



APPENDIX 4

Gifts, Hospitality and Bribery Policy

This policy was approved and ratified by the
Finance and Resources Committee of
Cox Green School
on
10th October 2017

Version	Authorisation	Approval Date	Effective Date	Next Review
1	Full Governing Body	28/02/12	28/02/12	Sept 2012
1.1	Full Governing Body	09/10/12	09/10/12	Sept 2013
1.2	Full Governing Body	15/10/13	15/10/13	Sept 2015
1.3	Full Governing Body	02/12/14	02/12/14	Sept 2015
1.4	Full Governing Body	20/10/15	20/10/15	Sept 2017
1.5	Finance & Resources Committee	10/10/17	10/10/17	Sept 2020



Introduction

The principle of integrity requires that Cox Green School staff should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted must be declared and recorded.

The process set out in this policy and procedure is designed to safeguard employees from any misunderstanding or criticism.

This policy takes into consideration the requirements under the UK Bribery Act 2010, which came into effect 1 July 2011. The Ministry of Justice has published guidance which provides the basis for inclusion in this policy. This guidance is under section 9 of the Act.

The Chair of Governors is responsible for ensuring compliance with Cox Green School Policies and Procedures. This procedure applies to all Cox Green School staff.

Gifts

- You must not accept cash, or personal gifts with a significant monetary value, under any circumstances, although items of nominal value (approximately £25 or below) or free promotional pens, calendars, diaries or similar items may be accepted.
- Gifts which are intended for Cox Green School as an academic body can be accepted but must not be retained by the individual who receives them. Such gifts should be deposited with the Administration Office, for use by Cox Green School.
- Personal gifts may not be solicited under any circumstances.
- When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.
- All gifts received must be recorded in Cox Green School's gifts and hospitality register, which is maintained by the Deputy Business Manager.

Supplier Special Offer Gifts

- Gifts are sometimes offered by suppliers with the purchase of items. All special offer gifts are the property of the Cox Green School and must be turned into the Administration Office for use by the School.

Hospitality

- You should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf of Cox Green School. The timing of hospitality in relation to procurement or purchasing decision that Cox Green School may be taking is especially sensitive. You should never solicit hospitality. As a general rule, you should not accept hospitality that the School would not reciprocate in similar circumstances.



- Staff attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants is not normally acceptable. Where it is considered that there is a benefit to Cox Green School in a member of staff attending a sponsored event, the attendance should be formally approved by the Headteacher.
- If necessary, you should pay your share of any costs and claim these in the usual way.
- When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.
- You may accept modest working meals and light refreshments without making any declaration. All other hospitality must be recorded in the school's gifts and hospitality register which is maintained by the Deputy Business Manager.
- Other hospitality may be accepted where:
 - You are representing Cox Green School in the community or are imparting information about Cox Green School to the public.
 - An event is clearly part of the life of the community or where Cox Green School should be seen to be represented.
 - The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.

Staff Entertainment

- In the event that the school decides to contribute towards a Staff social event this must be approved in advance by the Governors of the Finance and Resources Committee and should comply with HMRC guidelines.
- All expenditure of this kind will come from the Schools Unrestricted funds and not GAG funding.

Expense Claims

- Where hospitality is to be provided by Cox Green School this should be approved in advance by a member of the Leadership Team. The Headteacher or Business Manager should review the hospitality in light of the UK Bribery Act 2010. Hospitality is not prohibited by the Act but should be considered in light of it.
- Any hospitality provided should not be extravagant.
- Claims for reimbursement of expenses should be made on the relevant Expenses Claim form and receipts should always be enclosed.

PROVEIT Test

- Please use the following guideline to determine whether an offer of a gift or hospitality is acceptable:
 - PURPOSE – Token, thanks or seeking a favour? (token/thanks = yes; favour = no)



- RULES – What are they? Does this situation conform?
- OPENNESS – Is the offer transparent?
- VALUE – Expensive or inexpensive?
- ETHICS – Does the offer fit with School's ethics?
- IDENTITY – Who has made the offer?
- TIMING – Are you about to make a decision affecting the giver?

UK Bribery Act 2010

- It is an offence under Section 7, which can be committed by a commercial organisation which fails to prevent persons associated with them from bribing another person on their behalf.
- Facilitation Payments, payments to induce officials to perform routine functions they are otherwise obligated to perform, are bribery under the Act.
- Trustees and Senior Leadership do not tolerate Bribery in any form.
- Senior Leadership considers all organisations which the school does business with, in order to consider the risk.
- Senior Leadership considers all persons or organisations which act on behalf of the school or provide services for the school, in order to consider the risk.
- Actions of suppliers of goods do not create a risk for the school under the UK Bribery Act 2010.
- As risk of bribery can often be greater in overseas transactions, all overseas transactions must be approved in writing on the purchase order by the Headteacher and the Chair of Governors, regardless of the value of the transaction.

