



# **Anti-bribery (Gifts & Hospitality) Policy**

The Chorus Schools Federation  
(St. Giles', St. Andrew's & Wethersfield  
C of E Primary Schools)

**Approved by:** Mrs. Jinnie Nichols

**Last reviewed on:** December 2025

**Next review due:** December 2026



V24.1	May 2024	<p>Resource reviewed. Amended policy to be standalone maintained school version rather than a combined maintained school / academy version.</p> <p>Removed financial limit specified in section 3 to allow school to insert their own limit.</p>
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## **1. Introduction**

This is the School's approved Code of Conduct relating to the offer and/or acceptance by staff of gifts and hospitality of whatever nature from outside individuals or organisations.

Within the terms of the Code, staff and governors are expected to exercise common sense. If they are in any doubt they must consult the Executive Headteacher and Chair of Governors and in every case declare the acceptance of a gift or hospitality in the register kept by the school, using the 'Declaration of Gifts and Hospitality' form. See Appendix B

The process set out is designed to safeguard governors staff from any misunderstanding or criticism.

The general principles which govern gifts and hospitality are:-

- Offers of hospitality should only be accepted if there is a genuine need to represent the school.
- Gifts should only be accepted in exceptional circumstances.
- The Code of Conduct applies to all governors and staff of the school.
- To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied by staff and referred to the Executive Headteacher /Chair of Governors if in doubt. See Appendix A.
- Registers are accessible for viewing by the following appropriate officers: the Executive Headteacher, governors, External Auditors and Internal Auditors.
- Any request by a member of the public to view the Register of Declarations of Gifts and Hospitality will be referred to the Executive Headteacher. In considering any request, they will balance the requirement for the school to be open and transparent against the requirements of the Data Protection Act 2018.

## **2. Hospitality**

The following principles should be followed in deciding whether or not to accept hospitality:-

a) Staff and governors should ask themselves whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered. If the answer is yes, the hospitality should be declined. In making judgements, relevant facts to take into account include the person or organisation offering the hospitality, its scale and nature, and its timing in relation to decisions to be made by the school.

b) Care should be taken to avoid situations in which an individual governor or member of staff is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation.

Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as follows:-

- a) Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest.

b) Attendance at events or functions where there is a demonstrable need for the school to be represented to either give or to receive information or to participate as part of the school's corporate image.

c) Attendance at events or functions which are part of the civic, cultural or sporting life of the school.

d) Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

Overnight hospitality linked to any of the above should be declared to either the Executive Headteacher or Chair of Governors before being accepted.

### **3. Gifts**

All personal gifts should be refused or donated to charity unless they come within the categories set out in 3(1) or 3(2) below.

(1) Gifts of the following type may be accepted:-

(a) modest gifts of a promotional character, eg calendars, diaries and other similar articles. See also point 4; and

(b) gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation.

(c) Gifts up to £50.00 in value

(2) Gifts which are intended for the school as a corporate body or intended for an school can be accepted but must not be retained by the individual who receives them. Such gifts should be passed to the Executive Headteacher.

### **4. Registration of Gifts and Hospitality**

Staff must, within 28 days of accepting any gift or hospitality, provide written notification to the Executive Headteacher using the 'Declaration of Gifts and Hospitality' form. All offers accepted should be recorded in case of any queries, in particular through FOI requests.

The Declaration of Gifts and Hospitality forms must be completed in full, setting out full details of the offer or the gift and/or hospitality received as well as:

- ❖ estimated or actual value;
- ❖ an indication from the Executive Headteacher as to why acceptance of the offer is authorised;
- ❖ the employee's/governor's printed full name and signature; and
- ❖ The Executive Headteacher printed full name and signature.

## **5. Monitoring**

The Finance Officer maintains a register of gifts and hospitality accepted. The Finance Officer will report annually the content of the register to the Finance Committee. Any concerns/issues identified should be noted and an action plan put in place by the governors.

## **6. Penalties for breaching the Code**

The school's disciplinary procedures may be applied where it is found that breaches of the Code have occurred.

## **7. Retention of Documentation**

Documentation in the Register will be kept for seven years.

## APPENDIX A: Managing the Receipt of Gifts and Hospitality

The **PROVEIT** test:

Whether or not the offer is acceptable:

<b>Purpose</b>	Token, thanks or seeking a favour?  (token or thanks: yes; favour: no)
<b>Rules</b>	What are they? Does this situation conform?
<b>Openness</b>	Is the offer transparent?
<b>Value</b>	Expensive or inexpensive?
<b>Ethics</b>	Does the offer fit with school ethics? Is this an exceptional circumstance?
<b>Identity</b>	Who has made the offer?
<b>Timing</b>	Are you about to make a decision affecting the giver?

## APPENDIX B: Declaration of Gifts and Hospitality Form

Receiving benefits, gifts, rewards or hospitality in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. Staff are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible.

If you have received or wish to declare a gift or hospitality please complete the form and return to the Executive Headteacher.

### Details of employee receiving gift or hospitality

Full Name	
Job Title	
Department	
Date of Declaration	

### Description of gift or hospitality

Description of gift / hospitality	
Value/estimated value of gift / hospitality	
Purpose of the offer	
Person/organisation providing the gift or hospitality	
Relationship to the person/organisation offering the gift or hospitality	
Acceptance of gift / hospitality	Yes / No

### Approved by

Signature	
Date	
Name	
Job Title	