

Gifts and Hospitality Policy

King's College London
Mathematics School

Monitoring and reviewing

Action	Individual / Group	Date	Role
Reviewed	Gaenor Stevenson	04/02/2017	Business Manager
Ratified	Governing Body	12/02/2019	Governors
Next review	Finance and General Purposes Committee	Spring 2021	Governors

Provision of Hospitality

1. Hospitality is defined as the provision of food and/or drink at meetings involving third parties, i.e. one or more persons who are not members of the School's staff. Hospitality may be provided within the School or at external restaurants. All hospitality must be agreed with the Chair of Governors in advance.
2. Hospitality should only be provided for the purposes of the business of the School and must be dealt with within the framework of the relevant tax regime. It should be able to be justified on the grounds of furthering the School's aims and objectives, e.g. by helping build relationships, contacts, etc. It should never be seen as a means to reward staff.
3. Only staff who have a direct interest in the meeting with the third party should be included in any provision of hospitality. Other than in exceptional circumstances hospitality should not be extended to spouses of staff or guests.
4. Hospitality should not be unduly lavish but be consistent with normal practice that would be expected of a school or other public body.
5. All claims for reimbursement of hospitality costs must be accompanied with a list of all attendees, both school staff and third parties, as well as the purpose of the event.

Policy on Gifts and Hospitality

1. General

This policy relates to the School's approved code of conduct concerning the offer and/or acceptance by staff of gifts and hospitality of whatever nature from outside individuals or organisations. Within the terms of the code, staff and governors are expected to exercise common sense. If they are in any doubt they must consult the Head Teacher and Chair of Governors and in every case declare the acceptance of a gift or hospitality in the register kept by the School. The policy applies to all governors and staff of the School.

The process set out is designed to safeguard governors and staff from any misunderstanding or criticism.

The general principles which govern gifts and hospitality are:-

- (i) Offers of hospitality should only be accepted if there is a genuine need to represent the School.

(ii) Gifts should only be accepted in **exceptional** circumstances and should have regard to purpose, openness, value and the identity of the person providing the gift.

2. Hospitality

The following principles should be followed in deciding whether or not to accept hospitality:-

(i) Staff and governors should ask themselves whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered. If the answer is yes, the hospitality should be declined. In making judgements, relevant facts to take into account include the person or organisation offering the hospitality, its scale and nature and its timing in relation to decisions to be made by the School.

(ii) Care should be taken to avoid situations in which an individual governor or member of staff is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation.

Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as follows:-

- Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest;
- Attendance at events or functions where there is a demonstrable need for the School to be represented to either give or to receive information or to participate as part of the School's corporate image;
- Attendance at events or functions which are part of the civic, cultural or sporting life of the School;
- Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are of a reasonable level.

Overnight hospitality linked to any of the above should be declared to either the Head Teacher or the Chair of Governors before being accepted.

3. Gifts

All personal gifts should be refused unless they come within the following categories:-

- (i) Modest gifts of a promotional character, e.g. calendars, diaries and other similar articles;
- (ii) One off, modest gifts from students, parents or governors up to £25 in value;
- (iii) Gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation;
- (iv) Gifts which are intended for the School as a corporate body can be accepted but must not be retained by the individual who receives them. Such gifts should be passed to the School as appropriate.

Staff must be mindful of how the gifts may be perceived in the eyes of the public.

Staff must, within 28 days of accepting any gift in category (iii) or (iv) or any hospitality, provide written notification to the Head Teacher. A record will be maintained by the Business Manager, this would include an estimate of or its actual value and an indication from the Head Teacher as to why acceptance of the offer is authorised.

The Head Teacher must inform the Chair of Governors of any gifts in category (iii) or (iv) or hospitality received.

Failure to comply with these requirements are subject to the School's disciplinary procedures.

The Business Manager maintains a register of gifts and hospitality accepted, monitors this regularly and keeps the Finance and General Purposes Committee informed. Any concerns/issues identified should be noted and an action plan put in place.

Documentation within the register will be held for a period of seven years.