

# Inspire Partnership Multi Academy Trust

## Gifts and Hospitality Policy



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## **1 Purpose**

- 1.1 This policy sets out the procedure staff, members and Trustees must follow when giving or receiving gifts and hospitality.

## **2 Scope**

- 2.1 This policy applies to full time and part time employees on a substantive or fixed-term contract, and to associated persons such as Trustees, members, secondees, agency staff contractors and others employed under a contract of service.

## **3 Policy Statement**

- 3.1 The Trustees of IPMAT are committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff, members and Trustees 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 Trust.

- 3.2 In order to protect all individuals associated with the Trust, and the reputation of the Trust from accusations of bribery or corruption staff and Trustees 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. (See the Anti-Fraud, Bribery and Corruption Policy)

- 3.3 The Trust and each Academy will hold a Gifts and Hospitality Register. All gifts/ hospitality over the value of £25 must be recorded in the Gifts and Hospitality Register.

- 3.4 It is the responsibility of Trustees, members, and staff to ensure that they are not placed in a position that risks, or appears to risk, compromising their role or the Trust's public and statutory duties. Trustees, members, and staff should not be seen to be securing valuable gifts and hospitality by virtue of their job or role. Trustees, members, and staff should not accept or provide any gift or hospitality if it gives the impression that they have been influenced or deemed to be influencing while acting in an "official capacity".

- 3.5 Trustees, members and staff must declare all offers of gifts and hospitality, made to or by them, regardless of value, in their role at IPMAT. All such offers must be declared *whether accepted or declined*. Offers of gifts and hospitality may include items ranging from diaries, wall charts, and boxes of chocolates, to free international travel and accommodation.
- 3.6 Declarations must be recorded on the Gifts and Hospitality Register (the register). The register is maintained by the School Business Officer in each Academy and service and the PA to the CEO for central Trust employees, members, and Trustees.
- 3.7 This policy also applies to spouses, partners, or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the official.
- 3.8 In exercising judgement as to whether to accept a gift or hospitality, the question should be asked what public perception would be if the information was published given Trustees and staff role and circumstances.

#### **4 Receiving gifts**

- 4.1 Trustees and staff may retain all gifts valued at £25 or under when given in recognition of presenting at events or otherwise.
- 4.2 For gifts exceeding a value of £25, the decision on how to deal with the gift rests with the Chief Executive Officer. The following options are suggested:
- share the gift with all staff;
  - raffle the gift for charity;
  - donate the gift to charity; or
  - donate to charity and keep the gift.
- 4.3 It is not uncommon that in various working environments, gifts are exchanged between staff, for example at Christmas. In these circumstances, and providing those gifts have not been funded in any way by monies associated with the Trust, such gifts need not be registered.

#### **5 Accepting offers of hospitality – genuine business reasons**

- 5.1 Hospitality offered should only be accepted where there is a direct link to working arrangements and a genuine business reason can be demonstrated, for example:
- attendance or speaking at a conference, which provides complimentary subsistence, travel, and accommodation (this does not need to be declared on the register except where a gift was received);

- attending at a free training course; or
- attending a drinks reception to network.

5.2 It is recognised that, in the course of carrying out Trust duties, Trustees, members and staff will need on occasion to ensure good relationships with existing and future customers, suppliers and stakeholders and that this may involve for example, the receipt of modest working lunches and dinners. These are acceptable where there is a genuine business reason.

5.3 Hospitality invitations to events which are purely social events should be considered very carefully before accepting; in such circumstances it may be much more difficult to substantiate a genuine business reason. Such invitations should be discussed with the Chief Executive Officer prior to accepting.

5.4 Trustees and staff may not accept free holidays from a current or potential supplier or customer. These invitations should be recorded in the register.

5.5 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 are valued at less than £25 these are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register.

5.6 Where a gift is received on behalf of the Trust, the gift remains the property of the Trust. The gift may be required for departmental display or it may, with the Chief Executive Officer's approval, remain in the care of the recipient.

5.7 Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the Trust and must be registered and used accordingly.

## **6 Gifts and hospitality offered by IPMAT**

6.1 Trustees, members and staff must be mindful that the value of all gifts and hospitality offered by the Trust are sourced from public funding, and the expectation is that such funding will be used for legitimate purposes and demonstrate value for money.

6.2 It is acceptable to provide modest hospitality in the way of working lunches to existing and potential partners and stakeholders subject to a genuine business reason e.g., potential sponsorship of a school, a joint project, or strategic partners.

## **7 Declaration**

7.1 Trustees, members and staff should make a declaration by email as soon as possible after the offer or receipt of gifts or hospitality. All records of

declarations are to be shared with Chief Financial Officer who will discuss these with the Chief Executive. The declarations will be recorded in the register and will be available for inspection at any time.

7.2 The declaration will need to include the following information:

- date of offer of gift or hospitality, and date of event where relevant;
- name, job title and organisation of recipient / provider;
- nature and purpose of gift or hospitality received or declined;
- the name of any other organisation involved;
- actual or estimated value.

## **8 Monitoring**

8.1 The register will be reviewed as part of the Trust's Internal Audit reviews and external audit reviews as well as an annual internal inspection.

8.2 Trustees, members and staff will be reminded periodically of their requirement to declare gifts and hospitality provided/accepted/declined in accordance with this policy.

8.3 The policy will be reviewed every 3 years and all staff, members and Trustees will be asked to sign to say that they have read and understood the policy.

## **9 Policy breach**

9.1 Staff and Trustees who fail to declare the acceptance/provision/decline of hospitality and gifts in accordance with this policy may be subject to disciplinary action under the Disciplinary Policy.

**Declaration of Gifts and Hospitality Offered to Trustees and Employees**

<b>Name of Employee</b>	
Who was/would have been the recipient of the gift/hospitality ( <i>if not self</i> ) and what is their relationship to Trustees and staff?	
Who made the offer [ <i>individual/company/organisation etc</i> ] and when?	
Give details of the gift/hospitality	
What was its estimated value?	
What was the purpose of the offer?	
Did Trustees and staff accept or refuse the offer?	
Is the individual/company/organisation dealing with Trustees and staff or the college in relation to any matters? If so, please give details.	
Are they providing goods/services to the college or hoping to do so in future?	

I certify that to the best of my knowledge, I have complied with that guidance

Signature of Trustee/Employee:

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Date of declaration:

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