

Inspire Partnership Academy Trust Gift and Hospitality Policy

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Approved By:	Resources Committee
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1. Purpose and scope of the Policy

- 1.1. The Inspire Partnership Academy Trust is committed to ensuring that the leadership and governance of the Trust and its schools is conducted in accordance with the highest standards of integrity, probity and openness.
- 1.2. The purpose of this policy is to ensure that the business conducted by employees, local governors and trustees of, and those associated with, the Trust and its schools is appropriate and avoid the risk of any perceived or real conflict of interest or allegation of bribery or corruption.
- 1.3. The policy applies to all employees, local governors, trustees, contractors and consultants or other associated persons, agents or representatives acting in the name of, or on behalf of, or dealing with the Trust and its schools.
- 1.4. All employees and those acting on behalf of the Trust are expected to uphold the interests and reputation of the Trust at all times, by having honesty and integrity in business relationships.

2. Principles of the Policy

- 2.1. As a general rule, obtaining goods and services which include an element of private use for employees, local governors and trustees should be avoided. Employees, local governors and trustees should avoid accepting excessive hospitality, entertainment or other services from existing or prospective suppliers.
- 2.2. A gift or form of hospitality may be considered inappropriate where the Trust or individual would be embarrassed should the proposed action become public knowledge, or if they may be seen to be influenced in their decision-making as a result of the gift or hospitality.
- 2.3. Employees and those acting on behalf of the Trust must always use their best judgement when deciding on the most appropriate course of action, and must always be transparent in declaring gifts and hospitality received or given of any value or nature.
- 2.4. It will be a serious disciplinary offence for any individual to receive or give any gift, loan, fee, reward, hospitality or other advantage in their capacity as an employee, governor or trustee, which might reasonably be seen to compromise their personal judgement and integrity.

3. Register of Gifts and Hospitality

- 3.1. A Gifts and Hospitality Register is maintained at all schools and the central Trust. This should be updated as soon as practicably possible where hospitality or gifts of any value are offered or received. The template register is attached to this Policy.
- 3.2. The Registers of Gifts and Hospitality are open documents and must be made available for inspection by the Chief Executive Officer, senior Finance Staff of the Trust and the Auditors.

- 3.3. All staff must be made aware of this policy, and agree to report any gifts or hospitality received or given to the local school Finance Representative as soon as the event occurs, so that it can be recorded on the register.

4. Definitions

- 4.1. The expressions “gifts” and “hospitality” have wide meanings and no conclusive definition is possible. Gifts and hospitality can include:
 - 4.1.1. Free gift of any goods or services
 - 4.1.2. The opportunity to acquire any goods or services at a discount or at terms not available to the general public
 - 4.1.3. The opportunity to obtain goods or services not available to the general public
 - 4.1.4. The offer of food, drink, accommodation or entertainment
- 4.2. Common gifts include pens, diaries, calendars and other business stationery, articles of clothing, books, wine and flowers. Common hospitality includes lunches provided by external bodies.
- 4.3. For the purpose of this policy a “gift” is defined as any item, cash or goods or any service, which is offered for personal benefit at no cost, or at a cost that is less than its commercial value.
- 4.4. “Hospitality” is defined in this policy as any generous or material welcome or reception that is more than an incidental beverage or light refreshment e.g. attendance as a non-paying guest at a cultural, sporting or other event.

5. Acceptable gifts and hospitality

- 5.1. Employees, local governors and directors are permitted to accept isolated gifts of a trivial and inexpensive nature, including:
 - 5.1.1. Seasonal or promotional gifts or corporate branded items that can be used by an employee in their role at the Trust (such as stationery)
 - 5.1.2. Courtesy hospitality and refreshments at business meetings and events of a modest nature
 - 5.1.3. Invitations to attend charity or fund-raising events as a guest, if considered to be for a good cause and of reciprocal benefit to the partnership.
- 5.2. Such gifts under £30 in value can be accepted without the need to seek approval, provided there is no expectation or belief that something will be given in return for these gifts.
- 5.3. Acceptance of gifts or hospitality with a value exceeding £30 must always be subject to prior approval from the Headteacher, the Chief Executive Officer, or an Executive leadership team member.

- 5.4. If there is any doubt about the appropriate acceptance of gifts, advice should be sought from the central Trust finance team.
- 5.5. Gifts and hospitality of any value must be recorded and reported in the Gifts and Hospitality Register.

6. **Unacceptable gifts and hospitality**

- 6.1. No employee, governor or trustee should solicit gifts from another individual, school or organisation. The following must never be offered or accepted:
 - 6.1.1. Monetary gifts
 - 6.1.2. Free memberships or subscriptions
 - 6.1.3. Free goods or services which are normally provided by a supplier to the Trust at a charge
 - 6.1.4. Gifts or hospitality offered to family members, partners or close friends of members, trustees or staff
 - 6.1.5. Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
 - 6.1.6. Gifts or hospitality that could reasonably be described as lavish or excessive.
This list is not intended to be exhaustive.
- 6.2. Where refusal of a gift or hospitality would cause offence, an acceptable alternative is to suggest a donation to the partnership or to a charity nominated by the partnership.
- 6.3. Where a trustee, governor or member of staff receives an unsolicited gift of more than token, which it is impractical to refuse (such as vouchers already issued), they must immediately donate it to the Trust via the Chief Operating Officer who will decide, depending on the nature of the gift, whether it is most appropriately used for partnership purposes or donated to a charity chosen by the Trust.

7. **Guidance on giving gifts and hospitality (internally and externally)**

- 7.1. The Academies Financial Handbook states that “when making gifts, the trust must ensure the value is reasonable, is within its scheme of delegation, the decision is documented, and achieves propriety and regularity in the use of public funds.”
- 7.2. It is the responsibility of the School Business Manager, Financial Controller, and Headteacher to ensure that any gifts and hospitality given by the Trust are reasonable and represent effective use of school funding. Any concerns over purchases, or large or contentious items, should be flagged to the central finance team before an order is approved or payment is made.
- 7.3. It is considered acceptable to provide:

- 7.3.1. Reasonable costs to entertain visitors on Trust business are acceptable. For example, the cost of a working lunch, sandwiches, finger buffet and non-alcoholic beverages.
 - 7.3.2. Refreshments at a reasonable cost to the Trust as part of training or development events. This includes training courses, departmental meetings, consultation meetings and general staff developmental activities.
 - 7.3.3. Tea, coffee, milk and sugar for staff rooms.
 - 7.3.4. Travel expenses, subsistence and refreshments to Trustees and governors in undertaking their roles for the Trust.
 - 7.3.5. One-off gifts (costing under £50) to members of staff for a serious compassionate event (such as a serious medical condition or bereavement). Headteachers have discretion to authorise flowers or a comparable gift at the school's expense. These must always be recorded on the Gifts and Hospitality Register, including the reason for the gift.
- 7.4. Requests for reasonably priced staff gifts or staff social events should be made only in exceptional circumstances and with the approval from a member of the Trust Executive team.
 - 7.5. Gifts to Schools should be made only in exceptional circumstances and with the approval of the Chair of Trustees or CEO. Evidence of any such activity and their approval should be maintained.
 - 7.6. Regarding reimbursement of expenses, refer to the guidance on staff expenses in the 'Procurement Card and Staff Expenses Policy', and the guidance on trustee expenses in the 'Financial Regulations Manual'.

Gifts and Hospitality Register

Date of event	Name of individual or company receiving the gift	Name of individual or company giving the gift	Nature of gift / hospitality and reason for gift	Estimated value (£)	Reason for offer / acceptance / Refusal	Signed