



## Leicester Diocesan Board of Education: Gifts & Hospitality Policy

### Policy Statement – Gifts and Hospitality

The Leicester Diocesan Board of Education (LDBE) is committed to the Diocesan Vision & Purpose to be 'Shaped by God'. One of the Values linked with 'Shaped by God' is that we will seek to *welcome newcomers*, helping those who come close to the church to feel cherished by God. One of the ways we do this is by being hospitable and sharing in hospitality with our working partners. However, LDBE through this policy affirms that any gifts or hospitality must be given and received in a way which is in line with our Articles of Association, our Charitable status and is compliant with the Bribery Act 2010. LDBE values its reputation for ethical behaviour and financial probity and reliability.

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.

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

### Bribery

Is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

### The Bribery Act

There are four key offences under the Act:

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

The Bribery Act 2010 ([http://www.opsi.gov.uk/acts/acts2010/ukpga\\_20100023\\_en\\_1](http://www.opsi.gov.uk/acts/acts2010/ukpga_20100023_en_1)) 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).

### 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, but should be declared where worth more than £15 by notifying the Diocesan Director of Education (DDE) who will keep a register of gifts and hospitality received. Gifts offered by LDBE will also be recorded. The DDE will enter any gifts received personally on the register and will notify the Chair of the DBE and the Business & Finance Committee. In the case of staff, the Line Manager should also be notified.

### **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.

### **Approving and reviewing**

This policy was approved by the board in September 2022 will be reviewed in September 2025.