

**ST AIDAN'S**  
Voluntary Controlled  
**PRIMARY SCHOOL**

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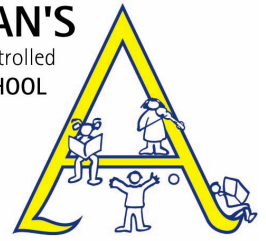
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## **Gifts, hospitality and anti-bribery policy**

### **Introduction**

At St Aidan's we are committed to the highest level of integrity, honesty and accountability in all areas of school life. All staff and governors are expected to maintain the highest standards of propriety and professionalism at all times, ensuring they are free from any conflict of interest through their business in the name of the school. Bribery by, or of, employees, agents or consultants, or any person acting on behalf of the school will not be tolerated.

This policy covers all individuals working for the school at all levels (whether permanent, fixed-term or temporary), and includes governors, volunteers, agents and any other person associated with the school. Bribery and corruption by individuals is punishable by up to 10 years' imprisonment and the school could face an unlimited fine and serious damage to its reputation; therefore we take our legal responsibilities very seriously.

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## **1 Definitions**

- 1.1 Under the Bribery Act 2010, a bribe is 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, the school offers, promises, gives, requests, receives or agrees to receive bribes;
  - an employee or associated person acting for, or on behalf of the school, offers, promises or gives a bribe to a public official with the intention of influencing that official in the performance of their duties;
  - the school does not have adequate procedures in place to prevent bribery.
- 1.2 A Gift is any item or service which is received free of charge; or personally offered at a discounted rate, ie on terms not available to the general public.
- 1.3 Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event at discounted rates, ie. on terms not available to the general public.

## **2 General principles**

We do not prohibit normal and appropriate gifts or hospitality, both given or received, provided that:

- they are 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 exchange for favours or benefits;
  - they comply with local law;
  - they do not include cash;
  - they are appropriate in the circumstances, e.g. small gifts at Christmas;
  - the type and value of the gift is reasonable given why it was offered;
  - they are given openly, not secretly.
- 2.1 Gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the Headteacher (or, in the case of the Headteacher, the Chair of Governors).

## **3 Receiving gifts**

It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of small personal gifts. The value of these should not exceed £30 if given by an individual or £100 if by a group. These gifts need not be entered in the Gifts and Hospitality Register (GHR) nor referred to the Headteacher. Gifts above these values must be referred to the Headteacher and entered in the GHR, whether or not they are agreed by the Headteacher or, in the case of the Headteacher, the Chair of Governors.

- 3.1 Staff will not accept:
- cash;
  - gifts or hospitality offered to their spouse, partner, family member or friend;
  - gifts or hospitality from a potential supplier or tenderer;
  - lavish or extravagant gifts or hospitality.



- 3.2 Staff will consider the following before accepting gifts or hospitality:
- Whether there is any benefit to the 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, or the school's, support or favour.
- 3.3 If not accepting a gift would be regarded as causing offence, (such as a sudden and unexpected gift, or one where it would cause cultural offence) it should be accepted. The matter should then be brought to the attention of the Headteacher as soon as possible who may decide to return the gift, discuss it with the Chair of Governors and/or may donate it to a school raffle/ fair or a charitable cause.
- 3.4 If staff are unsure whether to accept a gift in any situation, they should speak to the Headteacher.

## **4 Giving of gifts and hospitality**

Gifts up to the value of £30 may be given by the school to staff, parents and governors who have gone above and beyond to contribute towards the school. Gifts over £30 in value would be considered an exceptional circumstance, a sign of long term service to the school and therefore agreed in advance with the HeadTeacher and or Governors.

- 4.1 Hospitality in the form of working lunches, coffees etc. are perfectly acceptable and appropriate to offer in support of good relationships with visiting staff or business colleagues. These would not be added to the register.

## **5 Charitable donations**

Charitable donations are considered to be part of the school's wider purpose. We support a number of carefully selected charities and fundraising events.

- 5.1 Donations must not be offered or made in the school's name without the prior approval of the Headteacher.

## **6 Record keeping**

- 6.1 The Headteacher should be informed about all hospitality or gifts received or offered over the value of £30 (or £100 if a group gift). These will have to be agreed and entered in the Gifts and Hospitality Register in which the following information is recorded:
- the nature of the gift/hospitality;
  - the date the gift/hospitality was offered;
  - who the gift/hospitality was offered by;
  - who the gift/hospitality was offered to;
  - value of the gift/hospitality;
  - action taken, eg. whether the offer was refused or accepted.



## **7 Monitoring and review**

This policy will be monitored by the Resources committee and reviewed every 3 years, or sooner if the need arises.

Date of document: **JANUARY 2022**

Ratified:..... (Signature) ..... (Date)

Review due: **JANUARY 2025**