

## **Brunel University Policy for the Acceptance of Donations**

It is Brunel University's policy not to accept donations likely to be illegally or immorally obtained or to risk adversely affecting its reputation or compromising its academic integrity. This can encompass, but is not limited to, refusing to accept a donation where:

- (1) It results from illegal or immoral activities;
- (2) The activities of the donor are contrary to the objectives and values of the institution;
- (3) The gift represents a significant reputational or future financial risk to the institution;
- (4) The offer is dependent upon the satisfaction of conditions by the institution which are contrary to the institution's values and objectives, or unreasonable in relation to the nature of the donation;
- (5) Where conditions tie the donation to a specific activity and the activity itself is not within the objectives or intended strategy of the institution.

These general principles operate in conjunction with the University's overarching Ethical Framework and shall be the guiding principles behind the seeking as well as the acceptance of donations.

The University will adhere to a professional code of practice in the solicitation of gifts and dealings with donors as set out below.

Brunel University will carry out due diligence on the nature of proposed donations and their sources of funding. It must make reasonable efforts to satisfy any questions raised before gifts are accepted. The Development and Alumni Relations Office is best placed to carry out this work and the University shall not accept gifts without this Office being made aware of them. The Director of Development will have responsibility in conjunction with the Director of External Affairs and the Vice-Chancellor for deciding whether gifts should be accepted, or whether further consideration is required. Audit Committee can render a view on the risks inherent in the acceptance of any donations or corporate sponsorship and recommend whether further consideration by the Ethics subcommittee (an ad hoc sub-group of Council) should be sought.

Brunel will seek appropriate legal and financial advice for correctly dealing with donations as required and it will also advise donors to do the same where appropriate.

Council will monitor non-research related ethical questions through the Ethics subcommittee (an ad hoc sub-group of Council).

In all areas of doubt, submissions should be made to the Council sub-committee for Ethics that will exercise oversight of the operation of this policy under delegation from the Audit Committee. Audit Committee's role in this matter will be to render an opinion to the executive as to the effective application of the policy and the risks inherent in accepting any donations.

The Ethics sub-Committee and the Audit Committee shall have the authority to empower the Director of Development to undertake additional due diligence work in order to fully inform its opinion and will be able to propose, in exceptional circumstances, that the University Council be asked to render a final decision about the suitability of a gift.

## **Code of Practice for the Solicitation of Gifts**

### **Solicitation of Gifts**

Fundraising solicitations on behalf of Brunel University will:

- Be truthful; and
- Describe accurately the University's priorities; its strategic aims and the intended use of any gift.

All fundraising solicitations by or on behalf of Brunel University will disclose the University's name and the purpose for which the funds are requested, in whatever format or media they are transmitted.

Employees, volunteers or persons hired specifically to solicit funds for the University will

- Be advised of and adhere to the provisions of the Policy for the Acceptance of Donations, this Code of Practice, the University Financial Regulations and the Anti-Bribery Policy;
- Act with transparency, fairness and integrity and in accordance with applicable laws;
- Adhere to the provision of applicable professional codes of ethics and standards of practice;
- Cease solicitation of a gift from a prospective donor on request;
- Disclose immediately to the Director of Development any potential, actual, perceived or alleged conflict of interest.

Paid fundraisers, whether staff or consultants will be compensated by a salary, retainer or fee and will not be paid finder's fees, commissions or other payments based on either the number of gifts received or the value of funds raised. Compensation, including performance based compensation, will be consistent with the University's policies and procedures for non-fundraising personnel.

The University will not sell or exchange personal details of donors.

## Dealings with Donors

Gifts are accepted on the following understanding:

- **Academic Freedom and independence from influence:** Brunel University accepts gifts on the clear understanding that the donor cannot influence the academic freedom or the independence of the University.
- **Admissions:** Brunel University's selection criteria for admissions are based exclusively on academic achievement and potential and are independent of philanthropic support of the University. No gift will affect the academic record of any current or future student, nor will it have any bearing on any dispute between a student and the University.
- **Management of programmes:** Donors accept that the management, and governance of programme and/or activities funded through philanthropy, rests solely with the University. Donors will, however, be provided with appropriate and commensurate opportunities for continuing engagement with the programmes/activities that they have funded/are funding. The scope for this engagement will, in the case of significant gifts, be enshrined within a Gift Agreement. Any wish by a donor to restrict who can benefit from a donation will be considered by the University in accordance with Charity Commission guidance to ensure compliance with the Equality Act 2010 ("the Act"). Where it is not possible to accommodate such wishes due to the provisions of the Act, the University will work with the donor to agree an alternative basis for the donation.

Donors and prospective donors can expect:

- To be informed about the priorities and strategic aims of the University;
- That the University is able to fulfil the intended purpose of a gift;
- That a gift given for a specific purpose will be used for that purpose;
- That if there is a change in the priorities or needs of the University, or in the case of funding an academic position, a change in personnel, the use of any gift will be discussed with the donor or their representative;
- To be informed of the impact of their gift;

- To have their gift acknowledged in a timely manner, and where appropriate to be recognised publically, in consultation with the University, or to remain anonymous if requested;
- To have their right to privacy respected and their personal information treated in compliance with the Data Protection Act 1998;
- To have their questions relating to their gift answered in a timely and honest manner; and
- To be provided promptly on request with copies of the University's most recent published financial statements.

Donors and prospective donors are entitled to know, upon request, whether an individual soliciting funds on behalf of the University is a volunteer, an employee or a professional fundraiser hired by the University.

Donors will be encouraged to seek independent advice if the University has any reason to believe that a proposed gift might affect the donor's financial position, taxable income, or relationship with other family members in a significant manner.

Donors' requests to remain anonymous will be respected as far as is legally, practically and ethically possible.

The privacy of donors will be respected. Any donor records that are maintained by the University will be kept confidential to the greatest extent possible. Donors have the right to see their own donor record, and to challenge its accuracy.

Donors and prospective donors will be treated with respect. Every effort will be made to honour their requests to:

- Limit the frequency of solicitations;
- Not be solicited by telephone or other technology;
- Receive printed material concerning the University.

The University will respond promptly to a complaint by a donor or prospective donor about any matter that is addressed in the Gift Acceptance Policy or this code of practice. If there is an issue or complaint, in the first instance please contact [alumni@brunel.ac.uk](mailto:alumni@brunel.ac.uk) or write to The Director of Development, Brunel University, Kingston Lane, Uxbridge, Middlesex UB8 3PH