FUNDRAISING CODE OF PRACTICE

1. INTRODUCTION

To be used as a reference guide and policy document in relation to all fundraising practices at the University.

1.2 Purpose

It is essential that fundraising is professionally coordinated across the University to ensure the most ethical, efficient, and effective approaches are made and to safeguard the reputation of the University.

The purpose of this Code of Practice is to:

- Ensure donors are identified and stewarded correctly and all approaches are coordinated and professionally managed;
- Ensure gifts are compatible with the University's ethical principles, objectives and consistent with the goals outlined in the University Strategic Plan
- Define philanthropic income and ensure all gifts are correctly recorded and reported in the University's philanthropic returns for both internal and external bodies, including the CASE Insights on Philanthropy (United Kingdom and Ireland) Survey ("CASE Survey") which is the annual survey of gifts and costs of voluntary giving to Higher Education in the UK;
- Maximise gift income by helping ensure donors are giving in the most tax effective way and the University is benefitting from Gift Aid where applicable;
- Ensure the Advancement Team is made aware of the source of all donated income to the University to enable the University to comply with other policies and ensure a coordinated fundraising approach and response on behalf of the University;
- Ensure that the University is able to account accurately for and record all gifts raised (pledged) or received, to measure fundraising activity and income generation throughout the University, for audit purposes and both internal and external regulatory bodies; and
- Help build and maintain relationships with donors by ensuring that there is appropriate thanking and stewardship of donors in place and ensuring that their wishes are carried out.

1.3 Scope

The Advancement Team at the University provides professional advice and support in the ongoing receipt, processing, thanking, reporting and stewardship of all donors through our Stakeholder and Supporter Relations Programme. This Code of Practice applies to all University staff. Only legislation, statutory and regulatory rules can override the provisions of this Code of Practice.

1.4 Definitions

- **Philanthropic Funds**: the University follows HE sector best practice by defining philanthropic funding according to the rules established for the CASE Survey.
- **Philanthropic Intent**: Giving to the University which does not confer full or partial ownership of a deliverable, financial benefit, or control to the funder in return for the funding. The gift must be owned in full by the University once it is received.
- **Gifts**: Funds received / Gifts fulfilled.
- **Pledges**: An unfulfilled (donor has responded positively to a solicitation but funds have not yet been received) / incomplete Gift (where the donor has requested to spread their total gift over a number of Instalments).
- **Donation Form / Gift Agreement / Statement of Intent**: Provides the donor and the University with a written record of the agreed Gift proposed (although not legally binding). The written record will include: terms and conditions of Gifts and provide an auditable confirmation of donor intentions (and agreed stewardship / donor recognition). During an audit, Gift evidence such as Donation Forms / Gift Agreements / Statement of Intent provide the necessary verification to allow Pledges to be included in the Fundraised Total but not Gifts Received.

2. POLICY

2.1 Gifts and Pledges

Gifts or Pledges can only be counted as Philanthropic Funds if they meet both of the following criteria:
The source of the funds is eligible AND the nature of the gift meets the definitions of Philanthropic Intent.

2.2 Eligible Sources of Philanthropic Funds

Note that qualifying as an eligible source as below is not enough to determine the eligibility of funds as Philanthropic, as the Gift must also be made with Philanthropic Intent (see 1.4 above).

Eligible sources of Philanthropic Funds include, but are not limited to:

- Gifts from individual donors, in the UK and overseas, of cash and other instruments of wealth, including shares, appreciated securities, bonds etc.;
- Gifts-in-kind of physical items – property, art, equipment etc;
- Actual Legacy income realised in-year from deceased individuals (notifications of Legacy pledges from living donors should also be reported as a pledge with any other gift);
- Gifts from charitable trusts and foundations in the UK and overseas. This includes gifts from independent charities associated with NHS Trusts/NHS Foundation Trusts (but not direct from NHS Trusts/NHS Foundation Trusts);
- Grants made by affiliated support foundations such as 501(c)(3) organisations (exempt from US federal income tax) and similar organisations in other countries;
- Gifts from companies or other legal entities, persons or bodies in the UK and overseas;
- Gifts from overseas governments (non UK) or their agencies and foundations;

- Income from National Lottery and similar sources (e.g. Heritage Lottery Fund, Sport England etc.);
- Funding through the Landfill Scheme.

