

Hospitality & Gifts Policy

Within Derby Diocesan Board of Education's (DBE) vision one of the ways in which we look to support our diocesan family of schools to Transform, Grow & Build is by offering hospitality, hope and love to children, young people and households.

Being hospitable and sharing in hospitality extends to all of those we interact with, including our working partners, those within or with close links to the diocesan family and equally to any external 3rd party with whom we interact.

It is also the case however that Derby DBE values its reputation for ethical behaviour and financial probity and reliability. Therefore, it has a policy that affirms that any gifts or hospitality must be given and received in ways which are in line with our Articles of Association, our charitable status and compliant with the Bribery Act 2010.

Bribery is a criminal offence. The Board and those acting on its behalf does not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor does it or will it, accept bribes or improper inducements, or use a third party as a conduit to channel bribes.

Derby DBE is committed to the prevention, deterrence and detection of bribery.

Bribery

Very generally, this is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for already having done so. An inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

The Bribery Act

The Bribery Act 2010 ([Bribery Act 2010 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2010/23)) makes it an offence to offer, promise or give a bribe (Section 1). It also makes it an offence to request, agree to receive, or accept a bribe (Section 2). These are 2 of the four key offences under the Act. The four are listed as:

- bribery of another person (section 1)
- accepting a bribe (section 2)
- bribing a foreign official (section 6)
- failing to prevent bribery (section 7)

Bribery is not tolerated

It is unacceptable to:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- 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 you know, or suspect is offered with the expectation that it will obtain a business advantage for them
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return

- 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.

Facilitation payments

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

Gifts and hospitality

The Act does not prohibit genuine hospitality. Reasonable, proportionate gifts and hospitality made in good faith and that are not lavish are acceptable.

Any gifts or hospitality with a value / estimated value in excess of £15 should be declared by notifying the Diocesan Director of Education (DDE) for approval. The DDE will inform the Senior Business and Operations Manager who will maintain a register Gifts & Hospitality Register.xlsx of the gifts and hospitality received. This will be shared with the Board trustees.

In the case of the DDE receiving gifts / hospitality that qualify for declaration, the DDE will notify the Chair of the DBE for approval.

Staff responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Board or under its control. All staff are required to avoid activity that breaches this policy.

You must raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

As well as the possibility of civil and criminal prosecution, staff who breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.