

Philanthropic Gifts, Grants and Donations Policy

Standards for the ethical and compliant solicitation, acceptance and management of philanthropic donations and gifts-in-kind

Summary

- This policy protects the University's reputation and the interests of its supporters and partners. It ensures transparency and due diligence in relation to philanthropic gifts, grants and donations (hereafter known as 'donations'). **(Section 1.4)**
- This policy applies to all donations, defined as external income (whether a gift, award, benefaction, grant or gift-in-kind) given with the intention of achieving public benefit without any private (e.g. commercial) benefit in return. Grants awarded by the larger research funders (e.g. the Wellcome Trust) for research as defined by the Frascati Manual are not included in this policy. Commercial sponsorship is also not included in this policy, but sponsorship with philanthropic intent is. **(2)**
- Every prospective donation-funded project must be fully costed; approved in line with the *Scheme of Delegation and Decision-making Powers*; and comply with the *Code of Practice and Principles for Good Ethical Governance*. **(3.2)**
- Every supporter of the University must be known to us and have been considered for ethical/legal issues, conflicts-of-interest and reputational risks to the University. **(4)**
 - Individual staff, including academics and fundraisers, must use the *Framework for Ethical Consideration of Sources of Funding* to evaluate potential supporters in the first instance. **(4.3)**
 - The *Donor Due Diligence Policy and Process* managed by OPPA will be used to research and authorise the sources of all donations of £25,000+ as well as those at a lower value which are considered higher risk. **(4.6)**
- If a donation or a gift-in-kind is offered, advice must be sought from OPPA as a matter of course. **(4.3)**
- Donations between £5,000 and £100,000 must have a written agreement signed by the Registrar and Secretary or Director of External Relations. Donations over £100,000 must have a written agreement signed by the Vice-Chancellor. **(6.1–6.3)**
- Offers of gifts-in-kind must be evaluated against acceptance criteria prior to agreeing the gift. **(7.2)**
- Scholarship selection criteria must comply with the Equality Act, only discriminating to proportionately target support at a disadvantaged group. Having residency requirements for a scholarship is acceptable; having nationality requirements is not. **(3.3)**
- Fundraising must be honest, respectful, fair and comply with the *Code of Fundraising Practice*. **(5)**
- Donations to the University of York in America have separate arrangements. **(2.3)**

1 Introduction

- 1.1 The Office of Philanthropic Partnerships and Alumni (OPPA) at the University of York is responsible for income generation and partnerships with grant-giving bodies, individual donors, corporate organisations and lottery distributors. Philanthropic donations and partnerships are an increasingly important source of income to the University in support of the priorities laid out in the University Plan, including: building our global reputation; providing the best possible student experience; and building our financial resilience.
- 1.2 In undertaking these activities, the University recognises the need to conduct its fundraising within the context of the following national policies/codes (see Appendix 1 for links):
- Institute of Fundraising's *Codes of Fundraising Practice*
 - Association of Fundraising Professionals' *International Statement of Ethical Principles in Fundraising*
 - *Statement of Recommended Practice (SORP, 2015)*
 - *Wolf Inquiry (2011)*
- 1.3 This policy should be read in conjunction with the following related University policies/codes (see Appendix 1 for links):
- *Anti-Bribery Policy*
 - *Anti-Money Laundering Policy*
 - *Code of Practice and Principles for Good Ethical Governance*
 - *Donor Due Diligence Policy and Process*
 - *Ethical Investment Policy*
 - *Framework for Ethical Consideration of Sources of Funding*
 - *OPPA Complaints Procedure*
 - *Our Pledge to our Supporters*
 - *Scheme of Delegation and Decision-making Powers*
 - Internal processes for research funding applications
- 1.4 The overarching purpose of this policy is to protect the University's reputation and also the interests of its supporters. It also seeks to ensure transparency and due diligence in the management of philanthropic gifts, grants and donations.
- 1.5 This policy supersedes the *Policy and Guidance on the Solicitation and Acceptance of Philanthropic Gifts* and the *Guidance on the Definition of Philanthropic Sources and Philanthropic Intent*.

