

Three Counties Academy Trust



Gifts, Hospitality and Anti-Bribery Policy

#FI13

Last amended 20th May 2026 (v1.0)

Policy lifespan: 1 years. Next full review 19th May 2029.

Version history

Date	Version	Details	Actioned by	PDF to Websites	Word to Governor Hub
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Trust Glossary

Policy Abbreviations and Acronyms

CEO	Chief Executive Officer
CFO	Chief Financial Officer
DfE	Department for Education
TCAT	Three Counties Academy Trust

NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.

Statement of intent

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

Bribery by, or of, employees, agents, consultants, or any person acting on behalf of TCAT will not be tolerated. Executive Leaders are committed to implementing effective measures to prevent, monitor and eliminate bribery.

Bribery and corruption by individuals is punishable by up to 10 years' imprisonment and TCAT and our schools could face an unlimited fine and serious damage to our reputation; therefore, TCAT takes its legal responsibilities very seriously.

The purpose of this policy is to:

- Establish the responsibilities of TCAT and any TCAT school in observing and upholding our position on bribery and corruption
- Provide information and guidance to all TCAT employees on how to recognise and deal with bribery and corruption concerns
- Ensure TCAT achieves regularity, propriety and value for money in its use of public funds

This policy covers all individuals working for TCAT at all levels, whether permanent, fixed-term or temporary. This includes staff, Members, Trustees, Local Governors, volunteers, agents and any other person associated with TCAT or a TCAT school, known throughout the policy as 'employees'.

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

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance and good practice including, but not limited to, the following:

- [DfE 'Academy trust handbook'](#)
- [The Bribery Act 2010](#)

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available.

This policy operates in conjunction with the following policies and documents:

- Gifts and Hospitality Register
- Whistleblowing Policy (HR25)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website. Where there is no policy number indicated but the document begins with "TCAT", then this indicates the document can be located on the TCAT website or be made available from TCAT Central Office.

2. Roles and responsibilities

The Executive Headteacher/CEO will be responsible for:

- In collaboration with the Chief Financial Officer (CFO), approving the offering, giving or accepting of gifts and hospitality in the necessary circumstances, including where they are being offered to employees from pupils and/or parents where values exceed the stated maximums in this policy

The CFO will be responsible for:

- In collaboration with the Executive Headteacher/CEO, approving the offering, giving or accepting of gifts and hospitality in the necessary circumstances and are above the maximum values stated within the policy, including all instances, regardless of value where they are being offered to or accepted from government officials and representatives

- Approving charitable donations offered or made in TCAT or the school's name
- Recording on their own register, those donations that are approved but above the maximum stated value for any TCAT school, and all donations that relate to TCAT as an entity, and acting in accordance with the provisions of this policy

Headteachers/Heads of School will be responsible for:

- Alerting the Executive Headteacher/CEO and CFO when any donation should be considered before acceptance
- Recording on their own register, those gifts that exceed the maximum stated value and acting in accordance with the provisions of this policy

All employees will be responsible for:

- Following the procedures set out in this policy
- Considering whether gifts and hospitality offered, given or received are appropriate to the circumstances, and reflecting on the intention behind them
- Seeking approval from the Headteacher/Head of School, as appropriate, to offer, give or accept gifts or hospitality in the necessary circumstances that exceed the maximum as set out in this policy
- Registering and documenting any gift or hospitality received in excess of the maximum as set out in the Gift and Hospitality Register, held and maintained by the Headteacher or Head of School, including the date it was received, who it was sent by and the reason it was accepted or rejected
- Reporting instances of known or suspected bribery to the Executive Headteacher/CEO at the earliest opportunity, or, if the suspected bribery relates to the Executive Headteacher/CEO then reporting to the CFO

3. 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.

A criminal offence will be committed under the Act if:

- An employee or associated person acting for, or on behalf of, TCAT or a TCAT school:
 - Offers, promises, gives, requests, receives or agrees to receive bribes
 - Offers, promises or gives a bribe to a public official with the intention of influencing that official in the performance of their duties
- And, in either case, TCAT or the TCAT school does not have the defence that it has adequate procedures in place to prevent bribery

4. Acceptable and unacceptable practice

The advice of TCAT is for employees to consider, in all circumstances, whether the gift or hospitality is reasonable and justified and to reflect on the intention behind it.

