



Gift Acceptance and Naming Policy

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Contents

1	Introduction.....	3
2	Scope	3
3	Responsibilities.....	3



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4	General Principles.....	5
5	Implementation.....	10
6	Policy compliance.....	10
7	Monitoring and Review	10
8	Related Policies and Standards	10



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 with a monetary value and non-monetary philanthropic donations (gifts in kind), given with the intention of achieving public benefit without any private (e.g. commercial) benefit in return.
- 2.3 Grants awarded by the larger research funders for research as defined by the Frascati Manual are not included in this policy and are defined as research funding. When considering if funding is a philanthropic donation or research funding the University will also review if the funder defines themselves as a philanthropic funder or a research funder and whether the funding opportunity is defined as philanthropic or as research.
- 2.4 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, Development and Communications 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 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 current version of the University's Long-Term Investment Policy (as published on the University website at the time of seeking approval of the gift) and in accordance with its Ethical Framework.
- 4.1.5 In accordance with these policies, at the time of the approval of this policy the University will follow the restrictions of the Long-Term Investment policy. These restrictions include but are not limited to the University not ordinarily accepting philanthropic donations from organisations:
- That are engaged in fossil fuel extraction.
 - That, following engagement, needlessly emit significant quantities of carbon into the atmosphere, or which do not take seriously the transition to a low carbon.
 - That are engaged in tobacco production and manufacturing of tobacco-related products, with this noted as being achievable due to the discrete nature of tobacco companies.
 - Whose core mode of operation is in the manufacture/trading of arms.
 - Whose core mode of operation is in alcohol.
 - Whose core mode of operation is in gambling.
- 4.1.6 The University will apply these principles to the acceptance of gifts from individuals. If an individual is employed by or otherwise connected to an organisation the University would not ordinarily accept a gift from due to the restrictions of the Long-Term Investment Policy, when deciding the suitability of that gift the University will consider the individual's seniority within or level of connection to that organisation – with lower seniority or connection making a gift more acceptable.
- 4.1.7 The University will follow these procedures in the result of the University receiving a gift in an individual's will, or when being informed that an individual intends to leave a specific amount or item to the University in their will.
- 4.1.8 The University will follow similar principles in relation to the acceptance of gifts from Trusts and Foundations and will not ordinarily accept philanthropic gifts from Trusts and Foundations where the source of their funding is included in the restrictions of the Long-Term Investment Policy.
- 4.1.9 The University will not ordinarily consider these restrictions in relation to trustees of Trusts and Foundations in terms of the employment, income, or positions they



may hold, but will follow all other guidelines (4.1.1 to 4.1.3) in relation to their trusteeship and considering if a gift is suitable.

- 4.1.10 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. The due diligence report will be refreshed each time a new gift from that funder requires approval.

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 seek to 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 All donor gift agreements or similar fundraising collateral, whether print or electronic, must specify in their terms and conditions that, should it prove impossible to fulfil the intended purpose of a gift, that the University will endeavour to find a closely related purpose, in consultation with the donor for gifts of a value of £5,000+. The University reserves the right to use any donation for its general charitable purpose where this cannot be done.



4.3.6 The 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 All gifts of £5,000 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.

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

Table 1 - Approval thresholds

£5,000+	Associate Director, Engagement, Development and Communications
£50,000+	Vice-Chancellor or other Executive Board member nominated by Vice-Chancellor
£100,000+.	University Ethics Committee
£500,000 +	University Ethics Committee and Council

4.4.3 Once a gift has been accepted, the University will be permitted to accept further gifts from that source within an 18-month period without seeking re-approval, unless the cumulative gifts from the date of that approval exceed the upper limit of the threshold that the gift has been accepted at.

4.4.4 The above thresholds also apply to gifts in kind donated to the University. Reasonable measures will be taken to value a gift in kind, and to approve the gift at the relevant level. The University will not ordinarily commission professional valuation unless the gift in kind is at a potentially significant level or if it is required for insurance purposes.

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

4.5 University of Bradford Library Special Collections

4.5.1 The University of Bradford’s Library’s Special Collections has a Collection Development Policy for the development of the collection. The valid version of this policy will be available on the University website.

4.5.2 Gifts in kind donated to the Library and Special Collections will be accepted through the Gift Acceptance and Naming Policy if:

- The value of the item or collection may be of an in-kind value of £5,000+



- Library and Special Collections are concerned that the source of a donation of a value under £5,000 may not be approved through the Gift Acceptance and Naming policy.

In both cases the potential donation should be considered through the University's Gift Acceptance and Naming Policy.

4.5.3 Library and Special Collections should keep a secure record of all donations accepted and the source of the donations.

4.6 Naming Gifts

4.6.2 For some donations, especially substantial gifts, the University may wish to recognise the donor's contribution through independently choosing to honour and celebrate their contribution, including through choosing to bestow upon them the naming of an asset after them. Such assets include; buildings, spaces within buildings (laboratory), outdoor spaces, endowed academic posts, public lectures, student scholarships or student prizes.

4.6.3 Terms of Naming

- The naming of the given asset continues for the duration of the activity funded, for example in the case of a bespoke funded scholarship programme.
- An asset funded by a permanent endowment should be funded in perpetuity but since this can never be guaranteed, the naming of an endowment or asset funded by it will last for the period of time that the endowment does.
- Clear and transparent discussions with the donor or their representatives will take place if there is a significant change to purpose of the original asset named after them.
- If the period of recognition offered to the donor is time limited, this will be communicated in a formal document or gift agreement to the donor.

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

4.6.5 Threshold guidelines for naming assets

The University will ordinarily decide to offer to name an asset after a donor in line with the below guidelines of the size of their donation in relation to the full costs of the asset. Each case will be considered on its merits and the University may choose to name an asset in recognition of a gift at a lower threshold.

Table 2 – Threshold guidelines for naming assets

Asset	Proposed Threshold	Further Information
Buildings and facilities		
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.
Posts and programmes		
Endowed academic post	25%-50%	Full costs of the post's salary are required and must include staffing on-costs as well as a budget for expenses. For senior roles such required administrative roles must be costed in. For all posts, the cost of inflation must be factored in.
Student Scholarship Tuition Fees (UG)	50%	Tuition fee scholarships should support the cost at the time of 4 years of study, covering the 3-year duration of a typical undergraduate degree study and an additional year to cover either; a foundation year, a re-sit year, or integrated 4-year Masters programmes. Donors should be encouraged to cover the full cost of tuition fees, however if part funding is opted for a minimum of 50% is expected.
Student Scholarship Living Costs (UG)	Minimum donation of £12,000	Living costs scholarships should support 4 years of study as above. The option to name scholarships after the donor may be given in recognition of a scholarship programme of a minimum of £12,000 per student (£3,000 a year). For new bespoke scholarships requiring standalone application and selection processes a higher threshold would be required agreed at the time in consultation with the Fees and Finance Manager.
Student Scholarship (PG)	50%	Scholarships should support 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, including tuition fees, living costs, and bench fees for some programmes. However, if part-funding is opted for a minimum of 50% is expected.
Student Prize	100%	Full cost for the prize is expected for it to be named after the donor. The University will

		only offer this in recognition of prizes of at least £1,000 over a maximum of a five year period, with a signed gift agreement.
Public Lecture Series	100%	Full cost of the lecture series is expected for it to be named after the donor.
Other		
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.

4.6.6 **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.

4.6.7 **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.

4.6.8 **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 Senior 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
- 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.