

## **Policy concerning the acceptance of gifts by staff in the course of conducting College business**

### **Scope**

The College's Finance Regulations provide general guidance on the acceptance of gifts. See <https://www.kcl.ac.uk/policyhub/financial-regulations-2>.

This policy provides more specific guidance on these matters and covers all staff of the College.

### **Policy**

1. Staff may accept gifts offered to College in the course of carrying out their official duties. Before accepting gifts, however, staff should satisfy themselves that acceptance of a gift does not:
  - constitute an actual or perceived conflict of interest;
  - create a specific or general obligation which the College is required to fulfil; and
  - constitute an actual or perceived inducement in respect of a decision the College must take.
2. All gifts, without exception, received by staff in the course of carrying out their official duties, are the property of the College.
3. All gifts received by staff must be declared to the staff member's line manager at the level of head of department or its equivalent.
4. If a member of staff wishes to keep a token gift for personal use, he or she must seek the approval of their line manager and make a donation to the College's Annual Fund in lieu of the value of the gift.
5. Senior managers of the College, particularly those whose staff may need to accept and/or exchange gifts regularly in the course of their work, should implement appropriate and proportionate monitoring and recording procedures to ensure that the College's policy is implemented.

### **Guidance**

6. If members of staff require specific guidance they should consult their line manager in the first instance and the Internal Audit Department in relevant cases.

### **Related policies**

7. See the College's *Policy for the Acceptance of Donations*.

Approved by the Head of Administration and College Secretary

Review date – October 2016