



The Island Learning Trust

GIFTS & HOSPITALITY POLICY

December 2023

As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below.

The intention of the policy is to ensure that The Island Learning Trust can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the Academy Trust. The Academy Trust should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

The Academy Trust encourages and expects staff, trustees and governors to use their networks and contacts for its benefit. It is however a fundamental requirement on all staff, trustees and governors, that they must not derive any financial benefits, beyond their agreed salary, from a decision they make or which they contribute to. Financial gain from decisions involving the education of pupils or the spending of significant sums from the Academy Trust's budget would be considered to be gross misconduct, therefore staff, trustees and governors shall not use their authority or office for personal gain and will demonstrate that all financial decisions have due regard to propriety and regularity. This will be evidenced by ensuring that staff, trustees and governors of the Academy Trust.

1. Maintaining an unimpeachable standard of honesty and integrity in all their business relationships.
2. Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
3. At all times in their business relationships acting to maintain the interests and good reputation of the Academy Trust.
4. Any employee who becomes aware of a breach of policy must refer to the Academy Trust's Whistleblowing Policy and report this immediately to their line manager who will instigate investigations as necessary.
5. Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's, trustee's or governor's impartiality or conflict with the duty owed to the Academy Trust in any matter relevant to an employee's, trustee's or governor's duties (such as conflicting business interests) should be declared in writing. Any member of staff, trustees or governors who is aware of any business dealings conferring personal gain, or involving relatives or associates must supply details of such transactions for entry into the Register of Business Interests. This includes information on:
 - a. Business of which they are a partner or sole proprietor
 - b. Company directorships including conflicting business interests
 - c. Charity trusteeships

- d. Membership of professional bodies, membership organisations, public bodies or special interest groups where they have a position of general control or management
 - e. Details of all gifts or hospitality offered by external bodies whilst acting as a member of staff, a trustee or a governor and whether this was declined or accepted in the last 12 months
 - f. Contracts offered by Staff, trustees or governors for the supply of goods and / or services to the trust/school
 - g. Company directorships or trusteeships of family members.
6. Employees, trustees and governors are permitted to accept gifts, rewards or benefits from members of the public or organisations the Academy Trust has official contacts with only where they are isolated gifts of a trivial character (such as diaries, flowers, chocolates or calendars). Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to effect a business or educational decision.

For the avoidance of doubt “trivial” is deemed to be a value of £10 or less.

7. Where purchased items include a “free gift”, such gifts should be either used for Academy Trust business or handed to the Academy Trust to be used at charity raffles, pupil prizes, etc.
8. In relation to conventional hospitality (lunches, outings, tickets for events etc.) provided that it is normal and reasonable in the circumstances they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision. In circumstances such as these, they should be discussed with the Chief Executive Officer and/or Chief Financial Officer in the first instance. If they involve either of these persons, it should be discussed with the Chair of the Trust Board.
9. The Island Learning Trust encourages and seeks cooperative relationships with stakeholders and external organisations. Accordingly, there can be occasions where it is appropriate for the Trust to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house. These fund limited gifts may include flowers, chocolates or vouchers i.e. love 2 shop. Likewise it may be appropriate for leaving gifts to be provided to staff leaving the employment of the Trust, particularly after a long period of service. Such gifts are often supplemented with private contributions from continuing members of staff.

However, it should be noted that gifts for a long period of service can represent taxable benefits. The Academy Trust will not have to report or pay a non-cash award to an employee, trustee or governor if all of the following apply:

- They’ve worked for the Academy Trust for at least 20 years
- The award is worth less than £50 per year of service
- The Academy Trust has not given the employee/trustee/governor a long-service award in the last 10 years

For example, the Academy Trust can give a non-cash award with a value of up to £1,000 for 20 years’ service. The Academy Trust must be mindful of the rules regarding regularity, propriety and value for money in the use of public funds in the Academies Trust Handbook.

10. Any gifts or hospitality provided by the Trust, such as a working lunch for visitors, must not be extravagant. A maximum value of £25 per head should be used as a guideline.
11. Expense claims should be made to the finance team and receipts must always be enclosed.

12. Any proposal to provide gifts or hospitality with a value of over £40 must be agreed by the Chief Finance Officer. Those in receipt of any gifts or hospitality offered to them or the Academy Trust with a value of over £40 must record the event on the gifts and hospitality register (see appendix I) within 5 working days, even if declined. Items below this value do not need to be recorded on the register. The Chief Financial Officer is responsible for maintaining the gifts and hospitality register on a day-to-day basis. Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a staff disciplinary matter.

13. To ensure that there is no risk that the behaviour of a governor, trustee or employee could be interpreted as a gesture to treat more favourably, bribe or groom, or that there is a perception that a favour of some kind is expected in return, it is only allowed that a gift to a pupil is given as part of an agreed Academy Trust reward system, approved in advance by the Head of School and/or SLT. Please note - The word 'gift' covers either an object or a monetary donation directly given to benefit the pupil. Also, the words 'charity' or 'reward' equally apply to this scenario if the intention is to benefit an individual child.

This Policy will be reviewed by the Trustees on a 3-yearly cycle and must be signed by the Chair of the Trust Board and the CEO.

Policy Reviewed:	December 2023
Next Review:	December 2026
Signature of Chair of the Trust Board:	Signature of CEO:

Appendix 1 – Gifts and Hospitality Register

Date	Name	Description of gift/hospitality	Approximate value	Party offering gift/hospitality	Accepted or Rejected?	Approved by