

Gifts and Bribery Policy



Little Fishes aims for the highest possible standards of ethical conduct in all of its activities and expects the conduct of individual employees to reflect this. 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. Dishonesty of any kind will be treated as a serious matter, which may amount to gross misconduct and therefore to dismissal without notice.

Gifts and Hospitality

- The acceptance of gifts and hospitality from parents/carers, potential parents/carers, suppliers and potential suppliers must not give the appearance that employees of Little Fishes may be unduly influenced in the decisions that they make in respect of parents/carers or suppliers or in any other aspect of their work.
- All gifts and hospitality given, of whatever value, must be entered into the Gifts and Hospitality Register kept by the Manager. This applies to both gifts given to individuals and gifts given to Little Fishes, other than donations of second-hand items such as books, toys or craft materials.
- No personal gifts of a value in excess of £20 or gifts to Little Fishes in excess of £100 should be accepted from individual parents/carers, potential parents/carers, suppliers and potential suppliers without express permission from your line manager.
- No personal gifts of a value in excess of £100 should be accepted from groups of parents/carers without express permission from your line manager.
- Acceptance of hospitality, such as lunch or drinks, should be kept within common sense limits and should always be authorised by your line manager.
- If a gift or hospitality potentially falls outside the usually acceptable range, you should, at the time it is offered, state that you cannot accept until you have discussed with your line manager, in accordance with Little Fishes' policy.
- If a parent or carer asks if gifts are allowed, you should refer them to this policy, whilst also making it clear that there is no expectation or obligation. If, in recognition that many parents do like to give gifts to staff, a notice is placed in eg the Little Fishes newsletter suggesting appropriate gifts, this should refer to this policy.
- You may also be instructed to return any gifts which your manager considers to be inappropriate, or to refuse to accept hospitality from a particular person or business. Failing to obey such an instruction will be treated as misconduct.
- No gifts or hospitality should be offered to parents/carers, potential parents/carers, suppliers or potential suppliers without agreement of your line manager, other than the

following, which are deemed to be part of the church's wish to share God's love with our community, and do not need to be entered into the Gifts and Hospitality Register:

- drinks and light refreshments whilst in the church building, such as at an end-of-term celebration, during a visit by a prospective parent or during a parent consultation, and
 - books or other small gifts at the end of the academic year or when a child leaves Little Fishes.
- All other gifts and hospitality given need to be entered into the Gifts and Hospitality Register.
 - When considering whether a gift or hospitality is acceptable, your line manager will consider whether:
 - it has clearly been given for an appropriate reason, usually as an act of appreciation,
 - the value and nature of the gift or hospitality is proportionate to the occasion,
 - acceptance will create any obligation or be seen to confer any undue influence on the giver,
 - the gift or hospitality has been offered openly, and
 - the gift or hospitality has been appropriately documented.

If necessary, your line manager will discuss the issue with the Chair of the Little Fishes Management Group before making a decision.

- Allowing gifts or hospitality to influence any business decisions that you may make on behalf of Little Fishes or to otherwise influence the way in which you perform your duties is an act of gross misconduct which will usually result in dismissal.
- It is also an act of gross misconduct to seek to influence any other person to behave in an improper way or to confer a business advantage on you or Little Fishes through the giving of any gift or hospitality.

Bribery

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your line manager or the Church Manager.

Specifically, you must not:


- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;

- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your line manager as soon as possible.

Legal framework

- Bribery Act 2010

<i>This policy was adopted by:</i>	Little Fishes Pre-school on 6 September 2024
<i>next review date:</i>	July 2025
<i>Signed on behalf of the provider by</i>	 Alison Carr, Chair of Little Fishes Management Group