



AYLESBURY
GRAMMAR SCHOOL
Founded 1598

GIFTS & HOSPITALITY POLICY

CATEGORY B

This policy is reviewed and updated by the Governors Resources including Finance (RiF) Committee every three years.

This version was approved by the governing body in January 2025.

The next update will be due by January 2028.

Signed: 

Mr R Williams - Chairman of Governors



GIFTS & HOSPITALITY POLICY

1. Introduction

As a general guideline, business gifts and hospitality should not be accepted, or given by any member of staff and Governors, except as provided for below.

The intention of the policy is to ensure that the School can demonstrate compliance with the Bribery Act 2010 and that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the School. The School should be able to show all decisions are reached on a basis only of value for money and for no other reason.

- 1.1 All forms of bribery are strictly prohibited. Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 1.2 Bribery includes offering, promising, giving, accepting or seeking a bribe.
- 1.3 If there is an uncertainty about whether a particular act constitutes bribery, it should be raised with the Resources Director.
- 1.4 Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.
- 1.5 Governors or Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the School by:-
 - Maintaining an unimpeachable standard of honesty and integrity in all their business relationships.
 - Complying with the letter and spirit of the law, and contractual obligations rejecting any business practice that might be deemed improper.
 - At all times in their business relationships acting to maintain the interest and good reputation of the School.
- 1.6 Any personal interest that may impinge or might reasonably be deemed by others to impinge on a employee's or Governors impartiality or conflict with the duty owed to the School in any matter relevant to an employee's or Governors duties (such as conflicting business interests) should be declared in writing. Any member of staff or Governor who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff or Governors must supply details of such transactions to the Finance & Resources Director for entry into the Register of Pecuniary Interests.
- 1.7 Employees who become aware of a breach of policy must either report this immediately to his or her manager who will instigate investigations as necessary or refer to the School's "whistle blowing" policy. Governors should report to the Chair of Governors or Headmaster as appropriate.
- 1.8 Employees and Governors are permitted to accept gifts, rewards or benefits from pupils, parents, members of the public or organisations with which the School has official contacts only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as diaries, calendars or bottles of wine/spirits). Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision.

- 1.9 Where purchased items include a "free gift", it should be the intention that the gift should either be used for School business or handed to the School to determine its alternate use (donation, charity event etc) via the Resources Director.
- 1.10 In relation to conventional hospitality (lunches, outings tickets for events etc) this may be accepted provided that it is normal and reasonable in the circumstances. Such invitations should not be accepted:-
- Where there is no reasonable business justification for doing so.
 - Where an invitation is disproportionately generous.
 - Where the invitation could be seen as inducement to affect a business decision.
- 1.11 Any hospitality other than of a nominal value (£25 +) or facilities provided during the normal course of business should be reported to the Resources Director for entry into the Gifts and Hospitality Register.

2. Policy Governance

- 2.1 This policy is reviewed, updated and agreed by the Governors Resources including Finance Committee (RiF) every three years.