



The Lord Almighty is holy. His glory fills the world. (Isaiah 6:3)

We strive to live holy lives through

“... love that is patient and kind” that “never gives up”

enabling us to “Go out into the world, and love the people we meet.”

(Saint Paul and Saint Teresa)

All Saints Academy Bribery Prevention, Gifts & Hospitality Policy

Date of Policy	February 2024	Responsibility	CFO
Date of review	February 2027	Approval date	February 2024
Commitment to equality	This policy does not impact the trust's commitment to equality.		

This policy outlines All Saints Inter-Church Academy's commitment to legal and ethical conduct in all operations, specifically focusing on the prevention of bribery and the appropriate handling of gifts and hospitality. It applies to all members of the Academy, including council members, staff, contractors, consultants, agents, and any associated persons. This policy is designed in accordance with The Bribery Act 2010 and aims to maintain the Academy's reputation for integrity and probity.

1. Anti-bribery Policy

All Saints Inter-Church Academy strictly prohibits bribery in any form. Bribery is defined as offering, giving, receiving, or soliciting anything of value to influence the actions of an official or other person in a position of trust. Bribery is illegal and against the ethical standards of our Academy. Engaging in bribery will have legal consequences and will adversely affect the individual's and the Academy's reputation.

2. Dealing with Contractors, Agents, and Business Partners

Due diligence is required in selecting and maintaining relationships with contractors, agents, and business partners. This includes ensuring they are aware of and comply with our anti-bribery policy. The Academy will conduct regular reviews and audits of these relationships, particularly with international agents, to ensure alignment with the Bribery Act 2010.

3. Giving Gifts and Hospitality

All members of the Academy must avoid giving gifts or hospitality that could be perceived as bribes. Any gift or hospitality given must be reasonable, modest, and intended only to reflect respect or gratitude. Gifts or hospitality should not exceed a predetermined value and must be reported and recorded transparently.

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;

Purchase of alcohol 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.

4. Receiving Gifts and Hospitality

Members of the Academy should exercise caution when accepting gifts or 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.

5. Conflicts of Interest Policy

All conflicts of interest, or potential conflicts, must be disclosed immediately. The Academy will provide guidance on managing these conflicts to ensure that they do not influence operational

integrity.

6. Reporting Bribery, Corruption, and Suspected Non-Compliance

The Trust's Anti-Fraud, Corruption and Whistleblowing Policy provides a channel to allow staff, students and all members of Trust bodies (e.g. Trust Committees) to raise, at high level, concerns or information which they, in good faith, believe provides evidence of malpractice or impropriety. Individuals discovering apparent evidence of malpractice, bribery, impropriety or wrongdoing within the Trust should feel able to disclose the information appropriately without fear of reprisal.

7. Record-Keeping

Accurate and detailed records of all gift-giving and hospitality activities will be maintained to ensure transparency and accountability.