GIFTS AND HOSPITALITY POLICY

Acting impartially. Maintaining transparency.
Protecting public trust.



RIVERSIDE BRIDGE SCHOOL

INSPIRE, EMPOWER, ACHIEVE

This policy forms part of the Riverside Bridge School Policy Framework
and should be read alongside any related policies, procedures and guidance.

RIVERSIDE BRIDGE SCHOOL
INSPIRE, EMPOWER, ACHIEVE

OUR COMMITMENT

At Riverside Bridge School, every policy reflects our commitment to creating a safe, inclusive and ambitious school community in which every pupil is valued, every voice matters and every family is respected and supported.

Our policies translate our values into consistent practice. They support high expectations, clear responsibilities, effective partnership and informed decision-making, ensuring that the needs, rights, wellbeing and future outcomes of our pupils remain at the heart of our work.

We work collaboratively, act with integrity and continually reflect upon and improve our practice to achieve the best possible outcomes for every pupil.

POLICY PRINCIPLES

Our Policy Principles underpin how we work together and guide the decisions and actions we take to support every pupil and their families.



POLICY PURPOSE & FRAMEWORK

Riverside Bridge School policies set out the expectations, responsibilities and approaches that support safe, consistent and high-quality practice across the school. They translate our values, statutory responsibilities and professional expectations into clear guidance for everyday decision-making and practice.

Each policy forms part of the Riverside Bridge School Policy Framework and should be read alongside any related policies, procedures, statutory guidance and school frameworks referenced within the document.

Policies apply to the members of the school community identified within each document, including staff, governors, parents and carers, volunteers, contractors and other professionals where relevant. Everyone is expected to understand and apply the requirements appropriate to their role and to seek further guidance where clarification is required.

CURRICULUM DRIVERS



Our Drivers provide a shared golden thread across curriculum, school life, policy and leadership, helping ensure that our decisions and practice remain focused on the experiences and futures we want for every pupil.

STATEMENT OF INTENT

This policy sets out Riverside Bridge School's approach to the giving, receiving, approval, declaration and recording of gifts and hospitality. It establishes the principles and responsibilities through which the school protects impartial decision-making, manages actual, potential and perceived conflicts of interest and ensures that public resources are used appropriately.

Riverside Bridge School is committed to maintaining high standards of integrity, honesty, accountability and transparency in all of its professional, financial and business relationships. Those acting on behalf of the school occupy positions of trust and are expected to make decisions objectively and in the best interests of pupils, the school and Partnership Learning.

The school recognises that gifts and hospitality may sometimes form a legitimate and proportionate part of professional relationships. A modest token of appreciation from a pupil or family, routine refreshments at a professional meeting or appropriate hospitality connected with a legitimate business purpose will not necessarily present a concern.

However, gifts and hospitality can create, or appear to create, an obligation or conflict of interest. They may call into question the independence of procurement, recruitment, commissioning, contracting or other professional decisions even where no improper influence was intended.

Particular care is therefore required where gifts or hospitality are offered by suppliers, prospective suppliers, contractors, consultants or others who have, or may seek, a commercial or professional relationship with the school or Trust. Individuals must never allow personal benefit to influence, or reasonably appear to influence, decisions made on behalf of Riverside Bridge School.

The school will operate this policy consistently with Partnership Learning's financial governance arrangements, including the Trust's Financial Regulations, Scheme of Financial Delegation, procurement requirements, arrangements for managing conflicts of interest and current gifts and hospitality requirements.

The Academy Trust Handbook requires academy trusts to maintain appropriate controls over gifts, hospitality, awards, prizes and other benefits which could compromise personal judgement or integrity. Trust funds must be used only for appropriate purposes, and any gifts made by the Trust must be reasonable, within delegated authority, fully documented and consistent with the principles of regularity, propriety and value for money.

This policy applies to employees, governors and others acting on behalf of Riverside Bridge School. Everyone within scope is personally responsible for considering whether a gift or hospitality is appropriate, seeking approval where required and making any necessary declaration. Uncertainty should result in advice being sought rather than an assumption that acceptance or expenditure is permissible.

