Gifts and Hospitality Policy

Signed:

Chair: S. Gribbin

CEO: R. Swindells

Date: 15th October 2026

Review date: October 2027

Collective Vision Trust
Gifts and Hospitality Policy

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Collective Vision Trust
Gifts and Hospitality Policy

Statement of intent

Collective Vision Trust is committed to maintaining the highest ethical standards and acting with integrity in all business activities. This policy details the trust's position on preventing and prohibiting bribery.

Bribery by, or of, employees, agents, consultants, or any person acting on behalf of the trust will not be tolerated. The directors are committed to implementing effective measures to prevent, monitor and eliminate bribery.

Bribery and corruption by individuals are punishable by up to 10 years' imprisonment and the trust could face an unlimited fine and serious damage to its reputation; therefore, the trust takes its legal responsibilities very seriously.

The purpose of this policy is to:

- Establish the responsibilities of the trust in observing and upholding our position on bribery and corruption.
- Provide information and guidance to trust staff on how to recognise and deal with bribery and corruption concerns.
- Ensure the trust achieves regularity, propriety and value for money in its use of public funds.

This policy covers all individuals working for the trust at all levels, whether permanent, fixed-term or temporary. This includes staff, members, directors, local governing committee members, volunteers, agents and any other person associated with the trust, known throughout the policy as 'employees'.

This policy and the trust's Gifts and Hospitality Register outline the trust's procedures on the acceptance of gifts, hospitality, awards, prizes and other benefits that could compromise the judgement or integrity of the trust or its staff. All staff will be made aware of this policy.

Please note when the term 'headteacher' is used it refers to the person legally registered as the 'headteacher', in some schools this may be the 'Executive Headteacher'.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- The Bribery Act 2010
- DfE 'Academy trust handbook'

This policy operates in conjunction with the following trust policies and documents:

- Gifts and Hospitality Register
- Whistleblowing Policy

2. Roles and responsibilities

The directors will be responsible for:

- In collaboration with the CEO, approving the offering, giving or accepting of gifts and hospitality in the necessary circumstances.

The CEO will be responsible for:

- In collaboration with the headteacher, approving the offering, giving or accepting of gifts and hospitality in the necessary circumstances.
- Approving charitable donations offered or made in the trust/school's name.

All staff will be responsible for:

- Following the procedures set out in this policy.
- Considering whether gifts and hospitality offered, given or received are appropriate to the circumstances, and reflecting on the intention behind them.
- Seeking approval from the headteacher and/or CEO, as appropriate, to offer, give or accept gifts or hospitality in the necessary circumstances.
- Reporting instances of known or suspected bribery to the CEO at the earliest opportunity.

3. Bribery

Under the Bribery Act 2010, a **'bribe'** is defined as 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 trust:
  - Offers, promises, gives, requests, receives or agrees to receive bribes.

  - Offers, promises or gives a bribe to a public official with the intention of influencing that official in the performance of their duties.
- And, in either case, the trust does not have the defence that it has adequate procedures in place to prevent bribery.

4. Acceptable and unacceptable practice

The advice of the trust is for staff to consider, in all circumstances, whether the gift or hospitality is reasonable and justified and to reflect on the intention behind it.

In line with this policy, it will be unacceptable for employees to:

- Give, promise, offer or receive a payment, gift or hospitality with the expectation or hope that they or the trust will give or receive an advantage.
- Give, promise or offer a payment, gift or hospitality to reward an advantage they or the school have already received.
- Give, promise or offer a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure.
- Accept payment from a third party if they know or suspect that it is offered with an expectation of a business advantage in return.
- Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in any activity that may lead to a breach of this policy.

This policy will not prohibit normal and appropriate gifts and hospitality, both given and received, if the following requirements are met:

- It is not given with the intention of:
  - Influencing a third party to obtain or retain business or a business advantage.
  - Rewarding the provision or retention of business or a business advantage.
- It is not given in exchange for favours or benefits.
- It is given in the school's name, not in the individual's name.
- It complies with local law.
- It does not include cash or a cash equivalent, e.g. vouchers or gift certificates.
- It is appropriate in the circumstances, e.g. the giving of small gifts at Christmas.
- The type and value of the gift or hospitality is reasonable based on the reason it is offered.
- It is given openly, not secretly.

