

IMPERIAL COLLEGE LONDON
POLICY AND PROCEDURE FOR
THE ACCEPTANCE OF GIFTS AND HOSPITALITY BY STAFF

1. The College is committed to the maintaining the highest standards and conducts its business in accordance with best practice in higher education corporate governance and with the seven Principles identified by the Committee on Standards in Public Life (selflessness, integrity, objectivity, accountability, openness, honesty and leadership). All staff should conduct themselves with integrity, impartiality and honesty at all times and should maintain high standards of propriety and professionalism. This includes avoiding situations where they could be open to suspicion of dishonesty, and not putting themselves in a position of conflict between their official duty and private interest.
2. This policy sets out the standards of behaviour the College expects from its employees, members of the Court and Council and members of College Advisory Boards when they are offered gifts and hospitality by external organisations or have personal, financial or other beneficial interests in any transaction between the College and a third party.⁽¹⁾
3. The College has a number of related Ordinances, policies and procedures already in place, which should be considered in conjunction with this Policy. These include the Financial Ordinance and its associated Regulations and Procedures, the Ordinances and procedures concerning staff grievance and discipline; scientific misconduct; the treatment of fraud, corruption and irregularities; and public interest disclosure.
4. It is the responsibility of each member of staff to ensure that they comply with this Policy and its related procedures. Failure to formally register substantial gifts or benefits in accordance with this Policy could result in disciplinary action. For the avoidance of doubt, this procedure includes gifts and/ or hospitality offered to individuals and/ or their spouse/ partner, or members of their close family,
5. College staff are expressly prohibited from soliciting benefits or rewards in return for providing services whether those services should be provided as part of their usual role or are provided because a gift or inducement has been offered. It is a disciplinary offence for staff to accept any benefit as an inducement or reward:
 - a. To take any action (or specifically not take action) in his or her official capacity.
 - b. To show favour (or disfavour) to any person or organisation in his or her official capacity.
6. Such behaviour may also, in certain circumstances, amount to a criminal offence for which the penalty may be a prison term or a fine or both. A member of staff who is convicted of a criminal offence might also be liable to forfeit any compensation or pension rights.

ACCEPTING GIFTS AND HOSPITALITY

7. Staff may, in certain circumstances and subject to these procedures, accept offers of gifts, benefits and hospitality. However staff must at all times be, and be seen to be, acting in a way which is fair, impartial and unbiased. The receipt of gifts, benefits and hospitality can create

1. This Policy only applies to external members of the Court, Council and College Advisory Boards in circumstances where they are offered gifts and/ or hospitality in connection with their role as an external member of the Court, Council or College Advisory Board.

conflicts of interest and may give rise to an adverse inference as to the integrity of either the donor or the staff member. It is important therefore that employees consider carefully the circumstances in which they accept gifts.

8. Some staff necessarily spend time with other organisations where it is normal business practice or social convention to offer gifts, hospitality or awards. Offers of this kind can place staff in a difficult position: to refuse may cause misunderstanding or offence; however to accept may give rise to questions of impropriety or conflict of interest. The guiding principles in such circumstances are:

- a. The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest.
- b. The action of individuals acting in an official capacity should not give the impression (to any member of the public, to any organisation with whom they deal or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation.

9. Before accepting any offers of gifts, hospitality or other benefits of **£50** or over in value staff members should seek the approval of their line manager. In addition, gifts, hospitality or other benefits of **£250** or over in value must be formally registered in accordance with this Policy within 28 days of the date of receipt. Where a member of staff receives a series of gifts, hospitality or other benefits from the same organisation in one year with a cumulative value of **£250** or over when taken together, these too must be formally registered.

10. It is expressly prohibited for a member of staff to accept any gift or benefit from an organisation that is actively involved in a tender process at the University. This prohibition commences at the point that an invitation to tender is published and extends to a period 3 months after a contract has been awarded. Any offers of gifts or benefits during this period must be refused. Where a gift or inducement is offered to the College corporately (rather than to an individual employee) in the course of a purchase negotiation, the College's representative in the negotiations should refer to the Purchasing Regulations for guidance.

GIFTS

11. Staff should not accept any gift or reward from any organisation or individual with whom they have contact in the course of their work as an inducement either for doing something or not doing something in their official capacity. Particular care should be taken about any gift from a person or organisation which has, or is hoping to have, a contract with the College.

12. Although it is conventional in some parts of the private sector for businesses to exchange seasonal gifts, this is not an acceptable practice in the College. Gifts of a trivial or inexpensive nature may be accepted, but more substantial or expensive offerings should be declined.

13. If unsolicited gifts of a substantial nature arrive from contractors they should be returned with a polite explanation that the College's Policies do not allow their acceptance. If staff have any doubts about whether an offer of a gift should be refused on the grounds that refusal may cause offence, they should consult their line manager, who in turn should discuss the matter with the College Secretary to determine whether the gift should be accepted. The College Secretary is the final arbiter on the advisability of accepting or refusing gifts.

