



**SANCTA
FAMILIA**

CATHOLIC ACADEMY TRUST

Gifts & Hospitality Policy

Internal & External Use

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Introduction

Sancta Familia Catholic Academy Trust applies this policy to all individuals working at all levels and grades, including Governors, Headteachers, the Senior Leadership Team, Officers, Directors, employees, consultants, contractors, apprentices, casual workers and agency staff, volunteers or any other person associated with the Trust (collectively referred to as “you” and “Staff” in this policy) who are advised to familiarise themselves with its content.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

We are committed to all our Staff conducting themselves in an honest and ethical manner and acting professionally, fairly and with integrity in all their dealings and relationships with other Staff, any pupils, any pupil's parents and any other third parties.

Staff must ensure that they read, understand and comply with this policy. All Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate its contractual relationship with other workers with immediate effect if they breach this policy.

Frequently used terms

The definitions in this paragraph apply in this policy:

- **Third party:** any individual or organisation that Staff may come into contact with during the course of their work for the School or Trust, and includes actual and potential pupils and pupils' parents, Governors, suppliers, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.
- **Bribe:** a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- **Bribery:** including offering, promising, giving, accepting, or seeking a bribe.

The Purpose of this Policy

The purpose of this policy is to set out the School and Trust's and all its staff's responsibilities in observing and upholding our position on bribery and corruption in order to protect staff from suspicions of dishonesty and ensure that they are free from any conflict of interest with respect to the acceptance or provision of gifts, hospitality, or any other inducement from or to suppliers of goods or services to the School or Trust. It provides information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption and could face an unlimited fine and face damage to its reputation, we, therefore, take our legal responsibilities very seriously.

Principles of this Policy

We expect our Staff to exercise the utmost discretion in giving and accepting gifts and hospitality when on School / Trust business. Particular care should be taken about a gift from a person or organisation that has or is hoping to have a contract with the School or Trust.

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. However, Staff should be aware that the receipt of gifts or excessive hospitality can damage the School and Trust's reputation and possibly lead to prosecutions for corruption.

You must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that your personal integrity is being compromised, or that we might be placed under an obligation.

You must not make use of your official position to further your private interests or those of others.

What may be deemed permissible?

Gifts of low intrinsic value such as promotional calendars or diaries, or small tokens of gratitude, can be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, you should decline the gift or refer the matter to the Headteacher.

Where approval is granted, any gift or hospitality received with an equivalent value of £100 or over must be recorded in the Register of Gifts and Hospitality (see below).

In cases where you receive a gift on our behalf, the gift remains our property. The gift may be required for departmental display, or it may, with your Line Manager's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the Department on or before your last working day.

Modest hospitality provided it is reasonable in the circumstances, for example, lunches in the course of working visits, may be acceptable, though it should be similar to the scale of hospitality which the School or Trust as an employer would be likely to offer.

Your attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants is **not** normally acceptable. Where it is considered a benefit to us in you attending a sponsored event, the attendance should be formally approved by the Headteacher.

Business gifts, which include hospitality, may be provided by the School or Trust, in connection with third party entertaining but should be regarded as the exception rather than the rule. Gifts and hospitality must not exceed £100 in a year for anyone recipient and must not be provided in expectation of material to our benefit.

Rather than allowing you to accept hospitality or keep a gift that exposes you and/or the School or Trust to risk, you may be required to decline hospitality or return higher-valued gifts, or to donate it to charity, or we may apply the gift for School or Trust use.

We would like you to be mindful that even lower value gifts and hospitality are inappropriate if they are repeated or are intended to (or may appear to) improperly influence the recipient.

What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided to us in return;
- threaten or retaliate against another member of staff who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Gifts to and from students

In the interests of safeguarding children, and to prevent staff from being open to accusation of exerting undue influence, you are not permitted to give a gift to a student at any time, unless it is part of a whole school approach that has been agreed with the Headteacher and signed off by the CFO.

If a gift is received from a pupil or the parents of a pupil and the value is £50 or over this gift is to be registered in the Register of Gifts and Hospitality (see below).

Your Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for or under the control of the School or Trust. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Headteacher as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if you are offered something to gain a business advantage with the School or Trust, or it is indicated to you that a gift or payment is required to secure an advantage with them.

Some examples of activity that may indicate bribery or corruption are listed below:

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- you learn that a third party has a reputation for paying bribes;
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- third party requests an unexpected additional fee or commission to "facilitate" a service;
- third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- third party requests that a payment is made to "overlook" potential legal violations;
- third party requests that you provide employment or some other advantage to a friend or relative;
- You receive an invoice from a third party that appears to be non-standard or customised;
- third party insists on the use of side letters or refuses to put terms agreed in writing;
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; [or]
- you are offered an unusually generous gift or offered lavish hospitality by a third party

The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags in the course of your employment, you must report them promptly to the Headteacher or Chief Financial Officer or using the procedure set out within our Whistleblowing Policy and Procedure.

Registering Gifts

In the interests of transparency, a Register of Gifts and Hospitality is kept online.

If you accept an offer of a gift or hospitality over the value of £50, you must ensure this is recorded in this register, specifying the:

- nature of gift/hospitality. In the case of a gift, it should be specified whether it is a personal gift for the recipient or a related party, such as a partner, or a corporate gift accepted by the recipient on behalf of the [School/Academy/Trust]

- value of gift/hospitality. If the exact cost is not known an estimate should be provided.
- name of firm/individual concerned.
- date gift/hospitality accepted.
- name of member(s) of staff involved.
- We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties, and therefore you must report all hospitality or gifts offered to the School Business Manager.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

Donations

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices.

How to Raise a Concern

You must notify the Headteacher or report any concern in accordance with our Whistleblowing Policy and Procedure as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

What to do if you are a Victim of Bribery or Corruption

It is important that you tell the Headteacher as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Protection

Staff who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Training and Communication

Training on this policy forms part of the induction process for all new Staff. All existing Staff will receive regular, relevant training on how to implement and adhere to this policy.

We take a zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Who is responsible for the Policy?

The Board of Directors has overall responsibility for ensuring this policy complies with the Trust's legal and ethical obligations, and that all those under the Trust's control comply with it.

The Chief Financial Officer has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them, are made aware of and understand this policy and are given adequate and regular training on it.

Monitoring and Review of this Policy

The Chief Financial Officer will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.



SANCTA FAMILIA

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