



Gifts, Hospitality, Anti-Bribery & Anti-Corruption Policy

September 2025

Approved by	Date	Review Schedule	Date of next review
Trust Board	24/09/25	Every 2 years	Sept 2027

Saint Paul teaches, 'the body is not made up of one part but of many.'

Chester Diocesan Learning Trust recognises and nurtures the unique gifts, skills and talents within our whole community.

We will empower adults and children to grow in character and mind, shaping a better future.

Shaping better futures; one body, many parts.

Contents

1. Introduction	3
2. Who is covered by this policy	3
3. What is bribery	4
4. Gifts, hospitality, awards and prizes	4
5. What is not acceptable	4
6. Donations	4
7. Workers' responsibilities	4
8. Record keeping	5
9. How to raise a concern	5
10. Policy review	5

Please note that this document includes links to external documents and guidance, which can be accessed by clicking on the underlined references.

1. Introduction

It is Chester Diocesan Learning Trust (CDLT)'s 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. We will implement and enforce effective systems to counter bribery. CDLT will comply with the Bribery Act 2010.

All instances of alleged or suspected bribery will be investigated and may also be reported to:

- the Director of Public Prosecutions
- the Serious Fraud Office
- the Revenue and Customs Prosecutions Office
- and the Police

Purpose of this policy:

- Comply with the Bribery Act 2010
- Set out the responsibilities of the Trust and all workers in upholding our anti-bribery position
- Provide information and guidance on recognising and dealing with bribery and corruption
- Ensure all instances of alleged or suspected bribery are investigated and potentially reported
- Share good practice across the Trust

Bribery and corruption are criminal offences. Individuals may be punished with up to 10 years' imprisonment, and CDLT could face an unlimited fine and significant reputational damage. We take our legal responsibilities very seriously.

Definition:

In this policy, *'third party'* means any individual or organisation workers come into contact with during the course of their work for CDLT. This includes actual and prospective pupils and parents, suppliers, business contacts, agents, advisers, and government and public bodies.

All CDLT schools are expected to adopt and implement this policy in full.

2. Who is Covered by this Policy?

This policy applies to all individuals working for CDLT at all levels, whether permanent, fixed-term, or temporary. This includes:

- Staff
- Governors
- Volunteers
- Agents
- Any other person associated with the Trust
(Collectively referred to as *'workers'* in this policy)

All workers are expected to uphold the Seven Principles of Public Life (Nolan Principles):

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

3. What is Bribery?

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

4. Gifts, Hospitality, Awards and Prizes

This policy does not prohibit normal and appropriate hospitality, whether given or received.

The giving or receiving of gifts/hospitality/awards/prizes is permitted only if:

- It is not intended to influence or reward a business advantage
- It complies with local law
- It is given in CDLT's name, not an individual's
- It does not include cash or cash equivalents (e.g., gift vouchers)
- It is appropriate and customary (e.g., small Christmas gifts)
- It is of appropriate value and timing
- It is given openly, not secretly
- Government officials are not involved without prior approval from the CEO or, if delegated, the Headteacher

The key test: *Would a reasonable person view the gift, hospitality, award or prize as justifiable and appropriate given the circumstances?*

5. What is Not Acceptable?

Workers (or someone on their behalf) must not:

- Give, offer, or promise a gift/hospitality/award/prize with the expectation of gaining advantage for CDLT
- Offer payments to government officials to expedite routine tasks
- Accept payments or gifts from third parties in exchange for business advantage
- Retaliate against anyone refusing to commit bribery or raising concerns
- Engage in any activity that might breach this policy

6. Donations

All Related Party Transactions must follow the Trust's policy and the Academy Trust Handbook.

CDLT only makes legal and ethical charitable donations. No donation must be offered or made in the Trust's name without prior approval from:

- The Chief Executive Officer, or
- The Headteacher (where appropriately delegated)

7. Workers' Responsibilities

All workers must:

- Read, understand and comply with this policy
- Prevent, detect and report bribery and corruption
- Avoid any activity that could lead to a breach

If a worker suspects a potential breach, they must notify:

- The CEO, or
- The Headteacher (where appropriately delegated)

Consequences:

- Employees breaching this policy may face dismissal for gross misconduct
- CDLT may terminate contracts with other associated individuals or entities

8. Record Keeping

CDLT will:

- Maintain a register of business and pecuniary interests, including gifts/hospitality/award/prizes over **£25** for trustees, members, senior leaders, and financial personnel
- Keep financial records and internal controls to evidence payments to third parties
- Review all **hospitality/gift/award/prizes offers over £25** — these must be declared to the CEO (central) or School Business Manager (school)
- Require all expense claims to comply with the CDLT Expenses Policy, including detailed reasons for third-party spending
- Prohibit 'off-book' accounts

9. How to Raise a Concern

The **Whistleblowing Policy**, available on the Trust's website, provides guidance on reporting concerns confidentially.

All workers are encouraged to raise any concerns or suspicions of malpractice as early as possible.

10. Policy Review

This policy was approved by the CDLT Board in September 2025.

It will be reviewed **every two years**, or earlier if required by legislative or regulatory changes.