



GIFT GIVING AND RECEIVING POLICY

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1. Introduction to the Policy

This policy sets out the framework, principles, and procedures that **Byram House** follows regarding the giving and receiving of gifts by staff, children, families, suppliers, and contractors. The policy applies to all staff, agency workers, volunteers, contractors, and anyone acting on behalf of Byram House, whether at 62 Deighton Road, 66 Deighton Road, or elsewhere.

The Home is Byram House, which comprises the two residences at 62 Deighton Road and 66 Deighton Road. This policy applies equally across both residences.

Byram House must at all times exercise the highest standards of integrity. Staff must avoid any situation where they could be suspected of obtaining improper benefit by virtue of their employment. This policy is designed to protect children, staff, and the home from any perception of impropriety, grooming, or bribery.

The objectives of this policy are to:

- Ensure compliance with the **Bribery Act 2010** (which makes it a criminal offence to offer, promise, give, request, or accept a bribe).
- Protect children from potential grooming behaviours disguised as gift-giving.
- Provide clear guidance on what constitutes an acceptable token gift versus an unacceptable gift.
- Ensure that all gift-giving or receiving is transparent, recorded, and authorised by the Registered Manager.
- Protect staff from allegations of impropriety or favouritism.

2. How this Policy Benefits the Home

This Gift Giving and Receiving Policy benefits Byram House in the following ways:

- **Legal Compliance** – It ensures the home meets its duties under the **Bribery Act 2010**, the **Safeguarding Vulnerable Groups Act 2006** (grooming offences), and the **Children's Homes (England) Regulations 2015**.
- **Child Protection** – It prevents gift-giving that could be interpreted as grooming (e.g., staff buying expensive gifts for individual children). It requires that any gift from staff to a child is pre-approved, recorded, and notified to the social worker.
- **Integrity and Transparency** – It ensures that any gift from a child or family is declared to the Registered Manager and recorded, preventing any perception of bribery or improper influence.
- **Supplier Relationships** – It prevents individual staff from accepting personal discounts or gifts from suppliers that should belong to the Company.
- **Clarity for Staff** – It sets out clear rules: token gifts only; no cash; all gifts must be approved and recorded.
- **Training Framework** – It includes annual training for staff on the Bribery Act and the home's gift policies.
- **Inspection Readiness** – The **Social Care Common Inspection Framework (SCCIF) 2026** expects robust governance. This policy provides clear evidence.

3. Definitions & Legislation

3.1 Definitions

Term	Definition
Home	Byram House, the children's home registered with Ofsted, comprising two residences at 62 Deighton Road and 66 Deighton Road.
Company	IMS Care LTD, the registered provider and legal entity responsible for operating Byram House.
Byram House	The name used throughout this policy to refer to the home and its staff.
Token Gift	A gift of small monetary value (typically under £10, or up to £20 in exceptional circumstances) that is given as a genuine expression of goodwill or appreciation, not as a bribe or to create obligation.
Bribe	A gift, favour, or advantage given or received with the intention of influencing a decision or action improperly.
Grooming	The act of building an emotional connection with a child to gain trust for the purposes of sexual abuse or exploitation. Gift-giving can be a grooming behaviour.
Registered Manager	The person registered with Ofsted as the manager of the home.

3.2 Key Legislation and Statutory Guidance (presented in a table)

Legislation / Guidance	Key Provisions	Relevance to this Policy
Bribery Act 2010	Makes it a criminal offence to offer, promise, give, request, or accept a bribe (financial or other advantage). Also creates an offence of failure to prevent bribery by an associated person.	The home must have adequate procedures to prevent bribery. This policy is part of those procedures. Staff must not accept or give gifts that could be perceived as bribes.
Safeguarding Vulnerable Groups Act 2006	Defines regulated activity and includes grooming as a barrable offence.	Gift-giving by a staff member to a child could be a grooming indicator if done secretly or excessively. This policy prevents that.
Children's Homes (England) Regulations 2015	Regulation 34 – requires policies for the protection of children. Regulation 11 – Positive Relationships Standard.	The home must have a clear policy on gifts to protect children from harm.
Working Together to Safeguard Children 2026	Emphasises the importance of professional boundaries.	Gift-giving must not cross professional boundaries.
Code of Conduct and Ethics Policy	Requires staff to act with integrity and avoid conflicts of interest.	This gift policy is a subset of the Code of Conduct.
Social Care Common Inspection Framework (SCCIF) for Children's Homes 2026	Inspects governance and culture, including staff integrity.	Inspectors will review how the home manages gifts and declarations.

