

1 Purpose

- 1.1 This Policy defines UKCEH's position on the acceptance of donations.
- 1.2 Philanthropic support is in line with UKCEH charitable status. It can support the delivery of UKCEH charitable Objects and our organisational ambition.

2 Scope

- 2.1 This Policy applies to all UKCEH staff, potential donors and donors.
- 2.2 In accordance with this Policy, UKCEH can accept donations from individuals (including legacy bequests), charitable trusts and foundations, and companies in the UK and overseas.
- 2.3 All fundraising, donations and funded activities will be delivered within the wider context of the UKCEH Code of Ethics.
- 2.4 Gifts and hospitality offered to UKCEH Trustees, staff and students are not subject to this Policy, these should refer to the UKCEH Gifts and Hospitality Policy, before acceptance.
- 2.5 Proposed grants or research contracts, including the UK government, UKRI and related bodies within the UK, will not be subject to this process.
- 2.6 UKCEH will not accept anonymous donations.

3 Policy Statement

Context

- 3.1 This policy should be read in conjunction with the following UKCEH policies and procedures: Equality, Diversity & Inclusivity Policy; Gifts and Hospitality Policy; Safeguarding Policy; Fraud and Bribery Policy and UK Data Protection Laws. Just as UKCEH will not partner with organisations whose values do not reflect those of UKCEH regarding social, environmental and humanitarian concern (these would for example include but not limited to human rights abuse; discrimination on the grounds of race, gender, disability, age, or religion; serious and persistent environmental damage), so it will not accept donations from such organisations.
- 3.2 The UK Bribery Act 2010 requires UKCEH to ensure that the receipt of a donation is not associated with an advantage to the donor, such as the award of a contract. Other relevant legislation includes the Proceeds of Crime Act 2002, the Terrorism Act 2000, Money Laundering Regulations 2007 and Criminal Finances Act 2017 under which it is an offence to receive, retain or convert money or property known or reasonably suspected to be the product of criminal activity.

4 UKCEH Approach

- 4.1 Donations may be generated through fundraising appeals that are either open-ended to fund long-term research and innovation activities or shorter-term project-based initiatives. Donors will be provided with the information to understand what activity they are supporting whether this is restricted or unrestricted funding.
- 4.2 Directors of Finance and Impact & Innovation must endorse all fundraising initiatives. The UKCEH Finance & Audit Sub-committee must then approve any novel method not previously supported, before implementation. Approvals will be based on a fundraising appeal plan.
- 4.3 Fundraising appeal plans will include a description of the funded activity, the financial and non-financial goals, the resources required, the audience(s), the fundraising method and marketing, a risk assessment and approach to Monitoring Evaluation Accountability and Learning (MEAL).

- 4.5 UKCEH will not:
- 4.5.1 Outsource or deliver fundraising in commercial partnerships without the explicit approval of the Trustees.
 - 4.5.2 Remunerate Trustees for engagement in fundraising activities.
- 4.6 UKCEH may accept assets other than cash as donations: equities and bonds, property and personal property, subject to approval by the Director of Finance.
- 4.7 Fundraising appeals must make the following explicit:
- a) The identity of UKCEH as the legal organisation with charitable status and what it does; and
 - b) What the funds raised are for and how they will be used including any secondary purpose; and
 - c) How to donate; and
 - d) The Gift Aid arrangements (these cannot be offered on Overseas Donations); and
 - e) What deductions will be made from the donations e.g. third party fees; and
 - f) What will occur if surplus or inadequate funds are raised.
- 4.8 A documented Donation Agreement between UKCEH and the donor is required for all donations that are not delivered through the endorsed charitable giving platform. This agreement needs to include details of the donation, the project to be supported (if restricted), payment schedule, stewardship of the donation and principle statements on UKCEH independence.
- 4.9 The Donation Agreement should state restrictions related to the purpose of a donation as intentions or preferences to allow UKCEH appropriate freedoms to ensure future use. When that is not possible, the agreement should reserve the authority of the UKCEH Board of Trustees to change the use or purpose of the donation as circumstances change.
- 4.10 Donors will receive appropriate acknowledgement and recognition. UKCEH will provide assurances that the donor's gift is used for the purposes designated. UKCEH will feedback on outcomes where possible, often through community-wide communication.
- 4.11 UKCEH does not provide legal advice or financial planning services for donors.
- 4.12 Donors are not permitted to participate in the selection or appointments to any position within UKCEH, paid or unpaid. This includes projects which they have donated or positions which are associated with projects they have funded.