2.3 Ineligible Sources of Philanthropic Funds

Ineligible sources of Philanthropic Funds include, but are not limited to:

- All funding from HM Government and its agencies, including the Office for Students, Research England, and the Research Councils;
- Funding from NHS Trusts/NHS Foundation Trusts;
- All funding from the EU Commission or its agencies;
- Royalties and other funds generated by the exploitation of the University's intellectual property rights;
- Internal transfers within the University.

2.4 Exclusions from Philanthropic Intent

If any of the following exclusion criteria apply the whole of the funding associated with a funding agreement is not considered to be Philanthropic. The University shall not deduct the known or estimated value of any such exclusion from the overall value of the funding associated with such agreement and report the net remaining balance as Philanthropic.

If any of the following exclusion criteria apply, and the funder is based in the UK, it is very likely that the University is providing a service which is subject to UK VAT. In this context any reference to the funder also includes those people or organisations associated with the funder.

- Contractual relationship: a contract exists which commits the University to provide an economic benefit for compensation, where the agreement is binding and creates a quid pro quo relationship between the University and the funder. Contract income, including income for conducting clinical trials, is ineligible;
- Exclusive information: the funder is entitled to receive exclusive information, or other privileged access to data or results emerging from the programme of activity whether that funded by the funder or other programme of activity;
- Exclusive publication: the funder is entitled to exclusive rights to publication of research or other results through their own branded communication channels (website, report etc.) whether of research funded by the funder or otherwise.
- Consultancy included: consultancy for the funder is included as part of the agreement.
- IP rights: the University assigns to the funder, under the agreement, any full or partial rights to intellectual property which may result from a programme of activity whether that funded by the funder or other programme of activity. This exclusion extends to the provision of royalty-free licences (whether exclusive or non-exclusive) to the funder, and also to granting the funder first option or similar exclusive rights to purchase the rights to any subsequent commercial opportunities. If the written agreement includes any actual or potential future benefit of this kind, it must be excluded.

- Other forms of financial benefit: Any other direct financial benefits are required by the funder as a condition of the funding (e.g. discounted courses, training etc.).
- Funder control: the funder retains control over operational decisions relating to the use of funds once the gift has been made; the funder may specify the use for which the Gift is given but not how that use is operationalised by the University. This exclusion includes control over the appointment and selection procedures to academic posts and student scholarships. It would not be accepted practice in any case for the funder to have final say on the approval of a University appointment, though donors may be included (on the same basis as other participants) in interview panels.

In each case above the funding is ineligible if an associated person or entity of the funder or other person named by the funder is given benefits as part of the funding arrangement.

2.4.1 Separate agreements

In some circumstances it may be appropriate for philanthropic and contractual elements of a multi-faceted relationship with the University to be summarised in separate written agreements. In these circumstances the funding subject to the Gift agreement may be treated as Philanthropic, as long as none of the exclusion criteria as listed above apply, and as long as the income associated with the Gift agreement is not contingent on delivery of any activities included within the separate contractual agreement.

2.4.2 Corporate or other sponsorship

The first exclusion criteria in 2.4 above (Contractual Relationship) dictates that in the vast majority of cases corporate or other sponsorship cannot be counted as Philanthropic Funds, as sponsorship is based on quid pro quo relationship.

Any Corporate sponsorship which is subject to VAT as a chargeable supply according to HMRC
definitions cannot be counted as Philanthropic Funds. HMRC considers an agreement to take the form of sponsorship liable for VAT “if, in return, you are obliged to provide the sponsor with a significant benefit”.