2 Scope and definitions

- 2.1 This policy applies to philanthropic gifts, grants and donations (hereafter 'donations') as well as the individuals and organisations that are the sources of these (hereafter 'supporters').
- 2.2 Any external income that is given to the University with philanthropic intent is classed as a philanthropic donation.
- 2.2.1 The term 'donation' can refer to gifts, awards, benefactions, grants, sponsorship and gifts-in-kind given with philanthropic intent.
- 2.2.2 Philanthropic intent is defined as an intention by the donor to achieve public benefit without any private (e.g. commercial) benefit in return. The definition of private benefit is derived from the Charity Commission's 2014 guidance.
- 2.2.3 Gifts-in-kind are donations of non-monetary items of value to the University. Examples of gifts-in-kind include works of art, items of equipment, and goods and services provided free of charge.
- 2.2.4 Philanthropic grants awarded by larger research funders (e.g. the Wellcome Trust) for research as defined by the Frascati Manual are not included within this policy. In these cases, the normal processes for grant application, acceptance and management apply, as defined by the Research Grants and Contracts office.
- 2.2.5 Sponsorship offered with philanthropic intent will fall within the terms of this policy. If the supporter's intention is to achieve commercial benefit, VAT will be incurred and the sponsorship will fall outside the scope of this policy.
- 2.2.6 If in doubt as to whether a donation is subject to this policy, staff should contact OPPA for guidance.
- 2.3 Funds not within the scope of this policy include:
- research grants as defined by the Frascati Manual;
 - commercial sponsorship, defined by the HMRC guidelines on forms of sponsorship;
 - funding from the UK and EU governments and their agencies;
 - donations given to the University of York in America, which is a separate legal entity with its own policies and procedures.
- 2.4 Guidelines for which external income counts towards a philanthropic campaign or reporting target are separate to the question of whether income is a donation subject to this policy.
- 2.5 This policy applies to all philanthropic donations to the University, regardless of whether OPPA is responsible for their solicitation, acceptance or management.

2.6 This policy applies to all members of staff who are faced with making decisions about whether to solicit or accept philanthropic donations of any kind.

3 Acceptable causes and projects

- 3.1 The University intends to ensure that all philanthropic donations are accepted for purposes that align with the strategic aims of the University and its core values of impartial, independent research, scholarship and teaching.
- 3.2 Before soliciting funds for a new project (or further funding for an existing project), the following standards must be observed:
- 3.2.1 The outline case and full costing for the project (including support staff and operational costs) must be approved in line with the *Scheme of Delegation and Decision-making Powers*.
- 3.2.2 The project will comply with the ethical standards laid out in the University's *Code of Practice and Principles for Good Ethical Governance*.
- 3.3 Where philanthropic donations are directed at the setup of scholarships, bursaries or awards, any eligibility criteria and selection processes will conform to the following principles.
- 3.3.1 Direct discrimination in eligibility or selection on the basis of Equality Act 2010 protected characteristics – specifically age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation – is not permitted except for the purpose of supporting a disadvantaged group.
- 3.3.2 For a scholarship, bursary or award to be targeted at a disadvantaged group, all three 'positive action' conditions must be met:
- the targeted group must suffer a disadvantage in their academic studies or extracurricular opportunities, or a disproportionately low level of participation;
 - the purpose of the awarded funds must be to minimise that disadvantage or encourage greater participation;
 - the scholarship, bursary or award programme must be a proportionate response to the level of need.
- 3.3.3 Scholarships, bursaries and awards targeted at specific nationalities are not permitted, in accord with the Equality Act 2010; however, criteria targeted at residents of specific countries or regions are permissible in some circumstances.
- 3.3.4 Where a scholarship, bursary or award is stated to be intended for nationals of particular countries, it will in all cases be treated as open to residents of those countries as well.
- 3.4 Before accepting a gift-in-kind, the full costing for acceptance and management of the gift (including support staff costs, storage, transportation, installation, maintenance and insurance where applicable) must be approved in line with the *Scheme of Delegation and Decision-making Powers*.

