



# GIFTS, HOSPITALITY, ANTI-BRIBERY AND CORRUPTION POLICY

This policy is informed by the Christian values which are the basis for all of CDAT's work and any actions taken under this policy will reflect this.

*'Blessed are those who act justly, who always do what is right'*

*Psalm 106:3*

## 1. Introduction

It is Chester Diocesan Schools Trust (CDAT)'s policy to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. CDAT will comply with the Bribery Act 2010. We will ensure that all instances of alleged or suspected bribery will be investigated and may also be reported to the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the Police.

The purpose of this policy is to:

- comply with the Bribery Act 2010;
- set out the responsibilities of the Trust, and of those working for us, in observing and upholding our position on bribery and corruption;
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues;
- ensure all instances of alleged or suspected bribery will be investigated and may also be reported;
- share good practice within the Trust.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption CDAT could face an unlimited fine and damage to its reputation. We therefore take our legal responsibilities very seriously.

In this policy, 'third party' means any individual or organisation that workers come into contact with during the course of their work for CDAT, and includes actual and prospective pupils and parents, suppliers, business contacts, agents, advisers, and government and public bodies.

It is expected that each of our schools will adopt this policy and implement it in a way that ensures the policy is adhered to in full.

## 2. Who is covered by this policy?

This policy applies to all individuals working for CDAT at all levels (whether permanent, fixed-term or temporary), and includes governors, volunteers, agents or any other person associated with the Trust (collectively referred to as 'workers' in this policy).

## 3. What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any business or personal advantage.

## 4. Gifts & Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts or hospitality is not prohibited, 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 complies with local law;
- it is given in CDAT's name, not in an individual's name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly;
- gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the Chief Executive Officer of the Trust or the school Headteacher.

The practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

## 5. What is not acceptable?

It is not acceptable for workers (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an advantage for CDAT will be received, or to reward an advantage already received;
- give, promise to give, 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 that they know or suspect is offered with the expectation that it will obtain an advantage for them;
- accept a gift or hospitality from a third party if they know or suspect that it is offered or provided with an expectation that a business advantage will be provided by CDAT in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy, or engage in any activity that might lead to a breach of this policy.

## 6. Donations

CDAT only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made in CDAT's name or on behalf of a school without the prior approval of the Chief Executive Officer of the Trust or Headteacher of the School.

## 7. Workers' responsibilities

Workers must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

A worker must notify the Chief Executive Officer of the Trust or Headteacher of the School as soon as possible if he/she believes or suspects that a breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

## 8. Record keeping

CDAT keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties. All central workers must make the Chief Executive Officer aware and all school workers must make the school/School Business Manager aware of all hospitality or gifts accepted or offered over the value of £25 which will be subject to managerial review. Workers must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with CDAT's expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book' to facilitate or conceal improper payments.

## 9. How to raise a concern

Workers are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedure set out in the Whistle-blowing Policy

## 10. Policy Review

This policy was updated and agreed by the CDAT Board in September 2023. In line with recommended best practice, it will be reviewed again after two years, in August 2025, unless earlier review is necessitated by changes in legislation etc.