

## Gift acceptance and naming policy

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## 1 Introduction

- 1.1 This document sets out the University's gift acceptance and naming policy in relation to the solicitation and acceptance of philanthropic donations.
- 1.2 Ultimate responsibility for the acceptance – or otherwise – of gifts to the University rests with University Ethics Committee and Council.
- 1.3 As an exempt charity included in Schedule 3 to the Charities Act 2011, the University has a responsibility to ensure that the processes of securing and receiving funds is to support the mission and aims of the University and these processes do not compromise its integrity, the trust of its supporters or its commitment to students, staff and communities that it serves.

## 2 Scope

- 2.1 This policy is intended for University staff and prospective donors and their advisers, providing assurance that all donors are treated equitably. The University actively encourages philanthropic support, in line with its charitable status, and views establishing such support as a key element in being able to fulfil its mission.
- 2.2 The policy applies to all philanthropic donations and gifts with a monetary value and non-monetary gifts in kind.
- 2.3 This policy does not cover accepting personal gifts. Guidance for University staff in relation to accepting personal gifts can be found in the Entertaining, Hospitality and Gifts Policy.

## 3 Responsibilities

- 3.1 Part of the Office of the Vice Chancellor, the Alumni and Development team are responsible for operating a framework to enable gifts to be accepted. They work to build relationships with potential donors and effectively steward and thank all donors to the University.
- 3.2 All actual or potential gifts to the University must be notified to the Associate Director, Engagement, Alumni and Development at the earliest opportunity. In any event, members of staff must not solicit a gift – or accept an unsolicited gift – without reference to the process of accepting and recording a gift highlighted below in 4.4.
- 3.3 Should any member of staff become aware of a gift that has been accepted without reference to the process of accepting and recording a gift, it is their responsibility to notify the Development team immediately.



## 4 General principles/Policy statements

### 4.1 Gift Acceptance Principle

4.1.1 The University will only accept philanthropic donations based on the following ethical principles:

- That the gift is consistent with the University mission, values, strategic goals.
- There is no conflict with the interests of the University or the potential to expose the University to financial or legal liability.
- The gift will not restrict academic freedom or compromise academic integrity but rather allows for impartial and independent teaching and research; both parties must accept this.
- International conventions that bear on human rights will not be violated.
- Political, religious and commercial influence does not threaten or compromise the University or its values.

4.1.2 The University will not accept philanthropic donations where:

- The University has reason to believe that the funds may have been illegally or unethically obtained.
- Acceptance may damage the reputation of the University.

4.1.3 The University will not accept philanthropic donations if the terms of accepting the proposed donation will:

- Require any illegal action on the part of the University.
- Harm the University's relationship with its students, staff, benefactors, partners, funders, local community or other external stakeholders.
- Fail to meet the requirements of the The Equality Act 2010.
- Be too difficult or expensive to administer, could create unacceptable liability or future expense.
- Create an unacceptable conflict of interest.
- Conflict with the Anti-Bribery and Corruption Policy.

4.1.4 The acceptance of all gifts will be done so in reference to the University's Long-Term Investment Policy and in accordance with its Ethical Framework. In accordance with these policies, the University will not ordinarily accept philanthropic donations from organisations that:



- Manufacture and sell armaments
- Generate significant turnover from the manufacturing of alcohol
- Derive significant turnover from gambling
- Produce or derive their turnover directly from the manufacturing of tobacco related products
- That are clearly involved in the pornographic materials or adult entertainment services.
- Have 5% or more of their turnover involved in the mining of thermal coal or tar sands
- Are deemed to needlessly emit significant quantities of carbon into the atmosphere, or which do not take seriously the transition to a low carbon economy

4.1.5 The University will undertake due diligence to ensure it is aware of the true source of the funding for each philanthropic donation. This will be done with reference to the University's Anti Money Laundering policy and Due Diligence Framework.

## **4.2 Due Diligence**

4.2.1 Systematic due diligence checks are undertaken and recorded for all proposed gifts including single and multiple gifts from a single donor or source. A variety of sources will be used to screen the prospective donor, in line with the University's Due Diligence Framework and be proportionate to the size of the gift.

4.2.2 In line with agreed Due Diligence procedures which are proportionate to the size of the gift, an assessment will be made to ensure that all gifts are accepted in accordance with the University's Equality and Diversity policy.

4.2.3 The due diligence report will be stored against the donors record in the appropriate database.

## **4.3 Repayment of donations**

4.3.1 Donations will not normally be returned.

4.3.2 Should it come to light that the donor lacked the capacity to make the decision to donate, the University will return the money to the source or bank account from which it came.

4.3.3 Should it come to light that, in spite of due diligence carried out, the University has accepted a gift resulting from a crime or money laundering, or from a donor who presents a significant reputational risk to the University, legal advice will be sought



prior to the appropriate action being taken.

4.3.4 Where a change in circumstances prompts a donor to request the repayment of all or part of a donation, the final decision will rest with the Vice Chancellor.

4.3.5 In order to preclude claims for a refund of donations in the case of a failed appeal, all appeals, fundraising websites, donor agreements and lists of terms and conditions must specify that, should it prove impossible to fulfil its intended purpose of a gift, the University will endeavour to find a closely related purpose. The donor will be consulted in the case of a major gift, but the University reserves the right to use any donation for its general charitable purpose where this cannot be done.

4.3.6 Ethics Committee will be made aware of any returned gifts in line with the gift acceptance thresholds outlined in 4.4.1.

