



<i>Policy Title</i>	Expense Claim Policy
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<i>Approved By Finance and Resources Committee</i>	Summer 2018
<i>Date of Approval by Governing Body</i>	Summer 2018
<i>Version Approved</i>	Summer 2018
<i>Date of Next Review</i>	Summer 2019

Revisions Table

<i>Version</i>	<i>Date</i>	<i>Edited by</i>
Summer 2018	Summer 2018	Ruby Sutherland

The master copy of this document can be found on the FBS Google Drive, under the “Policies” folder. This is one of a number of policies that are reviewed by the Governing Body, the full list can be found on the FBS Google Drive in the Policies Folder. Minor revisions that just adjust factual items (eg contact details / names) can be made by the author without formal review, and must be recorded in the Revisions table above. Revisions table front sheet was added to all policies during policy review of Summer 2018.



THE FULHAM BOYS SCHOOL

GIFTS AND HOSPITALITY POLICY

Date of Next Review: Summer 2019

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1. INTRODUCTION

1.1 The Fulham Boys School is committed to the highest level of integrity, honesty and accountability in all its business dealings. All Governors and staff are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of The Fulham Boys School.

1.2 The Prevention of Fraud and Bribery Act 2010 makes it a criminal offence to:

- Offer, promise or give a bribe;
- Request, agree to or accept a bribe
- Fail to prevent bribery by those acting on its behalf to obtain or retain business or a business advantage for the organization.

Under this Act, a bribe is a 'financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

2. DEFINITIONS

2.1. A gift is any item or service which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public.

2.2 Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend a sporting event not available to the general public.

This policy applies to all staff and Governors of The Fulham Boys School.

3. STATEMENT OF POLICY

3.1 In order to protect all adults involved in the school, and the reputation of the school from accusations of bribery or corruption staff must take extreme care that none of their dealings, directly, or indirectly, could be deemed as a reward or benefit, in line with the Bribery Act 2010. This Act makes it a criminal offence.

3.2 Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct. Staff and Governors should also be aware of the Bribery Act 2010 and that any action that comes under the provision of that Act will be referred to the police and may be subject to criminal prosecution.

3.3 Governors and staff may accept the following gifts/ hospitality without the need to seek the approval of the Trust or formally register receipt:

- courtesy hospitality at business lunches/dinners or attendance in an official capacity at a public function;

- incidental promotional gifts such as calendars, diaries or pens;
- receipt of small items from suppliers or contractors as expressions of gratitude such as boxes of chocolates or individual bottles of drink (at a value of less than £30)
- Where purchased items include a “free gift”, such gifts should be either used for school or Trust business or handed to the school to be used at charity raffles etc.
- Small gifts (value less than £30) from pupils or parents as a “thank you” may be accepted.

Care must always be taken to ensure that whenever such gifts/hospitality are accepted no obligation to the person or organisation in question is accepted. In cases of doubt members should consult the Head of Finance and Operations. Gifts should be given openly and with no secrecy

- 3.4 Any other gifts or hospitality must be reported to the Head of Finance and Operations for entry onto the gifts and hospitality register. A decision will be made by the Head of Finance and Operations and Headmaster as to what should happen to that gift.
- 3.5 Where a gift is received on behalf of the school, the gift remains the property of the school.
- 3.6 Governors and staff may give similar small gifts/ hospitality to third parties without the need to seek the approval of the Trust provided that the value is small and is in the normal course of business. Gifts of cash or vouchers should not be given.
- 3.7 If not accepting a gift would be regarded as causing offence (such as a sudden and unexpected gift or one where refusal could cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Headmaster as soon as possible who may decide to return the gift, or donate it to a school raffle.
- 3.8 Gifts cannot be accepted in the following examples and must be politely refused by staff.
 - Gifts of money (not including donations to the school or Trust made without obligation)
 - Free membership or subscriptions (e.g. sports clubs)
 - Foreign travel unless as a specific element of a business, academic or research activity approved by the school or Trust
 - Free goods, services or equipment which are normally provided by a supplier to the school or Trust at a charge

- Goods supplied to, or work done for a member of staff personally at a discount or free of charge by a supplier or contractor that supplies or would like to supply the School.
- Gifts or hospitality offered to a member of your family.
- Gifts or hospitality from a potential supplier in the immediate period before tenders are invited or during the tender process

Any offers of gifts and hospitality falling into any of the above categories should be reported immediately to the Head of Finance and Operations.

4. NON COMPLIANCE

In the case where it is believed a member of staff or Governor has not declared a gift or hospitality then a formal investigation will be instigated by the Headmaster. If misconduct is indicated, this may take the form of disciplinary procedures.

APPENDIX 1

**FULHAM BOYS SCHOOL
GIFTS AND HOSPITALITY REGISTER**

Recipient	Nature of gift/hospitality	Donor	Date	Estimated value (£)	Comments