Our responsibilities to our school community and public funds

Riverside Bridge School will promote an open culture in which gifts and hospitality are considered transparently and individuals can seek advice without concern.

We will:

- ensure decisions are free from inappropriate personal influence;
- maintain clear arrangements for approval and declaration;
- ensure procurement and commercial decisions remain objective;
- maintain appropriate records and registers;
- ensure school expenditure on gifts and hospitality is properly authorised and justifiable;
- manage actual, potential and perceived conflicts of interest;
- protect public funds from inappropriate expenditure;
- respond appropriately to suspected breaches;
- comply with Partnership Learning's current financial and governance requirements.

Individuals must never use their position at Riverside Bridge School for personal gain or accept a benefit which could reasonably undermine confidence in their impartiality.

Through these arrangements, Riverside Bridge School aims to protect individuals as well as the organisation by ensuring that professional relationships remain transparent, decisions can withstand appropriate scrutiny and public confidence in the integrity of the school and Trust is maintained.

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APPROVED BY:
Governing Board

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REVIEWED DUE ON:
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Section 01

PURPOSE AND SCOPE

Protecting integrity. Maintaining transparency. Safeguarding public funds.

The purpose of this policy is to establish a clear and consistent framework for managing gifts and hospitality connected with Riverside Bridge School. It is intended to protect the integrity and reputation of individuals, the school and Partnership Learning by ensuring that gifts and hospitality do not improperly influence professional judgement, create inappropriate obligations or undermine confidence in school decision-making. The policy provides a framework through which individuals can:

- recognise appropriate and inappropriate gifts and hospitality;
- identify actual, potential and perceived conflicts of interest;
- understand when a gift or hospitality should be declined;
- understand when prior approval is required;
- make declarations where required;
- ensure gifts and hospitality provided using school funds are appropriate;
- maintain transparency in relationships with suppliers and other organisations;
- report concerns about possible breaches.

The policy supports the school's wider responsibilities for regularity, propriety, value for money, ethical conduct and responsible stewardship of public resources.

Who this policy applies to

This policy applies to all individuals acting for or representing Riverside Bridge School, including:

- employees;
- members of the Governing Board;
- volunteers acting in an official capacity;
- agency staff where applicable;
- contractors and consultants, where acting on behalf of the school;
- any other individual authorised to represent Riverside Bridge School in a professional or business capacity.

Trustees, Members and Central Trust employees are governed by Partnership Learning's Trust-wide arrangements. Where those arrangements interact with school-level activity, the applicable Trust requirements take precedence.

What the policy covers

The policy applies to gifts, hospitality and other benefits:

- offered to or received by an individual because of their connection with Riverside Bridge School;
- offered by pupils, parents, carers, suppliers, contractors or external organisations;
- offered during procurement, tendering, commissioning or contract-management activity;
- provided by Riverside Bridge School using school or Trust resources;
- connected with professional meetings, events, visits or partnerships;
- which could reasonably be perceived as connected with an individual's school role.

The policy applies whether a benefit is offered directly to an individual or indirectly through another person where the connection with the individual's professional role remains relevant.

Personal gifts unrelated to school business

This policy is not intended to regulate ordinary private gifts exchanged between colleagues or other individuals where the gift is clearly personal, purchased from personal funds and unrelated to the exercise of professional authority or school business.

However, individuals should remain alert to circumstances in which a supposedly personal gift could create an inappropriate obligation because of the professional relationship between those involved.

Where there is doubt, advice should be sought.

Interaction with Trust requirements

This policy establishes Riverside Bridge School's expectations but does not replace Partnership Learning's financial controls. Current Trust requirements concerning:

- financial thresholds;
- prior approval;
- declaration;
- submission routes;
- authorised approvers;
- register maintenance;
- retention of records

must be followed.

Where Partnership Learning changes an operational threshold or form, the current Trust requirement applies without requiring formal amendment of this policy.

Section 02

LEGISLATIVE AND GOVERNANCE FRAMEWORK

Meeting requirements. Managing conflicts. Maintaining propriety.