4. The Policy

4.1 General Principles and Integrity

Byram House operates on the following principles:

- **No cash gifts** – Staff must never accept cash or cash equivalents (e.g., vouchers) from children, families, suppliers, or any other person.
- **Token gifts only** – Only gifts of small monetary value may be accepted or given, and only with the approval of the Registered Manager.
- **Transparency** – All gifts given or received (including offers that are declined) must be declared to the Registered Manager and recorded in the **Gift Declaration Log**.
- **No expectation** – Gifts must never be given or received with the expectation of favours, preferential treatment, or influence over decisions.
- **Child protection first** – Any gift from a staff member to a child must be assessed for potential grooming risk.

4.2 Gifts from Children, Young People or Families

General rule: Staff will not accept any gift or money from a child, young person, or their family without the prior approval of the Registered Manager.

Procedure:

1. If a child, young person, or family member offers a gift (including money), the staff member must **politely decline** and explain that the home's policy does not normally allow acceptance.
2. If the offer is persistent and refusing may cause offence (e.g., a small token of appreciation such as a box of chocolates, a card, or a small homemade gift), the staff member must:
 - **Not accept** until they have spoken to the Registered Manager.
 - The Registered Manager will assess the nature and value of the gift.
 - If the gift is of **small monetary value (typically under £10)** and refusing would genuinely cause distress or offence, the Registered Manager may authorise acceptance.
 - The gift must be **recorded** in the Gift Declaration Log (Appendix A), including the date, nature of the gift, approximate value, and the reason for acceptance.
 - The gift becomes the property of the staff member only after authorisation. If the value exceeds £10 or there is any suspicion of grooming or improper motive, the gift must be **refused** and the incident recorded.
3. **Cash gifts** – Under no circumstances may a staff member accept cash. Any cash offered must be refused, and the Registered Manager must be informed immediately. The cash should be returned to the giver with an explanation of the policy. If the cash is left anonymously or cannot be returned, it must be handed to the Registered Manager to be donated to a children's charity (recorded).

Gifts of significant value (e.g., jewellery, electronics, expensive items): These must be refused outright. If a family insists, the Registered Manager will contact the child's social worker to discuss the context. The gift will not be accepted, and the incident will be recorded.

4.3 Gifts from Suppliers or Contractors

General rule: Any gift, discount, or favour offered by a supplier, contractor, or potential supplier to an individual staff member belongs to the **Company**, not the individual.

Procedure:

1. If a supplier offers a gift (e.g., bottle of wine, calendar, small promotional item), the staff member must **declare it to the Registered Manager** before accepting.
2. The Registered Manager will decide whether:
 - The gift is of token value (e.g., promotional pen, calendar) and may be kept by the staff member or shared.
 - The gift is of higher value – it must be handed to the Registered Manager and used as a raffle prize for children, donated to charity, or returned.
3. **Discounts** – Any discount offered to a staff member personally (not to the home) must be declared. Staff must not use their position to obtain personal discounts from suppliers.
4. **Hospitality** – Offers of meals, tickets to events, or other hospitality must be declared and approved by the Registered Manager. Hospitality of significant value (over £50) must be approved by the Responsible Individual.
5. **Bribery** – Any offer of a gift or favour in exchange for awarding a contract or preferential treatment is a criminal offence. Staff must refuse and report immediately to the Registered Manager and, if appropriate, to the police.

4.4 Gifts Given by Staff to Children

General rule: Staff may give token gifts to children only on special occasions (e.g., birthday, religious festival, or as a small reward for achievement) and only with prior approval.

Procedure:

1. Staff must **not** buy gifts for children using their own money without **prior written approval** from the Registered Manager.
2. The Registered Manager will assess:
 - The value of the gift (should be **token**, typically under £10).
 - The occasion (birthday, religious festival, end-of-term achievement).
 - Whether the gift could be perceived as grooming (e.g., expensive items, jewellery, repeated gift-giving to one child).
 - Whether the gift is inclusive (e.g., not favouring one child over others).

