

Introduction

1. Royal Holloway welcomes and relies upon donations to help underpin the College's strategic aims and objectives, in particular through the use of such funds to support research and enhancing the student experience.
2. This policy covers the solicitation and acceptance of gifts by or in the name of the College. It seeks to ensure that gifts to the College are properly received, recorded and administered using appropriate internal controls and that the College's acceptance and management of gifts are in compliance with external regulations and the College's fiduciary obligations to donors.
3. For the purposes of this policy, charitable donations and gifts include, but is not exclusively limited to, cash or cheques, property, shares or bonds, tangible personal property (gifts-in-kind), legacy gifts, corporate sponsorship and charitable foundation gifts.

Principles

4. The College subscribes to the 10 ethical principles behind the acceptance of gifts developed by CASE Europe, the Ross Group and the 1994 Group of Development Directors. The 10 principles are set out below, with additional text explaining how the principle applies in practice at Royal Holloway.

Principle 1: Universities should seek philanthropic support which is aligned with their values, strategic goals and financial needs, as a legitimate, sustained and vital component of their income.

5. Royal Holloway will not accept gifts that:
 - Compromise its status as an independent institution
 - Do not help fulfil the College's strategic aims
 - Suppress or falsify academic research
 - Limit freedom of inquiry
 - Expose the College to undue adverse publicity or reputational risk
 - Require unacceptable expenditure of additional College resources
 - Create conflicts of interest which are not fully transparent and managed appropriately
 - Potentially harm Royal Holloway's relationships with other donors or stakeholders or inhibit unreasonably, the College's ability to seek support from other donors
 - Undermine the College's vision and values
 - Cost the College more than the benefit it derives from it
6. Gifts will be tested against current strategy, copies of which will be made available to donors on request and periodically promoted in publications such as *Higher* magazine.

Principle 2: Ethical guidelines for the acceptance of such gifts in any institution should be available in the public domain.

7. This policy will be published on the Royal Holloway web site, accessible to all users of the site.

Principle 3: Impartial, independent research, scholarship and teaching are the basis for the furtherance of knowledge. Universities should not accept philanthropic gifts if this is not clearly understood and accepted by all parties.

8. The rights of Royal Holloway academic staff to freedom of inquiry and expression are protected under statute and should not be influenced by the donation of a gift.

Principle 4: Universities are charitable bodies and must observe the requirements of charity law and other relevant legislation in relation to the receipt and expenditure of funds. Ultimate responsibility regarding the acceptance and refusal of donations rests with the governing body of each university.

9. Royal Holloway is a charity (HMRC reference: XN69536) and will at all times observe the requirements of charity law and other relevant legislation. Council delegates this responsibility to the Principal and senior officers, except where careful consideration is required in acceptance or refusal of a gift.

Principle 5: Where the authority for the acceptance of donations is delegated to the Vice-Chancellor/Principal and other senior academics or officers, that authority should be explicit and the responsibility of those accepting gifts to implement the institution's detailed ethical policies and procedures on donations must be clearly understood and consistently applied.

10. As ultimate responsibility for the acceptance and refusal of gifts rests with Council, but is delegated to the Principal and senior officers who will ensure that everyone accepting gifts understands and implements this policy. Further details are provided in the section below on Delegation of Authority, starting at paragraph 18.

Principle 6: Universities should take all reasonable steps to ensure that they are aware of the source of funding for each gift, and have processes in place to satisfy themselves that the funds do not derive from activity that was or is illegal, or runs counter to the core values of impartial, independent research, scholarship and teaching.

11. Royal Holloway will not accept gifts from unknown sources of funding.
12. Royal Holloway will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal or which runs counter to the provisions of this policy. Where necessary, it will look beyond charitable trusts and foundations in order to satisfy itself about their ultimate source of funding. The test of compliance with this policy will be taken prior to solicitation wherever possible, rather than at the point of acceptance.

Principle 7: Discussions with potential donors that are likely to give rise to significant public interest, or which raise complex questions with regard to acceptability, should be considered at the earliest stage possible by the appropriate decision makers who should be fully informed of the purpose and the background to the donation and the source of funds.

13. A schedule of delegations and operating procedures are set out in this policy.

Principle 8: The legal and reputational rights of potential donors should also be considered as part of any due diligence undertaken in assessing the acceptability of a proposed donation. In this regard, a clear distinction should be drawn between rumour or speculation and matters of confirmed fact or legal finding, whilst also accepting that institutions may wish to consider the reputational risks that could be incurred through public perception of any particular donor.