Riverside Bridge School will manage gifts and hospitality in accordance with applicable legislation, Academy Trust Handbook requirements and Partnership Learning's governance framework.

The principal framework includes:

- the current Academy Trust Handbook;
- Partnership Learning Financial Regulations;
- Partnership Learning Scheme of Financial Delegation;
- Partnership Learning procurement requirements;
- Partnership Learning arrangements for declarations of interest, gifts and hospitality;
- the school and Trust Codes of Conduct;
- Equality Act 2010;
- Bribery Act 2010;
- Fraud Act 2006, where relevant;
- applicable charity and company-law requirements;
- relevant employment and disciplinary arrangements.

Academy Trust Handbook

The Academy Trust Handbook establishes the financial-management and governance framework within which academy trusts operate. The Handbook requires trusts to maintain appropriate controls over gifts and other benefits that may compromise personal judgement or integrity.

Where the Trust makes a gift, it must ensure that:

- the value is reasonable;
- the decision is within the Trust's Scheme of Financial Delegation;
- the expenditure is fully documented;
- the expenditure demonstrates propriety and regularity in the use of public funds.

Riverside Bridge School will therefore not treat gifts and hospitality simply as matters of individual discretion. They form part of the school and Trust's financial governance and accountability arrangements.

Bribery and improper influence

The Bribery Act 2010 establishes offences relating to giving or receiving financial or other advantages in circumstances intended to induce or reward improper performance.

A gift or hospitality does not have to involve cash to create a risk of improper influence. No person acting on behalf of Riverside Bridge School may offer, promise, give, request, agree to receive or accept a gift, hospitality or other advantage as an inducement or reward for improper action. Any suspected bribery must be reported immediately through the appropriate school or Trust route.

Conflicts of interest

Gifts and hospitality are closely connected to the management of conflicts of interest. A conflict may be:

- **actual** - where an individual's personal interests currently conflict with their professional responsibilities;
- **potential** - where circumstances could develop into a conflict; or
- **perceived** - where a reasonable person could believe that an individual's judgement may be affected, even if the individual considers themselves impartial.

Perception matters because public confidence can be damaged without evidence of actual wrongdoing.

A declaration of a gift or hospitality does not replace any separate requirement to declare a relevant business or personal interest.

Procurement and commercial relationships

Particular care is required in relationships with:

- suppliers;
- potential suppliers;
- contractors;
- consultants;
- recruitment agencies;
- service providers;
- organisations participating in a tender or procurement exercise;
- organisations seeking to establish or renew a commercial relationship.

Gifts or hospitality must never be allowed to influence procurement or contract-management decisions.

The safest course may be to decline an offer even where its financial value is modest if its timing or circumstances could reasonably create a perception of influence.

Related-party considerations

Where a gift, hospitality arrangement or associated transaction involves a related party, the Trust's related-party and conflict-of-interest requirements must also be followed. The existence of a gift or hospitality declaration does not remove any separate requirement relating to related-party transactions, procurement or declarations of interest.

Section 03

PRINCIPLES

Acting impartially. Avoiding influence. Exercising sound judgement.

All individuals acting on behalf of Riverside Bridge School must act with honesty, integrity and impartiality in professional, financial and business relationships. Gifts and hospitality must be considered according to their context as well as their monetary value. A relatively inexpensive gift may be inappropriate if offered during a tender exercise, while modest hospitality at a routine professional meeting may be entirely reasonable.

Gifts and hospitality must not influence decisions

A gift, hospitality or other benefit must never:

- influence, or appear to influence, a professional or business decision;
- create an inappropriate obligation;
- reward preferential treatment;
- create an actual, potential or perceived conflict of interest;
- compromise impartiality;
- undermine fair procurement;
- result in personal gain arising improperly from an individual's position;
- damage public confidence in Riverside Bridge School or Partnership Learning.

