Anti-Bribery, Gifts and Hospitality Policy

Steffi Hesketh Tutoring – online one-to-one and group tutoring

Document control	**Details**
Document	Anti-Bribery, Gifts and Hospitality Policy
Organisation	Steffi Hesketh Tutoring (sole trader), online-only tutoring, based in Southampton, Hampshire
Business address	32 Inver Way, Southampton, SO19 1SF
Policy owner	Steffi Hesketh-Spells, Owner and Designated Safeguarding Lead (DSL)
Deputy DSL	Shim Amin, contactable via the business email (steffiheskethtutoring@gmail.com). If neither the DSL nor the Deputy DSL can be reached, follow the alternative route in the Safeguarding and Child Protection Policy (contact children's social care, the police or the LADO directly).
Contact	steffiheskethtutoring@gmail.com, 07802 828910
Version	1.0
Effective date	November 2026
Review date	November 2027, or sooner after a serious incident, a change in law or guidance, or a change to the Hampshire contract
Applies to	Steffi Hesketh-Spells, all self-employed tutors, cover tutors and anyone else working for or on behalf of the business
Contract	Hampshire County Council SEND Alternative Provision Register Agreement CS25116 and Tutoring Call-Off Contract CS25116A

Document control	Details
Approved by	Steffi Hesketh-Spells. Signature: Steffi Hesketh-Spells, Owner and Designated Safeguarding Lead. Date approved: 9 November 2026

1. Purpose

Steffi Hesketh Tutoring does not tolerate bribery or corruption in any form. This policy:

- explains how we comply with the Bribery Act 2010;
- meets the anti-bribery policy requirement in clause 7.4 of the Hampshire SEND AP Register Agreement CS25116;
- sets out our rules on tips, gratuities, gifts and rewards from pupils and families, as required by clauses 20.12 to 20.15 of the Call-Off Contract.

Gifts can also be a safeguarding issue. Grooming can involve gifts or special treatment, and children can be exploited financially. This policy should therefore be read with the Safeguarding and Child Protection Policy, which adopts the principles of Keeping Children Safe in Education (KCSIE) as good practice.

2. What is bribery?

Bribery means offering, promising, giving, asking for, agreeing to receive or accepting any financial or other advantage to make someone act improperly, or to reward them for doing so. Under the Bribery Act 2010 it is an offence to:

- bribe another person;
- be bribed;
- bribe a foreign public official.

A business can also commit an offence if someone acting for it pays a bribe and the business did not have adequate procedures to prevent it.

Examples relevant to us:

- offering a gift, payment or favour to a Council officer, SEN case officer, school or anyone involved in assessing or referring pupils, to win placements or a better ranking;
- a tutor accepting money or a gift from a family in return for exaggerating progress, falsifying attendance or session records, or completing a pupil's assessed work;

- a "facilitation payment" (a small payment to speed up a routine process). These are bribes and are not allowed.

3. Our rules

Steffi Hesketh-Spells, all tutors, and anyone acting for the business must not:

- offer, promise, give, request or accept a bribe of any kind;
- make any payment, in cash, gift or in kind, to Council employees or anyone who may be involved in assessing potential pupils (Call-Off clause 20.14);
- ask for any tip, gratuity, reward, collection or charge for Council-funded services (clause 20.13);
- charge a Council-referred pupil or their family for any service funded under the contract, unless the Council has agreed this in writing (clause 20.15);
- falsify session, attendance, progress or invoice records;
- use a third party to do any of the above.

4. Gifts, hospitality and tips

4.1 From pupils and families

- **Council-referred pupils:** tutors must not ask for or accept money, cash-equivalent gifts (vouchers, gift cards, bank transfers), tips or gratuities in any amount.
- A small, low-value token of thanks may be accepted, such as a card, a handmade item, a pupil's drawing, or a small item worth no more than £15. It must be offered openly by the parent or carer, for example at the end of term. Anything over that value must be politely declined.
- Gifts must never be accepted if they are offered:
    - privately by a child;
    - in secret;
    - repeatedly;
    - around a decision such as a review, a report or a change of tutor.
- Tutors must not give personal gifts to pupils. Normal learning rewards that are part of the lesson plan (for example praise, certificates or stickers sent through the parent) are fine.
- Tutors must not take on any financial role for a pupil or family, such as acting as power of attorney or receiver. Any such request must be reported to Steffi, who will tell the Council (Call-Off clause 20.16).

4.2 To or from the Council and other organisations

- We do not give gifts or hospitality to Council employees, schools or other commissioners.

- We do not accept gifts or hospitality from suppliers, referrers or other providers where this could influence, or appear to influence, a decision.
- Modest refreshments at a normal business meeting or training event are acceptable.

4.3 Recording gifts

All gifts offered to a tutor or the business are recorded in the gifts and hospitality register (Appendix A), whether accepted or declined, promptly.

5. Conflicts of interest

Tutors must tell Steffi about any personal, family or financial link to a pupil, a family, a Council officer or another provider that could affect, or appear to affect, their work. Steffi records the conflict and decides how to manage it, for example by allocating a different tutor.

6. Raising a concern

- Anyone who suspects bribery, an improper gift or a conflict of interest should tell Steffi straight away. If the concern involves Steffi, contact the Council directly (the Council's contract manager, via the agreed secure route with the Council), or use the whistleblowing routes in the Safeguarding Policy.
- If a gift or offer raises a safeguarding concern (for example possible grooming, exploitation or financial abuse), report it to the DSL immediately under the Safeguarding Policy.
- No one will be treated unfairly for raising a concern in good faith, or for refusing to take part in bribery.

7. Telling the Council

Situation	**Timescale**
Any known or suspected bribery, or other Prohibited Act, connected with the Register Agreement or Call-Off Contract	Tell the Council immediately (Register Agreement clause 7.5). Our standard is the same working day and never later than 24 hours. We will co-operate with any investigation and allow audit of records (clause 7.6).
A request for a tutor to act as power of attorney, receiver or independent mental capacity advocate for a pupil	Tell the Council promptly (Call-Off clause 20.16), within 24 hours

Situation	Timescale
The Council asks to see this policy or our gifts procedure	Provide it on request (Register clause 7.4; Call-Off clause 20.12)
Annual certificate of compliance, if the Council asks for one	Within 10 working days of the commencement date if requested, then every year (Register clause 7.3.2)

Reports go to the Council's contract manager via the agreed secure route with the Council.

8. Consequences of breaching this policy

A breach may lead to:

- removal from Council work;
- termination of the tutor's agreement;
- referral to the police;
- for safeguarding matters, referral to the LADO or DBS.

For the business, a Prohibited Act can lead to termination of the Council contract.

9. Training, monitoring and review

All tutors receive this policy at induction and confirm they have read it. Steffi reviews the gifts register every term and this policy every year, or sooner if there is a concern or the contract changes.

10. Related policies

- Safeguarding and Child Protection Policy (whistleblowing, allegations, low-level concerns)
- Safer Recruitment and Tutor Vetting Statement
- Complaints Policy
- Parent and Carer Terms and Conditions (private families only)

Appendix A – Gifts and hospitality register

Date	Tutor or person	Offered by (parent, organisation; no child names)	Pupil reference	Description	Estimated value (£)	Accepted or declined	Reason	Any concern raised?	Recorded by