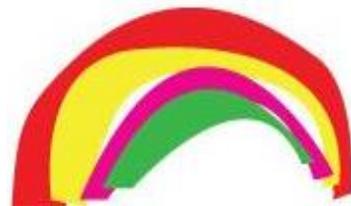


Thomas Coram Centre and Nursery School

Gifts & Hospitality Conflicts of Interests Policy



Thomas Coram Centre
and Nursery School
49 Mecklenburgh Square
London WC1N 2NY



Reviewed and Approved: Spring 2022	Next review: Spring 2024
Reviewed bi-annually	

1. Purpose

- 1.1. The aim of this policy and procedure is to ensure that Thomas Coram Centre and Nursery 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. Thomas Coram Centre and Nursery 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 £25 (singular or cumulatively) can in most circumstances be accepted without declaration or approval. Some examples of gifts that can be accepted under the value of £25 are:
Calendars, chocolates, cakes, other confectionary, promotional gifts and merchandise e.g. diaries and pens etc.
- 2.2. 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 Head Teacher.

3. Hospitality that is accepted

- 3.1. Gifts and hospitality over the value of £25 should be declared and declined unless otherwise agreed with your Head teacher. If accepted and over the value of £25, these need to be declared. Examples of these occasions are as follows:
 - Hospitality at an event where there is a genuine need to exchange or impart information or represent the School.
 - 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.
 - 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. School funds should not be used for offering hospitality to third parties. However, there are exceptional circumstances where individuals may be in a position where they

are required to provide hospitality. The need to incur such expenses should be approved by your Head teacher 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 Head Teacher. The following are examples of offers which must be declined and declared to the Head teacher must be notified:

- Offers of a high intrinsic value or resale value (e.g. expensive gifts, theatre tickets, invitations to prestigious sporting events).
- Provisions of holiday or weekend hospitality or the use of company flats.
- 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).

4.2. School funds should not be used to purchase gifts including gratuities or donations of any nature to external bodies or individuals.

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 school office.

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

Decline the offer of a gift or hospitality if over £25 and not previously agreed by the Head Teacher. Decline 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 £25)

If Under the value of £25

As the gift/hospitality is under the value of £25, it does not need to be declared.

If Over the value of £25

As the gift/hospitality is over the value of £25 and agreed by the Head Teacher, declare the offer on the school's hospitality register.

NB: In the case of the Head teacher, 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 a conflict of interests.

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

6. Conflict of interests

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 as to 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 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. 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.

7.2. 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.

7.3. 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.

7.4. **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.

7.5. **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.

7.6. 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 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 'Register of Interests'. The form can be found in the school office and summary details will be recorded in a register held by the Head teacher/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 head teacher.

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

The head teacher will record the signed registration form.

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