POLICY SCHEDULE	
Policy title	Donations Policy
Policy owner	Director of Development and Alumni Relations
Policy lead contact	Director of Development and Alumni Relations
Approving body	Council
Date of approval	27 November 2020
Date of implementation	27 November 2020
Version no.	3
Appendices 1 2 3	Donor due diligence procedure Due diligence procedural checklist University of Sussex donor charter
Annex 1	Financial Administration of Gifts and Donations Policy
Related Policies, Guidelines and Procedures	Financial Regulations, Anti-Money Laundering Policy Anti-Bribery Policy Guidance: Principles of public life Policy on the Registration and declaration of interests Treasury and Investments Policy
Review interval	3 yearly, or on changes to relevant legislation or guidance
Further info contact	Director of Development and Alumni Relations

1.

1.1 The University takes pride in the philanthropic support it receives from UK and internationally-based donors in order to achieve excellence in research, scholarship and teaching. This support enables the University to invest further in key strategic areas including student hardship, research, teaching and the enhancement of campus buildings and equipment.

1.2 The University is committed to conducting itself with the highest standards of probity and good conduct in carrying out its academic and business functions. This policy is adopted by the University's Council and supports these aims by ensuring that donations are compatible with the University's objectives and consistent with its strategic goals.

1.3 The University has a duty to comply with legal requirements, the requirements of funding bodies (including, notably, the Offic6 re0Gffic699.42 14. S4(a)-uT0 0 1 22eWang, notably, t-1q03b6.3f1 0 dis com4("S

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the University and must not benefit in any way from making the donation.

Donations are interpreted, for the purposes of this policy, as including the following forms of giving:

providing there is no donor control over the appointment and neither consultancy nor work on research contracts is included.

as long as the student recipient is not required to undertake specific activities of economic benefit or other advantage to the funder (e.g. research projects, work placements) and the donor does not select the recipient.

of lectures and other academic activities.

where the University retains control over how the donation is spent and exclusive intellectual property and exploitation rights to the research results.

3.2 For the purposes of this policy, givers or rs Ş Mo

4.2

4.2.1 .

The University will actively seek donations on the basis that:

The donation is consistent with the University's values and strategic goals and will be applied to its charitable purposes at the earliest and most beneficial opportunity.

The funder can have no influence over the academic freedom and independence of the University, or over the assessment of the academic performance of any student or member of faculty, or over any other area of University activity.

The project involves no, or minimal, net cost to the University in terms of financial commitment at the end of the period covered by the gift, unless agreed otherwise with the donor and specified as part of the process of accepting the donation.

4.2.2

The University will follow due diligence processes to ensure that the of potential

4.2.3

In deciding whether to accept a donation the University will consider

b)

The University will accept gifts from the parents/relatives/other associates of current and prospective 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 that student.

c)

The University will accept donations from staff, provided that these are not made with the intention of supporting the donor's own work or research. As with other university donors, members of staff who make donations will not be allowed to have any control and influence over the spending of their gift.

d)

The University will accept gifts from corporate organisations with a philanthropic intent but will refuse these if the donor expects tangible benefits in return or imposes contractual obligations.

4.2.5

The University does not accept wholly anonymous donations, i.e. cases where the donor will not make his/her identity known to the University even on a confidential basis via an intermediary.

The University accepts and will facilitate the wishes of donors who do not wish to have their identity published or otherwise made generally known. However, the minimum set of University officers to whom the identity of the donor must be disclosed is set out (for different levels of donation) in section 6.1 below.

4.2.6

Where the University offers to name a building, academic post or other aspect of its activities in recognition of a particular benefaction, the University reserves the right to withdraw such named recognition in the future if it subsequently transpires that the source of funding arose in whole or in part from any activity listed under sections 4.2.3 and 4.2.4.

5.

This section details provisions to underpin the principle that "the funder can have no influence over the academic freedom and independence of the University, or over the assessment of the academic performance of any student or member of faculty, or over any other area of University activity." Where a donation funds (in whole or in part) an area of academic activity:

a) Donors will have no influence over the process of appointing staff, including the composition of thers

7.3

7.3.1 All donors will be properly thanked and their donation appropriately acknowledged by External Relations and, where appropriate, the Vice-Chancellor and relevant academic Schools or professional service units. All donors (unless otherwise requested) may be listed in the University's Donor Roll and published online or in print. Occasionally, the University may decide to publish a subset of donor names (e.g. lead donors to a campaign); in these circumstances, any donor who wishes to remain anonymous will be omitted from the list. Donors will also be invited to donor events and other appropriate University events throughout the year.

As part of the External Relations stewardship programme, major donors will receive a tailored annual report informing them of the progress or outcome of their particular donation. Supporters of named scholarships will receive an annual letter from their student informing them of progress.

7.3.2 In relation to donors' rights, the University undertakes that:

a) The legal and reputational rights of potential donors should be considered as part of the due diligence process.

b) Gift agreements for all gifts over £5,000 are accepted and signed by the Director of DARO in External Relations, the relevant Head of School and the donor to confirm that the gift will be applied to the intended purpose, unless explicit consent is given otherwise by the donor or executors, and that the management and governance of programmes funded through donations rest solely with the University. In the case of significant gifts, the gift agreement will also be signed by the Vice-Chancellor.SntF3 0.0mrs

8.3 Anyone wishing to raise a concern about the operation of any aspect of this policy may contact the Director of DARO in External Relations, or alternatively the COO.

