

GIFTS AND HOSPITALITY POLICY

1. PURPOSE AND OVERVIEW

- 1.1. Imperial College London (“Imperial” or the “University”) is committed to maintaining the highest standards of professional conduct in its activities. In accordance with our [Code of Conduct for Staff](#), the University expects all individuals acting on its behalf to avoid situations that may give rise to actual or perceived conflicts of interest, and to carry out their roles and responsibilities with dedication and a commitment to [Imperial Values](#): Respect, Collaboration, Excellence, Integrity and Innovation.
- 1.2. This Gifts and Hospitality Policy (“Policy”) sets out the principles and procedures governing the offering and acceptance of gifts and hospitality, or other benefits, by staff and members in connection with official University business; to ensure that no individual is unduly influenced, or perceived to be unduly influenced, in the performance of their official duties.

2. SCOPE

- 2.1. This Policy applies to all individuals while acting for or on behalf of Imperial in an official capacity, including employees, academic visitors, honorary contract holders, independent and external members of Imperial’s committees and advisory boards (including Council), consultants, agency workers, and contractors. Collectively referred to as “staff” and “members” in this Policy.
- 2.2. This Policy applies equally to offers of gifts or hospitality made to or by a staff or member’s spouse, partner, or close family members where such offers are connected to the individual’s role at the University. These must be treated as if offered directly to or by the staff or member and are subject to the same approval thresholds and registration requirements.

3. RESPONSIBILITIES

3.1. All staff and members

- 3.1.1. Must not offer, solicit or accept gifts or hospitality, when acting in an official capacity on behalf of Imperial, that could unduly influence, or be perceived to unduly influence, their official duties.
- 3.1.2. Must seek line manager approval for any gift or hospitality offer valued at £50 or up to £249.
- 3.1.3. Must register any gift or hospitality valued at £250 or more (individually or cumulatively from the same source in a financial year) within 28 days of receipt.

3.2. Line managers

- 3.2.1. Are responsible for reviewing and approving the offer or acceptance of gifts or hospitality in accordance with this Policy.
- 3.2.2. Should escalate any concerns to the Registrar & University Secretary at university.secretary@imperial.ac.uk.

3.3. Registrar & University Secretary

- 3.3.1. Shall maintain registers of declared gifts and hospitality to members of Imperial's staff, and offers of gifts and hospitality by members of Imperial's staff.
- 3.3.2. Shall provide annual reports of declarations to the Audit and Risk Committee.
- 3.3.3. May approve disclosure of register entries in accordance with the University's freedom of information obligations.

4. POLICY

4.1. General principles for receiving and offering gifts and hospitality

- 4.1.1. Staff and members must not accept any gift or hospitality that could be construed as an inducement or reward for performing (or not performing) a function in their official capacity.
- 4.1.2. Offers must be proportionate, infrequent, and clearly related to legitimate business or academic engagement. Staff and members should consider not only the value of a gift or hospitality, but also its timing, frequency, and context. Offers that are modest in value may still be inappropriate if they are repeated or coincide with key decisions.
- 4.1.3. Offers must always be considered in light of the potential for reputational risk, perceived bias, and conflict of interest. Transparency and good judgement must guide all decisions to accept offers.
- 4.1.4. Offers to public officials by members of Imperial's staff must be subject to enhanced scrutiny. The University does not make political donations.
- 4.1.5. Where refusal may cause genuine offence, staff and members should explain that University policy prohibits acceptance.

4.2. Acceptance of gifts and hospitality

The following may generally be accepted without registration:

- Low-value items (e.g. pens, mugs, chocolates).
- Working meals or refreshments during meetings or training.
- Attendance at formal functions or academic events as an Imperial representative.*

Staff and members should note that offers involving travel, accommodation, or other conference/event-related costs funded, in whole or in part, by an external organisation must be declared and, where required, approved in advance. This includes invitations to speak or attend where personal expenses are covered.

4.3. **Thresholds and required actions for the offer or acceptance of gifts and hospitality**

Value	Action Required
Under £50	No formal action required. Line manager approval recommended if unsure.
£50 to £249	Must be approved by line manager prior to acceptance/offer.
£250 or more (individual or cumulative from same source in one financial year)	Line manager approval required. Must be registered within 28 days of receipt.

