



Classification Number	<i>To be assigned by Policy Office</i>
Parent Policy	Ethical Conduct Policy
Framework Category	Legal, Compliance and Governance
Approving Authority	Audit and Finance Committee
Policy Owner	University Secretary and General Counsel
Approval Date	DRAFT FOR CONSULTATION
Review Date	
Supersedes	

## GIFT REGISTRY PROCEDURES

### PURPOSE

1. The purpose of these Procedures is to establish a process for reporting gifts received by Employees and documenting those gifts to ensure compliance with the Code of Ethical Conduct.

### DEFINITIONS

2. For the purposes of these Procedures the following definitions apply:

**“Employees”** means individuals, including students, who are employed by the University or holding an appointment with the University including paid, unpaid and/or honorific appointments.

**“Gifts”** means Tangible Gifts, Hospitality, or Invitations given to Employees.

**“Tangible Gift”** means tangible goods given by an external party in connection with an Employee’s University responsibilities or position.

**“Hospitality”** means meals, accommodations, entertainment or similar given by an external party in connection with an Employee’s University responsibilities or position or major academic interests.

**“Invitation”** means an invitation from an external party to attend or speak at an event, workshop, conference or similar and may include of admission, registration, transportation and/or accommodation costs.

### SCOPE AND AUTHORITY

3. These Procedures apply to Employees of the University.
4. The General Counsel, or successor thereof, is the Policy Owner and is responsible for overseeing the implementation, administration and interpretation of these Procedures.

### PROCEDURES

#### 5. Responsibilities

- 5.1. **Office of the General Counsel** is responsible for:

- a) Developing an online form for submission of Gift details and maintaining a Registry of Gifts.
- b) Providing advice to supervisors on the acceptance of gifts.
- c) Annual compliance reporting under these procedures.

**5.2. Unit Supervisor** is responsible for:

- a) Reviewing Gifts reported by their Employees.
- b) Determining whether Gifts are consistent with the Code of Ethical Conduct.

**5.3. Employees** are responsible for:

- a) Reporting Gifts received using the prescribed means.
- b) Understanding the rules regarding acceptable gifts under the Code of Ethical Conduct and seeking advice when necessary.

**6. Reporting of Gifts**

**6.1.** All Gifts received by an Employee will be reported to their immediate supervisor as soon as possible. The supervisor will determine if the gift is consistent with section XX of the Code of Ethical Conduct Policy. The supervisor will consider whether:

- a) The Gift is a University Gift that can be accepted in accordance with the Gift Acceptance Policy.
- b) The value exceeds the maximum allowable.
- c) The Employee is directly involved in transactions or other activities with the source that would give rise to a perceived Conflict of Interest.
- d) The Employee's attendance at an event would be of benefit to the University due to increased public profile, training or development of the Employee, or strengthening of institutional partnerships.
- e) The gift is consistent with Procurement Policy, related procedures and the Supply Chain Code of Ethics.
- f) Hospitality would be otherwise allowable as a business expense claim under the University's Expense Policy and Procedure.

**6.2.** Tangible Gifts inconsistent with section XX of the Code of Ethical Conduct Policy should not be accepted, or, if accepted, should be returned. Where returning a Tangible Gift would be considered a breach of protocol or would give offense, disposal by donation to a non-profit organization or similar should be considered.

**6.3.** Hospitality inconsistent with section XX should not be accepted.

**6.4.** A supervisor may contact [legal@ontariotechu.ca](mailto:legal@ontariotechu.ca) for advice when making determinations based on section XX of the Code of Ethical Conduct Policy.

**7. Registry of Gifts**

- 7.1. The Office of the General Counsel will maintain a Registry of Gifts to track Tangible Gifts, Invitations and Hospitality received by Employees.
- 7.2. The Office of the General Counsel will create an online form for submitting information on Gifts received by Employees. The following information is required:
  - a) Value (or estimated value) of Gift
  - b) Type of Gift
  - c) Source of Gift
  - d) Date of Gift
  - e) Recipient of Gift
  - f) Unit of Recipient
  - g) Supervisor
- 7.3. Gifts should be reported to the Office of the General Counsel within a month of receipt.
- 7.4. An annual report on Gifts received will be submitted by the Office of the General Counsel to [the Audit and Finance Committee] as part of compliance reporting.

#### **MONITORING AND REVIEW**

8. These Procedures will be reviewed as necessary and at least every three years. The [insert position/committee], or successor thereof, is responsible to monitor and review these Procedures.

#### **RELEVANT LEGISLATION**

9. Legislation 1  
Legislation 2  
Legislation 3

If no associated legislation use the text "This section intentionally left blank".

#### **RELATED POLICIES, PROCEDURES & DOCUMENTS**

10. Ethical Conduct Policy  
University Investigation Procedure  
Procurement of Goods and Services Policy and Procedure  
Supply Chain Code of Ethics