

University Policy on Gifts and Hospitality

SUMMARY

Principles

- The University'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 University staff or representatives when:
 - the offer has been made for a proper purpose;
 - acceptance is consistent with the purposes of the University;
 - it is appropriate and its value reasonable and proportionate to the circumstances;
 - acceptance accords with all applicable University policies and governmental legislation.
- Acceptance of gifts or hospitality up to a value of £100 may be self-certified as long as they conform with policy principles. Above this threshold further levels of authorization apply.
- Gifts and hospitality exceeding the self-certification threshold (single items and series of items) must be recorded in a departmental Gifts & Hospitality Register.

Policy on providing gifts and hospitality

- Gifts and hospitality may only be provided by University staff or representatives when:
 - the offer is consistent with the purposes of the University;
 - the purpose is not to influence improperly;
 - it is appropriate and its value reasonable and proportionate to the circumstances;
 - provision accords with all applicable University policies and governmental legislation.
- The University does not make political donations
- Provision of gifts or hospitality up to a value of £100 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 the self-certification threshold (single items and series of items) must be recorded in a departmental Gifts & Hospitality Register.
- Gifts and hospitality provided to staff should not influence or appear to influence individuals improperly.

Application

- This policy and associated guidance applies throughout the University, apart from Oxford University Press, and includes majority and wholly owned University subsidiary companies, except where alternative policies have been approved.
- This policy and associated guidance applies to all staff and associated persons acting on behalf of the University in any manner – further guidance on terms used, the scope and application of the policy is provided on the University [web-site](#)¹.

¹ At: <http://www.admin.ox.ac.uk/councilsec/compliance/giftshospitality/>

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1. Principles

- 1.1 The University operates on a global basis in pursuit of its mission to achieve and sustain excellence in every area of its teaching and research. Integrity and fairness, both actual and perceived, are vital to its success in achieving this mission. The University'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 University will take firm action against any identified breaches of this policy or its associated procedures. Where this involves University 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 University 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 University,
 - (b) acceptance is consistent with the academic, professional or charitable purposes of the University, for promoting the values and reputation of the University, or aiding the establishment and maintenance of academic, collaborative, professional or business relationships with partners and supporters of the University;
 - (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 University 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 University 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 University 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 University must conform with the principles set out above but are subject to separate procedures, as

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defined in section 2.3 of Financial Regulations² and financial processes³ for the receipt of donations.

- 2.1.5 Gifts accepted in accordance with this policy should be dealt with in a practical manner that accords with the guidance⁴ issued from time to time by the Registrar.

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 £100 total value.	Self approval
(b) Gifts or hospitality up to £500 total value.	Departmental Administrator
(c) Gifts or hospitality up to £1,000 total value.	Head of Department
(d) Gifts or hospitality exceeding £1,000 total value.	Head of Division

Note – when applied to situations outside the UK these value thresholds should be considered in terms of equivalent sterling value.

- 2.2.2 Gifts and hospitality in excess of £1,000 must also be reported to the Registrar who will notify the Chair of Audit and Scrutiny Committee; the Chair may at his or her discretion report the gift to the Audit and Scrutiny Committee itself.
- 2.2.3 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, although practically the majority of items are unlikely to exceed £50.

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) **£100** 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) **£100** 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;

² At: <http://www.admin.ox.ac.uk/statutes/regulations/101-078.shtml>

³ At: <http://www.admin.ox.ac.uk/finance/processes/cashmanagement/candb/donation/>

⁴ At: <http://www.admin.ox.ac.uk/councilsec/compliance/giftshospitality/>

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- (d) any charitable donations received, which should be dealt with as set out in section 2.1.

2.3.2 A template Gifts & Hospitality Register⁵ is provided for departments to record all required details, which must be done within 28 days of the receipt concerned. Departments are expected to keep the content of the Register under constant review and will be requested to forward copies of the records made annually to the Registrar, or a nominated delegate. Records must be maintained in a complete, up-to-date, and accurate manner. The information may be published at the discretion of the University, requested for review by Internal Audit, or made available under the provisions of the Freedom of Information Act.

3. Policy on providing gifts and hospitality

3.1 Standards

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

- (a) to promote the values and reputation of the University 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 University; or
- (c) to provide a small token of thanks to University staff, associates or supporters for their contribution to the work of the University;

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 University 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 University 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

⁵ At <http://www.admin.ox.ac.uk/councilsec/compliance/giftshospitality/giftshospitalityregisters/>.