5. Due Diligence

- 5.1 UKCEH's donations due diligence processes are risk-based to ensure that disproportionate time is not spent assessing low-risk donations.
- 5.2 Donations, or a combination of smaller donations, in excess of £7,500, will trigger an internal review as detailed in the UKCEH Donations Acceptance Procedure. Donations over £25,000 have a more stringent due diligence and review process.
- 5.2.1 The Directors of Finance and Impact & Innovation will review and approve donations between £7,500 and £25,000.
 - 5.2.2 The Finance and Audit Sub-committee (FASC) will review and approve donations above £25,000, referring individual donations, or a series of individual donations, exceeding a £50,000 threshold per annum to the UKCEH Board of Trustees.

6. Declining or Returning Donations

- 6.1 UKCEH is a registered Charity in England & Wales (number 1185618) and in Scotland (number SC049849), and a registered Company Limited by Guarantee in England & Wales (number 11314957). Donations to charities can, and should, be accepted for purposes consistent with the charity's Objects. This Policy sets out UKCEH's position and ensures that

donations are only turned down for legitimate reasons.

6.2 UKCEH will decline donations when:

- a) It would be unlawful to accept it (e.g. the organisation made aware that the donation comprises the proceeds of crime); or
- b) Accepting the donation would be detrimental to the achievement of the purposes of the organisation, as set out in its Articles of Association. This includes reputational damage.
- c) This anticipated detriment must be set against the benefit of having the funds from the donor, which would enable the organisation to pursue its purposes; or
- d) From individuals below the age of 18, people in vulnerable circumstances or where there are reasonable grounds that a donor lacks the capacity to make an informed decision. If a donation has already been made, and at the time of donating the individual lacked capacity (and the charity receives evidence of this) then the charity will return that donation; or
- e) UKCEH is to act as a conduit for transferring donations to another charity or third party; or
- f) Favourable benefits or benefits accrue specifically to the donor or create an unacceptable conflict of interest; or
- g) Donations are interest free loans; or
- h) Funds are donated from an unknown or unverified source.
- i) Intend to influence the application of UKCEH's acceptance criteria
- j) Intend to affect the academic record of any current or future students or have bearing on any dispute between a student, UKCEH or their University about the outcome of their programme of study
- k) Limit UKCEH's freedom or its capacity to operate independently

6.3 Whilst a donor's right to remain anonymous externally will be maintained, UKCEH will only accept donations if the donor provides their identity.

6.4 UKCEH Trustees will apply to the Charity Commission in difficult or complex cases for an order to refuse a donation. This may be the case where large sums of money or property are involved and it is not immediately clear what action is in the best interest of the charity in relation to the proposed donation. Advice may also be sought from the Scottish Charity Regulator (OSCR).

7. Complaints

7.1 UKCEH will manage complaints regarding donations through its External Complaints procedure.

8. Reporting

8.1 UKCEH will report suspect donations to Action Fraud and the Charity Commission. This, includes individual or a series of smaller donations, exceeding £25,000 where funds are donated from an unknown or unverified source.

8.2 UKCEH will report donations within annual accounts as defined in the applicable Charities Statement of Recommended Practice.

9. Responsibilities

Compliance, monitoring and review

- 9.1 The UKCEH Finance & Audit Sub-committee, supported by the Directors of Finance and Impact & Innovation are responsible for ensuring the policy:
- a) aligns with relevant legislation and UKCEH values,
 - b) is implemented and monitored, and
 - c) is reviewed annually or after significant change, to evaluate its continuing effectiveness.
- 9.2 The Directors of Finance and Impact & Innovation are responsible for communicating with donors regarding the donation acceptance policy, unless there is a more appropriate point of contact in UKCEH.
- 9.3 Directors of Finance and Impact & Innovation are responsible for all final decisions regarding donations and for ensuring donations are tracked and reported in the Annual Report.
- 9.4 This Policy will be published on the UKCEH corporate website for all prospective and actual donors to UKCEH research and innovation initiatives. It will also be published on the Policy and Procedures Site for all staff to view.

End of Document