HMRC advises that this significant benefit might include any of the following:

- naming an event after the sponsor (where to do so gives the sponsor a business benefit, such as promoting their brand) although this will not generally apply to naming an event after a private individual or entities;
- displaying the sponsor’s company or other logo or trading name – though not where that logo is purely connected with a government agency or charitable foundation, and merely acknowledges generosity;
- participating in the sponsor’s promotional or advertising activities;
- allowing the sponsor to use the University’s name or logo;
- giving free or reduced price tickets;
- allowing access to special events such as premieres or gala evenings;
- providing entertainment or hospitality facilities;

- giving the sponsor exclusive or priority booking rights (except where HMRC is satisfied that there is no actual benefit in accessing these rights, and that they merely secure the sponsor's income for the charity).

HMRC adds the following note: "This list is not exhaustive and there are many other situations where your sponsor may be getting tangible benefits. What matters is that the agreement or understanding you have with your sponsor requires you to do something in return."

Circumstances where HMRC considers corporate support is outside the scope of VAT, and therefore can be considered as Philanthropic Funds, is where support is freely given and secures nothing in return for the donor. A taxable supply is not created where the recipient provides an insignificant benefit such as a minor acknowledgement. Examples include:

- Giving a flag or sticker;
- Naming a building or University Chair after the donor (without the use of a logo);
- Putting the donor's name on the back of a seat (e.g. in a theatre);
- Acknowledging the donor in a list of supporters.

These HMRC guidelines should be applied in assessing the eligibility as Philanthropic Funds of all corporate sponsorship, including sponsorship income from overseas companies not subject to UK VAT.

Further guidance is available at https://www.gov.uk/guidance/sponsorship-and-vat-notice-70141

2.4.3 HMRC tainted charity donation rules

As mentioned above the University may have multifaceted relationships with certain donors and funders, some of Philanthropic Intent, some of contractual intent. HMRC has issued anti-avoidance guidance (known as "tainted charity donation rules"), to ensure that the usual tax reliefs are not available where donors enter into arrangements to obtain a financial advantage from a charity for themselves, or someone else involved in the arrangement, in return for their donation. As institutions enjoying charitable status, universities should take appropriate measures to ensure that they do not become party to such arrangements.

Further guidance is available from the Finance Directorate and here: https://www.gov.uk/government/publications/charities-detailed-guidance-notes/annex-viii-tainted-charitydonations

2.4.4 Approaches to and from donors/funders

When anyone from the University approaches a donor or potential donor they will ensure that they comply with the Fundraising Regulator Code of Fundraising Practice: https://www.fundraisingregulator.org.uk/code. In particular that they do not apply undue pressure or persistent approaches to a donor or prospective donor, they respect the privacy of the donor/ prospective donor and end interactions when requested by a donor /prospective donor. All information given to donors/prospective donors must not be misleading and be evidence backed where required; there must be no exaggeration or omission of key facts.

Some companies, trusts or individuals may approach the University about a potential gift or invite the University to apply for grants. This has no bearing on the Philanthropic Intent involved, and any gifts or grants gained on that basis are Philanthropic if none of the exclusion criteria apply as detailed in section 2.4.

2.4.5 Requests for reports to funders

The donor/funder often requests or requires an accounting of the use of funds and of the impact of the programmes or projects undertaken. Any such request/requirement from the donor for regular status or other reports does not negate Philanthropic Intent underlying a specific gift of grant, so agreements with reporting requirements are Philanthropic if none of the exclusion criteria apply as detailed in section 2.4.

2.4.6 Donor stewardship

Donor stewardship strategies (e.g. providing update reports on the progress of students supported by donors, or informal contact between donors and those supported by their Gifts), do not of themselves represent a benefit to the donor. Stewardship of this kind is considered best practice and is actively encouraged.

2.5 Gift Acceptance / Refusal

In considering the acceptance of any Gift, the University will consider if the Gift is compatible with the purposes of the University consistent with the goals outlined in the current University Strategy. The University will also ensure that its use of any Gift complies with any relevant current legislation.

2.5.1 Refusal of Gifts

The University will not accept any Gift or Pledge which is deemed after investigation (if required) to have been funded through activities which:

- Are unlawful (including any form of theft, fraud, tax evasion, money laundering, or terrorist activity), whether in the UK or under the jurisdiction of the country from which the Pledge is made;
- Violate international conventions that bear on human rights;
- Limit freedom of enquiry, or encroach on academic freedom;
- Are listed on the UK [and/or EU] Financial Sanctions List; or
- Are listed by the US Office of Foreign Assets Control (OFAC).

