



Gifts, Hospitality and Anti-bribery Policy

AUGUST 2023

CONCORDIA MULTI ACADEMY TRUST

Table of Contents

1. Document Control	2
Amendment History	2
Review Dates	2
Author(s)	2
Reviewer(s)	2
Approver(s)	2
2. Introduction	3
3. Record Keeping	4
4. Gifts and Hospitality from Parents and Pupils	5
5. Gifts and Hospitality to staff from the Academy or Trust	6
6. Gifts and Hospitality from other third parties and suppliers	7

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1. Document Control

Amendment History

Version No.	Date	Comments
1.0	Oct 2021	
2.0	March 2023	Reviewed

Review Dates

Next Review Date
March 2024

Author(s)

Name	Role
Simon Faircloth	Acting Chief Finance Officer

Reviewer(s)

Name	Role
Dave Teggin	Trustee, Chair of Finance & Audit Committee

Approver(s)

Name	Role
Simon Faircloth	Acting Chief Finance Officer

2. Introduction

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 and defined as 'items given without the expectation of receiving anything in return'.

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.

Staff must not accept any gifts, rewards, or hospitality from any organisation or individual with whom they have contact in the course of their work, as an inducement either for doing something or not doing something in their official capacity.

Particular care should be taken about any gift from a person or organisation which has, or is hoping to have, a contract with the Academies.

Any questions relating to the content or operation of this policy should be directed to a Headteacher or the CEO.

3. Record Keeping

There is a register within the Academy to record events relating to Gifts where Staff are required as part of this policy or where Gifts have been refused.

This register must be kept up to date and failure to do so will be investigated as potential misconduct. The register should be provided to the CFO prior to 31 August each year.

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.

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

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 ESFA approval is required, the trust will disclose aggregate figures for transactions of any amount, and separate disclosure for individual transactions above £5,000, in its audited accounts for gifts or donations from or to the trust.

4. Gifts and Hospitality from Parents and Pupils

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 which may include 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.

Gifts (which can include gift vouchers) with a value of £25 or less may be accepted without approval from the Headteacher.

- 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.
- 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.

Staff must not accept cash regardless of the amount, under any circumstances. If cash is offered, the member of staff must explain that they cannot accept cash and only accept vouchers.

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.

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.

If the Headteacher or a member of the Central Team receives a Gift, the above conditions apply. If they believe the Gift may breach any part of this policy, Headteachers and other Central Team employees must seek approval from the CEO and the CEO must seek approval from the Chair of Trustees.

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.

If multiple gifts over £25 from the same parent/pupil or if an aggregate gift over £150 is approved to be accepted then these must be included on the gift register. In the case of an aggregate gift details of all parents/pupils must be included.

5. Gifts and Hospitality to staff from the Academy or Trust

From time to time an Academy or the Trust may purchase Gifts for members of Staff.

The Academy and Trust will never gift money, gift vouchers or alcohol.

All Gifts from Academy or Trust to Staff should not have an individual value exceeding £25. Anything above this value could be seen as excessive.

The Headteacher or CEO will make a decision on whether or not a Gift from an Academy or the Trust to Staff is excessive. If there is any doubt the Headteacher or CEO will seek approval from the Chair of Trustees.

6. Gifts and Hospitality from other third parties and suppliers

This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- establishing or maintaining good business relationships;
- improving or maintaining our image or reputation; or

The acceptance of Gifts is allowed if the following requirements are met:

- 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;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value.;
- it is given openly, not secretly.
- no more than two gifts from any external organisation within a single financial year

Promotional gifts of low value such as branded stationery to or from existing suppliers and business partners will usually be acceptable as long as their value does not exceed £25.

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.

No gifts, regardless of value, should be accepted from any third party that is involved in, or anticipated to be involved in, any tender or future unsigned contract with the Trust or Academies.