Professional decisions must remain objective

Procurement, recruitment, commissioning, contracting and other professional decisions must be based on legitimate considerations including:

- the needs and interests of pupils;
- quality;
- suitability;
- value for money;
- fairness;
- compliance with procurement and financial requirements;
- the best interests of the school and Trust.

Personal benefit must not form part of that decision-making process.

Transparency

Where a gift or hospitality requires approval or declaration under current Trust arrangements, it must be recorded accurately and promptly. Attempting to avoid declaration by dividing, disguising or underestimating the value of a gift or hospitality is unacceptable. Where several benefits are provided by the same person or organisation over time, the cumulative nature of those benefits should be considered.

Proportionality

Modest and proportionate gifts or hospitality may be acceptable where there is no reasonable risk of influence or obligation. The fact that an item is below a Trust declaration threshold does not automatically make it appropriate. Similarly, declaration does not automatically make an otherwise inappropriate gift acceptable.

Public scrutiny

Individuals should consider whether they would be comfortable with the gift or hospitality being publicly known. A useful test is whether an impartial member of the public could reasonably conclude that the benefit might affect professional judgement. Where that question cannot confidently be answered, advice should be sought.

Personal responsibility

Every person within scope of this policy has a personal responsibility to:

- understand the requirements relevant to their role;
- exercise professional judgement;
- seek approval where required;
- make declarations accurately;
- declare relevant conflicts of interest;
- retain evidence where required;
- report concerns.

Approval by another person does not remove the individual's responsibility to act with integrity.

Section 04

RECEIVING GIFTS AND HOSPITALITY

Recognising boundaries. Declaring appropriately. Protecting impartiality.

As a general principle, employees, governors and others acting on behalf of Riverside Bridge School should not accept a gift or hospitality which could influence, or reasonably be perceived as influencing, their professional judgement. Acceptance should be considered according to the nature, value, frequency, source, timing and purpose of the offer.

Modest gifts

Modest gifts of a trivial or promotional nature may normally be accepted where they are occasional, proportionate and clearly offered as a gesture of goodwill rather than an inducement. Examples may include:

- calendars;
- diaries;
- inexpensive stationery;
- small promotional items;
- another low-value token associated with ordinary professional contact.

Current Partnership Learning declaration requirements must still be followed where applicable.

Gifts from pupils and families

The school recognises that pupils and families may occasionally wish to give staff a modest token of thanks, particularly at the end of a term or school year. Reasonable, modest gifts of this nature may generally be accepted where:

- they are genuinely offered as an expression of appreciation;
- there is no expectation of preferential treatment;
- acceptance does not create an inappropriate obligation;
- the nature and value are proportionate;
- Trust declaration requirements are followed.

Staff should be particularly cautious about accepting unusually valuable gifts, repeated gifts or gifts of cash or cash-equivalent items. Where the value or nature of a gift appears excessive, staff should seek advice before accepting it.

Cash and cash-equivalent gifts

Cash offered personally to an employee, governor or other individual acting on behalf of the school should not normally be accepted. Cash-equivalent benefits, including high-value vouchers or other readily transferable financial benefits, require particular caution and should not be accepted unless expressly permitted under current Trust arrangements and appropriately authorised. This does not prevent approved collections, donations or payments made directly to the school through authorised financial arrangements.

Hospitality

Reasonable hospitality may be accepted where there is a legitimate professional purpose. Examples may include:

- refreshments at a professional meeting;
- a working lunch provided during a legitimate business meeting;
- reasonable refreshments at a conference or training event;
- proportionate hospitality forming part of an official professional event.

Acceptance should be proportionate to the circumstances and should not reasonably be capable of influencing a decision.

Gifts or hospitality that must not be accepted

Gifts or hospitality must not be accepted where they:

- are intended, or could reasonably be regarded, as an inducement or reward;
- are disproportionately generous;
- create an inappropriate personal obligation;
- could compromise or appear to compromise impartiality;
- are connected with an expectation of favourable treatment;
- conflict with law or Trust policy;
- would otherwise be improper.