4 Acceptable sources of gifts, grants and donations

- 4.1 The University intends to satisfy itself, within the reasonable capacity of the organisation, that philanthropic donations do not derive from any activity that is illegal, or runs counter to its core values of impartial, independent research, scholarship and teaching.
- 4.2 The University will take all reasonable measures to:
- ascertain the sources of philanthropic donations from individuals, corporate entities, and other organisations;
 - ensure that such donations are made for purposes consistent with the University's ethical principles and strategic plan;
 - determine that no legal or reputational issues are raised by the acceptance of such donations.
- 4.3 The onus is on individual members of the University who are faced with making decisions to solicit or accept external funding to use the *Framework for Ethical Consideration of Sources of Funding* to evaluate potential supporters in the first instance, supplementing the more rigorous evaluation and final approval carried out under the *Donor Due Diligence Policy and Process* (see 4.6).
- 4.3.1 The individual must identify whether there are any ethical issues and then consult further with appropriate colleagues, such as their HoD, line manager or departmental/subject-level ethics committee.
- 4.3.2 With regard to research funding, such responsibility lies with the individual researchers who need to be proactively engaged with any potential issues in their own research.
- 4.3.3 If funding is offered in the form of a philanthropic donation, advice must always be sought from OPPA as a matter of course.
- 4.4 Grounds for rejecting a particular source of philanthropic donations include, but are not limited to, the following:
- if acceptance might potentially bring the University into disrepute;
 - if acceptance might detrimentally affect other existing relationships within the University;
 - in the case of funding for research, consultancy or other such work, if the outputs or results might be used by the funder to enhance unethical practices or subject to limitations on dissemination or approval by the funder;
 - if acceptance would:
 - damage the effective operation of the University in fulfilling its stated objectives
 - cause significant harm to relationships with other partners, visitors, funders or stakeholders
 - create an unacceptable conflict of interest

- lead to a demonstrable net decline in the assets of the University
 - depend on the fulfillment of conditions unacceptable to the University;
- if there is published or other credible evidence that the proposed donation will be made from a source that arises in whole or in part from an activity that:
 - evades taxation
 - involves fraud or any other criminal activity
 - violates international conventions that bear on human rights
 - limits freedom of inquiry or encroaches on academic freedom to question and test received wisdom and put forward new ideas and controversial or unpopular opinions.

4.5 The University will not reject philanthropic donations from supporters on the grounds that they have non-philanthropic relationships with the University, unless a conflict of interest would be introduced by the donation, and management or mitigation of this conflict is impracticable.

4.5.1 Donations from supporters in a supplier or customer relationship with the University must adhere to the *Anti-Bribery Policy*, and consideration must be given when preparing a written agreement (see 6.3) to preventing the supporter's donations from influencing procurement decisions or terms.

4.5.2 Grant-making and grant management procedures must include robust standards and processes for avoidance of conflict-of-interest where grant recipients may also be current, previous or future supporters of the University.

4.5.3 The University facilitates and encourages student fundraising in support of their own projects and appeals as well as general University causes. Where a supporter is also a current student or related person, consideration must be given when preparing a written agreement (see 6.3) or allocation procedure (see 6.5) to preventing the supporter's donations from affecting their academic results or opportunities available to them at the University.

4.5.4 University employees and members are permitted to give philanthropic donations, provided these donations do not breach the University's HR, financial or other regulations (including the other standards set in this Policy).

4.5.5 In all cases, policies and procedures for management of an identified potential conflict of interest should be documented in the written agreement for the donation.

4.6 Individuals should show due consideration for the cornerstones of the management of ethical issues in the University: explicit discussion, institutional accountability and proportionality.

4.7 The *Donor Due Diligence Policy and Process* will be followed to conduct, document and authorise due diligence research into the sources of all philanthropic donations that meet the risk threshold and other criteria outlined in that policy, to ensure that ethical and reputational concerns are identified and considered systematically and at the appropriate level for each supporter.