14. This principle will be applied as part of the consideration of acceptance of a gift within this policy.

Principle 9: Donors must accept and, for significant gifts (as determined by individual institutions), sign appropriate gift agreements to confirm that the management and governance of programmes funded through benefaction rest solely with the university. Individual institutions typically choose, without undermining this core principle, to offer donors opportunities for continuing engagement

with the activities that they have funded. Universities should employ their standard procedures relating to recruitment, admissions, hiring, promotion, procurement, management and governance for all research, teaching, outreach, capital development, or student scholarship programmes funded by gifts.

15. Gifts of £25,000 and over must be accompanied by a gift agreement laying out the terms for the donor and the departments involved. Gift agreements should be signed by the donor and the College. Where there is a need, for instance a dedicated bursary, gift agreements for lower amounts can also be drawn up. While donors will be offered opportunities for continued engagement with the activities they have funded, the management and governance of those activities will remain solely with the College.

Principle 10: Universities should have procedures in place for reviewing and reconsidering previous decisions taken in good faith relating to the acceptance of particular gifts if subsequent events or the subsequent availability of additional information require it. The response to such circumstances should be transparent and proportionate to the particular circumstances that have arisen.

16. Royal Holloway will periodically request a review of gifts to ensure compliance to this principle.
17. In the event that the College is unable to put a gift to the use originally intended by the donor, the Head of Development will recommend a course of action for approval by the Planning and Resources Committee.

Delegation of Authority

18. Authority for the acceptance of gifts is delegated by Council through a hierarchy comprising:

- Council Executive
- Planning and Resources Committee
- Head of Development.

The following table sets out the limits of authority, beyond which matters must be referred upwards through the hierarchy.

Authority of...	Solicitation	Acceptance of Gift and Approval of Gift Vehicle (subject to paragraph 19)
Leader of Development team	For any gift up to £5 million, provided the relevant Dean of Faculty is consulted on asks over £100,000	Gifts valued up to £250,000
Planning and Resources Committee	For major gifts expected to exceed £5 million	Gifts valued over £250,000 and up to £5m
Council Executive	See paragraph 19	Gifts exceeding £5m
Council	See paragraph 19	See paragraph 19

19. Where a solicitation or gift is deemed to be unusually complex, demanding or restrictive (as determined by the Head of Development, Principal, Chair of Council or their nominee), the matter should be escalated through the governance approval hierarchy, to an appropriate level. Special consideration will be given to gifts exceeding £100 from a current or prospective student or from people known to be in a close familial or personal relationship- in such cases if a gift is made for the direct benefit of the student’s actual or prospective department, approval must be sought by the Planning and Resources Committee, Council Executive or Council and a declaration of interest should be made at any examination board that considers the student’s progression or graduation. (NB. This excludes donation of books to the Library, for example).

20. The Head of Development will be responsible for providing decision-makers with sufficient facts pertaining to the donation in question, to enable them to come to a fair and informed decision on acceptance.
21. For gifts made through the Annual Fund, recommendations for disbursement will be made by the Alumni Advisory Committee and approved by the Planning and Resources Committee. Such recommendations will be made within a set of general objectives and guidelines provided in advance by the Planning and Resources Committee. The use of all other gifts will be determined by the Planning and Resources Committee and in accordance with the stated purpose of the gift.

Transparency

22. Royal Holloway will normally publish the names of the donors in the annual Roll of Donors. Where a donor wishes to remain anonymous, every effort will be made to respect that wish, within the limits of the law.
23. The Head of Development will be responsible for the day to day operation and annual review of this policy and all College staff, contractors, and volunteers who are seeking to raise funds in the College's name must work in partnership with the Head of Development to ensure compliance with this policy.

Record Keeping and Accountability

24. The Development Office is responsible for acknowledging charitable gifts, for claiming Gift Aid on behalf of departmental gifts and for maintaining a proper record of the transaction. The Development Office will acknowledge all gifts in a timely manner and seeks to do so within 3 working days of receiving a gift, with major gifts being acknowledged, where possible, on the day of receipt.
25. Gifts received in a department must be immediately forwarded, along with all pertinent information regarding the gift, to the Development Office. Such information should include:
 - Donor's name and address
 - Gift description, including restrictions on use of the gift
 - Gift date
 - Exact value of the gift, if known, or approximate value if a gift-in-kind
 - A brief outline of how the gift was solicited and details of all parties involved
26. Deans, department chairs and other individuals with an interest in a gift are also encouraged to thank donors in their own capacity.
27. The Development Office is responsible for reconciling the gift database with the general ledger. The Head of Development will perform regular quality assurance reviews to ensure that gifts are assigned to the correct accounts and that expenditure meets expressed purposes.
28. The Development Office will provide a periodic report to the Planning and Resources Committee to demonstrate effective operation of the policy.
29. This policy is related to anti-bribery and anti-fraud policies and should be read in conjunction with these policies.

Policy originally approved by Council, November 2012 and amended in April 2015.