



**Lings Primary School**  
**(Northampton Primary Academy**  
**Trust Partnership)**

**Gifts, Hospitality and**  
**Entertaining Policy**

Date of Last Review: July 2016

Date of Next Review: July 2018

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## 1. Policy Purpose

- ❖ This outlines the Northampton Primary Academy Trust's (NPAT) policy with regard to the receipt of gifts and hospitality by its staff from any third parties arising from duties undertaken on behalf of Lings Primary School or NPAT.
- ❖ NPAT is committed to ensuring that governance is conducted in accordance with the highest standards of integrity, probity and openness. This policy has also been set in context of the **Anti - fraud & Corruption Policy**

## 2. General Rules

- ❖ NPAT staff must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgment or integrity. Staff are asked to immediately report any offer or receipt of such gifts to the Business Manager within their school to be recorded in the Register of Gifts and Hospitality.
- ❖ Directors, local Governors and staff may accept the following gifts/ hospitality without the need to seek the approval or formally register receipt.
  - Courtesy hospitality at business lunches / dinners or attendance in an official capacity at a public function;
  - Incidental promotional gifts such as calendars, diaries or pens;
  - Receipt of small items from suppliers or contractors as expressions of gratitude such as boxes of chocolate or individual bottles of drink (at a value of less than £25)
  - NB: Care must always be taken to ensure that whenever such gifts /hospitality are accepted no obligation to the person or organisation in question is accepted. In cases of doubt academics should consult their Head Teacher.

- The following examples of gifts/hospitality require local Governing Body approval and should be formally recorded by the relevant school's Business Manager in the Register of Gifts and Hospitality:
- Attendance as a non-paying guest of a commercial organisation or individual at a non-work related cultural or sporting event (at a value of more than £25)
- Promotional gifts worth in excess of £25
- Other offers of gifts/ hospitality not falling into any of the above categories.

### **3. Unacceptable Gifts/Hospitality**

The following are examples of offers of gifts/hospitality which should be refused by staff.

- Gifts of money (not including donations)
- Free membership or subscriptions (e.g. sports clubs)
- Foreign travel unless as a specific element of a business, academic or research activity approved by the NPAT board.
- Free goods, services or equipment which are normally provided by a supplier at a charge
- Any offers of gifts and hospitality falling into any of the above categories should be reported immediately to the Head Teacher.

### **4. Entertaining Policy**

- ❖ This outlines NPAT's policy with regard to the provision of entertaining third parties by its employees and on the use of public funding for the provision of hospitality/entertaining of its staff.
- ❖ NPAT recognises that it is customary and routine for education professionals to provide reasonable gifts and entertainment to clients and to receive the same from clients and suppliers. Entertaining must not be made with the purpose of gaining an unfair commercial advantage. We must avoid the situation where

entertaining an individual employed by an organisation could breach that organisation's code or cause embarrassment.

- ❖ NPAT is committed to ensuring that governance is conducted in accordance with the highest standards of integrity, probity and openness. This policy has also been set in context of the **NPAT Anti-fraud and Corruption Policy** and the Bribery Act 2010.

#### **4.1. Provision of entertaining to third parties**

- Where funding is to be used from a school's funding, then all entertaining must be approved and agreed with the school's local Governing Body, prior to that expenditure.
- Entertaining will not be reimbursed via monthly expense claims and the company credit cards cannot be used for entertaining unless approval has been sort from the school's local Governing Body.
- If approved, all entertaining must be recorded on the Entertaining Expenditure Register held by the School Business Manager at the relevant school. This should include an assessment of the impact on the recipient, value and the perception this may have within the market place.

#### **4.2. Provision of entertaining to staff**

- A maximum amount of £300 per term will be set aside from Unrestricted Funds to be used towards a staff well-being fund. This is to include whole school staff events, celebratory events e.g. successful Ofsted or outstanding exam results and a contribution towards staff member leaving events. Each event will need to be agreed by the Head Teacher and must be recorded on the Entertaining Expenditure Register held by the School Business Manager at the relevant school.