Procurement, tendering and contract decisions

Particular caution applies during procurement, tendering, contract award, contract renewal or supplier-selection activity. Individuals directly involved in such decisions should not accept gifts or hospitality from an organisation involved in, or reasonably likely to become involved in, that process where acceptance could create a perception of influence. This may require declining an offer which might be acceptable in a different professional context.

Repeated offers

A series of individually modest gifts or hospitality from the same person or organisation may create a greater concern when considered cumulatively. Individuals should therefore consider the frequency of offers as well as individual value. Repeated offers should be discussed with the appropriate manager or finance/governance lead and declared where required.

Promotional and complimentary items associated with purchases

Where goods or services purchased by the school generate a complimentary or promotional item, the item belongs to the school or Trust rather than the individual making the purchase. Such items should be:

- used for school purposes;
- allocated transparently;
- used for an approved educational or charitable purpose;
- otherwise dealt with in accordance with Trust requirements.

They must not automatically be retained for personal use.

Declining an offer

Where a gift or hospitality is inappropriate, it should be declined politely.

Where returning a gift would be impractical or likely to cause significant offence, advice should be sought about an appropriate alternative, which may include surrendering the item to the school for an approved use. Any required declaration must still be made.

Section 05

GIVING GIFTS AND HOSPITALITY

Spending appropriately. Demonstrating value. Maintaining public confidence.

Riverside Bridge School will use public funds carefully and will not routinely provide gifts to external organisations or individuals. Any gift or hospitality provided using school or Trust funds must have a legitimate purpose, be reasonable and proportionate and fall within delegated financial authority.

Permitted circumstances

Subject to Trust requirements, appropriate expenditure may include:

- reasonable refreshments for meetings;
- proportionate hospitality connected with legitimate professional activity;
- modest recognition of significant service or contribution where permitted;
- approved charitable or community activity;
- another gift or hospitality specifically authorised through Trust procedures.

The existence of a legitimate purpose does not by itself make any level of expenditure reasonable.

Value for money

Before expenditure is incurred, the person authorising it must be satisfied that:

- there is a legitimate school or Trust purpose;
- the expenditure is proportionate;
- it represents reasonable use of public funds;
- it falls within delegated authority;
- it can withstand public scrutiny;
- appropriate evidence and approval are retained.

School funds should not be used merely because an expenditure would be customary in a private business context.

Staff gifts and recognition

Public funds must not be used routinely for personal gifts to staff.

Where recognition of service, retirement, bereavement or another significant circumstance is proposed, expenditure must comply with current Partnership Learning requirements and be appropriately authorised. Personal collections organised voluntarily by colleagues using their own money fall outside school expenditure and should be clearly separate from school funds.

Gifts for pupils

Any expenditure on prizes, awards or modest items for pupils must have a clear educational, recognition or school-community purpose and must be reasonable and proportionate. Such expenditure should be managed consistently and should not create inappropriate inequality or personal benefit unrelated to the school's purposes.

Hospitality

Hospitality provided by the school must be:

- connected with a legitimate professional or school purpose;
- reasonable;
- proportionate;
- properly authorised;
- supported by appropriate records;
- capable of withstanding public scrutiny.

Alcohol

School or Trust funds must not be used to purchase alcohol for consumption, except where a specific lawful Trust arrangement applies, such as alcohol required for religious services. Riverside Bridge School will not ordinarily purchase alcohol as a gift or as hospitality.

Approval before commitment

Where proposed expenditure requires prior approval under Trust arrangements, approval must be obtained before any financial commitment is made. Individuals must not incur expenditure personally and assume that reimbursement will subsequently be authorised. Where a proposed gift or hospitality falls outside normal parameters, advice must be obtained before proceeding.

Section 06

APPROVAL, DECLARATION AND THE REGISTER

Recording transparently. Following authority. Maintaining accountability.

Riverside Bridge School will maintain appropriate records of gifts and hospitality in accordance with Partnership Learning requirements. The purpose of the register is to provide transparency and assurance. It protects both individuals and the organisation by providing an auditable record of relevant offers, acceptance, refusals, approvals and expenditure.

