

WOLFSON COLLEGE POLICY ON GIFTS AND HOSPITALITY

SUMMARY

Principles

- The College's staff and representatives must act, and be seen to act, at all times in a manner that is fair, impartial and without favouritism or bias.

Policy on accepting gifts and hospitality

- Gifts and hospitality may only be accepted by College staff or representatives when:
 - the offer has been made for a proper purpose;
 - acceptance is consistent with the purposes of the College;
 - it is appropriate and its value reasonable and proportionate to the circumstances;
 - acceptance accords with all applicable College policies and governmental legislation;
 - no gifts above £25 accepted from any service provider/supplier without specific permission of the Bursar.
- Acceptance of gifts or hospitality up to a value of £25 may be self-certified as long as they conform with policy principles. Above this threshold further levels of authorization apply.
- Gifts and hospitality exceeding £10 (single items and series of items) must be recorded in the Gifts & Hospitality Register (held by the PA to the Bursar).

Policy on providing gifts and hospitality

- Gifts and hospitality may only be provided by College staff or representatives when:
 - the offer is consistent with the purposes of the College;
 - the purpose is not to influence improperly;
 - it is appropriate and its value reasonable and proportionate to the circumstances;
 - provision accords with all applicable College policies and governmental legislation.
- The College does not make political donations
- Provision of gifts or hospitality up to a value of £25 may be self-certified as long as they conform with policy principles and the person making the offer also has budgetary authority for the expenditure. Above this threshold further levels of authorization apply.
- Gifts and hospitality exceeding £10 (single items and series of items) must be recorded in the Gifts & Hospitality Register, which is held by the PA to the Bursar.
- Gifts and hospitality provided to staff should not influence or appear to influence individuals improperly.

1. Principles

- 1.1 The College operates on a global basis. Integrity and fairness, both actual and perceived, are vital to its success. The College's staff and representatives must act, and be seen to act, at all times in a manner that is fair, impartial and without favouritism or bias.
- 1.2 The College will take firm action against any identified breaches of this policy or its associated procedures. Where this involves College employees or student members acting on its behalf this may include disciplinary action, depending upon the nature and severity of the breach.

2. Policy on accepting gifts and hospitality

2.1 Standards

2.1.1 The acceptance of gifts and hospitality by College staff or associated persons shall only occur when *all* of the following criteria apply:

- (a) the offer has been made for a proper business or charitable purpose, is consistent with reasonable custom and practice, and is not made with the intent or appearance of improperly influencing the individual recipient(s) or the College,
- (b) acceptance is consistent with the academic, professional or charitable purposes of the College, for promoting the values and reputation of the College, or aiding the establishment and maintenance of academic, collaborative, professional or business relationships with partners and supporters of the College;
- (c) the gift or hospitality offered is appropriate and the value, whether estimated or known, appears reasonable and proportionate to the circumstances; and
- (d) acceptance is in accord with all applicable College policies and governmental legislation.

2.1.2 Gifts and hospitality shall always be received and acknowledged openly, without any degree of secrecy attached.

2.1.3 College staff and associated persons are expressly prohibited from personally requesting or accepting any gifts or hospitality:

- (a) of money or of a monetary nature;
- (b) as inducement for providing particular services or preferential treatment to any individual or organization;
- (c) in return for not performing their work for the College properly or impartially; and/or
- (d) from or on behalf of any individual or organization involved in a current or active application for admission, application for employment, or a procurement tender process, for the duration of the process concerned.

2.1.4 Charitable and philanthropic gifts or donations received by the College must conform with the principles set out above and all College financial regulations and processes for the receipt of donations.

2.2 Authority to accept gifts and hospitality

2.2.1 Gifts and hospitality that are in complete accord with the standards set out above may be authorized for acceptance as follows:

Condition and estimated value	Approver
(a) Gifts or hospitality up to £25 total value.	Self approval
(b) Gifts or hospitality up to £1,000 total value.	Bursar
(c) Gifts or hospitality exceeding £1,000 total value.	President (or Governing Body where appropriate)

- 2.2.2 There is no exemption in principle in respect of the acceptance of promotional gifts or hospitality (for example, branded items, items or events provided as part of a marketing or sales campaign) – these must conform with the standards set out above.

2.3 Record-keeping

- 2.3.1 Subject to the exceptions set out at (c) and (d) below, a formal record must be kept of gifts and hospitality *received* where:

- (a) any *single* gift or act of hospitality is accepted by an individual or group with a value exceeding (or estimated to exceed) **£10** total; or
- (b) any *series* of gifts or hospitality not otherwise recorded is accepted by an individual or group from the same third party and the cumulative total value exceeds (or is estimated to exceed) **£10** in any rolling 12-month period.

Exceptions – the following are *not* required to be recorded:

- (c) any gift or act of hospitality up to an actual or estimated value of **£250** that is directly connected with teaching or research where:
 - (i) what is offered is reasonable and proportionate to the circumstances; and
 - (ii) there is clearly no intention, or appearance, of undue influence being exerted upon the recipient(s); and
 - (iii) the offer is not, or cannot be construed as, anti-competitive; and
 - (iv) the offer does not create any conflict of interest;
 - (d) any charitable donations received, which should be dealt with as set out in section 2.1.
- 2.3.2 A Gifts & Hospitality Register is held by the PA to the Bursar for employees to record all required details, which must be done within 7 days. The Bursar will keep the content of the Register under review.

