



Gifts and Hospitality Policy

November 2020- November 2023

This policy aims to ensure that:

- The academy trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academies Financial Handbook
- The trust and those associated with it operate in a way that commands broad public support
- The trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds
- Directors fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors
- Members, Directors and staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same

Assessment of Policy's Impact

The trust is committed to promoting and achieving equality of opportunity for all pupils, parents, staff, members, directors' governors, visitors and other stakeholders.

The effectiveness of this policy and its impact will be assessed by the Finance and Audit Committee who will monitor the outcomes and impact of this policy every 3 years.

GIFTS AND HOSPITALITY

This policy is based on the Academies Financial Handbook, which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of members, trustees, staff and/or any other representative of the trust. This policy also complies with our funding agreement and articles of association.

Inspire Education Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All Staff, Directors and Governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Academy and Trust.

The trust will not purchase alcohol under any circumstance and any gifts from the Trust will be taken from school fund with a **maximum** value of £50 per gift. The Trust will never give money as a gift. The level of appropriateness for a gift will be made at the Headteachers discretion up to the maximum above amount.

All gifts must be approved by the associated Headteacher and their office manager must inform the Finance Officer – Administration and Compliance in the Central Finance Team where all such gifts will be logged on the trust Gifts register and signed by the Accounting

Officer and Head of Finance. This log will be presented to the external Auditors during the statutory annual finance audit.

Employee 25 years' Service

The trust wants to recognise long service (i.e. 25 years) this will be funded on a school by school basis and the gift is £100 presented in vouchers (choice to be made by Employee).

Staff must make their own personal collections for such occasions as birthdays, special events and recognition or praise for an achievement.

BRIBES

In order to protect all individuals associated with the trust, and the reputation of the trust and its academies, from accusations of bribery or corruption Staff, Directors, and Governors must take extreme care that none of their dealings, directly or indirectly, could be deemed as a reward or benefit, in line with the Prevention of Fraud and Bribery Act 2010. This Act makes it a criminal offence to:

- offer, promise or give a bribe;
- request, agree to or accept a bribe;
- (by an organisation) fail to prevent bribery by those acting on its behalf (associated persons) to obtain or retain business or a business advantage for the organisation.

Under this Act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

FACILITATION PAYMENTS AND KICKBACKS

The Trust does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

If staff are asked to make a payment on the trust's behalf, they should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Staff should always ask for a receipt which details the reason for the payment. If staff have any suspicions, concerns or queries regarding a payment, they should raise these with the Headteacher.

Kickbacks are typically payments made in return for a business favour or advantage. All staff must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the School.

DONATIONS

The trust does not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of Head of Finance and Accounting Officer.

HOW TO RAISE A CONCERN

Staff must notify the Headteacher as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. Concerns should be reported by following the procedure set out in our Whistleblowing Policy. A copy of our Whistleblowing Policy can be found on the academy website.

WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

It is important that staff tell the Headteacher as soon as possible if they are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

PROTECTION

Staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The trust aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The trust is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance Finance Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on your academy website.

TRAINING AND COMMUNICATION

The trust's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

What is a gift?

A gift is any item or service that you receive free of charge. It also includes any goods or services which you personally are offered at a discounted rate or on terms not available to the general public.

What is hospitality?

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to

attend any cultural or sporting event on terms not available to the general public.

What gifts or hospitality can be accepted without any approval?

You can accept gifts and hospitality, which are small gestures and have a value of £30 or less, without the approval of the Headteacher. Gifts and hospitality of this nature do not need to be recorded in the school's Gifts and Hospitality Register.

What things should I think about before I decide what to do?

You should treat with caution any offer of gift or hospitality made to you personally. In particular, think about whether there is a benefit to the school in you accepting, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of your, or the school's, support or favor.

GIFTS TO AND FROM STUDENTS

In the interests of safeguarding children, and to prevent staff from being open to accusation of exerting undue influence, no member of staff is permitted to give a gift to a student at any time.

If a gift is received from a pupil or the parents of a pupil and the value is £30 or over this gift is to be registered in the Register of Gifts and Hospitality (see below).

What gifts or hospitality need approval from the Headteacher or Chair of Governors?

Any gift or hospitality which is more than just a token, defined as a having a value of more than £30, should be politely refused or returned. You must have the prior written approval of the Headteacher if you decide to accept something which has more than this value. This should only be in exceptional circumstances. If you or your Headteacher has any concerns or doubts about the public perception that might be attached to accepting any gift or hospitality, then you must refer it to the Chair of Governors.

