



IAT

# GIFTS, HOSPITALITY AND BRIBERY POLICY

NOVEMBER 2023

BIENNIAL

POLICY APPLIES TO:	ALL STAFF
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## Statement of intent

Ironstone Academy Trust is committed to maintaining the highest ethical standards and acting with integrity in all business activities. This policy details the school's position on preventing and prohibiting bribery.

Bribery by, or of, employees, agents, consultants, or any person acting on behalf of the school will not be tolerated. The Trust is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Bribery and corruption by individuals are punishable by up to 10 years' imprisonment and the Trust could face an unlimited fine and serious damage to its reputation; therefore, the school takes its legal responsibilities very seriously.

The purpose of this policy is to:

- Establish the responsibilities of the trust in observing and upholding our position on bribery and corruption.
- Provide information and guidance to Trust staff on how to recognise and deal with bribery and corruption concerns.
- Ensure the trust achieves regularity, propriety and value for money in its use of public funds.

This policy covers all individuals working for the IAT (Ironstone Academy Trust) at all levels, whether permanent, fixed term or temporary. This includes trustees, staff, governors, volunteers, agents and any other person associated with the Trust, known throughout the policy as 'employees'.

This policy and the trust's Gifts and Hospitality Register outline the school's procedures on the acceptance of gifts, hospitality, awards, prizes and other benefits that could compromise the judgement or integrity of the Trust or its staff. All staff will be made aware of this policy.

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## 1. 1. Aims

This policy aims to ensure that:

- o The academy trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academy Trust Handbook
- o The trust and those associated with it operate in a way that commands broad public support
- o The trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds
- o Trustees fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors
- o Members, trustees and staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same

## 2. Legislation and guidance

This policy is based on the [Academy Trust Handbook](#), which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might compromise their personal judgement or integrity. This should include members, trustees, staff and/or any other representative of the trust. The handbook states that the trust should ensure that all staff are aware of this policy.

This policy also complies with our funding agreement and articles of association.

## 3. Definitions

Gifts are any items, cash, awards, prizes, goods or services, offered without expectation of payment or benefit. Gifts also include goods or services offered at a discounted rate, or on terms not available to the general public.

Hospitality is defined as food, drink, accommodation or entertainment (such as cultural or sporting events) provided free of charge, heavily discounted or on terms not generally available to the general public.

## 4. Roles and responsibilities

### 4.1 Members, trustees and staff

Members, trustees and staff:

- o Must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that the trust might be placed under any obligation as a result of acceptance
- o Must not use their official position to further their private interests or the interests of others
- o Must not solicit gifts or hospitality

- Must record any gifts or hospitality offered to them or the trust with a value of over £30 on the gifts and hospitality register (see appendix 1) within 7 working days, even if declined
- Must consult the HT or CEO (Chief Executive Officer) before accepting or offering any gifts or hospitality with a value of over £30

## **4.2 Academy trustees**

Academy trustees will ensure that the trust's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

## **4.3 The HT/ CEO**

The HT/CEO is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The HT/CEO will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the school and trust and to those outside the organisation.

They will also ensure, alongside the SBM (School Business Manager) / TFBM (Trust Finance & Business Manager), that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £20 are in line with this policy.

The HT/CEO is responsible for communicating the school/trust's rules and expectations about gift-giving to parents.

## **4.4 The TFBM**

The TFBM will ensure that:

- The trust maintains a gifts and hospitality register
- Figures for transactions relating to gifts made by the trust are disclosed in the trust's audited accounts, in accordance with the Academy Trust Handbook
- The academy trustees and HT/CEO are provided with information on gifts and hospitality received and given, as appropriate

They will also ensure, alongside the HT/CEO, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value of over £20 are in line with this policy.

## **4.5 The SBM and TFBM**

The SBM and TFBM are responsible for maintaining the gifts and hospitality register on a day-to-day basis.