## 5. Penalties for Breach of either above policies

If a breach of this policy amounts to a breach of the Bribery Act 2010 it may attract the following penalties.

- **Individuals** - the penalties for individuals on conviction are severe, and may include imprisonment up to 10 years for all individuals involved.
- **Corporate** - NPAT directors may be liable to severe financial penalties for bribery committed by employees, contractors, agents, representatives and other third parties who provide services for or on behalf of the school's within NPAT. The costs of any external investigation ordered by the regulator may easily be more than £1m, and will be payable by NPAT.
- **Third parties** - any breach of this policy by any contractor, agent, consultant or supplier will normally result in NPAT's contract with any such party being terminated insofar as its terms or law permits.
- **Investigations** - any breach, or suspected breach, of this policy will be investigated and appropriate disciplinary action taken as necessary, which may include reporting to appropriate authorities.
- **Disciplinary action** - any breach of this policy may result in disciplinary action being taken under local disciplinary procedures, and may lead to dismissal if it constitutes gross misconduct. NPAT will support any employee or officer who makes such a report and will ensure that the report is treated appropriately. No disciplinary action may be taken against any person who makes a legitimate report, even if the suspicions reported turn out to be incorrect. Disciplinary action may be taken against any person who attempts to victimise or discriminate against a person making such a report.

## **6. Role of the Business Manager in relation to the above policies**

- Responsible for ensuring that any offer or receipt of gifts, hospitality or donations to staff is recorded in the relevant school's Register of Gifts and Hospitality.
- Reporting any possible conflict of interests arising from the offer or receipt of gifts and or hospitality to the Local Governing Body
- Any entertaining expenditure is recorded within the Entertaining Expenditure Register with appropriate details.
- Returning a copy of the Gifts and Hospitality Register to the Local Governing Body on an annual basis.

## 7. THE DOs and DON'Ts

DO	DON'T
✓ Read and follow the guidance on gifts and hospitality	✓ Accept any gifts or hospitality which have a value of more than £25 without the approval of the local governing body
✓ Seek advice from the Head Teacher if you are in doubt	✓ Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process.
✓ Record all offers of gifts and hospitality which have a value of more than £25 in the School's register, whether accepted or not	✓ Accept cash or monetary gifts
✓ Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything	✓ Accept a gift or hospitality as an inducement or reward
✓ Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality	✓ Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time
✓ Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body	✓ Accept a gift or hospitality which you or a member of the public would think is extravagant or excessive, even if the hospitality is taken in your own time



<ul style="list-style-type: none"> <li>✓ Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept</li> </ul>	<ul style="list-style-type: none"> <li>✓ Accept gifts or hospitality offered to your husband, wife, partner, family member or friend</li> </ul>
<ul style="list-style-type: none"> <li>✓ Consider paying for yourself if offered any hospitality by a supplier or third party</li> </ul>	

## 8. RECORD OF GIFTS & HOSPITALITY (*accepted\*/refused\**)

*\*Delete as appropriate*

This form must be completed by any member of staff or Governor receiving or declining a gift or hospitality, which relates to their position in the School and has a value of more than £25. If the individual is concerned about the likely "level" of any gift or hospitality that he or she may receive, agreement from the Head Teacher or Chair of Governors must be obtained in accordance with the School's guidance.

<b>Name of staff/Governor</b>	<b>Position held</b>
<b>Individual, company or organisation offering gift or hospitality</b>	
<b>Date, time and venue</b>	<b>Gift/Hospitality</b>  <b>Accepted*/Declined*</b>
<b>Nature and approximate value of hospitality/gift.</b>	
If accepted, has the gift been retained for personal use or for School use?	
<b>If accepted, reason for accepting hospitality/gift</b>	
Signed: _____ Date _____	
Approved By: (Head Teacher/ Chair of Governors signature)	

## REGISTER OF GIFTS AND HOSPITALITY

[illegible]

**Confirmatory Signatures**

**Signed.....Head Teacher**

**Signed.....Governor**

**Approved on.....**

**To be reviewed on.....**