3. If approved, the gift must be recorded in the **Gift Declaration Log** (Appendix A), including the child's name (with consent), the nature of the gift, value, date, and the reason.
4. The Registered Manager must **notify the child's social worker** (and, where appropriate, the parent) that a gift will be given. This is to ensure transparency and to prevent any suspicion of grooming.
5. **Prohibited gifts:** Staff must never give:
 - Cash.
 - Vouchers.
 - Expensive items (over £20).
 - Intimate items (e.g., underwear, jewellery that could be seen as romantic).
 - Alcohol, tobacco, or vapes.
 - A gift in secret (without the knowledge of the Registered Manager and social worker).

Group gifts: Staff may contribute to a collective gift from the whole team (e.g., for a child's birthday). The Registered Manager must approve the collective gift, and the value per staff member should be nominal.

4.5 Gifts Between Staff

- **Token gifts** (e.g., a card, small box of chocolates) between staff on occasions such as birthdays or leaving are acceptable without formal approval, but staff should be mindful of perceptions.
- **High-value gifts** between staff (e.g., expensive jewellery, electronics) should be discouraged and may create conflicts of interest if there is a supervisory relationship.
- Staff should avoid giving gifts that could be interpreted as a bribe for preferential treatment (e.g., promotion, shift swaps).

4.6 Recording and Declarations

The Registered Manager will maintain a **Gift Declaration Log** (Appendix A) either in Bright HR or as a separate controlled document. The log must record:

- Date of offer or giving.
- Name of staff member giving or receiving.
- Name of child, family member, or supplier involved (if applicable).
- Description of the gift.
- Approximate value.
- Whether the gift was accepted, declined, or returned.
- Authorisation by Registered Manager (and RI if over £50).
- Any social worker notification (if gift given to child).

The log will be reviewed by the Responsible Individual during monthly governance checks and by the Regulation 44 Visitor.

4.7 Consequences of Non-Compliance

- Any staff member who accepts or gives a gift without following this policy (especially cash, high-value items, or secret gifts) will be subject to **disciplinary action**, which may include dismissal for gross misconduct.
- Acceptance of a bribe (e.g., from a supplier) is a criminal offence and will be reported to the police.
- Gifts to children that are deemed to be grooming behaviour will be reported to the LADO and the police.

5. How the Home Trains its Staff About this Policy

Byram House provides structured training to ensure all staff understand and can implement this Gift Giving and Receiving Policy effectively.

Training Element	Frequency	Method / Content
Induction	Upon appointment	Face-to-face training covering: the Bribery Act 2010, definition of token gifts, prohibition of cash, authorisation process, grooming risks, recording and declaration, and the dual-site operation (62 & 66 Deighton Road).
Annual refresher	Every 12 months	Classroom or virtual session covering updates to legislation, case studies of improper gift-giving, and refresher on declaration procedures.
Safeguarding and grooming awareness	Annually	Training on how gift-giving can be used as a grooming technique, and how to recognise warning signs.

Staff are required to:

- Read and sign this policy annually.
- Complete all mandatory training.
- Never accept cash gifts.
- Declare any gift offer (even if refused) to the Registered Manager.
- Seek prior approval for any gift to a child.

6. Related Policies and Guidance

- Code of Conduct and Ethics Policy
- Safeguarding Policy
- Anti-Slavery and Human Trafficking Policy
- Whistleblowing Policy
- Disciplinary Policy
- Children's Homes (England) Regulations 2015
- Working Together to Safeguard Children 2026
- Bribery Act 2010 guidance

7. Appendices

Appendix A – Gift Declaration Log

Date	Staff name	Giver / Receiver	Recipient / From	Description of gift	Approx value (£)	Accepted / Declined	Authorised by (RM / RI)	Social worker notified (Y/N)
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8. Policy Approval and Review Details



Policy Name	MONITORING QUALITY POLICY	
Home	Byram House	
Reviewed by	Danyaal Iqbal / Mustafa Amin	Deputy Manager / Registered Manager
Approved by	Stacey Wagstaffe	Responsible Individual
Date	May 2026	