Trust thresholds and requirements

Partnership Learning determines the current financial thresholds and circumstances in which:

- a gift or hospitality must be declared;
- prior approval must be obtained;
- an offer must be recorded even where it is declined;
- hospitality provided by the school must be declared;
- gifts made using school or Trust funds must be recorded;
- specific approval routes apply.

Riverside Bridge School will apply the current Trust thresholds in force at the time. The policy deliberately does not reproduce those monetary thresholds because they are operational financial controls which may be revised by Partnership Learning without requiring the Governing Board to amend this policy.

Prior approval

Where current Trust arrangements require prior approval, the individual must obtain that approval before accepting, offering or committing to the gift or hospitality. The appropriate Partnership Learning approval route must be followed. An individual must not approve their own gift, hospitality or expenditure.

Declaration

Where declaration is required, the current Partnership Learning declaration form or approved reporting system must be used. Declarations should contain sufficient information to establish:

- the person making the declaration;
- the date;
- the person or organisation offering or receiving the benefit;
- the nature of the gift or hospitality;

- its estimated value where relevant;
- whether it was accepted or declined;
- the reason for acceptance, refusal or provision;
- any connection with current or prospective school business;
- any approval obtained.

Declarations must be made within the timescale specified by current Partnership Learning requirements.

School register

The school will maintain its local Register of Gifts and Hospitality in accordance with Trust requirements. Day-to-day administration may be undertaken by designated finance staff, with appropriate senior oversight. The register will be retained and made available for appropriate internal, Trust, audit or governance scrutiny.

Governors

Members of the Governing Board must comply with the gifts and hospitality requirements applicable to governors and with separate requirements concerning declarations and conflicts of interest. Where a governor requires approval or must make a declaration, the current Partnership Learning route must be followed.

Trust-level roles

Where a declaration or approval concerns the Headteacher, Central Trust staff, Trustees, Members, the CEO, Chair of Trustees or another senior office-holder, the relevant Trust approval and escalation route will apply. Riverside Bridge School will not reproduce those routes within this policy because they form part of Partnership Learning's wider governance arrangements and may change independently.

Forms

The school will use the current Partnership Learning Gifts and Hospitality Approval Form and Declaration of Gifts and Hospitality Form, or any approved digital replacement.

Operational forms may be revised by Partnership Learning without requiring formal revision of this policy.

Section 07

BREACHES AND CONCERNS

Raising concerns. Responding appropriately. Protecting integrity.

All individuals within the scope of this policy are expected to comply with its requirements and with associated Partnership Learning financial and governance arrangements. A breach may include:

- accepting a prohibited gift or hospitality;
- failing to seek required prior approval;
- failing to make a required declaration;
- deliberately providing inaccurate information about value or circumstances;
- concealing or attempting to conceal a gift or hospitality;
- using school or Trust funds for an unauthorised gift;
- accepting a benefit connected with preferential treatment;
- attempting to influence another person through a gift or hospitality;
- failing to declare an associated conflict of interest;
- circumventing procurement or financial controls.

Reporting concerns

Anyone who becomes aware of a suspected breach should raise the concern promptly.

Depending on the circumstances, this may be through:

- the individual's line manager;
- the Headteacher;
- designated finance staff;
- an appropriate Trust officer;
- the Whistleblowing Policy;
- another relevant safeguarding, financial or governance route.

Where the concern involves the person who would ordinarily receive the report, it should be escalated to the next appropriate level.

Bribery, fraud or financial irregularity

Suspected bribery, fraud, theft or deliberate financial irregularity must be escalated promptly in accordance with Partnership Learning's financial and fraud-response arrangements. Individuals should not undertake their own investigation where doing so could compromise evidence or the Trust's formal response.

Response to breaches

Potential breaches will be considered fairly and proportionately. The response may include:

- clarification or management advice;
- requirement to return or surrender a gift;
- retrospective recording;
- review of a procurement or other decision;
- additional financial controls;
- formal investigation;
- disciplinary action;
- referral through Trust governance procedures;
- referral to an external authority where legally required or appropriate.

