



**Watford Grammar School for Girls**

## **Gifts and Hospitality Policy**

<b>This policy adopted by Board of Governors</b>	<b>1<sup>st</sup> July 2019</b>
<b>Next review date</b>	<b>8<sup>th</sup> July 2021</b>
<b>Committee Responsible</b>	<b>FG &amp; P</b>

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## 1. Aims

The purpose of the policy is to provide a framework for the Staff, Governors, Trustees and Headmistress of WGGS so that:

- use funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academies Financial Handbook
- and those associated with it operate in a way that commands broad public support
- have due regard to propriety and regularity, and ensures value for money, in the use of public funds
- fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors
- 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 members, trustees, staff and/or any other representative of the trust.

This policy also complies with our funding agreement and articles of association.

## 3. Definitions

**WGGS** – Watford Grammar School for Girls

**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

### 4.1 Governors, trustees 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 trust 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 trust with a value of [over £25/other value set by the trust] on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the Business and Finance Director or Headmistress before accepting or offering any gifts or hospitality with a value of over £50.

### 4.2 Governors

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

### 4.3 The Headmistress

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

The Headmistress 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 trust and to those outside the organisation.

She will also ensure, alongside the Business and Finance Director, 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.

### 4.4 The Business and Finance Director

The Business and Finance Director will ensure that:

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

They will also ensure, alongside the Headmistress, that 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.

### 4.5 The Executive Assistant to the Headmistress

The EA to the Headmistress is responsible for maintaining the gifts and hospitality register.

### 4.6 Parents

Parents will be made aware of this policy and are that

- WGGs 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 WGGs prevents teachers and other staff from accepting gifts worth over a certain amount

## 5. Acceptable gifts and hospitality

### 5.1 Offers of gifts and hospitality received

Governors, trustees and staff can accept gifts and hospitality that have a value of £50. These do not have to be pre-approved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, Governors, trustees and staff must consult the Business and Finance Director or Headmistress.

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 and Finance Director or Headmistress.

Any gifts or hospitality offered with a value of £50 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the Business and Finance Director or Headmistress before accepting.

If the Headmistress 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.

## **5.2 Offers of gifts and hospitality given**

The Business and Finance Director or Headmistress 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 manage their self generating fund for gifts on the occasion of births, weddings and significant birthdays.

Any gifts or hospitality provided by WGGS, such as a working lunch for visitors, must not be extravagant. A maximum value of £10 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
- Gifts or hospitality offered to family members, partners or close friends of members, trustees 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, trustees 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 Headmistress. The Headmistress 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 trust 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 and Finance Director.

This policy will be reviewed every 2 years by the Headmistress approved by the F G & P Governors Committee.

## **9. Links with other policies**

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures

## Appendix 1: gifts and hospitality register

Date	Name	Description of gift/hospitality and approximate value	Party offering gift/hospitality	Accepted/rejected	Approved by