



Horsham
Learning Alliance

Gifts & Hospitality Policy

May 2026

Reviewed by Executive Team:	[April 2026]
Endorsed by [committee]:	[Audit & Risk – after first draft]
Approved by Board:	[19 May 2026]
Next review	[Summer 2028]

1. Introduction

- 1.1. The Trustees of Horsham Learning Alliance are committed to providing sound financial controls, to achieving value for money and to being worthy custodians of public money.
- 1.2. To achieve these aims this policy provides the guiding principles for which all Members, Trustees, Local Governors and staff will operate within.

2. Legislative Framework

- 2.1. 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 any other benefit which might compromise their judgement or integrity. This should include Members, Trustees, Local Governors, staff and/or any other representative of the Trust. The handbook also states that the Trust should ensure that all staff are aware of this policy.
- 2.2. This policy also complies with our funding agreement and articles of association.

3. Scope

- 3.1. This policy applied to all Members, Trustees, Local Governors, and staff of the Trust.
- 3.2. Where a gift has been offered to a member of staff by a group of students then the maximum gift value of £50 will apply on a per student basis.

4. Definitions

- 4.1. Gifts are any items, cash, awards, prizes, goods or services, offered 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.
- 4.2. Hospitality is defined as food, drink, accommodation or entertainment (such as cultural or sporting events) provided free of charge, heavily discounted or on terms not generally available to the general public.

5. Aims

- 5.1. This policy aims to ensure that:
- 5.2. The Trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academy Trust Handbook.
- 5.3. The Trust and those associated with it operate in a way that commands broad public support.
- 5.4. The Trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds.
- 5.5. Trustees fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors.
- 5.6. Members, Trustees, Local Governors 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.

6. Responsibilities

6.1. Members, Trustees, Local Governors and Staff:

- 6.1.1. Must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that the Trust might be placed under any obligation as a result of acceptance.
- 6.1.2. Must not use their official position to further their private interests or the interests of others.
- 6.1.3. Must not solicit gifts or hospitality.
- 6.1.4. Must record any gifts or hospitality offered to them or the Trust with a value of over £50 on the gifts and hospitality register within 7 working days, even if declined.
- 6.1.5. Must consult the Chief Financial and Operating Officer (CFOO) or Executive Principal/Headteacher before accepting or offering any gifts or hospitality with a value of over £50.

6.2. HLA Trustees:

- 6.2.1. Will ensure that the Trust's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

6.3. Executive Principal/Headteacher:

- 6.3.1. Will ensure that all staff are aware of and understand this policy, and that it is being implemented consistently.
- 6.3.2. Will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the College/School and Trust and to those outside the organisation.
- 6.3.3. Will ensure, alongside the CFOO, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.
- 6.3.4. Is responsible for communicating the Trust's rules and expectations about gift-giving to parents/carers.

6.4. Chief Financial and Operating Officer (CFOO):

- 6.4.1. Will ensure that the Trust maintains a gifts and hospitality register.
- 6.4.2. Ensures that figures for transactions relating to gifts made by the Trust are disclosed in the Trust's audited accounts, in accordance with the Academy Trust Handbook.
- 6.4.3. Responsible for ensuring that Trustees are provided with information on gifts and hospitality received and given, as appropriate.
- 6.4.4. Will ensure, alongside the Executive Principal/Headteacher, that decisions on whether individuals or the Trust can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

6.5. Head of Finance:

- 6.5.1. Is responsible for ensuring that the gifts and hospitality register is updated and maintained on a regular basis.

6.6. Parents/Carers:

- 6.6.1. Are advised that small tokens of gratitude are appreciated, but gifts or hospitality with a value of over £50 per child cannot be accepted in line with this policy.
- 6.6.2. Are advised that gift-giving is not a requirement, nor expected.

7. Acceptable gifts and hospitality

Received:

- 7.1. Members, Trustees, Local Governors and staff can accept gifts and hospitality that have a value of up to £50. These do not have to be pre-approved or recorded on the gifts and hospitality register.
- 7.2. Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, Members, Trustees, Local Governors and staff must consult the CFOO or Executive Principal/Headteacher.
- 7.3. Similarly, hospitality such as working lunches may be accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the CFOO or Executive Principal/Headteacher.
- 7.4. Any gifts or hospitality offered with a value of over £50 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any Member, Trustee, Local Governor or member of staff who is offered such gifts or hospitality must consult the CFOO or Executive Principal/Headteacher before accepting.
- 7.5. If the CEO/Executive Principal is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the Chair of the Board of Trustees and record the offer on the gifts and hospitality register.
- 7.6. If the Headteacher/CFOO is the recipient, or intended recipient, of any offer of gifts or hospitality, they must inform the CEO and record the offer on the gifts and hospitality register.
- 7.7. 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.

Given:

- 7.8. 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. This must be approved in advance by the CEO/Executive Principal/Headteacher.
- 7.9. Alcohol must not be purchased out of the Trust budget, under any circumstances.
- 7.10. Expense claims should be submitted to the Finance Department, and receipts must always be enclosed.
- 7.11. Small gifts may be given to staff following changes to personal circumstances (maternity, bereavement etc.) or upon resignation. Such gifts shall not exceed the value of £50 per event.

7.12. The CEO/CFOO must be consulted about any proposal to provide gifts with a value of over £50, or hospitality with a value of over £25 per head.

8. Unacceptable gifts and hospitality

8.1. The following must never be offered or accepted:

- Monetary gifts
- Gifts or hospitality offered to family members, partners or close friends of Members, Trustees, Local Governors or staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time

8.2. This list is not intended to be exhaustive.

9. Declining gifts and hospitality

9.1. Any Member, Trustee, Local Governor or staff member who is offered any of the unacceptable gifts or hospitality, including those outlined in section 8 above, should politely decline the offer.

9.2. If they feel it would not be appropriate for them to decline, they should refer the matter to the Executive Principal/Headteacher or CFOO. The Executive Principal/Headteacher or CFOO may decline the offer or donate the gift or hospitality to a worthy cause and must also record the offer on the gifts and hospitality register.

9.3. Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the Trust has deemed unacceptable or refer unacceptable gifts to the Executive Principal/Headteacher or CFOO.

9.4. Failure to declare any gifts or hospitality offered on the gifts and hospitality register, in line with this policy, will be dealt with as a staff disciplinary matter.

9.5. In some cases, the giving or receiving of unacceptable gifts or hospitality may be an act of fraud. If there is reason to believe that fraud has been committed by any Member, Trustee, Local Governor or staff member, this will be dealt with in accordance with the Trust's Fraud Policy.

10. Monitoring

10.1. The gifts and hospitality register is monitored regularly by the Head of Finance.

10.2. This policy will be reviewed every two years by the CFOO and approved by the Board of Trustees.

11. Related Documentation

This policy links to the following documents:

Staff Code of Conduct

Staff Disciplinary Policy

Anti-Fraud & Irregularity (Bribery)

HLA Funding Agreement

HLA Articles of Association