



Inspire Education Trust

Together we achieve, individually we grow

Gifts and Hospitality

Policy Date: September 2023

Review Date: August 2025

Document History

Version	Status		Date	Author	Summary Changes
V1			Nov20		
V2			Sept23	M Nisbet	Reformat and update

PURPOSE

Inspire Education Trust (the Trust) is committed to ensuring that the leadership and governance of the Trust and all academies within the Trust, is conducted in accordance with the highest standards of integrity, probity and openness.

The policy applies to all employees, local governing committee (LGC) members, Trustees/Directors, Members, 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 academies.

The purpose of this policy is to ensure that the business conducted by employees, LGC Members and Directors of, and those associated with, the Trust and its academies is appropriate and avoids the risk of any perceived or real conflict of interest or allegation of bribery or corruption.

The policy outlines the approach of the Trust on the receipt of gifts and hospitality by its employees, LGC Members, Directors and those associated with the Trust and its academies from any third parties arising from duties undertaken on behalf of the Trust.

PRINCIPLES OF THE POLICY

Practices, such as obtaining goods and services which may include an element of private use for employees, LGC members and Directors should be avoided.

Employees, LGC members and Directors should avoid accepting excessive hospitality, entertainment or other services from existing or prospective suppliers.

A Register of Gifts and Hospitality should be established at each academy and for the Trust central team and must be updated as soon as practicably possible where hospitality, entertainment, gifts or other services are offered or received as a result of the position held within the Trust.

The Registers of Gifts and Hospitality are open documents and must be made available for inspection as necessary eg by the Chief Executive Officer, the central Finance team and the Auditors.

It is a mandatory requirement for each academy and the Trust central team to hold a Register of Gifts and Hospitality, even if there is a nil return. It is recommended that the Register of Gifts and Hospitality is held alongside the Register of Pecuniary and Business interests and is freely available for inspection at all locations.

DEFINITION

The expressions "gifts" and "hospitality" have wide meanings and no conclusive definition is possible. Examples include:-

- Free gift of any goods or services
- The opportunity to acquire any goods or services at a discount or at terms not available to the general public
- The opportunity to obtain goods or services not available to the general public
- The offer of food, drink, accommodation or entertainment

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.

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.

"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.

The real test is whether the acceptance of any gift and/or hospitality could be regarded by a third party as compromising or likely to compromise the impartiality and objectivity of anyone acting on behalf of the Trust

GENERAL RULES

Employees, LGC members and Trust Directors must not receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity and must always refuse any such offer if it appears as if the provider ('giver') has an ulterior motive.

Academy employees and LGC members are asked to immediately report any offer or receipt of such gifts to their academy office, to be recorded in the Register of Gifts and Hospitality.

Trust central team employees and Trust Directors are asked to immediately report any offer or receipt of such gifts to the Trust Finance and Compliance Manager for recording in the central Register of Gifts and Hospitality.

Employees, LGC members and Trust Directors must not use their authority for personal gain and must uphold and enhance the standing and reputation of the Trust at all times by:

- Maintaining the highest standard of honesty, integrity and selflessness in all their business relationships
- Complying with the letter and the spirit of the law and their contractual obligations, rejecting any business practice that is deemed improper;
- Act to maintain the interests and good reputation of the Trust and/or the Academy at all times
- Adherence to the Seven Principles of Public Life

Employees, LGC Members and Trust Directors are permitted to accept isolated gifts of a minimal nature or inexpensive seasonal gifts or corporate branded items (such as diaries, pens, calendars). Such gifts can be accepted without the need to seek approval or formally register receipt.

Promotional gifts or small items from a supplier, contractor or parents as an expression of gratitude such as boxes of chocolates may also be accepted.

Any representative of the Trust must never accept a gift or hospitality from anyone who is, or may be in the near future, tendering for any contract with the Trust or academy within the Trust, seeking employment with the Trust or is in dispute with the Trust, even if not directly involved in that service area.

Acceptance of gifts or hospitality with a value exceeding £30 must always be subject to prior approval as per the table below and recorded and reported in the Gifts and Hospitality Register.

