



**Approving University Official(s):** Senior Vice President for Business and Finance and Provost  
**Responsible Office:** Northwestern University Conflict of Interest Office  
**Effective date:** July 1, 2021  
**Next review date:** June 30, 2022

## **Acceptance of Gifts and Hospitality from External Parties**

### **Policy Statement**

Northwestern University is committed to the utmost integrity in fulfilling its mission and thereby requires the same level of integrity from its employees. The acceptance of Gifts or Hospitality or other benefits may improperly influence a faculty or staff member in his or her discharge of official duties or create the perception that the employee is receiving personal gain by virtue of his or her position at the University. This policy provides guidelines on accepting Gifts and Hospitality from external sources. Departments and units may impose more stringent procedures, as they deem appropriate and necessary, to preserve the University's integrity.

### **Purpose**

Faculty and staff have a fundamental obligation to act in the best interests of the University. The purpose of this policy is to prevent faculty and staff from engaging in transactions or relationships that might influence or appear to influence their decision-making. The spirit of the Policy is to avoid accepting a gift or other offer when that offer creates even the perception that a decision was or could be biased by personal gain or could be perceived as seeking favor.

### **Audience**

All Northwestern faculty, staff and student workers.

### **Definitions**

*Gift:* Any item of value, including any service, favor, monies, credits, or discounts not available to others. Honoraria received for presentations or colloquia attendance and awards for service or contributions to one's field are not considered to be Gifts.

*External Party:* Any organization, vendor or individual that is not a member of Northwestern University.

*Hospitality:* Entertainment, meals, and travel, including, but not limited to event tickets, transportation, room or housing, registration fees, business lunches and dinners, and other comparable activity.

*Immediate Family Member:* A Faculty or Staff member's spouse, dependent child, domestic or civil union partner, or others as defined in the Faculty or Staff Handbook.

## Policy Implementation

### I. Acceptance of Gifts and Hospitality from External Parties

- A. Gifts received by Northwestern faculty, staff, and/or their Immediate Family Members from an external organization, vendor or individual in connection with their duties at the University are prohibited, except for *de minimis* items, such as:
- Gifts with a value of less than \$75 or items such as advertising tokens and informational materials available to anyone;
  - Tokens of goodwill given by officials of other Universities; and
  - Plaques or similar awards given in recognition of an event, milestone or similar circumstance.

Notwithstanding the exceptions listed above, employees may never accept Gifts from an External Party in the form of cash or gift cards.

- B. Business meals and other Hospitality can help establish a relationship of goodwill among current and prospective University partners. Nonetheless, the acceptance of Hospitality may interfere with the employee's ability to make decisions in the best interest of the University. Therefore, employees should only accept Hospitality that has a clear business purpose and where University work is being conducted.
- C. If faculty or staff members are in a position make or influence decisions regarding vendors in the process of seeking or continuing to do business with Northwestern, extra caution should be exercised when accepting Gifts or Hospitality from those entities as acceptance can create the perception of a *quid pro quo*.
- D. Exceptions may be made with respect to the receipt of either Gifts or Hospitality by the staff member's supervisor or faculty member's department chair and/or dean's office in accordance with the guidelines set forth in [Gifts and Hospitality Guidance and FAQs](#). Approval for such exceptions should be documented. In the event that a request for exception is denied, and the staff or faculty member wishes to appeal the decision, an appeal may be filed in accordance with the procedures in the [Policy on Conflict of Interest and Conflict of Commitment](#).
- E. Northwestern faculty and staff may not solicit individual Gift(s), Hospitality, or other personal benefit(s) to which they are not otherwise entitled from External Parties in connection with their duties at the University.

### II. Disclosure

In accordance with the Northwestern [Policy on Conflict of Interest and Conflict of Commitment](#), faculty and staff shall report *non-de minimis* Gifts and Hospitality as required in eDisclosure.

### III. Relationship to Other Policies

This Policy sets forth minimum standards governing the acceptance of Gifts and Hospitality by University employees. Some units and departments may have more stringent policies and procedures. In these cases, the more stringent rules apply.

This policy supplements and should be read in conjunction with the [Policy on Conflict of Interest and Conflict of Commitment](#).

## Consequences of Violating this Policy

Failure to comply with this Policy, including the acceptance of inappropriate Gifts and Hospitality and the failure to disclose Gifts and Hospitality as required will be handled in accordance with disciplinary policies and procedures as stipulated in Northwestern's Faculty Handbook or Staff Handbook, as applicable. If a Gift and/or Hospitality is inappropriately accepted in the course of an individual's University duties and determined to have resulted in undue personal benefit, the University also reserves the right to treat the Gift and/or Hospitality as personal income.

## Related Information

[Policy on Conflict of Interest and Conflict of Commitment](#)

[Northwestern University Staff Handbook](#)

[Northwestern University Faculty Handbook](#)

[Travel and Entertainment Policy](#)

[FAQs on Accepting Gifts or Hospitality](#)

## Contacts

The following office can address questions regarding this Policy:

Northwestern University Conflict of Interest Office

Phone: (847) 467-4515, email: [nucoi@northwestern.edu](mailto:nucoi@northwestern.edu)

## History

New policy.

## Policy URL:

<http://policies.northwestern.edu/docs/gifts-and-hospitality-policy-final.pdf>