The appropriate response will depend on the nature, seriousness and intent of the breach. An inadvertent administrative omission will not necessarily be treated in the same way as deliberate concealment or improper influence.

Protection for those raising concerns

Individuals who raise genuine concerns in good faith should be able to do so without fear of inappropriate retaliation. Concerns qualifying for protection under whistleblowing legislation or the school's Whistleblowing Policy will be managed accordingly. Knowingly making a malicious or deliberately false allegation may itself be addressed through the appropriate procedure.

Section 08

EQUALITY, MONITORING AND REVIEW

Applying consistently. Monitoring compliance. Reviewing arrangements.

Equality

Riverside Bridge School is committed to implementing this policy fairly, consistently and in accordance with the Equality Act 2010. The same standards of integrity and transparency apply regardless of an individual's role, seniority or position. Decisions about gifts and hospitality will be based on objective considerations including:

- nature;
- value;
- purpose;
- timing;
- frequency;
- source;
- professional relationship;
- potential conflict of interest;
- relevant Trust requirements.

Protected characteristics must not improperly influence decisions. Reasonable adjustments will be made where required to enable an individual to understand or comply with declaration and approval processes.

Monitoring

The Headteacher is responsible for ensuring that the policy is implemented effectively at Riverside Bridge School.

Designated finance staff will support administration and maintenance of relevant records in accordance with Trust arrangements.

Monitoring may include review of:

- the Gifts and Hospitality Register;
- declarations;
- approval records;
- patterns of repeated gifts or hospitality;
- procurement-related declarations;
- expenditure on gifts and hospitality;

- compliance with delegated authority;
- audit findings;
- suspected or confirmed breaches;
- changes to Trust requirements.

Monitoring should focus not only on whether forms have been completed but also on whether the underlying decision was appropriate.

Governing Board oversight

The Governing Board will receive appropriate assurance that gifts and hospitality arrangements are operating effectively as part of its wider oversight of financial governance, ethical conduct and conflicts of interest. Governors should not routinely receive unnecessary personal details about individual staff declarations unless this is required for a legitimate governance purpose.

Trust oversight

Partnership Learning retains the financial and governance responsibilities assigned to it through its Trust-wide arrangements. The school will provide registers, declarations, approvals and other information to the Trust where required for:

- financial monitoring;
- internal scrutiny;
- external audit;
- governance assurance;
- investigation; or
- regulatory reporting.

Data protection and retention

Information about gifts and hospitality may constitute personal data. Records will therefore be:

- accurate;
- relevant;
- securely maintained;
- accessible only where there is a legitimate purpose;
- retained and disposed of in accordance with the school's Data Protection Policy, Data Retention Policy and current Data Retention Schedule.

Transparency requirements do not remove the school's responsibility to process personal information lawfully.

Review

This policy will be reviewed annually, or sooner where there is a significant change to:

- the Academy Trust Handbook;
- Partnership Learning Financial Regulations;
- the Scheme of Financial Delegation;
- procurement arrangements;
- gifts and hospitality requirements;
- relevant legislation;
- Riverside Bridge School's governance arrangements.

Changes to Trust forms, monetary thresholds, named approval routes or administrative processes may be implemented operationally without requiring formal revision of this policy, provided they remain consistent with its principles and requirements.

Section 09

RELATED POLICIES & FRAMEWORKS

Connecting practice. Strengthening consistency.

This policy should be read alongside the current versions of:

- Partnership Learning Financial Regulations
- Partnership Learning Scheme of Financial Delegation
- Staff Code of Conduct
- Governor Code of Conduct
- Whistleblowing Policy
- Disciplinary Policy
- Data Protection Policy
- Staff Expenses Policy
- Charging and Remissions Policy
- current Partnership Learning Gifts and Hospitality Approval and Declaration arrangements

Where a Trust document, procedure or financial control sets a more specific requirement than this policy, the current Partnership Learning requirement will apply.

Detailed operational information, including monetary thresholds, forms, named approval routes and submission arrangements, will be maintained separately and may be updated as Partnership Learning's financial controls change without requiring formal revision of this policy.