ST PETER'S RC
PRIMARY SCHOOL

Gifts, Hospitality and Bribery Policy

Approved by Gareth Rein	Headteacher	Date: 07.10.25
Approved by P M McManus	Chair of Governors	Date: 07.10.25

Gifts, Hospitality and Bribery Policy

Introduction

The principle of integrity requires that staff and Governors of St Peter's RC Primary School 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 St Peter's RC Primary School Policies and Procedures. This procedure applies to all School staff members.

Gifts
Giving Gifts and Hospitality

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

Accepting Gifts and Hospitality

- 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 St Peter's RC Primary 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, following which they will be allocated as appropriate.
- Personal gifts may not be sought, either by formal request or suggestion, 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 offers of gifts or hospitality whether accepted or not must be recorded in the school's gifts and hospitality register, which is maintained by the Administration Officer.

Supplier Special Offer Gifts

- Gifts are sometimes offered by suppliers with the purchase of items. All special offer gifts are the property of St Peter's RC Primary 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 the school. The timing of hospitality in relation to a procurement or purchasing decision that the 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 the school in a member of staff attending a sponsored event, the attendance should be formally approved by the Headteacher and recorded as appropriate.
- 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 Administration Officer.
- Other hospitality may be accepted where:
- You are representing the school in the community or are imparting information about the school to the public.
- An event is clearly part of the life of the community or where the 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.

Expense Claims

- Where hospitality is to be provided by St Peter's RC Primary School, this should be approved in advance by a member of the Leadership Team. The Headteacher or Administration Officer 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, gifts or tokens provided by St Peter's RC Primary School should not be extravagant. The school may not use delegated budget for the provision of tokens or hospitality. Governors have agreed that School Fund funds will be used for any expenses incurred in this respect. However, funds in this account are limited and expenditure will be strictly monitored.
- Claims for reimbursement of expenses should be made on the relevant Expenses Claim form and receipts should always be enclosed.

The DO's and DON'Ts

DO	DON'T
● Read and follow the guidance on gifts and hospitality.	● Accept any gifts or hospitality which have a value of more than £25 without the approval of the Headteacher, or the Chair of Governors as necessary.
● Seek advice from the Headteacher or Chair of Governors if you are in doubt.	● Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process.
● Record all offers of gifts and hospitality which have a value of more than £25 in the School's register, whether accepted or not	● Accept cash or monetary gifts.
● Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything.	● Accept a gift or hospitality as an inducement or reward.

● Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality.	● Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time.
● Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body.	● Accept a gift or hospitality which you or a member of the public would think is lavish, extravagant or excessive, even if the hospitality is taken in your own time.
● Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept.	● Accept gifts or hospitality offered to your husband, wife, partner, family member or friend.
● Consider paying for yourself if offered any hospitality by a supplier or third party.	

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.
- The Governors and Senior Leadership Team 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.

ALN Statement

St Peter's RC Primary School is committed to providing an inclusive learning environment in line with the Additional Learning Needs and Education Tribunal (Wales) Act 2018 and the ALN Code for Wales 2021. We are dedicated to identifying, assessing, and making provision for Additional Learning Needs at the earliest opportunity, working in collaboration with pupils, parents, and relevant professionals. Our approach is based on promoting equity, respecting diversity, and ensuring that all pupils are provided with opportunities to meet success.

UNCRC statement

St Peter's RC Primary School is committed to creating a community where children's rights are respected, upheld, and fulfilled. We aim to foster a rights respecting environment that empowers pupils to become active and responsible citizens. Through collaboration with pupils, staff, parents/carers and governors, we aim to embed the United Nations Convention on the Rights of the Child (UNCRC) into our policies and practice.

Appendix 1

RECORD OF GIFTS & HOSPITALITY (accepted*/refused*)

*Delete as appropriate

This form must be completed by any member of staff or governor receiving or declining a gift or hospitality, which relates to their position in the School and has a value of more than £25. If the individual is concerned about the likely "level" of any gift or hospitality that he or she may receive, agreement from the Headteacher or Chair of Governors must be obtained in accordance with the School's guidance.

Name of staff member/Governor:	
Position Held at the School:	
Individual, company or organisation offering gift or hospitality:	
Date, time and venue:	
Gift/Hospitality Accepted* or refused*	
Nature and approximate value of hospitality/gift **If accepted, has the gift been retained for personal use or for School use?**	
If accepted, reason for accepting hospitality/gift:	
Signed:	
Date:	
Approved by:	
PLEASE RETURN COMPLETED FORM TO THE SCHOOL OFFICE FOR RETENTION ON THE GIFTS & HOSPITALITY REGISTER.	