- 4.8 The University will respect the rights of supporters to give anonymously to the extent possible, subject to the University's other duties including legal and regulatory compliance, transparency and efficient gift administration.
- 4.8.1 No supporter can be granted complete anonymity, as OPPA staff involved in soliciting, accepting and managing a donation must have knowledge of the supporter's identity in order to confirm the supporter as an acceptable source.
- 4.8.2 For the purposes of philanthropic donations, 'anonymous' means that a supporter's identity is not known by students, alumni, other supporters and members of the public, but is known to OPPA staff and other University members involved in solicitation, acceptance and management of donations.
- 4.8.3 Philanthropic donations will only be treated as anonymous at the request of the supporter. For reasons of transparency, the University's presumption is that philanthropic donations are not anonymous unless by explicit request.
- 4.8.4 Special arrangements of anonymity, restricting knowledge of the supporter's identity among University members, will only be granted in limited circumstances and at the discretion of the OPPA Information and Philanthropy Operations Manager.
- 4.8.5 Any level of anonymity granted to a supporter may prevent them from receiving certain benefits of giving, including invitations to supporters events and reporting on the impact of their giving.
- 4.8.6 No anonymity granted to a supporter will prevent OPPA from fulfilling its statutory obligations or regulatory requirements, including communicating supporter details to HMRC for the purposes of Gift Aid administration.
- 4.9 Cash gifts and other cash payments to OPPA will be limited to a maximum of £250 (excluding Gift Aid) per supporter per year, as a safeguard against money laundering and other illegal sources of funds.
- 4.10 If, following the acceptance of a philanthropic donation, subsequent events or additional information give rise to ethical or other concerns about the supporter, the University will undertake a thorough investigation and consider the appropriate response in light of the following considerations.
- 4.10.1 Where an issue with an existing supporter comes to light that would require refusal of future donations, the University will end solicitation of the supporter, but will continue to fulfill the terms of the supporter's previously approved gift agreements if possible.
- 4.10.2 Return of an already-received donation will only be considered in exceptional circumstances, where the reputation or effective operation of the University is under serious threat or there is a legal or regulatory requirement to return the gift.

- 4.10.3 The interests of individual scholarship holders, and the University's core values of impartial, independent research, scholarship and teaching, should not be adversely affected by any action taken.
- 4.10.4 The officer or committee with the highest level of authorisation under the *Due Diligence Policy and Process* will have the final decision on whether to return already-received funds, subject to the regulations of the *Scheme of Delegation of Decision-making Powers*.

5 Fundraising practices

5.1 All communications to potential supporters on behalf of the University will:

- be honest, truthful and legally compliant;
- accurately describe the University's activities and the intended use of philanthropic donations;
- respect the dignity and privacy of individuals who are expected to benefit from a philanthropic donation;
- ensure that the supporter's rights are respected and upheld.

5.2 Employees, volunteers and hired fundraisers who solicit or receive philanthropic donations on behalf of the University will:

- adhere to the provisions of this policy;
- adhere to the commitments made in the *Pledge to our Supporters*;
- act with fairness, integrity and in accordance with all relevant legislation;
- adhere to the provisions of applicable professional codes of ethics and standards of practice;
- cease solicitation of a prospective supporter who asks not to be solicited or identifies solicitation as harassment or undue pressure;
- cease solicitation of a prospective supporter who we believe to have diminished responsibility;
- disclose immediately to their HoD or the Director of OPPA any concern that a philanthropic donation may contravene any of the criteria contained within this policy.

5.3 Paid fundraisers, whether staff or consultants, will be compensated in accordance with the following standards.

5.3.1 Paid fundraisers will be compensated by a salary, retainer or fee.

5.3.2 Fundraisers will not be paid a finder's fee, commissions or other payments based on either the number of gifts received or the value of funds raised.

5.3.3 Compensation policies for fundraisers, including performance-based compensation practices (such as salary increases or bonuses), will be consistent with the University's policies and practices that apply to non-fundraising staff.

5.4 Employees, volunteers and hired fundraisers who solicit or receive philanthropic donations will adhere to the University's *Anti-Bribery Policy* and *Financial Regulations*.

5.4.1 In no circumstances must any gift of money be received by an employee, volunteer or hired fundraiser in the course of or as a result of their work on behalf of the University.