2.5.2 Acceptance of Gifts

The University must be able to confirm that the acceptance of Gift will not:

- Lead to a conflict of interest with the ethics and principles of the University;
- Require an action or actions on behalf of the University or its staff which are illegal;
- Harm or have the potential to harm the University's reputation and relationship with other benefactors, partners, students, potential students or research supporters; or
- Constitute any form of bribery.

2.5.3 Due Diligence

The University has a clear, comprehensive and auditable process in place to satisfy itself, within the reasonable capacity of the institution, that Philanthropic Funds do not derive from any activity that is illegal, or run counter to its core values of impartial, independent research, scholarship, and teaching.

The University will take into account the size of the proposed Gift, and will undertake all reasonable measures to:

- Ascertain that the source is eligible to be considered a philanthropic Gift in accordance with section 2.2 (Eligible Sources of Philanthropic Funds);
- Confirm that the proposed Gift is given with genuine Philanthropic Intent in accordance with sections 1.4 and 2.4 (Definition of and Exclusions for Philanthropic Intent);
- Ensure that such Gifts are made for purposes consistent with the University's ethical principles and current Strategic Plan and in accordance with the University Ethics Oversight Committee to determine that no legal or reputational issues are raised by the Gift Acceptance.

The University Schedule of Delegation applies for Gift Acceptance which is:

- Below £100,000 - Head of Alumni and Supporter Engagement;
- £100,000 - £800,000 – Executive Director of Communications and Advancement;
- £800,000 - £1,500,000 - Vice-Chancellor, on the recommendation of the Executive Director of Communications and Advancement ;
- £1,500,000 and above – Executive Director of Communications and Advancement will make recommendation for Gift Acceptance to the Vice-Chancellor, which will be referred to Council.

For Gifts in excess of £1,000,000 the University may also engage an appropriately qualified third party to carry out Due Diligence supplementary to that carried out by the Advancement Team, in line with the University's Data Protection and Information Security Policies.

Any potential Gift or Pledge, regardless of value, which, in the opinion of the Associate Director of Alumni and Supporter Engagement or any other approver, has a controversial dimension to it, should be reported to the Executive Director of Communications and Advancement and referred to the Philanthropic Funding Governance Group for consideration before acceptance. In line with the Proceeds of Crime Act 2002 as amended by the Criminal Finances Act 2017 (CFA) and the Money Laundering Regulations 2017 (SI 2017/692) the University will seek to identify and report any potential or existing donors who seek to give Philanthropic Gifts to Keele for tax evasion or other criminal or money laundering purposes.

Ongoing research and due diligence will be maintained on all high value donors to the University following a Gift as and when deemed appropriate i.e. when in receipt of a further gift from the same donor source OR when a donation becomes flagged as a manifested risk – see 2.5.6 below

In carrying out Due Diligence, the University follows the "know your donor" principles outlined in the Charity Commission's advice on "Protecting Charities from Harm".

In considering Gift Acceptance the University will give due consideration to the Due Diligence undertaken on the person offering the Gift, supplemented by any research undertaken by the Advancement Team.

2.5.4 Conflict of Interest

As part of the due diligence involved in Gift Acceptance, the University will identify if there are any present or upcoming University tenders that may be of interest to the donor. If there is a possible link, no Gift will be accepted or discussed until the University has ensured that there is no possible conflict of interest.

The University will accept Gifts from parents of current students but will make it clear within the Gift Agreement and related communication that the Gift will in no way have any bearing or influence on how the University will treat their child as a student.