8.4 Below are contact details f

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The aim of the due diligence procedure is to feed data into the donation consideration process

The procedural checklist below gives the series of questions that need to be asked of each donation over £25,000 as part of the due diligence process. Should the due diligence process identify a cause for concern in relation to a donor or the source of his/her donation, the Director of DARO in External Relations will discuss the answers to the questions below with the approval bodies identified in 6.1 above. The approval body may deem it necessary to engage third parties to assist with further checks and enquiries.

The due diligence procedural questions below will be applied to gifts of more than £25,000 according to levels of risk. The answers to these questions will assist in the decision-making process of accepting or refusing a donation.

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4)

1) Who is the donor or donors?
2) What is the source of their funds? Do these give rise to any red flags?
3) What relationship does the University have with the donors?
4) Are there clear legitimate reasons why the donor wishes to make th5 595.5 842.52 reW*nBT/F3 10.98 Tf1 0

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donations of different sizes (as set out in section 6 of the University's Donations Policy).

10. To request not to receive any further mailings from the University or External Relations in particular.

11. To be informed whether those seeking donations are volunteers, employees of the University or financial / legal advisors.

12. To be assured that the University will not sell or otherwise pass on its donor list to a third party except in a limited number of cases where the data is shared with third party suppliers to process data on our behalf, as outlined in the Development and Alumni Relations Office (External Relations) Privacy Policy.

13. To be assured that the University will review the cost effectiveness of its fundraising programme regularly.

14. To have access to the University's most recent published financial accounts and be assured that the University's financial affairs are correctly conducted.

15. The Director of DARO in External Relations will respond in a timely manner to any written complaints from donors or prospective donors about any matter relating to the University's fundraising activities (as set out in section 7.3.2 of the University's Donations Policy).

16. The Director of DARO in External Relations will report to the University's Audit and Risk Committee each year about the number, type and disposition of complaints received from donors or prospective donors (as set out in 7.2.1 of the University's Donations Policy).

POLICY SCHEDULE	
Policy title	Financial Administration of Gifts and Donations Policy
Policy owner	Director of Finance
Policy lead contact	Assistant Director of Finance – Finance Corporate Services
Approving body	COUNCIL
Date of approval	20 October 2017
Date of implementation	20 October 2017

A donation given under terms that restrict its use which are imposed by the donor.

2.4. An endowment whose terms require its capital to be preserved and invested to generate income which may be applied in support of the University's charitable activities. The purpose to which the income is to be applied may be restricted or may be unrestricted under the terms of the endowment.

2.5. An Endowment whose terms allow its capital to be spent but restrict the purpose to which it may be applied.

3.1. Under this policy the Director of Finance and the Director of Development and Alumni Relations (External Relations) may delegate their responsibilities to others. Delegations must be made in writing and notified to the Director of Finance.

4.1. Money may be donated in a variety of ways including, but not limited to, cash, cheque, payment card, bank transfer. Any person accepting donated money for the University must have regard to the University's Anti-Money Laundering policy and in particular should not accept or agree to accept cash in excess of £500 sterling or equivalent in foreign currency.

4.5. Any request by a donor for disclosure, other than disclosure under UK GAAP, of the donation and/or the donor's identity in the University's publis M financial statements mu M be approved by the Director of Finance prior to the acceptance of the donation.

4.6. The receipt of donations from overseas donors may require specific arrangements and/or structural measures for transactions to comply with the legal and tax environment of a particular geography or territory. Any such arrangements or structural measures must be approved by the Finance Director.

4.7. Donations from overseas donors will be the subject of additional checks by DARO, as part of the due diligence arrangements set out in the main donations policy, to ensure they do not contravene international sanctions, embargoes and restrictions which the University must comply with. Procedural guidance on sanctions checking is provided by the Finance Division.

5.1. All donations must be recorded in the External Relations donations database as defined in the donations policy which sets out the threshold above which a gift agreement must be established.

5.2. The Vice-Chancellor, Chief Operating Officer, Heads of School and Directors of Service are authorised by this policy to spend donated funds in accordance with the terms of the donation where they are established by the Director of DARO in External Relations as the nominated custodian of the donation. The authority to spend a donation may be delegated under the financial regulations which allow the delegation of budgetary authority. Any such delegation must be done in accordance with the financial regulations. The Vice-Chancellor may delegate authority to spend or control the allocation and spending of a donation or category of donations to a formally convened group or committee.

5.3. The Director of DARO in External Relations is responsible for:

5.3.1. Notifying the University's F M team of all donations received and of pledges in excess of £100k.

5.3.2. Claiming gift relief including maintaining accurate and compliant records of gift relief declarations.

5.3.3. Reconciling the alumni database to the University's financial ledgers.

5.3.4. Establishing and recording the specific person, persons or group under para 4.2, authorised to spend a specific donation and notifying the Finance team of this including any delegations of authority exercised.

5.5.2. The responsibility for spending a donation rests with more than one school or department and requires multiple budget holders.

5.5.3. The donation is funding a complex project which must be controlled through an appropriately structured budget which is beyond the capability of a central donation