



## **GIFTS AND HOSPITALITY POLICY**

|                                     |                                       |
|-------------------------------------|---------------------------------------|
| Date Written                        | Summer 2016                           |
| Date Reviewed                       | Spring 2017, Summer 2018, Autumn 2018 |
| Date Due Further Review             | Autumn 2019                           |
| Date Ratified by the Governing Body | Autumn 2018                           |

## **GIFTS AND HOSPITALITY POLICY**

Inspire Multi Academy Trust is committed to the highest level of integrity, honesty and accountability in all of its business dealings. All members, trustees, governors, staff and volunteers are expected to maintain high standards of propriety and professionalism in all of their dealings, ensuring they are free from conflict of interest through their business in the name of the Academy Trust.

### **Definitions**

**A Gift** is any item or service which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public.

**Hospitality** is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public.

**Prevention of Fraud and Bribery Act 2010** 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.

### **Statement of Policy**

In order to protect members, trustees, governors, staff and volunteers involved with the Academy Trust, and the reputation of the Trust from accusations of bribery or corruption individuals must take extreme care that none of their dealings, directly, or indirectly, could be deemed as a reward or benefit, in line with the Bribery act 2010. This act makes it a criminal offence.

The Academy Trust will hold an electronic Gifts and Hospitality Register.

It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these individual gifts are valued at less than £30 these are acceptable without the employee referring the gift to senior members of staff. These token gifts will not be added to the register. If a group of parents elect to buy a combined gift for a member of staff, if the total value of these gifts is less than £100 these are acceptable without the employee referring the gift to senior members of staff. These token gifts will not be added to the register.

Where a more valuable gift, benefit or service is offered which is to the good of the school, rather than an individual, then it must be referred to the Academy Headteacher, or in the case of the Academy Headteacher, to the Chief Executive Headteacher (CEHT) and if in the case of the CEHT, to the Chair of the Directorate for consideration for approval at their discretion. These items should be added to the register.

It is common for organisations and companies to offer free of charge marketing material to new or existing clients. Items in this category would be for example branded stationery such as pens, pencils, calendars etc. Such items would be nominal in value and therefore would not be added to the register.

Hospitality in the form of working lunches, coffees etc. are acceptable, and it would be appropriate to offer this to gain cordial relations in support of positive relationships with visiting staff or business colleagues. These would not be added to the register.

If a member of staff is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the Academy Trust, other than light refreshments, it is their responsibility to discuss this with the Academy Headteacher/CEHT/Chair of the Directorate before accepting such benefit and within 5 days of the benefit being offered.

If the gift is deemed acceptable, the details would need to be added to the register. If by not accepting a gift, this would be regarded as causing offence, (such as a sudden and unexpected gift, or for example, one where it would cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Academy Headteacher/CEHT/Chair of the Directorate as soon as possible and no later than within 5 days. A decision will then be made as to whether to accept the gift, return the gift or refer the decision to a more senior leader. In their decision making, the decision maker may conclude that the gift should be donated to a school raffle or charitable cause.

Examples of gifts or hospitality that should not be accepted are cash or monetary gifts; gifts or hospitality offers which benefit a member of your family; gifts or hospitality (other than light refreshments) from a potential supplier or tendered in the immediate period before tenders are invited or during the tender process.

Where a gift is received on behalf of the school or the Academy Trust, the gift remains the property of the school/Trust.

All gifts/ hospitality over the value of £30 must be recorded in the Gift and Hospitality Register, whether accepted or not.

### **Instances of non-compliance**

In the case where it is believed a member of staff, member, trustee or governor has not declared a gift or hospitality then a formal investigation will be instigated by the Academy Trust via an appointed officer likely to be a Headteacher/CEHT/Chair of the Directorate or Chair of an LGB.

In such instances, this may take the form of disciplinary procedures in the case of employees if misconduct is indicated.



### Declaration of a Gift or Hospitality

|           |  |
|-----------|--|
| Name:     |  |
| Position: |  |

- I have been offered a gift/hospitality which I have declined.
- I have been offered a gift/hospitality which I have accepted.

|                         |  |
|-------------------------|--|
| Date and Time of Offer: |  |
| Place Where Offered:    |  |

| Name of Organisation/ Person Making The Offer Including Their Relationship to the Academy Trust | Nature of Gift/Hospitality | Estimated Value |
|---|----------------------------|-----------------|
|   |                            |                 |
|   |                            |                 |

|  |
|--|
| Reason for Accepting/ Declining the Gift/Hospitality |
|  |

|         |  |
|---------|--|
| Signed: |  |
| Date:   |  |

**Academy Headteacher/Chief Executive Headteacher/ Chair of Directorate Approval**

|              |  |
|--------------|--|
| Approved by: |  |
| Date:        |  |

On completion please return this form to the School Office who will retain a copy and update the entry to the Register in date order.