

SOKE EDUCATION TRUST

Bribery Prevention, Gifts & Hospitality Policy

Signed via Governorhub

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Bribery Prevention, Gifts & Hospitality Policy

Introduction

This policy defines standards and guidelines in relation to adherence to the anti-bribery measures and standards that should apply to the acceptance and provision of gifts and hospitality. In particular, the policy is designed to comply with The Bribery Act 2010 (see Guidance notes).

The policy is set out under the following headings:

- anti-bribery policy;
- dealing with contractors, agents and business partners;
- giving gifts and hospitality;
- receiving gifts and hospitality;
- compliance;
- conflicts of interest policy;
- reporting bribery, corruption and suspected non-compliance with this policy.

Legislation and Guidance

As an academy trust, we must comply with the Academy Trust Handbook requirements regarding the proper management of public funds. This includes:

- **Regularity and Propriety:** All decisions regarding gifts and hospitality must demonstrate that we are dealing with expenditure and receipts according to relevant legislation and our funding agreement, and that we are spending and receiving funds with fairness and integrity.
- **Novel, Contentious or Repercussive Transactions:** Any gift, hospitality or business arrangement that could be considered novel, contentious or repercussive must be referred to the Department for Education for approval before the transaction is agreed and before it occurs.
- **Connected Party Transactions:** Any gifts or hospitality involving connected parties (as defined in the Academy Trust Handbook) must be disclosed and managed in accordance with our Conflict of Interest policy and ATH requirements.
- **Transparency:** We will maintain a gifts and hospitality register and publish a summary on our website annually to ensure transparency in our use of public funds.
- **Value for Money:** All decisions must demonstrate value for money, considering economy, effectiveness and efficiency."

Anti-bribery policy

The Soke Education Trust values its reputation for ethical behaviour and financial probity and reliability. The Trust recognises that any involvement in bribery is illegal and will reflect adversely on its image and reputation.

The Trust prohibits the offering, giving, soliciting or the acceptance of any bribe in whatever form to or from any person or company, public or private by any council member, member of staff, contractor, consultant, agent, overseas agent, external examiner and any non-employee service provider engaged on Trust business for whatever reason.

The prevention, detection and reporting of bribery is the responsibility of all staff.

Dealing with contractors, agents and business partners

The Bribery Act 2010 highlights two specific types of bribery that could lead to prosecution of the Academy:

- the liability to prosecution if a person associated with it bribes another person, where an associated person is one who performs services on or behalf of the organisation; and
- bribery of a foreign public official, where an official is one who holds a legislative, administrative or judicial position in a territory or country outside the UK.

This means that the Trust needs to take care to ensure that any contractors, agents or business partners acting on its behalf comply with the Act.

It is therefore essential that contractors and agents acting on behalf of the Trust are made aware of the Trust's anti-bribery policy, through the Trust's terms and conditions or through the tendering process for larger contracts and Gifts and hospitality must not influence procurement decisions and that due diligence must be maintained. In the case of international agents, reasonable due diligence must be carried out to ensure that they are not acting in a way that would compromise Soke Education Trust. Any gifts or hospitality involving connected parties (as defined in the ATH) must be disclosed and managed in accordance with our Conflict of Interest policy and the requirements of the Academy Trust Handbook.

Giving gifts and hospitality

Staff may not, directly or through others, offer or give any, money, gift, hospitality or other thing of value to an official, employee or representative of any supplier, customer or any other organisation, if doing so could reasonably give the appearance of influencing the organisation's relationship with the Trust

Staff may:

- give gifts of a nominal value (such as advertising novelties);
- with management approval, provide meals and other entertainment at venues outside the Trust Schools, provided that the expenses are kept at a reasonable level. For the avoidance of doubt, the per capita cost of a meal should not exceed £50 and would normally be much less;

The purchase of alcohol using Trust or school funds is forbidden.

Staff may:

- give gifts provided they are of a reasonable cost. For the avoidance of doubt, the per capita cost of a gift should not exceed £50 and would normally be much less. The decision should be fully documented.

Receiving gifts and hospitality

An employee or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence such situations as the outcome of an exam, the acceptance of a student into any School within the Trust, the award of business (contract) or the use of the Trust's Intellectual Property or other assets, or to benefit personally or for the benefit of any person connected to that person.

Unless you have been informed otherwise you may accept:

- a gift of nominal value, such as an advertising novelty, when it is customarily offered to others having a similar relationship with that individual or organisation;
- customary meals or entertainment provided that the expenses are kept at a reasonable level.

For the avoidance of doubt: gifts with a value of more than £25 and hospitality expected to cost in excess of £50 should be authorised by your line manager;

- gifts or hospitality in excess of £100 should be authorised by the CEO/Headteacher;
- hospitality or gifts in excess of £500 should be authorised by the Chief Financial Officer.

If an excessive gift or hospitality is found to have been accepted, then your manager will discuss the circumstances with you and agree how to deal with it e.g. a gift can be returned or steps can be taken to ensure that the acceptance of hospitality does not influence a decision or situation in favour of the giver. If excessive gift(s) or hospitality are accepted on more than one occasion or are found to have influenced decisions inappropriately, against Trust policy (or potentially illegally), then appropriate disciplinary procedures will be followed.

Compliance

All staff are required to comply with The Bribery Act 2010. The Chief Operations & Financial Officer (COFO) is responsible for the Trust's policy in relation to The Bribery Act 2010. Contact the COFO if further guidance is required.

Conflicts of interest policy

A conflict of interest occurs when you advance a personal interest (or that of others with whom you are connected) at the expense of the Trust.

Reference should be made to the Trust's Conflict of Interest policy.

Reporting bribery, corruption and non-compliance with this policy

If you know of, or have good reason to suspect that, an unlawful or unethical situation or that you suspect that either an act of bribery or non-compliance to this policy has occurred; you should report the matter to the CEO/Headteacher. Should reporting in this way be inappropriate, you should refer to the Whistleblowing Policy.

Monitoring

From time to time, Trust or School leaders, the Finance team or external auditors may review the register held by each school to ensure compliance. The register should be held in a central location in each school.

Links with other Policies

Conflicts of Interest

Disciplinary

Financial Regulations