In line with this policy, it will be unacceptable for employees to:

- Give, promise or offer a payment, gift or hospitality with the expectation or hope that they, TCAT or their school will receive an advantage
- Give, promise or offer a payment, gift or hospitality to reward an advantage they, TCAT or their school have already received
- Give, promise 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 if they know or suspect that it is offered with an expectation of a business advantage in return
- Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in any activity that may lead to a breach of this policy

This policy will not prohibit normal and appropriate gifts and hospitality, both given and received, if the following requirements are met:

- It is not given with the intention of:
 - Influencing a third party to obtain or retain business or a business advantage
 - Rewarding the provision or retention of business or a business advantage
- It is not given in exchange for favours or benefits
- It is given in TCAT or the school's name, not in the individual's name
- It complies with local law
- It does not include cash or a cash equivalent, e.g. vouchers or gift certificates
- It is appropriate in the circumstances, e.g. the giving of small gifts at Christmas

- The type and value of the gift or hospitality is reasonable based on the reason it is offered
- It is given openly, not secretly

Gifts and hospitality should not be offered to, or accepted from, government officials or representatives without the prior approval of the CFO.

5. Charitable donations

Charitable donations will be considered part of TCAT's wider purpose. TCAT and each of our schools will support a number of carefully selected charities and may also support fundraising events involving employees.

TCAT and our schools will only make charitable donations that are legal and ethical. No donation will be offered or made in TCAT or a TCAT school's name without the prior approval of the CFO.

6. Gifts and hospitality to employees from pupils and parents

It will be permissible for employees to accept gifts from pupils and parents in the appropriate circumstances, for example, at Christmas and at the end of the term or academic year.

Employees will be permitted to accept gifts up to a value of £25.00 from individual pupils or parents without approval from the Headteacher or Head of School, provided that these gifts do not satisfy the conditions outlined below. These gifts **do not** need to be recorded in the Gifts and Hospitality Register.

Employees will be permitted to accept gifts up to a value of £50.00 from groups of pupils or parents without approval from the Headteacher/Head of School, provided that these gifts do not satisfy the conditions outlined below. These gifts **do not** need to be recorded in the Gifts and Hospitality Register.

Where the gift or hospitality exceeds the values outlined above, employees will seek prior approval from the Headteacher/Head of School who will refer the instance to the Executive Headteacher/CEO for approval before accepting the offer. Details of the offer will be recorded in line with the 'Record keeping' section of this policy.

Before accepting gifts or hospitality from parents and/or pupils, employees will consider the following:

- Whether there is any benefit to TCAT or their school in them accepting the scale, amount, frequency and source of the offer
- The timing of the offer in relation to forthcoming decisions
- Whether accepting the offer could be misinterpreted as a sign of their, TCAT or the school's, support or favour

Where employees believe the offer may satisfy one of these conditions, they will seek prior approval from the Headteacher/Head of School for sums below the maximum permitted or the Executive Headteacher/CEO for sums in excess of the maximum permitted before accepting the offer.

Employees will not accept:

- Cash or monetary gifts, including tokens and gift certificates
- Gifts or hospitality offered to their spouse, partner, family member or friend
- Gifts or hospitality from a potential supplier or tenderer
- Lavish, extravagant or excessive gifts or hospitality
- Gifts or hospitality that they believe to be more than a token of gratitude given at an appropriate time, e.g. at the end of the year

These conditions apply regardless of whether the conditions outlined at the start of this section are met, e.g. monetary gifts will not be accepted even if they are below the value of £25.00.

If a gift meeting the above conditions is offered without warning, the member employee will politely decline the gift. If the employee feels it would be inappropriate to decline the gift, they will refer the matter to the Headteacher/Head of School as soon as possible; the Headteacher/Head of School will then decide on an appropriate course of action as long as the value does not breach the maximum level as defined in this policy. This may include the Headteacher/Head of School deciding to return the gift, asking the Chair of their Local Governing Body for their view, or donating the gift to a charity or other local cause.

If employees are unsure whether to accept a gift in any situation, they will speak to the Executive Headteacher/CEO.

Parents and pupils will be informed of TCAT's policy regarding gifts and hospitality and will be encouraged to speak to the Headteacher/Head of School or Executive Headteacher/CEO as appropriate if they want to give an employee a gift which is of high value or may satisfy any of the conditions outlined above.

7. Gifts and hospitality to employees from TCAT or the school

TCAT, the TCAT Trust Board or an individual TCAT school may, at the discretion of the Trustees, Executive Headteacher/CEO or Headteacher/Head of School, provide employees 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 £25.00.

When giving gifts to employees, TCAT will ensure:

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

The purchasing of excessive or alcoholic gifts is regarded as irregular expenditure; as such, TCAT or a TCAT school will not provide employees with gifts meeting these conditions. Individual school leaders may decide to reward team members from their own personal resources but will refrain from breaking the £25 established maximum except in extreme circumstances.

8. Reporting and investigating bribery

Employees will be encouraged to raise concerns about any known or suspected bribery or corruption to the Executive Headteacher/CEO 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 TCATs Whistleblowing Policy.

Reports of known or suspected bribery will be investigated thoroughly and in a timely manner by the Executive Leadership and in the strictest confidence.