#### 4.4 **Process of Accepting and Recording a Gift**

4.4.1 The following individuals/committees will approve the acceptance of a gift subject to approved due diligence reports:

£2,000 - £50,000	Associate Director, Engagement, Alumni and Development
£50,000 - £100,000	Vice-Chancellor or other Executive Board member nominated by Vice-Chancellor
£100,000 +	University Ethics Committee
£500,000 +	University Ethics Committee and Council

4.4.2 The above thresholds will also apply to multiple gifts from a single source amounting to the upper threshold within a 12-month period.

4.4.3 In any circumstances where due diligence identifies any potential ethical or reputational issues for the University, the Associate Director, Engagement, Alumni and Development will consult with the Ethics Committee.

4.4.4 All gifts of £2,000 and above will be recorded in a Gift Agreement, which will be signed by the donor and a University representative in line with the approval thresholds.

#### 4.5 **Naming Gifts**

4.5.2 For some donations, especially substantial gifts, the University may wish to recognise the donor's contribution through naming an asset after them. Such assets include; buildings, spaces within buildings (laboratory), outdoor spaces, endowed academic posts, public lectures, student scholarships or student prizes.

4.5.3 Terms of Naming



- The naming of the given asset continues for the duration of the donation, or a specified time period. In some cases, this will be time-limited such as a fixed contribution to several scholarships. The term of an endowment may be in perpetuity but since this can never be guaranteed, specified periods of time for naming an endowment will be agreed. Clear and transparent discussions with the donor or their representatives will take place if a change to purpose of the original donation is proposed and the Gift Agreement will be modified to reflect this.
- The period of recognition will be specified in the Gift Agreement. At the end of the term, the donor may wish to extend the gift and continue with their naming right should this be mutually agreed and outlined in a new gift agreement.

4.5.4 The donor may be given the right to be consulted about the naming of adjacent or contained facilities, but not to veto it.

4.5.5 Threshold guidelines for naming assets

Naming assets after donors requires a minimum donation towards the full costs of the asset. Guideline thresholds for assets are set out below, but each case will be considered on its merits. This is particularly the case for tangible assets such as the construction of buildings and the refurbishment of buildings.

<b>Asset</b>	<b>Proposed Threshold</b>	<b>Further Information</b>
Building	30%	Contribution to the construction of the building.
Facility within a building	30%	Contribution to the construction and fit out of a facility within a building, such as a laboratory, floor or wing of a building.
Endowed academic post	25%-50%	Full costs of the post's salary are required and must include staffing on-costs as well a small budget for expenses. For a senior role such as a Chair or Professor, often a part-time administrator is also required and must be costed in. For all time-limited and in perpetuity endowed posts, the cost of inflation must be factored in.
Student Scholarship Tuition Fees (UG)	50%	Scholarships should be endowed for the duration of the undergraduate study (3 years) and should cover tuition fees before living costs. Donors should be encouraged to cover the full cost of tuition fees, however if part



		funding is opted a minimum of 50% is expected.
Student Scholarship Living Costs (UG)	Minimum donation of £9,000	As living costs are harder to quantify for students and will change each year, we would look for a minimum 3-year commitment of £9,000 (£3,000 a year for 3 years) rather than a percentage of costs in order for the fund to be named.
Student Scholarship (PG)	50%	Scholarships should be endowed for the duration of the postgraduate study. For taught masters this is one year, for PhDs this is up to four years. Donors should be encouraged to cover the full costs of the student's costs to ensure they can successfully complete their studies, however if part-funding is opted, a minimum of 50% is expected. This donation could be used towards tuition fees or living costs.
Student Prize	100%	Full cost for the prize is expected for it to be named after the donor
Public Lecture Series	100%	Full cost of the lecture series is expected for it to be named after the donor
Other	Alumni and Development Office discretion	This could include naming a sports team, collection or archives and would be assessed on an individual gift basis.

#### 4.5.6 Approving Named Assets

Approval of all physical and non-physical named assets will follow the process for accepting and recording a gift as outlined in 4.4. Due diligence will be carried out as outlined in 4.2 to ascertain the source of the funding and ensure it nor the donor compromises the University's values, financial and legal liabilities. For named assets, consultation with stakeholders and the wider community should also be considered.

#### 4.5.7 Revoking Named Assets

The University will reserve the right to revoke the named asset should the donor breach the gift agreement, should circumstances change or should new facts come to light. Any repayment of donations will be considered as outlined in 4.3.

#### 4.5.8 Renaming Assets





If a donor funded scholarship, asset or programme requires renaming for any reason, the donor will be consulted and the final decision made by the Vice Chancellor in the best interests of the university.

## 5 Implementation

- 5.1 The policy will be uploaded onto the University website.
- 5.2 The policy will be made available to University staff through the University portal.

## 6 Policy compliance

- 6.1 Compliance with this policy is the responsibility of all members of staff, associates, and other third parties who in the course of their duties and responsibilities may be required to accept philanthropic gifts on behalf of the University.

## 7 Monitoring and review

- 7.1 The impact of this policy shall be reviewed by the Development Manager.
- 7.2 This policy shall be reviewed every two years from the date of approval.

## 8 Related policies and standards/documentation

- 8.1 The gift acceptance and naming policy forms part of a suite of policies and should be read in conjunction with the following policies:
  - Anti-Bribery and Corruption
  - Anti-Money Laundering and Financial Misconduct
  - Long-Term Investment
  - Ethical Framework
  - Due Diligence Framework
  - Ethics Code
  - EDI statement



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8.2

In undertaking fundraising activities, the University recognises the need to conduct its fundraising within the context of the Fundraising Regulator's Code of Fundraising Practice.