GIFTING POLICY

Transparent gifts, hospitality, donations and professional boundaries

EFFECTIVE: SEPTEMBER 2026 | REVIEW: SEPTEMBER 2027 | IMPACT AP

1 | PURPOSE AND SCOPE

Prevent conflicts of interest, favouritism, bribery and inappropriate relationships while allowing proportionate expressions of thanks. Applies to staff, governors, volunteers, suppliers and gifts involving learners or families. Use alongside Staff Code of Conduct, Rewards, Safer Recruitment, Whistleblowing and Data Protection. A gift must never influence a safeguarding, placement, employment or procurement decision.

2 | LEARNER REWARDS AND STAFF GIFTS

Learner rewards should use the agreed Rewards Policy and approved resources, with a clear educational or pastoral purpose. Staff must not buy secret, personal or unusually valuable gifts for learners. No gift may require affection, secrecy, personal contact, photographs or special access. Report boundary concerns promptly through adult-conduct routes.

3 | OFFERS FROM FAMILIES

Tell Kate promptly about a gift offered by a family, recording who offered it, the circumstances and approximate value. Modest shared tokens may be accepted where authorised and unlikely to influence decisions. Politely decline cash, personal loans and items creating obligation. Do not imply that gifts are expected or affect a learner's treatment.

4 | GIFTS AND HOSPITALITY FROM SUPPLIERS

Declare offers connected with purchasing, commissioning or referrals before accepting. Consider timing, frequency, value and the giver's expectations. Decline anything that could compromise judgement or appear to reward preferential treatment. A commercial discount or hospitality is not a reason to choose an unsuitable provider or relax safeguarding checks.

5 | AUTHORISATION AND INDEPENDENCE

Kate authorises ordinary decisions only when unconflicted. Gifts or hospitality involving Kate are reviewed by an unconflicted governance lead, normally Fiona Styler, with Jennifer Maunsell as an independent alternative. No person approves their own offer or benefit. Where impartial review is unavailable, decline or defer acceptance and record why.

6 | REGISTER AND CUMULATIVE VALUE

Maintain a gifts and hospitality register including offers declined: date, giver, recipient, item, estimated value, reason, conflict assessment, decision and approver. Review repeat small offers together rather than treating each in isolation. Record uncertainty about value and seek advice before acceptance. Keep personal details confidential and retain records under the appropriate schedule.

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7 | DONATIONS AND FUNDRAISING

Agree the purpose and conditions of donations before acceptance and record them transparently. Donations must not buy access to learners, confidential data or influence over admissions or safeguarding. Check whether branding, photography or publicity requests create risks. Money and equipment pass through authorised accounts and inventories, with suitable financial controls and acknowledgement.

8 | DECLINING OR RETURNING

Explain politely that professional boundaries require an item to be declined, returned or shared through an authorised route. Do not embarrass a learner or family. Record the decision and practical handling. If returning is impossible or unsafe, obtain an independent decision about charitable donation or another transparent disposal route; staff must not keep the benefit privately.

9 | BRIBERY AND SAFEGUARDING CONCERNS

Report suspected inducements, coercion, unexplained benefits or grooming to the appropriate lead immediately. Preserve messages and records; do not investigate privately or negotiate a favour. Use the independent route when a leader is implicated and contact statutory agencies where required. Genuine concerns must not lead to retaliation against the reporter or learner.

10 | MONITORING AND COMMUNICATION

Explain this policy during induction and to suppliers or families when needed. Kate and governance review register patterns, conflicts and compliance at least termly. Seek finance or legal advice for unusual offers. Complaints about handling follow the Complaints Policy; safeguarding concerns always receive a safeguarding response regardless of gift value.

11 | POLICY CONTROL AND REVIEW

Policy owner: Kate Willis, Principal and Proprietor. Effective date: September 2026. Scheduled review: September 2027, or sooner after relevant changes, incidents or feedback. Record actual governance approval and implementation decisions and brief staff on their duties. These policy dates do not assert that approval, staff training or operational checks have already occurred. Use the Complaints or independent reporting route for concerns about implementation.

12 | SOURCES AND RELATED DOCUMENTS

Bribery Act 2010; Impact Staff Code of Conduct, Rewards and Whistleblowing policies.

legislation.gov.uk/ukpga/2010/23/contents

Check current versions and apply according to Impact's legal and commissioning status.