The University will accept Gifts from University staff. As such, becoming a donor to the University will not confer benefit or preferment to the member of staff, beyond receiving standard donor stewardship as outlined in 2.4.6 and any permitted benefits set out in 2.4.2

2.5.5 Unsolicited Donations for Research

The policy and procedures on the receipt and governance of the expenditure for unsolicited donations to support research projects is as follows:

- Each donation will have undergone initial due diligence by the Advancement Team (e.g. separating out donations that are likely to cause reputational issues, or where a donation source is unknown or unclear); and
- The donations will be pooled within a dedicated University fundraising account; and
- The researcher in receipt of funding will be invited to work up a project and agreed method of expenditure, in liaison with the Research and Innovation Support Enhancement ("RaISE") team and the Advancement Team. The project will then go through the standard RaISE approvals process; and
- If approved, the donations will be moved into a University research account; and
- In accordance with applicable accounting standards, the donation will be recorded as research income in the year of receipt and not matched to expenditure. The balance of the donation will however be available across multiple financial years (at the ultimate discretion of the Faculty Executive Dean); and
- If no project can be agreed for expenditure of these donations within 12 months of Gift receipt date, they will need to be returned to donors; and
- Donors Gift is given on the basis that they do not need to be consulted about the project as their Gift will have been unsolicited, indicating no other restrictions except to support research carried out by an individual or team.

2.5.6 Manifested ethical and integrity risks

Should a donation of at least £1,000 be discovered as unacceptable at some point after it was received, having successfully gone through the original screening process and now deemed a manifested ethics risk e.g. the donor has become involved in a scandal, fraudulent

activity etc. then the matter of possible University institutional risk will initially be raised by the Head of Alumni & Supporter Engagement. They will then be supported by the most appropriate senior staff, Keele's legal team and if necessary, the press and public relations team in order to mitigate any issues and take the appropriate action(s).

The escalation of any manifested ethical and integrity risks that do arise, will be appropriate to the size of donation given and its intended purpose.

See also 3.4 Returning a Gift.

3. POLICY PRINCIPLES

The Advancement Team is responsible for coordinating fundraising across the University; maintaining details of all Gifts on its database, including for reporting and audit purposes and ensuring any contact made with donors is relevant and any future approaches are coordinated.

The Advancement Team should be made aware of all Gifts / Philanthropic Funds so that they can ensure they are consistent with the goals and policies of the University and so they can refer anyone who wishes to approach a donor to the Faculty / Directorate who holds the relationship with that donor, ensuring no conflicting requests or multiple approaches from different parts of the University are made. All intentions to approach existing or potential donors should therefore be notified to the Advancement Team before contact is made.

3.1 Recording and Reporting

It is the responsibility of the person within the University soliciting the Gift to develop the Statement of Intent in conjunction with the donor, the Advancement Team and any individuals in the Faculty / Directorate who might have a relationship with the donor or the project.

In some circumstances, donors might discuss the possibility of making a Gift directly with Faculty / Directorate staff. In these circumstances the Advancement Team should be advised and involved as soon as practicable and provided with all support information and relevant paperwork. The minimum information required by the Advancement Team is as follows:

- Name and Address of donor;
- Name of Faculty / Directorate staff member(s) involved;
- Amount and Purpose of Gift including Project / Department the Gift is to support;
- The Account and Project Code to which the gift is to be credited; and
- Copies of supporting letters, proposals and communications with and from the donor.

3.2 Stewardship

All donors should be properly thanked and acknowledgement of the Gift should be coordinated by the Advancement Team to be sent from the most appropriate person at the University. This can vary from the Advancement Team to Academics in the Faculty / Directorate that holds the relationship with the donor or the Vice-Chancellor. A copy of the final version thank you should be shared with the Advancement Team who will log this in the Gift Record in the database.

Appropriate thanking and stewardship will be carried out for each Gift received by the University. This will vary based on the Gift amount and how the gift is to be used. As Gifts increase in size and potentially their use is more specifically defined, the stewardship will reflect this in the more personalised thanking and stewardship given. This can involve relevant individuals from the Advancement Team, Faculty and Students who have received direct benefit from the Gift.

All donors will be listed in the Annual donor List, unless anonymity has been requested (see 3.2.1).

Donors can be invited to appropriate University events throughout the year, receive email newsletter updates, specific donor reports and meetings with relevant individuals at the University. Please contact the Advancement Team for further information about the Stakeholder and Supporter Relations Programme.