- 4.3.1. Particular caution should be exercised with offers or acceptance of tickets to sporting, cultural, or entertainment events, or offers or acceptance of travel or accommodation. These should only be offered or accepted where there is a clear and legitimate business or academic purpose, and must be approved and registered in accordance with this Policy.
- 4.3.2. Ceremonial gifts with an estimated value over £250 (presented formally as part of a cultural, diplomatic, or institutional exchange) received in an official capacity should be retained by the University; consideration should be given to whether it is appropriate to transfer such a ceremonial gift to the University's archives.

4.4. **Prohibited conduct**

Staff and members must not:

- 4.4.1. Solicit gifts or hospitality in connection with their role.
- 4.4.2. Accept any offer from an organisation or person involved in a University tender process, from the point of invitation to tender until three months after contract award.
- 4.4.3. Accept repeated or high value offers from the same source without clear justification.

4.5. **Registration procedure**

In order to register a declaration, staff and members must:

- 4.5.1. Complete the **Gifts and Hospitality Declaration Form** (annexed to this Policy) within 28 days of receipt or offer of the gift or hospitality.
- 4.5.2. Submit the completed form to their line manager for approval.
- 4.5.3. Forward the approved form to the Registrar & Secretary.

Registers are subject to internal and external audit and may be disclosed under freedom of information obligations.

4.6. Provision of Gifts and Hospitality

4.6.1. Gifts and hospitality provided by the University must be proportionate, for legitimate purposes, and comply with budgetary and policy constraints. The following provides guidance on when it is appropriate to offer gifts or hospitality:

Context	Guidance
Business or Academic Engagement	May be offered where it serves a legitimate business or academic purpose, such as hosting external collaborators, partners, or speakers.
Recruitment and Tendering	Must not be offered to individuals or organisations involved in recruitment or procurement processes.
Public Officials	Offers to public officials must be subject to enhanced scrutiny and pre-approval by the Registrar & University Secretary.
Cultural or Ceremonial Occasions	May be appropriate to offer symbolic gifts (e.g. books, institutional tokens) during formal exchanges. Any offer should be modest and culturally appropriate.
Hospitality at Events	Reasonable hospitality (e.g. refreshments, meals) may be offered to guests attending University-hosted events. Must be in line with budget and policy constraints.
Repeat or High-Value Offers	Repeated or high-value hospitality must be justified, approved, and recorded.
Political or Lobbying Contexts	Gifts or hospitality must not be offered in connection with political activity or lobbying.

4.7. Non-compliance

4.7.1. Failure to comply with this Policy, including failure to register or submitting misleading declarations, may constitute misconduct and result in disciplinary action. In serious cases, this may also give rise to criminal liability.

4.7.2. While this Policy sets internal thresholds for approval and registration, these do not override the legal requirement to assess whether any gift or hospitality could reasonably be perceived as creating an obligation or unduly influencing behaviour. Staff must exercise sound judgement and seek advice where necessary. Offers or acceptance of gifts or hospitality that breach the law may also result in disciplinary action and criminal liability.

POLICY AND DOCUMENT CONTROL	
Policy title:	Gifts and Hospitality Policy
Date approved:	28 November 2025
Approving body:	Council
Last review date(s):	November 2025 January 2009
Revision history:	Version 2: 28 November 2025 Version 1: 30 January 2009
Next review date:	November 2027 (or following any significant legal or regulatory change)
Related internal policies, procedures, guidance:	<ul style="list-style-type: none">• Code of Conduct for Staff• Declaration of Interests Policy and Conflict of Interests Guidance• Procurement Regulations and Policy• Regulation of Council 9: Public Interest Disclosure (Whistleblowing) Policy
Division / Department / Function:	Division of the University Secretary on behalf of Council
Policy owner:	Registrar & University Secretary
Point of contact(s):	Division of the University Secretary (university.secretary@imperial.ac.uk)

ANNEX TO THE GIFTS AND HOSPITALITY POLICY

GIFTS AND HOSPITALITY DECLARATION FORM

Before offering or accepting any offers of gifts, hospitality or other benefits of £50 or over in value staff and 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 or offer.

Where staff or members receive or offer a series of gifts, hospitality or other benefits from or to 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 / FUNCTION:

CAMPUS / LOCATION:

I confirm that:

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

Date of gift, hospitality or benefit	
Details of gift, hospitality or benefit	
Estimated value of gift, hospitality or benefit	£
Organisation or person providing or receiving the gift, hospitality or benefit and their relationship with the University	

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

SIGNED (RECIPIENT):

NAME (BLOCK CAPITALS):

DATE:

SIGNED (LINE MANAGER):

NAME (BLOCK CAPITALS):

DATE: