

**BIRMINGHAM COMMUNITY CHARTER HIGH SCHOOL
GIFTS AND GRATUITIES POLICY**

Board Policy #	BP# 74
Adopted:	September 26, 2026
Status	New policy
Companion documents	Conflict of Interest & Recusal Policy; Conflict of Interest Code

I. PURPOSE

Birmingham Community Charter High School (“BCCHS”) adopts this Policy so that decisions about purchasing, contracting, hiring, evaluation, and the treatment of students are made on the merits and are seen to be made on the merits. Accepting things of value from people who do business with BCCHS, or who seek to, can compromise that judgment or appear to compromise it, and either outcome damages the school.

This Policy is also an internal control. Employees with purchasing authority or vendor contact are the most common point of exposure in a school. While many of these employees do not hold positions designated under the Conflict of Interest Code this Policy also applies to them.

II. SCOPE

This Policy applies to all BCCHS employees, including certificated and classified staff, administrators, and temporary and substitute employees. It also applies to volunteers and to consultants and contractors when they act on behalf of BCCHS.

Board members, officers, and employees who hold positions designated under BCCHS’s Conflict of Interest Code are subject to this Policy and, in addition, to the gift, honorarium, and travel provisions of the Political Reform Act and Section VII of BCCHS’s Conflict of Interest & Recusal Policy. Where the requirements differ, the stricter requirement applies.

III. DEFINITIONS

Gift means any payment or thing of value, including goods, services, meals, entertainment, tickets, travel, lodging, discounts, rebates, loans on favorable terms, and gift cards or cash equivalents, for which the recipient does not provide goods or services of equal or greater value in return.

Gratuity means a tip, bonus, or other payment offered to an employee in connection with the performance of the employee’s duties.

Vendor means a current vendor, contractor, consultant, or supplier of BCCHS, a prospective bidder, proposer, or applicant for a BCCHS contract, and any agent, employee, or representative of such a person or entity.

IV. GIFTS FROM VENDORS

No employee shall solicit or accept from a Vendor any gift having a value of fifty dollars (\$50) or more.

- The fifty dollar (\$50) threshold applies to the aggregate value received from a single Vendor in a calendar year. A series of items shall not be divided, timed, or routed through another person so as to remain below the threshold.
- The threshold is a ceiling, not an entitlement. An item below fifty dollars (\$50) may still not be accepted if it falls within Section V.
- An employee who participates in selecting, evaluating, recommending, or approving a Vendor, or in administering a Vendor's contract, should decline gifts from that Vendor regardless of value while the procurement or contract is active.

V. GIFTS AND GRATUITIES INTENDED TO INFLUENCE

Regardless of value, and regardless of the source, no employee shall solicit or accept anything that is offered, or that would reasonably appear to be offered, in exchange for or to influence an official action, including, but not limited to, a purchasing or contracting decision, a grade or academic determination, a disciplinary decision, an employment decision, or the performance of the employee's duties.

No employee shall solicit or accept a gratuity for performing work that is part of the employee's job.

No employee shall use the employee's position at BCCHS to obtain a personal discount, rebate, loyalty benefit, or other advantage that is not available to BCCHS or to the public generally.

VI. GIFTS FROM STUDENTS, PARENTS, AND GUARDIANS

Gifts of appreciation from students, parents, and guardians are a normal part of school life and are not prohibited. The following limits apply:

- An employee may accept a gift of nominal value from a student, parent, or guardian. A single gift should not exceed fifty dollars (\$50) in value.
- Individual gift cards not exceeding twenty-five dollars (\$25) in value may be accepted from students, parents, or guardians. A class or group gift card presented to a classroom rather than to an individual may be accepted for classroom use and shall be used for that purpose.
- A gift shall not be accepted from a student, parent, or guardian while the employee is involved in a pending grade dispute, disciplinary matter, complaint, placement decision, or letter of recommendation concerning that student, and shall not be accepted at any time if Section V applies.

- An employee shall not solicit gifts from students, parents, or guardians, and shall not suggest that a gift is expected.

VII. DONATIONS TO BCCHS

A donation, grant, or contribution made to BCCHS, to a program, or to a classroom is not a gift to an individual and is not governed by Sections IV through VI. Donations are governed by BCCHS's policies on donations and fundraising and shall be recorded in BCCHS's records.

A payment shall not be characterized as a donation to BCCHS in order to avoid this Policy. If the benefit of a payment runs to an individual employee rather than to BCCHS, it is a gift to that individual.

Nothing in this Policy restricts Board members, administrators, or staff from soliciting donations for BCCHS in the ordinary course of fundraising.

VIII. EXCLUSIONS

The following are not gifts for purposes of this Policy:

- Informational materials, and meals or refreshments made available to all participants at a conference, training, meeting, or site visit attended in an official capacity;
- Items of nominal promotional value bearing a company name or logo;
- Gifts from family members, and gifts arising from a personal relationship that exists independently of BCCHS business;
- Awards, plaques, and recognition items of nominal value presented in connection with the employee's service;
- Benefits available to BCCHS employees generally as part of an employee benefit or discount program approved by BCCHS; and
- Travel payments and reimbursements permitted by law and approved in advance under BCCHS policy.

An exclusion under this Section does not relieve a person of any reporting obligation that applies under the Political Reform Act or BCCHS's Conflict of Interest Code.

IX. WHAT TO DO WITH SOMETHING THAT CANNOT BE ACCEPTED

An employee who is offered something that may not be accepted under this Policy should decline it at the time it is offered and explain that BCCHS policy does not permit acceptance. Declining early avoids the more awkward alternatives.

If an item has already been received, or cannot practically be declined, the employee shall promptly do one of the following and notify the CEO/Principal or designee:

- Return the item to the donor;

or

- Deliver the item to BCCHS or donate it to a tax-exempt organization without claiming a personal deduction.

Perishable items that cannot be returned, such as food delivered to a school office, may be shared with staff or students as appropriate and shall be reported to the CEO/Principal or designee if the value appears to meet or exceed fifty dollars (\$50).

X. QUESTIONS, REPORTING, AND NON-RETALIATION

An employee who is unsure whether this Policy permits acceptance should ask before accepting. Questions should be directed to the CEO/Principal or designee. An employee who is the CEO/Principal should direct questions to the Board Chair.

An employee who becomes aware of a violation of this Policy should report it to the CEO/Principal or designee, or, if the report concerns the CEO/Principal, to the Board Chair.

BCCHS shall not retaliate against an employee for declining a gift, for asking a question under this Policy, or for making a good faith report of a suspected violation.

XI. DISSEMINATION AND REVIEW

This Policy shall be provided to employees at hire and shall be made available to Vendors on request. BCCHS shall periodically review this Policy together with its Conflict of Interest Code and Conflict of Interest & Recusal Policy.

Adopted by the Board: September 26, 2026

Effective Date: September 26, 2026