- 5.4.2 Policies for acceptance of gifts and hospitality by employees, volunteers and hired fundraisers who solicit or receive philanthropic donations will be consistent with the University's policies and practices that apply to non-fundraising staff.
- 5.5 The cost-effectiveness of the University's fundraising programme will be reviewed regularly by the University Executive Board (UEB).
- 5.6 The University will not sell or share its list of supporters. However, the University freely publishes the names and giving club memberships of its non-anonymous supporters in an annual donor roll, for reasons of transparency and freedom of information.
- 5.7 Paid fundraisers, whether staff or consultants, will comply with the *Code of Fundraising Practice* at all times.
- 5.8 All University staff and volunteers can report concerns about the University's fundraising practice to the Director of OPPA or via the University's Speak Up whistleblowing procedure.
- 5.8.1 The Director of OPPA or their designee will investigate concerns about fundraising practice, including:
- possible breaches of this policy;
 - possible breaches of the *Code of Fundraising Practice*;
 - other public interest concerns related to fundraising practice.
- 5.8.2 The Speak Up whistleblowing procedure is documented at <https://www.york.ac.uk/admin/hr/policies/information/speak-up/>.
- 5.8.3 If the outcomes of the internal procedures are unsatisfactory, concerned individuals can escalate their concerns to the Fundraising Regulator: <https://www.fundraisingregulator.org.uk/contact-us/>.

6 Management and use of funds

- 6.1 All philanthropic donations of £5,000 or more require completion of a written agreement stating how the donation will be used, which must be approved by OPPA and signed by both the supporter and a senior member of the University in line with the *Scheme of Delegation and Decision-making Powers*.
- 6.2 It is the responsibility of volunteers, employees and hired fundraisers who solicit or receive funds on behalf of the University to adhere to the *Scheme of Delegation and Decision-making Powers* when applying for funding and/or drafting a contract or gift agreement.
- 6.2.1 Philanthropic donations between £5,000 and £100,000 require signed approval by the Registrar and Secretary or the Director of External Relations.
- 6.2.2 Philanthropic donations of £100,000 or more require signed approval by the Vice-Chancellor.
- 6.2.3 Philanthropic donations above £5,000 directed at a single Department require additional signed approval by the Head of Department.
- 6.2.4 Gifts-in-kind valued above £5,000 (see 7.1) that will be installed or stored on University property require additional signed approval by the Director of Estates and Campus Services.
- 6.3 Written agreements, whether in the form of a standard OPPA gift agreement, grant agreement or memorandum of understanding supplied by the supporter, should state:
- the purpose of the donation
 - the form in which the contribution shall be made
 - a payment schedule
 - how any funds given will be managed by the University
 - how any identified potential conflicts-of-interest will be managed
 - how the donation will be stewarded
 - where applicable, a Gift Aid declaration.
- 6.4 In cases where the agreed purposes of a philanthropic donation can no longer be fulfilled, the funds will be used in a manner consistent with the originally-expressed intentions as far as reasonably practicable, except by prior agreement with the supporter.
- 6.5 Individual supporters (as opposed to organisations) will not be allowed a decision-making role in the allocation of philanthropic funds to specific named individuals at the University, to avoid potential conflicts-of-interest and legal challenges to allocation decisions.
- 6.5.1 Individual supporters are prohibited from taking a decision-making role in recruitment and selection processes for roles, offices or posts entirely or primarily funded by their personal giving.

- 6.5.2 Individual supporters are prohibited from taking a decision-making role in the allocation of scholarships, bursaries or studentships entirely or primarily funded by their personal giving.
- 6.5.3 Individual supporters may be involved in the allocation of philanthropic funds to specific students or staff in a capacity of 'supporter representative', provided:
- their personal giving comprises less than 10% of the funds to be allocated;
 - they do not have a power of veto at any point in the process;
 - they are required to declare an interest and recuse themselves from decisions affecting relatives or friends.
- 6.5.4 Where an external organisation is a supporter, its representatives may take decision-making roles in the allocation of its philanthropic funds, if those representatives comprise less than 50% of the decision-making panel and do not have a power of veto at any point in the process.
- 6.6 Spending of philanthropic funds should align with the principle of charity law that charitable gift income should be spent within a reasonable period of receipt.
- 6.6.1 Where expendable philanthropic funding is given for a specific purpose, it should be applied to that purpose as soon as practically possible and not, as a matter of principle, be accumulated.
- 6.6.2 Where permanent endowments are given, this principle does not apply.
- 6.7 Philanthropic funds will not be spent on fundraising costs, including administration and staff time, except by prior agreement with the supporter.

