Elton Primary School and Nursery

Gifts & Hospitality Policy

Reviewed	Autumn 2026
Review	Autumn 2027

This policy is extracted from Code of Conduct 2013 (Code of Conduct for School Employees)

GIFTS

This section applies to all gifts other than very modest, low value gifts or other tokens of very low value (Elton Primary School and Nursery has defined this as gifts below £25). These are not subject to any of the declaration or approval provisions.

It is a serious criminal offence for an employee to receive corruptly a gift (this term covers a range of favours) or benefit in other ways for doing, or not doing, anything for another person. If an allegation is made, it is for the employee to show that any rewards have not been corruptly obtained. If a gift is offered or received, the employee must consider whether it is acceptable within the terms of this Code. If s/he considers it may be accepted, the gift should be declared on the special form (attached at the rear of the full Code). If s/he rejects the gift, this should be done diplomatically and the situation declared on the special form. If the employee is unsure, a request for the Headteacher's decision should be made on the special form.

Headteachers must not provide gifts to suppliers or contractors (other than very modest, low value gifts or other tokens of very low value).

Headteachers must retain a copy of every request / declaration form which they consider, in a special Declarations file. The file should be kept available for inspection by Internal Audit at any time.

Guidance

The offer of personal gifts or special favours may be associated with suppliers and contractors but other circumstances may apply in which a gift could be offered. There are two considerations where gifts (or favours) are concerned: 1. the nature of the gift and its value; 2. the motivation of the giver. Most firms, as part of their normal commercial activity, distribute gifts which range from the promotional (e.g. calendars, diaries) to the more expensive (e.g. wines and spirits). The latter are obviously distributed where the giver feels they will have the greatest impact. In general, gifts should be refused. The main exception to this requirement is modest promotional material of very low value such as calendars, diaries and pens, that may well be unsolicited. Even here however, staff should use their judgement. Headteacher's guidance should be sought in the case of more expensive promotional items and approval sought on the special form if necessary. Other types of gift may, of course, be offered with more covert motives. These must never be accepted.

Where a gift is returned or refused, this should not be done in a way which the donor might regard as impolite or as being unduly critical of what may be normal practice in other organisations. A gift that is returned or refused must be formally declared on the special form. Exceptionally, a modest, unsolicited gift might be retained, where the giver's motives are well meant and refusal could be seen as impolite or offensive.

The gift must be declared on the special form. It is sometimes acceptable to the giver of a gift, which in other circumstances would be refused, to agree to donate it (or equivalent cash value) to charity. Prior approval should be obtained to such an arrangement. Use the special form.

HOSPITALITY

Employees should only consider offers of hospitality if there is a genuine need to impart information or represent the school / local authority in the community (especially where the School / Council should be seen to be represented). Hospitality is likely to be acceptable where it is clear that the invitation is corporate rather than personal – but always provided there is no danger of contractual or other decisions being compromised. Offers aimed directly at employees as individuals must always be refused. All offers of hospitality must be authorised in advance by the Headteacher.

Headteachers must retain a copy of every request form which they consider, in a special Declarations file. The file should be kept available for inspection by Internal Audit at any time.

Guidance

An offer of hospitality is a matter of judgement. The motivation of the person or organisation offering the hospitality will always be relevant as will the context. In many cases offers are innocuous and well meant, e.g. modestly priced tickets for a concert or play offered corporately. It is where an offer is directed at the individual in a personal capacity – and possibly covertly – that the situation is very likely to be unacceptable and could bring the School/Council into disrepute.

Special caution is needed if the host is seeking to do business with the School/Council or to obtain a favourable decision. Employees should be particularly sensitive to the timing of an offer or invitation in relation to School/Council business, e.g. contract processes. When a particular person or organisation has a matter currently in issue with the School/Council (e.g., an arbitration arising from a contract or an industrial development proposal), an offer of hospitality must be refused even if in normal times it might be acceptable.

It is generally more acceptable to join in hospitality offered to a group, rather than to accept something directed at the individual. Where hospitality has to be declined, this should be done courteously but firmly, referring directly to the School's/Council's standards and expectations.

All offers of hospitality are subject to advance approval from the Headteacher.

The following are generally acceptable (where the individual is representing the School / Council):

- *Working lunch of a modest standard (say at a conference or to allow business discussions to continue).*

- *Society or institute dinner or modest function.*
- *Company anniversary celebration.*
- *Cultural or sporting occasion 'sponsored' by the company.*
- *Where the School/Council pays for attendance at the event, e.g. for Inspection of equipment.*
- *Official opening.*
- *Tickets for a play or concert*

These are generally unacceptable:

- *Holiday (e.g. Where an employee organises a school visit and, as a consequence, s/he receives a free/discounted holiday. NB The position in relation to formal educational visits is different e.g. where an employee is requested by the school to make an exploratory visit)*
- *Hotel accommodation (see above).*
- *Use of company flat or hotel suite (see above).*