3.2.1 Anonymous Donors

When a donor asks that he or she or they remain anonymous in relation to a Gift, the Advancement Team must determine the appropriate level of anonymity. For some donors, it is acceptable for the University officials and internal entities to know about the source of a Gift. Their primary request is that their names and their Gift not be discussed in any public setting or included in any published honour roll of donors. In this case, the Gift will be recorded to the donor's individual entity record but will not be published in any University materials, nor recognised in any public fashion.

3.3 Tax Efficient Giving

3.3.1 For UK Taxpayers

Gift Aid is a way for the University to increase the value of monetary gifts from UK tax paying individuals by claiming back the basic rate tax paid by the donor. It can increase the value of gifts by up to a quarter at no extra cost to the donor. Gift Aid declarations (available from the Advancement Team) once returned should be sent to the Advancement Team who will process the claim and ensure the tax refunded is credited to the original project code. If you are unsure if Gift Aid can be claimed, please refer to the Advancement Team.

3.3.2 For Non-UK Taxpayers

- US Taxpayers can give to the University and potentially obtain US tax relief via the British Schools and Universities Foundation (BSUF) which is a non-profit organisation established in the United States to support teaching, research, and student achievement at the University. The organisation is a 501 (c) (3) not-for-profit charity and is governed by an independent Board of Directors. Please refer to the Advancement Team for more information.
- Tax efficient giving outside of the UK and USA can be facilitated through Giving Europe (GE) who cover a network of 19 countries (Belgium, Bulgaria, Croatia, Estonia, France, Germany, Greece, Great Britain, Hungary, Ireland, Italy, Luxembourg, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Switzerland) and enables donors, both corporations and individuals, resident in one of the participating countries, to financially

support non-profit organisations in other member countries, while benefiting directly from the tax advantages provided for in the legislation of their country of residence. Please refer to the Advancement Team for more information.

3.4 Returning a Gift

The University will not normally return a Gift which has been accepted in good faith and in compliance with this Code of Practice. Exceptionally, subsequent events or the subsequent availability of additional information may give rise to the need to review a previous decision to accept a Gift and its recognition. The University will consider the return of a Gift if any such circumstances come to light after the Gift is received that the Gift including that the Gift:

- was given illegally or becomes illegal;
- was made using illegal or illicit proceeds;
- the terms of the Gift cannot be met;
- the keeping of the Gift will or could cause reputational or other damage to the University; or
- the Gift fails to meet the ethical requirements of the University

The decision to return a Gift will follow the same Schedule of Delegation as applied to Gift Acceptance i.e. :

- Below £100,000 - Head of Alumni and Supporter Engagement;
- £100,000 - £800,000 – Executive Director of Communications and Advancement;
- £800,000 - £1,500,000 - Vice-Chancellor, on the recommendation of the Executive Director of Communications and Advancement
- £1,500,000 and above – Executive Director of Communications and Advancement will make recommendation for Gift Acceptance to the Vice-Chancellor, which will be referred to Council.

For Gifts in excess of £1,000,000 the University may also engage an appropriately qualified third party to carry out Due Diligence supplementary to that carried out by the Advancement Team, in line with the University's GDPR and Information Security Policy.

Where the University has a historic Gift that was given to support an activity or course that the University no longer provides, and therefore cannot fulfil the original intentions of the donor, the University will seek to utilise the funding in a way that is as close as possible to the donor's original intentions. Where possible the University will first seek the agreement with the donor or donor's representatives. Where the Gift is being reallocated, the same decision-making thresholds outlined above will apply.

3.5 University priorities and activities typically supported by Philanthropic Funds

Philanthropic Funds can support buildings and land, staff appointments, equipment and other assets, scholarships and bursaries, endowment of lectures and other academic activities, core funding of academic activities, and in some circumstances funding of research programmes. (NB none of the exclusion criteria as detailed in section 2.4 (exclusions from Philanthropic Intent) must apply, irrespective of the activity funded.)

Funding for buildings, land and equipment will typically be considered Philanthropic Funds, as long as the facilities funded will remain the property of the University.