7 Gifts-in-kind

- 7.1 As a matter of principle, the University will treat all gifts-in-kind as equivalent to monetary donations to the amount of the financial value of the gift-in-kind, for the purposes of acceptance and management, including requirement of a written agreement (see 6.1–6.3).
- 7.1.1 Gifts-in-kind that do not have a catalogue or retail price will have at least one expert valuation, and preferably an independent valuation, prior to acceptance.
- 7.1.2 Where a valuation is expressed as a range of possible values, the minimum will be counted as the gift's value for the purposes of acceptance and due diligence, management and reporting.
- 7.1.3 Where more than one valuation is conducted on a gift-in-kind, the average of all valuations (after 7.1.2 is applied) will be used in determining its value for the purposes of gift acceptance and due diligence, management and reporting.
- 7.2 In addition to the criteria described in Sections 3 and 4 of this policy, the following criteria will be applied in decisions on whether to accept gifts-in-kind:
- the value of the gift:
 - financial or resale value
 - value for teaching and research purposes
 - local, national and international significance;
 - the physical condition of the gift;
 - the gift's relevance to the University, its aims and its history;
 - associated costs of transporting, cataloguing, processing, conservation requirements, storage, installation, display and insurance;
 - plans for the gift's display or use once received.
- 7.3 Gifts-in-kind must only be accepted following approval of the full costing for accepting and managing the gift, both initial and yearly costs (see 3.4), in accordance with the *Scheme of Delegation and Decision-making Powers*.
- 7.3.1 Written agreements for gifts-in-kind must be authorised via the same approval arrangements as monetary donations of the equivalent value (see 6.2).
- 7.3.2 Advice must always be sought from OPPA prior to gift-in-kind acceptance.
- 7.4 The University accepts gifts-in-kind on the understanding that once accepted, they become the property of the University of York.
- 7.5 The University regularly reviews its collections and reserves the right to alter, sell or dispose of gifts-in-kind at any time following acceptance.

Appendix 1: Links to associated policies and codes

Anti-Bribery Policy:

<https://www.york.ac.uk/media/staffhome/finance/newfinancepages/documents/Bribery%20Act%202012.pdf>

Association of Fundraising Professionals' International Statement of Ethical Principles in Fundraising:

<https://www.afpnet.org/Ethics/IntlArticleDetail.cfm?ItemNumber=3681>

Code of Practice and Principles for Good Ethical Governance:

<https://www.york.ac.uk/staff/research/governance/research-policies/ethics-code/>

Donor Due Diligence Policy and Process:

<https://www.yorkspace.net/file/Due-Diligence-Policy-and-Process.pdf>

Ethical Investment Policy:

<https://www.york.ac.uk/media/staffhome/finance/Ethical%20investment%20policy%20March%202013.pdf>

Framework for Ethical Consideration of Sources of Funding:

<https://www.york.ac.uk/media/abouttheuniversity/governanceandmanagement/documents/sources-funding-framework.pdf>

Institute of Fundraising's Codes of Fundraising Practice:

<https://www.fundraisingregulator.org.uk/code-of-fundraising-practice/code-of-fundraising-practice-v1-4-310717-docx/>

Internal processes for research funding applications:

<https://www.york.ac.uk/staff/research/external-funding/applying/>

Money Laundering Policy:

<https://www.york.ac.uk/media/staffhome/finance/newfinancepages/documents/internaluseonly/University%20of%20York%20Money%20Laundering%20Policy.pdf>

OPPA Complaints Procedure:

<https://www.yorkspace.net/file/OPPA-Complaints-Procedure.pdf>

Our Pledge to our Supporters:

<https://www.yorkspace.net/file/pledge-to-supporters.pdf>

Scheme of Delegation and Decision-making Powers:

<https://www.york.ac.uk/media/abouttheuniversity/governanceandmanagement/documents/Scheme%20of%20Delegation%20June%202017.pdf>

Statement of Recommended Practice (SORP, 2015):

<http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2014/statement-of-recommended-practice.pdf#search=statement%20of%20recommended%20practice>

Woolf Inquiry (2011):

<http://www.lse.ac.uk/website-archive/newsAndMedia/woolf/pdf/woolfReport.pdf>

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