Gifts, Hospitality and Anti-Bribery Policy

Education is for improving lives and for leaving your community and world better than you found it.

Approved by the Board of Directors on: 18 October 2017

Review date: October 2019

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1. Introduction

This policy cover all individuals working in the Community Academies Trust and its member schools, including those who are employed, contractors, volunteers, directors and local governors. It provides guidance on the receipt of gifts and hospitality from any third parties arising from duties undertaken on behalf of the Trust or one of our schools. It also provides guidance on the giving of such gifts and the Trust's position on preventing and prohibiting bribery.

Community Academies Trust is committed to ensuring that the governance of the Trust is conducted in accordance with the highest standards of integrity, probity and openness.

The intention of the policy is to ensure that the Trust can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the Trust or one of the schools that form part of the Trust. The Trust should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this policy have been breached will be determined by reference to this provision.

Any breach of this policy could lead to disciplinary action and may constitute gross misconduct. Staff 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.

2. Principles

Staff must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity. Staff are asked to immediately report any offer or receipt of such gifts to their school Business Manager or Office Manager or the central team's Business Services Manager to be recorded in the Register of Gifts and Hospitality held by the central team. Academy staff must also not offer, promise or give any bribes to a third party, including a public official, with the intention of influencing that person in the performance of his/her duties.

Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the school and Trust by:

1. Maintaining an unimpeachable standard of honesty and integrity in all their business relationships.

2. Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.

3. At all times in their business relationships acting to maintain the interests and good reputation of the school and Trust.

4. Any employee who becomes aware of a breach of policy must report this immediately to his or her manager who will instigate investigations as necessary.

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Such reports will be treated under the Trust's whistleblowing policy and will be investigated in the strictest confidence.

Allowable Gifts and Hospitality

Directors, Local 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 £25)
- 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 £25) 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 their school Business Manager or the CAT Business Services Manager. Gifts should be given openly and with no secrecy.

Directors, Local 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. School budget should not be used to purchase alcohol, even as a gift or hospitality to third parties.

Gifts and Hospitality which may be accepted with prior approval

The following examples of gifts/hospitality require approval and must be recorded by the school Business Manager/CAT Business Services Manager in the Register of Gifts and Hospitality:

- Attendance as a non-paying guest of a commercial organisation or individual at a non-work related cultural or sporting event (at a value of more than £25)
- Promotional gifts worth in excess of £25
- Other offers of gifts/hospitality where there is an element of doubt as to whether they should be accepted.

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Gifts and Hospitality which cannot be accepted

The following are examples of offers of gifts/hospitality which should 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 who supplies or would like to supply the Trust or one of our member schools.

Any offers of gifts and hospitality falling into any of the above categories should be reported immediately to the school Business Manager/CAT Business Services Manager.

3. Role of the Accounting Officer

The Accounting Officer is responsible for ensuring that the Trust maintains a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of a member of staff and make sure that this policy is made available to all staff. The Accounting Officer must make sure that any offer or receipt of gifts, hospitality or donations to staff is recorded in the Trust's Register of Gifts and Hospitality. These responsibilities are laid out in the Academies Financial Handbook as published by the Education and Skills Funding Agency.

4. Register of Gifts/Hospitality

The Register of Gifts/Hospitality is held by the central CAT team and includes all of our schools as well as the Trust. The Business Services Manager has responsibility for the ownership of the Gift and Hospitality Register. Individual staff are personally responsible for reporting any gifts/hospitality offered and whether these have been accepted or declined to their school Business Manager, Office Manager or the Trust's Business Service Manager. School office staff will update the register which is held on a shared network drive. The Business Services Manager will answer any queries as they arise from schools.

The following should be recorded:

- Nature of gift/hospitality
- Value of gift/hospitality
- Name of person/company offering the gift/hospitality
- Date gift/hospitality accepted/refused.
- Name of employee/ director/ local governor/ contractor

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