



# Chiltern Way Academy

Turning Futures Around

## **Anti-Bribery, Gifts & Hospitality Policy**

**Responsibility for this policy (job title): Chief Financial Officer**

**Responsibility for its review: FPGP**

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## **Anti-bribery**

### **Introduction**

It is Chiltern Way Academy Trust's (CWAT) 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. CWAT will comply with the Bribery Act 2010.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption the Academy 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 CWAT, and includes actual and prospective students and parents, suppliers, business contacts, agents, advisers, and government and public bodies.

### **Who is Covered by the Policy?**

This policy applies to all individuals working for CWAT at all levels (whether permanent, fixed-term or temporary), and includes trustees, volunteers, agents or any other person associated with the Academy.

### **What is Bribery?**

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

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

## **Gifts and Hospitality**

### **Introduction**

This Policy aims to lay down guidelines which will enable you to meet the aims and core values of the Academy and to protect you from misunderstanding or criticism. Inevitably some issues will affect Trustees and senior post holders more than others and some breaches of the policy may be regarded more seriously for those in such positions.

The principle of integrity requires that Trustees and staff 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.

### **Gifts**

You must not accept cash, or personal gifts with a significant monetary value, under any circumstances, although items of nominal value, (i.e. approximately £25.00 or below) or free promotional pens, calendars, diaries and similar items, may be accepted.

Personal gifts may not be solicited 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.

All gifts received must be recorded in the Academy's hospitality & gifts register, which will be maintained by the CFO.

### **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 Academy. The timing of hospitality in relation to procurement or purchasing decisions that the Academy may be taking is especially sensitive. Above all, you must never solicit hospitality. As a general rule, you should not accept hospitality that the Academy would not reciprocate in similar circumstances.

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. If necessary, you should pay your share of any costs, and claim these in the ordinary way.

### **Acceptable Hospitality**

You may accept modest working meals and light refreshments without making any declaration.

Other hospitality may be accepted, for instance where:

- There is a genuine need to impart information or represent the Academy in the community
- An event is clearly part of the life of the community or where the Academy 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

Before accepting any hospitality, approval should be sought from either the Chair or Vice-Chair in respect of Trustees or the CEO, Heads of Campus or the Chief Finance Officer in respect of employees. In exceptional circumstances retrospective approval may be obtained. All hospitality received must be recorded in the Academy's hospitality & gifts register (see paragraph 6 below) with the exception of working meals, receptions etc.

### **Sponsorship**

Where an outside organisation wishes to sponsor or is seeking to sponsor the activity of the Academy, whether by invitation, tender or negotiation, or voluntarily, the basic conventions concerning the award of contracts, and acceptance of gifts or hospitality apply.

### **Hospitality Register**

The CFO will maintain a Hospitality Register for the Trustees and for senior post holders. It will be the responsibility of individuals to ensure that the CFO is notified of all hospitality given or received.

### **Expense Claims**

Where hospitality is to be provided by the Academy this should be approved in advance by the Chair or Vice-Chair in respect of Trustees or the CEO, Heads of Campus or CFO in respect of employees. In exceptional circumstances retrospective approval may be obtained. All hospitality provided must be recorded in the Academy's Hospitality & Gifts register.

Any hospitality provided should not be extravagant and a maximum figure of £40 per head should be used as a guideline.

Claims for reimbursement of expenses should be made on the relevant Expense Claim Form and submitted to the CFO once authorised. Receipts should always be enclosed.

Alternatively authorised invoices from the suppliers can be paid in accordance with the normal procedures.