Gifts and hospitality should not be offered to, or accepted from, government officials or representatives without the prior approval of the CEO and CFO.

5. Charitable donations

Charitable donations will be considered part of the trust's wider purpose. The trust will support a number of carefully selected charities, and may also support fundraising events involving employees.

The trust will only make charitable donations that are legal and ethical. No donation will be offered or made in the Trust or school's name without the prior approval of the CEO and CFO.

6. Gifts and hospitality to staff from pupils and parents

It will be permissible for staff to accept gifts from individual pupils and parents up to the value of £50; for example, at Christmas and at the end of the term or academic year, provided these gifts do not satisfy the conditions below. These gifts do not need to be recorded in the Gifts and Hospitality Register.

Value of Gift or Hospitality	**Recording Required**	**Approval Required**	**Approver**
Cash gifts or equivalent.	Yes	N/A	All must be declined
Declined Gifts.	Yes	N/A	CEO
Less than £50.	No	No	N/A
£50 & less than £250	Yes	Yes	Headteacher
Above £250.	Yes	Yes	Chair of Trustees
Gifts or hospitality of any value where you or the Headteacher have concerns about compliance with the overall policy.	Yes	Yes	CEO

Staff will not accept:

- Cash or monetary gifts, including tokens and gift vouchers.

If staff are unsure whether to accept a gift in any situation, they will speak to the headteacher.

7. Gifts and hospitality to staff from the trust

When giving gifts to staff, the trust will ensure:

- The value of the gift is reasonable.
- The gift is within its scheme of delegation.
- The decision to give the gift is documented.
- The gift achieves propriety and regularity in the use of public funds.

The purchasing of excessive or alcoholic gifts is regarded as irregular expenditure; as such, the trust will not provide staff with gifts meeting these conditions.

8. Reporting and investigating bribery

Employees will be encouraged to raise concerns about any known or suspected bribery or corruption to the CEO at the earliest possible opportunity. Issues that should be reported include:

- Any suspected or actual attempts at bribery.
- Any concerns that an employee may be in receipt of bribes.
- Any concerns that an employee may be offering or delivering bribes.

Concerns should be reported following the procedure set out in the trust's Whistleblowing Policy.

Reports of known or suspected bribery will be investigated thoroughly and in a timely manner by an appropriate member of the Trust/school SLT and in the strictest confidence.

Employees who raise concerns in good faith will be supported by the school, and the school will ensure that they are not subjected to any detrimental treatment as a consequence of their report. Any instances of detrimental treatment against an employee for reporting a suspicion will be treated as a disciplinary offence.

Following investigation, the Trust will invoke disciplinary procedures where any employee is found guilty of bribery; this may result in the finding of gross misconduct and immediate dismissal. The Trust may terminate the contracts of any associated persons, including consultants or other employees acting for, or on behalf of, the school who are found to have breached this policy.

9. Record keeping

The trust maintains up-to-date financial records and has appropriate internal controls to provide evidence for the business reasons for making payments to third parties. Employees will make the headteacher aware of gifts or hospitality received or offered over the values set out above.

The Gifts and Hospitality Register is used to record the details of gifts or hospitality that need to be recorded.

In line with its duties under the 'Academy trust handbook', and irrespective of whether DfE 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 from the trust.

10. Monitoring and review

This policy will be reviewed annually by the directors.

COLLECTIVE VISION TRUST – GIFTS & HOSPITALITY REGISTER
APPENDIX 1

ALL REGISTRATIONS MUST BE MADE IN ACCORDANCE WITH THE GIFT & HOSPITALITY POLICY						
DATE RECEIVED	**STAFF NAME**	**DESCRIPTION OF GIFT OR HOSPITALITY**	**ESTIMATED VALUE £**	**APROVAL REQUIRED Y/N**	**APPROVER SIGNATURE**	**ACTION TAKEN IF NOT APPROVED OR ACCEPTED**