

**Concordia Multi Academy Trust**  
**Gifts and Hospitality Policy**

**1. ABOUT THIS POLICY**

- 1.1 Concordia Multi Academy Trust is committed to preventing bribery in the workplace. Any form of bribery will not be tolerated. This policy implements effective measures to monitor and prevent bribery. We use the term 'Gifts' in this policy to cover gifts and any other form of hospitality.
- 1.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business contacts.
- 1.3 Any questions relating to the content or operation of this policy should be directed to a Headteacher or the CEO.

**2. GIFTS AND HOSPITALITY FROM PARENTS AND PUPILS**

- 2.1 From time to time, parents and pupils may offer Gifts to Staff; this is acceptable with conditions (see below). Concordia Multi Academy Trust understands that Gifts are likely to be offered to members of Staff during certain times of the year e.g. Christmas, or end of term. Staff must make a judgment when accepting a gift; any gift must not be excessive and not more than a token of gratitude.
- 2.2 Gifts (which can include gift vouchers) with a value of £50 or less may be accepted without approval from the Headteacher.
- (a) If multiple Gifts from the same parent/pupil are received but exceeding this value as a whole, this must be brought to the Headteacher's attention where approval may be given.
  - (b) If a Gift is received that has been contributed to by multiple parents/pupils and the aggregate value exceeds £150, this must be brought to the Headteacher's attention where approval may be given.
- 2.3 Staff must not accept cash regardless of the amount, under any circumstances.
- 2.4 If any of the circumstances in clause 2.2 apply, Staff must make a record of this in accordance with clause 5 (below). A copy of this record must also be sent to the Headteacher for their attention.

- 2.5 If Staff are unsure on whether or not they should accept a Gift, they must first speak to the Headteacher who will decide on a course of action. The Gift may be accepted for the member of Staff; accepted but sent to a charity; or politely declined.
- 2.6 If Staff believe a Gift breaches any part of this policy, they must politely decline the Gift. If a parent or pupil requires an explanation, they should be referred to the Headteacher.
- 2.7 If the Headteacher or CEO receives a Gift, the above conditions apply. If the Headteacher or CEO thinks the Gift may breach any part of this policy, they must seek approval from the Chair of Governors.
- 2.8 This policy should be brought to the attention of all pupils and parents. It should also be easily accessible. If a parent thinks a Gift may breach a condition of this policy, please speak to the Headteacher before making the Gift.

### **3. GIFTS AND HOSPITALITY TO STAFF FROM THE SCHOOL**

- 3.1 From time to time the School may purchase Gifts for members of Staff.
- 3.2 The School will never gift money or alcohol.
- 3.3 All Gifts from School to Staff should not have an individual value exceeding [£50]. Anything above this value could be seen as excessive.
- 3.4 The Headteacher or CEO will make a decision on whether or not a Gift from School to Staff is excessive. If there is any doubt the Headteacher or CEO will seek approval from the Chair of Governors.

### **4. GIFTS AND HOSPITALITY FROM OTHER THIRD PARTIES AND SUPPLIERS**

- 4.1 This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:
- (a) establishing or maintaining good business relationships;
  - (b) improving or maintaining our image or reputation; or
- 4.2 The acceptance of Gifts is allowed if the following requirements are met:
- (a) it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
  - (b) it does not include cash or a cash equivalent (such as gift certificates or vouchers);

- (c) it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value.;
  - (d) it is given openly, not secretly.
- 4.3 Promotional gifts of low value such as branded stationery to or from existing suppliers and business partners will usually be acceptable.
- 4.4 Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

## **5. RECORD KEEPING**

- 5.1 There is a register within the School to record events relating to Gifts where Staff are required as part of this policy or where Gifts have been refused.
- 5.2 When an entry is made in the register it must state the following:
- The name(s) of Staff the Gift was intended for;
  - The sender's name (and child's name if a parent);
  - Date gift was offered;
  - Type of Gift;
  - Value of Gift;
  - Reason for entry;
  - Actions taken.

Policy updated March 2019

Policy to be reviewed March 2022