Employees who raise concerns in good faith will be supported by TCAT, and TCAT will ensure that they are not subjected to any detrimental treatment as a consequence of their report. Any instances of detrimental treatment against an employee for reporting a suspicion will be treated as a disciplinary offence.

Following investigation, TCAT will invoke disciplinary procedures where any employee is found guilty of bribery; this may result in the finding of gross misconduct and immediate dismissal. TCAT may terminate the contracts of any associated persons, including consultants or other employees acting for, or on behalf of TCAT who are found to have breached this policy.

9. Record keeping

TCAT maintains up-to-date financial records and has appropriate internal controls to provide evidence for the business reasons for making payments to third parties. Employees will make the Headteacher or Head of School aware of gifts or hospitality received or offered over the value of £25.00, or over the value of £50.00 if received from multiple donors who in turn will contact the Executive Headteacher/CEO. These gifts and hospitality will be subject to review by the Executive Headteacher/CEO and the CFO.

The Gifts and Hospitality Register is used to record the details of gifts or hospitality that need to be recorded. The following information will be recorded and maintained by each Headteacher or Head of School:

- The nature of the gift or hospitality
- The date the gift or hospitality was offered
- The name of the person or people who offered the gift or hospitality
- The name of the employee the gift or hospitality was offered to
- The value of the gift or hospitality
- The action taken – for example, whether the offer was refused or accepted

Employees' expenses claims relating to gifts, hospitality or expenses incurred to third parties will be submitted in accordance with the relevant procedures.

Invoices, accounts and related documents will be prepared and maintained with the highest accuracy and completeness. No accounts will be kept "off book".

In line with its duties under the 'Academy trust handbook', and irrespective of whether DfE approval is required, TCAT will disclose aggregate figures for transactions of any amount, and separate disclosure for individual transactions above £5,000, in its audited accounts for gifts from TCAT.

Monitoring and review

Lifespan of Policy: 3 Years

At any point this policy is updated or fully reviewed, it will be updated on the main TCAT website and will automatically update on all TCAT school websites simultaneously.

Where an annual check or other check results in minor changes, the Version History will be reviewed and updated with a change in the number following the decimal point, for example, v1.1 ⇒ v1.2. Where the policy is reviewed in full, then the number before the decimal point will change and reset, for example v1.4 ⇒ v2.0.

Any changes made by the Executive Headteacher/CEO in collaboration with the Board Appointed Trustee will be passed to the Trust Board for ratification and subsequently be notified to Clerks to Local Governing Bodies and Headteachers/Heads of School.

The next scheduled full review date for this policy is 19th May 2029.

Date approved by the Board Appointed Trustee: 20th May 2026.

To be approved by Finance Audit and Risk Committee at the first meeting after 20th May 2026.

To be ratified and recorded in the minutes at the first Trust Board Meeting after 20th May 2026.

Appendix A: Individual TCAT School Gifts and Hospitality Register Template

It is not uncommon for employees to receive gifts and hospitality from parents, contractors, volunteers and other stakeholders as a gesture of gratitude at times such as Christmas or the end of term. These gifts should not be excessive or high value. Gifts and hospitality that are high in value or excessive may be interpreted as bribery; if this is the case, the employee should reject the offering. Bribery and corruption are punishable by up to 10 years' imprisonment; schools could face an unlimited fine and serious damage to their reputation if found guilty. This register has been created to ensure that all TCAT schools are committed to the highest ethical standards with regard to business activities.

Academies have a specific duty to ensure:

- The value of any gifts made is reasonable and fits within the scheme of delegation
- The decision to accept or decline any gift is documented in line with this policy
- The acceptance of a gift maintains the principles of propriety and regularity in the use of public funds

Academies should ensure they have due regard to the above when completing this register.

TCAT schools can use this template to record the type of gift or hospitality they have received, the date it was received, who sent and received the gift or hospitality and whether it was rejected or accepted – reasons for acceptance or rejection should be noted in the final column along with if this was referred up. This register must be maintained by the Headteacher or Head of School of each TCAT school and made available on request by the Executive Headteacher/CEO, the CFO or any Trustee or Local Governor.

Name of school – Gifts and Hospitality Register

Date gift or hospitality received	Recipient/Role	Gifted by	Description of gift or hospitality	Value	Gift or hospitality accepted or declined	Reason why/Referred to
20/10/2024	Ms Smith/AHT	Parent of Herbert Asquith	Champagne	£75	Accepted <input type="checkbox"/> Declined <input checked="" type="checkbox"/>	Value exceeds that permitted by the Gifts, Hospitality and Anti-bribery Policy, referred to Executive Headteacher/CEO.
					Accepted <input type="checkbox"/> Declined <input type="checkbox"/>	
					Accepted <input type="checkbox"/> Declined <input type="checkbox"/>	
					Accepted <input type="checkbox"/> Declined <input type="checkbox"/>	