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(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 University must conform with the principles set out above but are subject to separate procedures, as defined in section 3.3 of Financial Regulations⁶.

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

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 £100 total value.	Self approval
(b) Gifts or hospitality up to £500 total value.	Departmental Administrator
(c) Gifts or hospitality up to £1,000 total value.	Head of Department
(d) Gifts or hospitality exceeding £1,000 total value.	Head of Division

Note – when applied to situations outside the UK these value thresholds should be considered in terms of equivalent sterling value.

3.2.2 Gifts and hospitality in excess of £1,000 must also be reported to the Registrar who will notify the Chair of Audit and Scrutiny Committee; the Chair may at his or her discretion report the gift to the Audit and Scrutiny Committee itself.

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

3.2.4 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, although practically the majority of items are unlikely to exceed £50.

3.3 Gifts and hospitality offered to staff

3.3.1 The provision of gifts and hospitality by the University to its own staff and associated persons is covered by this policy but is also subject to the processes set out in the University Expenses and Benefits Guide⁷.

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

⁶ At: <http://www.admin.ox.ac.uk/statutes/regulations/101-078.shtml>

⁷ At: <http://www.admin.ox.ac.uk/finance/expenses/guide/11entertaining/>

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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) **£100** 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) **£100** 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 template Gifts & Hospitality Register⁸ is provided for departments to record all required details, which must be done within 28 days of the provision concerned. Departments are expected to keep the content of the Register under constant review and will be requested to forward copies of the records made annually to the Registrar, or a nominated delegate. Records must be maintained in a complete, up-to-date, and accurate manner. The information may be published at the discretion of the University, requested for review by Internal Audit, or made available under the provisions of the Freedom of Information Act.

4. Application

4.1 Definition and scope

4.1.1 This policy applies to all staff and associated persons of the University. It shall be made generally available and published publicly via the University web-site⁹.

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 on Gifts (Donations) for Research¹⁰.

⁸ At <http://www.admin.ox.ac.uk/councilsec/compliance/giftshospitality/giftshospitalityregisters/>

⁹ At: <http://www.admin.ox.ac.uk/councilsec/compliance/giftshospitality/>

¹⁰ At: <http://www.admin.ox.ac.uk/researchsupport/applying/donations/>

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- 4.1.4 Further definition and explanatory guidance concerning this policy and terminology used is provided separately on the University web-site¹¹.
- 4.1.5 This policy and associated explanatory guidance has been adopted by Council and applies throughout the whole University apart from Oxford University Press, which has its own complementary policy and procedures. It also applies in full to majority and wholly owned University subsidiary companies unless separate policies have been formally approved and adopted by the Boards of those companies and endorsed by Council's General Purposes Committee.

4.2 Responsibilities

- 4.2.1 The Registrar, or a nominated delegate, 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 and suggesting changes to Council as appropriate and when necessary.
- 4.2.2 Heads of Division, Heads of Department¹², and Heads of University Services (UAS and ASUC) are responsible for:
- (a) ensuring that staff within their divisions, departments or sections (as appropriate), affected students, and other associated persons are made aware of this policy and associated explanatory guidance;
 - (b) ensuring that the required records are kept.
- 4.2.3 The Boards of Directors of majority and wholly owned subsidiary companies of the University are responsible for ensuring that this policy, or an alternate policy that is approved by Council's General Purposes Committee, is implemented and maintained within those companies and that staff and other associated persons are made aware of the policy and associated explanatory guidance.
- 4.2.4 Every member of staff and other associated persons who act on behalf of or provide services to the University 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, then the matter must be reported at once and in accordance with the procedures under the University Policy for Bribery and Fraud¹³.
- 4.3.2 General concerns about non-compliance should be reported in the first instance to the Council Secretariat.

¹¹ At: <http://www.admin.ox.ac.uk/councilsec/compliance/briberyfraud/definitionsinterpretations/>

¹² Including faculty board chairs.

¹³ At: <http://www.admin.ox.ac.uk/councilsec/compliance/briberyfraud/>

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4.4 Interaction with other policies, procedures and regulation

4.4.1 This policy interacts and overlaps with a number of other University policies and procedures:

- Financial Regulations and supporting Financial Processes;
- Bribery and Fraud Policy;
- Policy on Conflict of Interest.