver in the position of having to prove that they did not act dishonestly.

3. The Local Government Act 1972 s117 provides that an employee of a local authority shall not, under colour of their office or employment, accept any fee or reward whatsoever other than their proper remuneration.

Pecuniary & Non-Pecuniary Interests

1. Relationships

Headteacher 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 the Chair of Governor 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. Personal Interests

Employees must declare of the Head of People Services (HR) Officer membership of any organisation, which has secrecy about rules, membership or conduct. Failure to do so could lead to disciplinary action. People Services (HR) will maintain a central register of such declarations.

3. Dual Employment

Employees on Grade 6 or above are bound by their conditions of services to devote their full-time services to the 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.

Any additional employment must not conflict with or react detrimentally to the school's interest or weaken public confidence in the conduct of the schools 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 interest – (e.g. involvement with an organisation or pressure group which may seek to influence the Governing Body's policies)

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.

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.

REGISTER OF PECUNIARY & NON-PECUNIARY INTERESTS

NAME OF EMPLOYEE	DETAILS OF PECUNIARY & NON-PECUNIARY INTEREST	DATE OF NOTIFICATION

This form is to be retained by the Head teacher. In the case of declarations of personal interests (membership of an organisation that has secrecy about rules, membership or conduct) a copy should be provided to People Services (HR).

Hospitality Register Log

Form Index No	Date of Offer	Name of Employee	Item Description	Accept/ Decline / Already Declined

Policy – document status:			
Date of policy creation	February 2025	Named responsibility	Selina Mahy
Date of policy review	February 2027	Named responsibility	Selina Mahy
Inception of new policy	March 2025	Named responsibility	Governors
Date of policy adoption by the governing body			March 2025