Gifts and Hospitality & Conflicts of Interests Policy and Procedure 2026-2027

1. Purpose

1.1. The aim of this policy and procedure is to ensure that Argyle school are compliant with its responsibilities under the Bribery Act 2010 and the Local Government Act 1972. The School's Code of Conduct sets out guidance for declaring and recording offers of gifts and hospitality and conflicts of interests for school employees.

1.2. Argyle school must ensure that the integrity of the school and its staff is not compromised by the offering and/or acceptance of inappropriate gifts and hospitality, and the public and other stakeholders are aware of the clear standards in place. Bribery and corrupt practices can amount to substantial financial loss of public funds and in some cases, are a violation of criminal law.

1.3. This policy and procedure applies to all persons working for the school or on its behalf in any capacity.

2. Gifts that are accepted

2.1. Gifts and hospitality under the value of **£100** (singular or cumulatively) can in most circumstances be accepted without declaration or approval.

2.2. Some examples of gifts that can be accepted under the value of **£100** are:

2.2.1. Calendars

2.2.2. Chocolates, cakes and other confectionary

2.2.3. Promotional gifts and merchandise e.g. diaries and pens etc.

2.3. Even with low value gifts and hospitality, employees should still consider whether in all the circumstances, accepting the gift is appropriate, so some thought is required, but this is a judgement for the employee. Should the officer be uncomfortable about the gift for whatever reason, they should report this to their Headteacher.

3. Hospitality that is accepted

3.1. Gifts and hospitality over the value of **£100** should be declared and declined unless otherwise agreed with your Headteacher. If accepted and over the value of **£100**, these need to be declared. Examples of these occasions are as follows:

3.1.1. Hospitality at an event where there is a genuine need to exchange or impart information or represent the School.

3.1.2. Hospitality at a purely social, entertainment or sporting function which is part of the life of the community, and where the school should be seen to be represented.

3.1.3. Subsidised or free of charge conferences and courses, where it is clear that the conference or course content is relevant to the business of the school.

3.2. There may be exceptional circumstances where individuals may be in a position where they are required to provide hospitality. The need to incur such expenses should be pre-approved by your Headteacher if possible, against a recognised and identifiable budget.

4. Gifts and hospitality that are not accepted

4.1. Any gifts and hospitality for doing, or not doing anything, or for showing favour or disfavour to any person or organisation in an official capacity must be declared and declined. In these circumstances this should be both reported to the Headteacher. The following are examples of offers which must be declined and declared to the Headteacher:

4.1.1. Offers of a high intrinsic value or resale value (e.g. expensive gifts, theatre tickets, invitations to prestigious sporting events).

4.1.2. Provisions of holiday or weekend hospitality or the use of company flats.

4.1.3. Offers from a consultant, potential contractor, tenderer or re-negotiations during contract negotiations or tendering period (unless this is purely incidental such as sampling a product as part of the contract evaluation process, e.g. food tasting for a catering contract).

5. Gifts and hospitality register

5.1. To record a declaration of gifts and/or hospitality, please use the school's hospitality register. The register can be found in the back office.

5.2. **The process of declining gifts or hospitality is as follows:**

Decline the offer of a gift or hospitality if over **£100** and not previously agreed by the Headteacher

Report the decline of the offer of a gift or hospitality on the school's hospitality register

5.3. **The process of accepting gifts or hospitality is as follows:**

Accept the offer of a gift or hospitality if the conditions above are met (e.g promotional gifts under the value of **£100**)

<u>If under the value of £100</u>

As the gift or hospitality is under the value of **£100**, it does not need to be declared.

<u>If over the value of £100</u>

As the gift or hospitality is over the value of **£100** , it must be agreed by the Headteacher, and declare the offer on the school's hospitality register.

NB: In the case of the Headteacher, the Chair of Governors will be asked to sign off any significant hospitality or gift that is accepted, and in all cases where the hospitality or gift represents a risk of conflict of interests.

5.4. The retention period for the gifts and hospitality register is 6 years.

6. Conflict of interests

Meaning: This is a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity

6.1. The School is responsible for ensuring that its services are delivered to the highest standard and that, when performing their duties, employees act with integrity and professionalism at all times.

6.2. Employees must not allow their private interests to conflict with their public duty. All employees have a statutory duty to declare any direct or indirect personal, financial, business related or other interests to the School, as well as any other potential conflicts of interest.

6.3. If any of the details change during your employment, you must disclose again within 21 days of the change. If you are in any doubt whatsoever on whether you need to declare an interest, you should go ahead and disclose it in the fullest terms.

6.4. Failure by employees to disclose financial interests in contracts with the School or Camden Council, could be a criminal offence and be subject to a fine under the Local Government Act 1972. It is also a breach of our Code of Conduct, our Financial Regulations and our Anti-Fraud and Corruption

Strategy, which can lead to formal action under the School's Disciplinary Procedure.

7. What is a conflict of interest?

7.1. A conflict of interest can arise if your personal or private outside activities, and/or financial interests influence, could be perceived to influence or interfere with the decisions you make in the course of your work for the School.

7.2. This can include, but is not limited to, ownership of shares or a financial investment in a company or business; and involvement in a company, business, club or organisation, (whether these are open to the public or not). This applies to both employed and non-employed roles and activities, including unpaid or voluntary positions within such organisations.

7.3. A conflict of interest can also occur where you have access to School information and use, or could be perceived as using this information for personal gain or advantage.

7.4. A conflict of interest can also occur where you have access to School information and pass this information without authorisation to a family member, personal contact or an external organisation you are involved with, who then gain or could be perceived to gain an advantage or benefit by receiving this information.

7.5. **Direct:** You will have a direct financial interest in a contract or a proposed contract if in any way you stand to benefit financially from the contract. For example, if you are associated or a partner of a business which is party to a contract with the School.

7.6. **Indirect:** You will have an indirect financial interest in a contract or a proposed contract if:

- You are a member of an organisation or other body which has entered into or proposed to enter into a contract with the School.
- You are a relative of someone with whom the contract is made or is proposed to be made

7.7. The Disclosure of Interests form sets out possible areas of conflicting interests between you, your spouse/partner or relative and the School, as follows:

- direct financial interest in a contract relating to the School;
- indirect financial interest in a contract relating to the School;
- other employment held;
- other dealings with the School over last five years;
- directorships and trusteeships held;

- large amount of shareholdings in companies;
- grant aid applied for or received;
- direct loans from the school and Council;
- association with organisations in receipt of School/Council grants/loans;
- other activities, relationships or conflicts of interest.

The above are not exhaustive lists and employees should use their judgement to determine whether other interests, activities or personal relationships could reasonably be perceived as a conflict of interest.

8. Conflict of interests register

8.1. To record a declaration of a conflict of interest, please use the School's 'Disclosure of Interests Registration Form'. The form can be found in the back office and summary details will be recorded in a register held by the Finance officer /Chair of Governors.

8.2. **The process to declare any type of conflict of interest is as follows:**

If you are in any doubt whatsoever as to whether you need to declare an interest, you should inform your headteacher.

Declare all conflicts of interests on the school's disclosure of interests registration form and give it to your headteacher.

The headteacher will record the signed registration form.

NB: In the case of the Headteacher declaring a conflict of interest, the Chair of Governors will be asked to sign off the Disclosure of Interests Registration Form.

9. Policy ownership & effective dates

Policy owner	Argyle Primary School
Approving body	The school's governing body
Date approved	October 2026
Review	October 2027