What gifts or hospitality should never be accepted?

You must never accept;

- cash or monetary gifts;
- gifts or hospitality offered to your husband, wife, partner, family member or friend;
- gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process;
- lavish or extravagant gifts or hospitality, even if they relate to activities in your own time.

What should I do if I receive a gift without warning?

If you estimate that the gift is more than just a token you should politely and courteously decline the gift. If you feel that it would not be appropriate to do this, you should refer the matter to your Headteacher as soon as possible and let the Headteacher decide what you

should do with the gift. Your Headteacher may decide to return the gift, may ask the Chair of Governors for a view, or may donate the gift to a worthy local cause.

If such offers are made to the Senior Leadership Team or Directors, the matter should be referred to the Chair of the Finance Committee.

What should I do if I get offered a gift or hospitality?

You must make sure that all offers you receive which have a value of more than £30 are recorded in the school's Gifts and Hospitality Register, which is kept in the school office.

Do I need to record offers that I decline?

Yes – all offers of gifts or hospitality, which have a value of more than £30, must be recorded in the school's register, even if you don't accept.

What should I do if I am in doubt?

If in doubt, always speak to the Headteacher. It is your responsibility to follow the school's guidance on gifts and hospitality and to justify why you chose to accept a gift or hospitality offered to you.

What would happen to me if I didn't follow the guidance?

The school will take disciplinary action against you if you failed to follow the guidance. It is also a criminal offence to demand or accept a gift or reward in return for allowing you to be influenced as a part of the school. This means you could be prosecuted by the Police.

WHO IS RESPONSIBLE FOR THE POLICY?

The board of governors has overall responsibility for ensuring this policy complies with the School's legal and ethical obligations, and that all those under the School's control comply with it.

The Head of Finance has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness [and dealing with any queries on its interpretation]. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

MONITORING AND REVIEW

The Head of Finance will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All staff are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

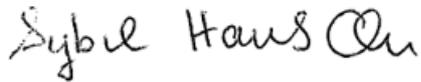
Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Headteacher.

Date of approval: 11th November 2020

Signature: Chief Executive Officer (Lois Whitehouse)



Signature: Chair of Finance and Audit (Sybil Hanson)



Renewal Date: November 2023

A signed copy of this policy is kept on file in all of the trusts school admin offices.

THE DO's and
DON'T's

DO	DON'T
<ul style="list-style-type: none"> Read and follow the guidance on gifts and hospitality 	<ul style="list-style-type: none"> Accept any gifts or hospitality which have a value of more than £30 without the approval of the Headteacher, or the Chair of Governors as necessary
<ul style="list-style-type: none"> Seek advice from the Headteacher or Chair of Governors if you are in doubt 	<ul style="list-style-type: none"> Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process.
<ul style="list-style-type: none"> Record all offers of gifts and hospitality which have a value of more than £30 in the School's register, whether accepted or not 	<ul style="list-style-type: none"> Accept cash or monetary gifts
<ul style="list-style-type: none"> Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything 	<ul style="list-style-type: none"> Accept a gift or hospitality as an inducement or reward
<ul style="list-style-type: none"> Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality 	<ul style="list-style-type: none"> Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time
<ul style="list-style-type: none"> Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body 	<ul style="list-style-type: none"> Accept a gift or hospitality which you or a member of the public would think is lavish, extravagant or excessive, even if the hospitality is taken in your own time
<ul style="list-style-type: none"> Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept 	<ul style="list-style-type: none"> Accept gifts or hospitality offered to your husband, wife, partner, family member or friend
<ul style="list-style-type: none"> Consider paying for yourself if offered any hospitality by a supplier or third party 	

XXX Academy

RECORD OF GIFTS and HOSPITALITY (accepted/refused*)*

*Delete as appropriate

This form must be completed by any member of staff or governor receiving or declining a gift or hospitality, which relates to their position in the School and has a value of more than £30. If the individual is concerned about the likely "level" of any gift or hospitality that he or she may receive, agreement from the Headteacher or Chair of Governors must be obtained in accordance with the school's guidance.

Name of staff/Governor	Position held
Individual, company or organisation offering gift or hospitality	
Date, time and venue	Gift/Hospitality Accepted*/Declined*
Nature and approximate value of hospitality/gift. If accepted, has the gift been retained for personal use or for School use?	
If accepted, reason for accepting hospitality/gift	
Signed: Approved By: (Head teacher)	Date