## **4.5 Parents**

Trust Schools may also wish to set out information in this policy for parents – for example, to explain restrictions on giving gifts to teachers in line with our trust's approach. If so, you might consider:

- o Explain that you do not wish to discourage all gift-giving, and that small tokens of gratitude are always appreciated
- o Explain that gift-giving is not a requirement, and parents are not expected to buy gifts for class teachers or other school staff
- o Provide guidance on the appropriate maximum value of gifts and when they may be offered, or explain that the trust prevents teachers and other staff from accepting gifts worth over a certain amount

## 5. Acceptable gifts and hospitality

### 5.1 Offer of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of up to £30. These do not have to be pre-approved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, members, trustees and staff must consult the HT/ CEO.

Similarly, hospitality such as working lunches may be accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the HT/ CEO.

Any gifts or hospitality offered with a value of over £30 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the HT/ CEO before accepting.

If the HT/ CEO is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the chair of the board of trustees and record the offer on the gifts and hospitality register.

Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a staff disciplinary matter.

### 5.2 Offer of gifts and hospitality given

The school may, at the discretion of the headteacher, provide staff with token gifts to reward efforts beyond their duties, e.g. significant contributions towards extracurricular activities. These gifts will be non-monetary, non-alcoholic and cost up to the value of £30.00.

When giving gifts to staff, the trust will ensure:

- o The value of the gift is reasonable.
- o The gift is within its scheme of delegation.
- o The decision to give the gift is documented.
- o The gift achieves propriety and regularity in the use of public funds.

Any gifts or hospitality provided by the trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £30 should be used as a guideline.

Alcohol must not be purchased out of the school and/or trust budget.

Expense claims should be made to the SBM/ TFBM, and receipts must always be enclosed.

The HT/ CEO must be consulted about any proposal to provide gifts or hospitality with a value of over £30.

## **6. Unacceptable gifts and hospitality**

The following must never be offered or accepted:

- o Monetary gifts
- o Gifts or hospitality offered to family members, partners or close friends of members, trustees or staff
- o Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
- o Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time This list is not intended to be exhaustive.

## **7. Declining gifts and hospitality**

Any members, trustee or staff member who is offered any of the unacceptable gifts or hospitality outlined in section 6 above should politely decline the offer.

If they feel it would not be appropriate for them to decline, they should refer the matter to the HT/ CEO. The HT/ CEO may decline the offer or donate the gift or hospitality to a worthy cause and must also record the offer on the gifts and hospitality register.

Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the trust has deemed unacceptable.

Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, will be dealt with as a staff disciplinary matter.

## **8. Monitoring arrangements**

The gifts and hospitality register are monitored regularly by the HT and CFO (Chief Financial Officers).

This policy will be reviewed every two years by the CEO and approved by the board of trustees.

## **9. Links with other policies**

This gifts and hospitality policy is linked to the:

- o Staff code of conduct
- o Staff disciplinary procedures
- o Accounting policy

Appendix 1: gifts and hospitality register

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED /REJECTED	APPROVED BY



## Appendix 2 Further information

### Bribery

Under the Bribery Act 2010, a **'bribe'** is defined as a financial or other type of advantage offered with the intention of inducing or rewarding improper performance of a function or activity, or knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity. Employees will be encouraged to raise concerns about any known or suspected bribery or corruption to the headteacher at the earliest possible opportunity. Issues that should be reported include:

- Any suspected or actual attempts at bribery.
- Any concerns that an employee may be in receipt of bribes.
- Any concerns that an employee may be offering or delivering bribes.

Concerns should be reported following the procedure set out in the school's Whistleblowing Policy.

### Charitable donations

Charitable donations will be considered part of the school's wider purpose. The school will support a number of carefully selected charities and may also support fundraising events involving employees.

The school will only make charitable donations that are legal and ethical. No donation will be offered or made in the school's name without the prior approval of the SBM.

The Trust will only make charitable donations that are legal and ethical. No donation will be offered or made in the Trust's name without the prior approval of the TFBM

### Monitoring and review

This policy will be reviewed biennially by the TFBM and the CEO The next scheduled review for this policy is November 2025.