



Batford Nursery School & Day Care

BATFORD NURSERY SCHOOL Gifts and Hospitality Policy (Anti-Bribery)

Version	1.4
Based on Model Policy	N/A
Review body:	Full Governing Body
Date issued:	February 2026
Review frequency:	Two years
Target audience:	All Stakeholders

Version	Date	Notes
V1.0	May 2018	New statement approved
V1.1	Jan 2020	New policy format
V1.2	Jan 2022	Reviewed without amendment
V1.3	Feb 2024	Reviewed without amendment
V1.4	Mar 2026	Reviewed without amendment

Batford Nursery School and Day Care is committed to:

- Safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.
- Eliminating discrimination, advancing equality of opportunity and fostering good relations between different groups. These factors were considered in the formation and review of this policy and will be adhered to in its implementation and application across the whole school community.
- Promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs: any school member or visitor expressing opinions contrary to fundamental British Values, including 'extremist' views, will be actively challenged.

BUILDING STRONG FOUNDATIONS FOR OUR CHILDREN

Batford Nursery School and Day Care, Holcroft Road, Harpenden AL5 5BQ

1. Anti-Bribery

Batford Nursery School is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff and governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the School.

The School is committed to countering bribery and corruption in all forms and will not tolerate it in any of its activities. Staff and governors and all those working or performing any service for or on behalf of the School must neither accept nor give bribes and must:

- act honestly with integrity at all times to safeguard the School's resources for which they are responsible;
- comply with the law (both in spirit and in the letter);
- abide by this policy.

In order to protect all adults involved with the School and the reputation of the School from accusations of bribery or corruption, Governors and Staff must take extreme care that none of their dealings, directly, or indirectly, could be deemed as a reward or benefit. In line with the Bribery Act 2010, the school will keep a Gifts and Hospitality Register if necessary.

2. Prevention of Fraud and Bribery Act 2010

Under this act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so. The Act makes it a criminal offence to:

- Offer, promise or give a bribe,
- Request, agree to or accept a bribe,
- (by an organisation) fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.

It is unacceptable to:

- Give, promise to give, or offer payment, gifts or hospitality with the expectation or hope that a favourable advantage will be received, or to reward a favourable advantage already given
- Give, promise to give, or offer payment, gifts or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- Accept payment from a third party that is offered with the expectation that it will obtain a favourable advantage for them, whether known or suspected
- Accept a gift or hospitality from a third party if it is offered or provided with an expectation that a favourable advantage will be provided by the School in return, whether known or suspected
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in activity in breach of this policy.

3. Definitions

A Gift is any item or service which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public. Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public.

4. Gifts and Hospitality Policy

It is common for appreciative parents to register their thanks for the work of staff in the form of a small personal gift, e.g. at Christmas or as children leave the school. If these are valued at less than £30 these are perfectly acceptable without reference to senior members of staff. These will not need to be added to the Gifts and Hospitality Register ("the register").

Where a more valuable gift, benefit or service is offered, which is to the good of the school rather than an individual, then it must be referred to the Headteacher (or to the Chair of Governors in the case of gifts to the Headteacher) for approval within their discretion. These items, if approved, will be added to the register.

Hospitality in the form of working lunches, coffees, *etc.*, are perfectly acceptable, and it would be appropriate to offer this to gain cordial relationships in support of good relationships with visiting staff or business colleagues. These would not be added to the register.

If a member of staff is offered a gift or hospitality other than light refreshments whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school, it is their responsibility to discuss this with the Headteacher before accepting such benefit. If approved, this would need to be added to the register.

If not accepting a gift would be regarded as causing offence, (such as a sudden and unexpected gift, or one where it would cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Headteacher as soon as possible who may decide to return the gift, discuss it with the Chair of Governors, or/and may donate it to a school raffle/fair or a charitable cause.

Examples of gifts or hospitality that should not be accepted are cash or monetary gifts; gifts or hospitality offered to a member of an employee's or governor's family; gifts or hospitality from a potential supplier or tendered in the immediate period before tenders are invited or during the tender process.

Where a gift is received on behalf of the school, the gift remains the property of the school. All gifts/hospitality over the value of £30 must be recorded in the Gift and Hospitality Register, whether accepted or not.

5. Instances of non-compliance

In the case where it is believed a staff member or governor has not declared a gift or hospitality then a formal investigation will be instigated by the Headteacher/Chair of Governors. This may take the form of disciplinary procedures in the case of employees if misconduct is indicated.

Breaches of this policy may also need to be reported to the police, with the possibility of civil and criminal prosecution.

6. Related Policies

The anti-bribery and gifts and hospitality policies must be considered alongside the following policies and procedures which collectively set out the School's approach to reducing bribery risks

- Whistle blowing
- Code of Conduct for staff
- Code of Conduct for Governors
- Contract Procedure Rules and Regulations and Procurement Regulations
- Recruitment and Disciplinary Procedures