Funded staff appointments are Philanthropic Funds, but if the funding agreement states that the member of staff will allocate time to specific activities which would not meet the Philanthropic Intent definitions within this Code of Practice document (i.e. any of the exclusion criteria in section 2.4 e.g. consultancy or work on research contracts) then none of the funding can be counted as Philanthropic.

Funding for scholarships and bursaries is Philanthropic Funds, as long as the student recipient is not required to undertake specific activities of economic benefit to the funder (e.g. research projects, work placements, etc.), in which case none of the funding can be considered as Philanthropic Funds.

Research funding. The exclusion criteria described above mean that the major proportion of research funding for the University, whether in the form of contracts with business and industry from grant-awarding bodies (even if they themselves are charities), should not be counted as Philanthropic Funds. In some cases, grants for research programmes from trusts and foundations may be eligible, but these will need to be assessed closely against the exclusion criteria on a case-by-case basis, given the differences in grant conditions between grant-making bodies.

3.6 Use of AI

The University may use generative artificial intelligence ("AI") in respect of its fundraising and donor activities (e.g. in drafting communications, searches, due diligence and administration). When it does so it will do so in compliance with relevant law and regulation (e.g. GDPR and data protection) and in accordance the University's relevant policies. The use of AI will be ethical so as not to mislead donors and potential donors that they are dealing with a human when they are not. AI shall not be used without human oversight with accountability being by both the Head of Alumni and Supporter Engagement and Director of Research, Innovation and Engagement.

4. ROLES AND RESPONSIBILITIES

Operational owner: Head of Alumni and Supporter Engagement

Executive owner: Director of Research, Innovation and Engagement

The University's Schedule of Delegation provides for the acceptance and refusal of Gifts / Philanthropic Funds of different sizes, as outlined above. In addition to this, the Advancement Team has responsibility to provide oversight over risk management and the implementation of this Gift Acceptance Code of Practice, seeking to protect the integrity and reputation of the University.

5. RELATED POLICIES AND PROCEDURES

The following University policies and procedures should be read in conjunction with this Code of Practice; as well as the listed relevant legislation and University governance provisions:

- Schedule of Delegation
- Anti-Money Laundering Policy
- Anti-Bribery Policy
- Ethical Investments Code of Practice
- Fraud Response Procedure
- Gift Acceptance and Due Diligence Procedure
- Data Protection Policy
- Information Security Policy
- Fundraising Regulator Code of Fundraising Practice: https://www.fundraisingregulator.org.uk/code
- HMRC Charity Guidance: http://www.hmrc.gov.uk/charities
- Charities Act 2022 - https://www.gov.uk/guidance/charities-act-2022-guidance-for-charities

6. REVIEW, APPROVAL & PUBLICATION

In addition to the Advancement Team, several stakeholders have been consulted on this revised Fundraising Code of Practice. This includes Finance, Research and Innovation Support, Research Governance and Integrity, Legal and Internal Audit.

- 3 year approval period by University Executive Committee ("UEC").
- Annual review by Operational Owner and approved by the Executive Owner within the Directorate of Research, Innovation and Engagement.
- UEC are ultimately responsible for approval.

This Code of Practice will be located/published on the webpage for the Directorate of Research, Innovation and Engagement and the external webpage for Fundraising, as well as on the University Policy Zone webpage.

7. ANNEXES

None submitted

8. DOCUMENT CONTROL INFORMATION

Document Name	Fundraising Code of Practice
Owner	Director of Research, Innovation and Engagement
Version Number & Key Amendment	2.0
Equality Analysis Form Submission Date	N/A

Approval Date	05 September 2022
Approved By	University Executive Committee
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Date of Last Review	24 November 2026
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Related University Policy Documents	Schedule of Delegation • Anti-Money Laundering Policy • Anti-Bribery Policy • Ethical Investments Code of Practice • Fraud Response Procedure • Gift Acceptance and Due Diligence Procedure • GDPR and Information Security Policy • AI policy • Fundraising Regulator Code of Fundraising Practice: https://www.fundraisingregulator.org.uk/code
For Office Use – Keywords	