



# **Inspire Multi Academy Trust**

## **Gifts and Hospitality Policy**

<b>Policy Reviewed :</b> <b>Adopted by Board of Trustees:</b>	<b>Spring 2026</b> <b>Summer 2016</b>
<b>Review Frequency</b>	<b>Annual</b>
<b>Date of Next Review</b>	<b>Spring 2027</b>
<b>Responsible Officer</b>	<b>Executive Bursar</b>
<b>Signed on behalf of the Board of Trustees:</b>	<b>S Ruffell</b>

## GIFTS AND HOSPITALITY POLICY

### Aims

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 Academy Trust 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
- Trustees fulfil their duties and wider responsibilities as charitable trustees
- Members, trustees 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

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.

This policy sets out the procedure staff must follow when receiving or declining gifts and hospitality.

This policy is based on the Academy Trust Handbook which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or other benefits that might compromise their judgement or integrity and should ensure all staff are aware of it. 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.

This policy also complies with our funding agreement and articles of association.

### Definitions

**Gifts** are any items, cash, awards, prizes, goods, services or donations offered free of charge without expectation of payment or benefit. Gifts also include goods or services offered at a discounted rate, or on terms not available to the general public.

**Hospitality** is defined as food, drink, accommodation or entertainment or the opportunity to attend a cultural or sporting event provided free of charge, heavily discounted or on terms not generally available to the general public.

**Bribery** is an inducement or reward offered, promised or provided in order to gain any business or personal advantage

**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 an inducement, a reward, a financial or other advantage offered, promised or given in order to induce a person to perform a relevant function or activity improperly to gain any business or personal advantage

### **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 Academy, 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 Trust 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 such as working lunches, coffees etc., are acceptable in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. These would not be added to the register. Any gifts or hospitality provided by the Academy Trust, such as a working lunch for visitors, must not be extravagant and alcohol must not be purchased.

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 Trust before accepting a gift and within 5 days of the gift 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 Trust 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 who to refer the decision to either Academy Headteacher/CEHT/Chair of the Trust dependent upon the circumstances and value of the gift. 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:

- Personal monetary gifts.
- Gifts or hospitality offered to family members, partners or close friends of members, trustees or staff.
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process.
- This list is not intended to be exhaustive.

Where a gift is received on behalf of the school or the Academy Trust, the gift remains the property of the Academy/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, governor, trustee or member has not declared a gift or hospitality then a formal investigation will be instigated by the Academy Trust via an appointed officer i.e: Headteacher/CEHT/Chair of the Trust.

Disciplinary action may be taken against anyone who fails to decline gifts or hospitality the trust has deemed unacceptable.



### 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 and Relationship to the Academy	Nature of Gift/Hospitality	Estimated Value

Reason for Accepting/ Declining the Gift/Hospitality

Signed:	
Date:	

**Approval : Academy Headteacher/Chief Executive Headteacher/ Chair of Trust**

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.