Recipient	Approver
Academy based staff	Headteacher or Head of Education
Central staff	CEO
CEO and members of the Board	Chair of the Board
Chair of the Board	Trust Member

Employees, LGC members and Trust Directors may accept the following gifts/ hospitality without the need to formally register receipt or seek approval of the Academy or the Trust:-

- Attendance in an official capacity at a public function
- Working lunches/dinners with customers, providers or partners are generally acceptable as a way of doing business provided they are not to an unreasonable level or cost

- Sponsored hospitality that is built into the official programme of conferences and seminars related to your work
- Incidental promotional gifts such as calendars, diaries or pens

Consideration must always be given to ensure that whenever such gifts/hospitality are accepted, no obligation to the person or organisation in question is accepted. If there is any doubt the advice of the Trust central team must be sought.

The following are examples of gifts or hospitality requiring approval and formal recording in the appropriate Register of Gifts and Hospitality:-

- Attendance as a non-paying guest or a commercial organisation or individual at a non-work related cultural or sporting event
- Sponsored cultural and sporting events, or other public performances as a representative of the Trust or Academy
- Promotional gifts exceeding the value of £50
- Other offers of gifts or hospitably.

The following are examples of gifts or offers of hospitality which must be refused by employees, LGC members and Trust Directors and any offers of such items or similar, must immediately be reported to the Trust central team:-

- Gifts of money
- Free membership or subscriptions (e.g. Sports clubs)
- Foreign travel or concessionary travel rates unless a specific element of a business, academic or research activity is approved by the Trust
- Hotel accommodation or use of company villas/apartments
- Free goods, services or equipment which are normally provided by a supplier to the Academy or Trust at a charge

GIFTS AND HOSPITALITY GIVEN

Reasonable costs to entertain visitors on academy or Trust business are acceptable. The cost of a working lunch, sandwiches, finger buffet and non- alcoholic beverages would be considered reasonable.

It is acceptable to provide employees with refreshments at a reasonable cost to the academy or Trust as part of training or development events. For this purpose, training and development is taken to cover not only training courses but also developmental meetings including for example departmental meetings, consultation meetings and general staff developmental activities.

In compliance with the Academies Trust Handbook, Trust funds must not be used to purchase alcohol. Academies should use their allocated GAG funding for the full benefit of their current pupils. Therefore academies and the Trust central team are advised not to purchase gifts and items for members of staff and people outside the Academy or Trust. In exceptional circumstances, prior approval must be obtained from the CEO and any approved spend must be justifiable and reasonable in cost.

ROLE OF ACADEMY OFFICE/TRUST CENTRAL FINANCE AND COMPLIANCE MANAGER

Responsible for ensuring that any offer or receipt of gifts, hospitality or donations is recorded in the Register of Gifts and Hospitality.

Reporting any possible conflict of interest arising from the offer or receipt of gifts and or hospitality.

Responsible for ensuring that employees, LGC members, contractors, consultants and agents that work for the academy or the Trust are made aware of this policy.

EMPLOYEE, LGC MEMBER AND TRUST DIRECTOR RESPONSIBILITIES

Employees, LGC members and Trust Directors have a responsibility to:-

- Comply with this policy
- Report gifts or hospitality offered and whether they have been accepted or declined
- Raise any concerns about the operation of the policy with their line manager in the first instance or the Trust Finance and Compliance Manager

RESPONSIBILITY

The Inspire Education Trust Board of Directors have a responsibility for the oversight of this and all policies within the Trust's academies and may delegate the implementation and review of this policy in accordance with our Scheme of Delegation.

APPENDICES



Gifts Hospitality
Form Register.pdf

The Trust Gifts and Hospitality Register template is managed on behalf of the Trust by the Finance and Compliance Manager (FCM). The FCM will provide guidance, advice and training on the use of this policy and the completion of the register. To ensure Trust wide consistency, all queries, should be directed to the FCM in the first instance.

GIFTS AND HOSPITALITY POLICY

Reviewed by: Michelle Nisbet September 2023

Next Review Date: August 2025

Approved by Directors: 2 October 2023

Signed:



Lois Whitehouse
CEO



Sybil Hanson
Chair of Finance, Audit and Risk Committee