3. Policy on providing gifts and hospitality

3.1 Standards

- 3.1.1 The offer or provision of gifts and hospitality by College staff or associated persons shall only occur when the purpose is:

- (a) to promote the values and reputation of the College for academic, professional or charitable purposes; or
- (b) to aid the establishment and maintenance of academic, collaborative, professional or business relationships with partners and supporters of the College; or
- (c) to provide a small token of thanks to College staff, associates or supporters for their contribution to the work of the College;

and, in every case, when *all* of the following criteria apply:

- (d) the purpose is not to influence individual recipients or bodies improperly, nor solely to provide personal entertainment;
- (e) the gift or hospitality offered is appropriate and the value is reasonable and proportionate to the circumstances; and;

- (f) provision is in accord with all applicable College policies, governmental legislation and, to the extent it can be reasonably determined, the rules and policies of the recipient organization.

3.1.2 Gifts and hospitality shall always be offered and provided openly, without any degree of secrecy attached.

3.1.3 College staff and associated persons are expressly prohibited from personally offering or providing any gifts or hospitality:

- (a) of money or of a monetary nature;
- (b) to induce an individual or organization improperly to provide particular services or preferential treatment;
- (c) in expectation of or reward for an individual or body not performing their work in a proper or impartial manner; and/or
- (d) to any individual or organization responsible for a formal application, tendering or procurement process immediately prior to or during that process.

3.1.4 Charitable and philanthropic gifts or donations made by or on behalf of the College must conform with the principles set out above and all College financial regulations.

3.1.5 The College does not make political donations. College staff and associated persons are expressly forbidden to provide any donation or gift to political parties or foundations on behalf of the College or in association with their work for the College.

3.2 Authority

3.2.1 Gifts and hospitality that are in complete accord with the standards set out above may be authorized for offer and provision as follows where the approver also has the necessary budgetary authority to permit expenditure:

Condition	Approver
(a) Gifts or hospitality up to £25 total value.	Self approval
(b) Gifts or hospitality up to £1,000 total value.	Bursar
(c) Gifts or hospitality exceeding £1,000 total value.	President (or Governing Body where appropriate)

3.2.2 Gifts and hospitality offered to public officials must be treated with particular care to ensure compliance with anti-bribery legislation.

3.2.3 There is no exemption in principle in respect of the offer of promotional gifts or hospitality (for example, branded items, items or events provided as part of a marketing or sales campaign) – these must conform with the standards set out above.

3.3 Gifts and hospitality offered to staff

3.3.1 The provision of gifts and hospitality by the College to its own staff and associated persons is covered by this policy but is also subject to the processes set out in College regulations and procedures.

3.3.2 In particular, gifts or hospitality must not be provided to any College staff or associated persons if there is any possibility that they might influence, or appear to influence, that individual improperly.

3.4 Record-keeping

3.4.1 Subject to the exceptions set out at (c) below, a formal record must be kept of gifts and hospitality *provided* where:

- (a) any *single* gift or act of hospitality is offered to an individual, group or organization (whether as private individuals or in an official capacity) with a value exceeding (or estimated to exceed) **£25** total; or
- (b) any *series* of gifts or hospitality not otherwise recorded is offered to the same individual, group or organization and the cumulative total value exceeds (or is estimated to exceed) **£25** in any rolling 12-month period.

Exceptions – the following are *not* required to be recorded:

- (c) any gift or act of hospitality up to an actual or estimated value of **£250** that is directly connected with teaching or research where:
 - (i) what is offered is reasonable and proportionate to the circumstances; and
 - (ii) there is clearly no intention, or appearance, of undue influence being exerted upon the recipient(s); and
 - (iii) the offer is not, or cannot be construed as, anti-competitive; and
 - (iv) the offer does not create any conflict of interest.

3.4.2 A Gifts & Hospitality Register is held by the PA to the Bursar for employees to record all required details, which must be done within 7 days. The Bursar will keep the content of the Register under review. Records must be maintained in a complete, up-to-date, and accurate manner.

4. Application

4.1 Definition and scope

4.1.1 This policy applies to all staff and associated persons of the College. It shall be made generally available and published publicly via the College web-site.

4.1.2 Gifts and hospitality are defined as the provision of property, consumables, services, entertainment or money for which no reasonable fee is paid in return by the recipient. This definition does *not* include prizes won in open competition or teaching and research prizes or awards.

4.1.3 Whilst gifts and hospitality accepted or offered in relation to research projects are covered by this policy, the funding and sponsorship of research is not a gift and should be managed separately in accordance with the procedures for Gifts (Donations) for Research.

4.2 Responsibilities

4.2.1 The Bursar is responsible for:

- (a) ensuring that this policy is implemented and maintained and that appropriate explanatory guidance is provided.
- (b) keeping this policy, associated procedures and guidance under review.
- (c) ensuring that staff are made aware of this policy.
- (d) ensuring that the required records are kept.

4.2.2 Every member of staff (and other associated persons who act on behalf of or provide services to the College) is responsible for ensuring that they comply at all times with this policy.

4.3 Compliance

4.3.1 Where there is any suspicion of bribery, fraud, or corruption in respect of gifts or hospitality, the matter must be reported to the Bursar or Governing Body at once.