14. Where a gift is made to an individual in their official capacity (for instance, when finalising a collaborative agreement between universities), the gift will be retained by the College and may be put on display. At an appropriate time, such ceremonial gifts will be transferred to the College Archives and Corporate Records Unit.

HOSPITALITY

15. It is accepted that, in the course of their normal duties, staff members will sometimes receive conventional hospitality including, but not limited to:

- a. Working meals including meals taken in the course of meetings or training schemes.
- b. Meals provided by other organisations during fact finding or information sharing events.
- b. Attendance at formal functions as a representative of the College; a formal function is an event promoted by an organisation, usually ceremonial in nature, for which an official invitation is issued to and accepted on behalf of the College.
- c. Attendance at formal social functions in relation to which invitations have been issued to a number of staff members;
- d. Attendance at information gathering or sharing events such as meetings with representatives of other universities and organisations for the purposes of sharing good practice.

16. Offers of hospitality that exceed this norm should in general be refused. In particular:

- a. Inducements which could lead to a contractual position between the College and a supplier, contractor or consultant should be avoided;
- b. Substantial or repeated offers of travel or accommodation or invitations to social functions should only be accepted after careful consideration;
- c. Substantial or repeated offers of meals or invitations to, and/ or tickets for, sporting, cultural or social events, particularly from the same source, should only be accepted after careful consideration.

17. Particular care should be taken when offered any form of hospitality from a person or organisation which has, or is hoping to have, a contractual relationship with the College. It is expressly prohibited for a member of staff to accept hospitality from an organisation that is actively involved in a tender process at the University, except where this is provided as part of a fact finding visit or meeting. If staff have any doubt about whether to accept any hospitality offered to them they should refer the matter to their line manager, who in turn may discuss it with the College Secretary.

REGISTRATION OF GIFTS AND HOSPITALITY

18. The College maintains two registers in respect of the acceptance of offers of gifts and hospitality. One is expressly for senior members of staff and members of the Council and is held by the College Secretary; the other is for all other staff of the College and is held by the Financial Controller.

19. The receipt of any gifts, benefits and hospitality with an individual or cumulative value of £250 or over should be notified to the College Secretary or the Financial Controller on the attached

form within 28 days of receipt. ⁽²⁾ The form must be completed and signed by the staff member and be passed to their line manager for approval and signature. After being signed off it should be passed to the College Secretary or Financial Controller as appropriate who will acknowledge and retain it.

20. The College Secretary and Financial Controller will each maintain a register and gifts, benefits and hospitality, which will be open to inspection by the internal and external auditors and may be released and/ or published in accordance with Freedom of Information requirements. The College Secretary and Financial Controller will provide the Audit Committee with an annual report on the register of gifts, benefits and hospitality.

21. It is the responsibility of each member of staff to ensure that they comply with this Policy and its related procedures. A failure to make a formal declaration within 28 days when required to do so, or the submission of an incomplete or misleading declaration may constitute misconduct and could result in disciplinary action.

DECLARATIONS

21. The following members of the College should declare the receipt of gifts, hospitality and other benefits to the College Secretary.

External Members of the Council
The Rector
Deputy Rector
Senior Principal
Pro-Rectors
Faculty Principals
Principal of the Imperial College Business School
Chief Operating Officer
Director of Planning
Director of Communications
Head of Central Secretariat
Director of Finance
Director of HR
Director of ICT
Director of Estates Projects
Director of Facilities Management
Director of Property Management
Academic Registrar
Director of Library Services
Director of Alumni Relations
Director of Commercial Services
Chief Co-ordinating Officer

22. All other staff should make their declarations to the Financial Controller.

Approved by the Management Board: 30 January 2009

2. The receipt of all individual gifts, hospitality or other benefits with a value of **£250** or over must be formally registered. Where a member of staff receives a series of gifts, hospitality or other benefits from the same organisation in one year with a cumulative value of **£250** or over when taken together, these too must be formally registered.

**PRO-FORMA FOR THE
DECLARATION OF GIFTS, HOSPITALITY AND INTEREST**

Before accepting any offers of gifts, hospitality or other benefits of **£50** or over in value staff members should seek the approval of their line manager. Gifts, hospitality or other benefits of **£250** or over in value must be formally registered using this pro-forma within 28 days of the date of receipt.

Where a member of staff receives a series of gifts, hospitality or other benefits from the same organisation in one year with a cumulative value of **£250** or over when taken together, these too must be formally registered using this pro-forma.

Name (block capitals): _____

Department/ Division: _____

Campus _____

I confirm that:

I, or my spouse/ partner, or a member of my close family, have been offered gifts, benefits and/ or hospitality as follows.

Date of gift, benefit or hospitality	
Details of gift, benefit or hospitality	
Estimated value of gift, benefit or hospitality	
Organisation/ person providing gift, benefit or hospitality and their relationship with the College	

My objectivity and independence in relation to the above external organisation have not been impaired by way of personal relationships, conflicts of interest or otherwise, other than as disclosed below.

Signed: (recipient) _____

DATE: _____

Name (block capitals) _____

Signed: (line manager) _____

DATE: _____

Name (block capitals) _____