Trust Glossary

AA	Admissions Authority	H&S	Health and Safety
AAI	Adrenaline Auto-Injector (Epi Pen)	HoS	Head of School
ACM	Asbestos Containing Materials	HSE	Health and Safety Executive
AHT	Assistant Headteacher	ICO	Information Commissioners Office
AIR	Attendance Intervention Reviews	IDSR	Inspection Data Summary Report
APDR	Assess Plan Do Review Cycle	IHP	Individual Healthcare Plan
APIs	Application Programming Interfaces	IRMS	Information and Records Management Society
ASC	Autistic Spectrum Condition	IWF	Internet Watch Foundation
ASP	Analyse School Performance	KCSIE	Keeping Children Safe in Education
ATH	Academy Trust Handbook	KS1/2/3/4	Key Stage 1/2/3/4
BAME	Black, Asian and Minority Ethnic Backgrounds	LAC	Looked After Child
BAT	Board Appointed Trustee	LADO	Local Authority Designated Officer
BCP	Business Continuity Plan	LGB	Local Governing Body
BFR	Budget Forecast Return	LLC	Low-Level Concerns
CEO	Chief Executive Officer	LSA	Learning Support Assistants
CFO	Chief Financial Officer	MASH	Multi-Agency Safeguarding Hub
CIF	Condition Improvement Fund	MAT	Multi-Academy Trust

CIN	Child in Need	MFA	Multi-Factor Authentication
CLA	Children Looked After	MFL	Modern Foreign Language
CMIE	Child Missing in Education	NCSC	National Cyber Security Centre
COO	Chief Operating Officer	NoV	Note of Visit
COSHH	Control of Substances Hazardous to Health	NPQ	National Professional Qualifications
CP	Child Protection	PA	Persistent Absence
CPD	Continuing Professional Development	PAN	Published Admission Number
CPOMS	Child Protection Online Management System	PECR	Privacy and Electronic Communications Regulations
CSCS	Children's Social Care Services	PEP	Personal Education Plan
CSE	Child Sexual Exploitation	PEEP	Personal Emergency Evacuation Plan
CTIRU	Counter-Terrorism Internet Referral Unit	PEx	Permanent Exclusion
CWD	Children with Disabilities	PP	Pupil Premium
CYPMHS	Children and Young People's Mental Health Services	PPG	Pupil Premium Grant
DBS	Disclosure and Barring Service	PSHE	Personal, Social and Health Education
DDSL	Deputy Designated Safeguarding Lead	PSED	Public Sector Equality Duty
DfE	Department for Education	PTFA	Parent, Teacher and Friends Association
DHT	Deputy Headteacher	QA	Quality Assurance

DSE	Display Screen Equipment	RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
DSL	Designated Safeguarding Lead	RHE	Relationships and Health Education
DPO	Data Protection Officer	RPA	Risk Protection Arrangement
EAL	English as an Additional Language	RSHE	Relationships, Sex and Health Education
ECT	Early Career Teacher	SA	Severely Absent
EDIB	Equality, Diversity, Inclusion and Belonging	SALT	Speech and Language Therapist
EHA	Early Help Assessment	SARC	Sexual Assault Referral Centre
EHCNA	Education, Health and Care Needs Assessment	SBM	School Business Manager
EHCP	Education, Health and Care Plan	SCC	Standard Contractual Clause
EHE	Elective Home Education	SCITT	School-Centred Initial Teacher Training
ELSA	Emotional Literacy Support Assistant	SCR	Single Central Record
ESFA	Education and Skills Funding Agency	SDP	School Development Plan
EVC	Educational Visit Coordinator	SDQ	Strengths and Difficulties Questionnaire
EWOSSO	Education Welfare and Safeguarding Support Officer	SEF	Self-Evaluation Form
EYFS	Early Years Foundation Stage	SEMH	Social, Emotional, and Mental Health
FBV	Fundamental British Values	SENCO	Special Educational Needs Coordinator
FFT	Fischer Family Trust	SEND	Special Educational Needs and Disabilities

FGM	Female Genital Mutilation	SIP	School Improvement Partner
FGMPO	FGM Protection Order	SLA	Service Level Agreement
FOI	Freedom of Information	SLCN	Speech, Language and Communication Needs
FSM	Free School Meals	SLT	Senior Leadership Team
FTS	Find a Tender Service	SPOC	Single Point of Contact
GAG	General Annual Grant	STEM	Science, Technology, Engineering and Maths
GDPR	General Data Protection Regulation	TA	Teaching Assistant
GIAS	Get Information about Schools	TAC	Team Around the Child
HASH	Herefordshire Association of Secondary Heads	TCAT	Three Counties Academy Trust
HBA	Honour Based Abuse	TUPE	Transfer of Undertakings (Protection of Employment)
HR	Human Resources	VSH	Virtual School Headteacher