

# GIFTS AND HOSPITALITY POLICY

Responsible:	Director
Date Reviewed:	January 2025
Review Period:	Annually
Approval Authority:	Governors
External Release:	Yes

The aim of this policy is to guarantee that Kingfisher Education adheres to high standards of transparency, particularly in relation to interactions with parents and third parties who are existing or prospective suppliers of equipment, goods, and services.

This policy addresses the giving and receiving of gifts and hospitality by Governors and staff from third parties. These third parties include individuals who are not Governors or staff but may be current or prospective students, parents of current or prospective students, or current or potential suppliers of equipment, goods, and services.

For the purposes of this policy, hospitality encompasses the offering or acceptance of meals, holidays and tickets to sports, social, or recreational events.

### **Scope of this policy**

This policy is relevant to Governors solely regarding gifts or hospitality connected to third parties that have either a current or potential relationship with the school.

This policy applies to all workers.

### **Principles**

The school's guidelines for offering or receiving gifts or hospitality include the following principles:

- Gifts and hospitality must not be solicited;
- The value of the gift or hospitality should not be perceived as exceeding what is typically acceptable or inconsistent with the standards of conduct expected by the school.
- Gifts or hospitality should only be given for a valid reason, and any gifts or hospitality that could be seen as an incentive or a bribe must never be accepted.
- Additionally, the gift or hospitality must be an occasional or irregular occurrence, ensuring it cannot be interpreted as a regular source of income by Her Majesty's Revenue and Customs.

If in doubt as to whether to receive or give gifts or hospitality, refer to the Director.

### **Procedure**

#### **Giving or accepting gifts with a value of £100 or under**

Gifts valued at £100 or less, given by or to suppliers of equipment, goods, and services, or to and from any other third parties with a vested interest in the school, such as students, may be accepted, provided that:

- The gift is shared without any expectation from either party that it creates a sense of obligation in return for the gift.
- the total value of the gift given or received from any one third party in any twelve month period does not exceed £100;
- It is suitable for the situation (for instance, it is a common practice for students to present small gifts to their teachers upon completing their course); and
- The receipt of the gift is notified to the school as set out below.

### **Giving or accepting gifts with a value above £100**

All gifts valued over £100 that are given by suppliers of equipment, goods, and services, or from any other third parties with an interest in the school, must be reported promptly via email, as detailed below. Such gifts may only be accepted in accordance with cultural norms; if this is the case, the recipient must transfer the gift to the school.

### **Giving or accepting hospitality**

Hospitality provided to or offered by suppliers of equipment, goods, and services, as well as any other third parties with a vested interest in the College, shall only be allowed if:

- The hospitality is not given or received with an expectation (by either party) that there is an obligation owed as a result of the hospitality;
- The hospitality cannot be viewed as an incentive or bribe; and
- The hospitality is appropriate or proportional to the nature of the relationship with the supplier or third party.

Examples of what might be considered appropriate and what might not be considered appropriate can be found in the Annex to this policy.

## **Duty to notify the giving of or acceptance of gifts and hospitality**

All gifts or hospitality valued at £100 or less, provided to or received from suppliers of equipment, goods, and services, or any other third parties connected to the school, should be reported promptly via email to the Director. The Director will then create and keep an accurate record in the 'Bribery book' maintained by their office.

## **Duty to notify refusal of gifts and hospitality**

Any offers of gifts or hospitality valued over £100 that are declined due to concerns about creating a sense of obligation, or could be perceived as incentives or bribes, must be reported promptly via email to the Director. The Director will then create and maintain a proper record in the 'Bribery Book' that is kept for this purpose.

## **Content of records**

Records must include a concise description of the gift or hospitality, its estimated value, the date it was offered and/or received, the reason for giving or receiving it, any third parties involved, and whether the gift or hospitality was accepted or declined.

## **ANNEX 1 EXAMPLES**

Examples of hospitality that would be acceptable are:

- A working lunch with a supplier of services to Kingfisher Education, valued at no more than £100 for two people.
- A pre-arranged and agreed lunch with a significant third party (donor, or other), valued at no more than £150 for two people.

Examples of hospitality that would not be considered acceptable are:

An agent has extended an invitation for a Governor or employee, along with their partner, to enjoy a complimentary three-day stay at a five-star hotel after attending a recruitment fair abroad. This offer, valued at over £1,500, should neither be given nor accepted.

I confirm I have read and understood the **Gifts and Hospitality Policy**

Signed: .....

Print Name: .....

Date: .....