

Development & Alumni Relations Office: Due Diligence Policy & Procedures

VERSION 1.6

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Contents

1. Introduction	2
2. Due Diligence Policy - Philanthropic Funding	2
Gift Acceptance Policy	4
3.1 Ethical Policy	4
3.2 Policy on Anonymous Gifts	6
Procedures for All Staff involved with Philanthropic Funding	7
Procedure for Approval to Solicit.....	8
Proposed Solicitation less than £25,000.....	8
Proposed solicitations of £25,000 or more.....	8
Procedure on Receipt of a Gift.....	8
Procedure for Approvals of Gifts	9
Level 1: Gifts up to £25k	9
Level 2: £25k up to £100k	9
Level 3: £100k and less than £1m	9
Level 4: £1m+	10
Procedures for Repeat Donors.....	11
3. Appeals Process	11
4. Due Diligence – Other DARO Responsibilities.....	11
Appendix 1: Role and responsibilities of Council and Authorised Decision Makers.....	14
Appendix 2: Forms	15
A2.1 Gift Notification Form.....	15
A2.2 Solicitation Approval Form	17
Appendix 3: Due Diligence Reporting	18
A3.1 Due Diligence Reports	18
A3.2 Due Diligence Report Template.....	19
A4 Due Diligence Resources.....	20



Development & Alumni Relations Office: Due Diligence Policy & Procedures

Operational guidelines for all staff or volunteers involved in receiving philanthropic gifts or making fundraising approaches. The policy also highlights areas outside of philanthropy for which DARO performs a due diligence service.

1 Introduction

The University of Leicester has an obligation to conduct its operations and relationships in an ethical manner, and to ensure due diligence is observed in certain circumstances in order to aid decision making.

This policy covers the areas for which the Development and Alumni Relations Office (DARO) is responsible for providing a due diligence service, which are:

- Philanthropic Gifts
- Naming (Philanthropic or Honorific)
- Honorary Degree Nominations
- Council Membership Applications
- Chancellor Shortlisting
- Events (administered by DARO)
- Volunteer Boards (associated with DARO)
- Volunteering (associated with DARO)
- Alumni Awards

NB There are a number of offices and departments within the University that operate a due diligence service and there will be other circumstances for which due diligence is performed (e.g. supplier relationships, research contracts etc) – these will be picked up by the respective responsible office, and are not covered by this policy.

2 Due Diligence Policy - Philanthropic Funding

1. The University of Leicester has an obligation to conduct its fundraising operations and relationships in an ethical manner, and to ensure that due diligence is observed when assessing whether to accept philanthropic gifts or establish specific philanthropic relationships.
2. The purpose of this policy, and the related procedures, is to guide members of the University Council and the staff who support them to make clear and consistent decisions regarding the acceptance or refusal of gifts.
3. Ultimate responsibility for all decisions relating to the acceptance and refusal of gifts rests with the University Council, even where decision-making has been delegated to members of staff.
4. The policy and procedures are to be observed by all staff of the University of Leicester engaged in these activities on behalf of the University.
5. The term 'Gift' covers all forms of philanthropic support received by or pledged to the University of Leicester, including cash, stocks and shares, and gifts in kind of equipment, services, property,

etc. For further guidance on the definition of a philanthropic gift, please refer to Guidance Note: Definition of Philanthropic Funding.

6. A gift will be deemed to have been accepted by the University only once it has been authorised by signature, where required, as per the procedures. This may require the signing of a Gift Agreement or formal Due Diligence Report, dependent on the gift.
7. Due diligence is defined as reasonable steps taken to ensure that relationships the University enters into are compliant with the University's [Ethical Policy](#) and can be defined as 'general' and 'enhanced'.
 - 7.1. 'General' due diligence, is defined as an awareness of, and adherence to the University's *Ethical Policy* at all stages of the relationship with potential funders to the University irrespective of value. This includes the identification of 'red flags' requiring elevation to 'enhanced' due diligence .
 - 7.2. 'Enhanced' due diligence is defined as the process of conducting a written due diligence report, by the University's Prospect Research team, utilising a range of sources, and which requires approval from an authorised decision maker in order to enter into the relationship.
8. For all donations University representatives must apply 'general' principles of due diligence, balancing the benefits the gift presents against the risks and standards as outlined in the University's [Ethical policy](#).
9. Enhanced due diligence must be performed before accepting a gift where:
 - there are any concerns that the gift may not be in compliance with the Ethical Policy, *regardless of gift value*
 - a gift of \geq £25k is to be solicited
 - a gift of \geq £25k is offered or received by the University
10. Due diligence reporting is conducted by the University's Prospect Research Team within the Development and Alumni Relations Office. It is therefore important that all gifts are reported on the University's Gift Notification Form to ensure that appropriate authorisation to accept the gift can be given.
11. Acceptance of Gifts involving the naming of a University entity (e.g. scholarships, rooms, buildings etc) must follow the University's 'Naming Policy and Procedures' prior to submitting a request for due diligence.
12. The value of the gift under consideration affects the reputational risk to the University. As a result, due diligence has been divided into four acceptance levels with increasing scrutiny and level of authority required as the value of the gift increases.
13. Projects with a net value of £1m+ must be approved by the President and Vice-Chancellor before a solicitation can be considered.
14. The delegated "Authorised Decision Makers" are, in increasing order of authority:
 - i. Member of Staff Receiving the Gift
 - ii. Director of DARO
 - iii. University Executive Board (UExB)
 - iv. Nominations Committee
15. The ultimate authority for acceptance of gifts rests with the University Council, even where decision-making has been delegated to members of staff.
16. Authorised Decision Makers can decide to refer complex cases, where a decision cannot be reached, up to the next level of authorisation. In the case of the Nominations Committee,

complex cases would be referred to the full University Council.

17. If any Authorised Decision Maker, or member of an Authorised Decision Maker, is to be a beneficiary of the gift e.g., through direct funding of their area of work, or there is the possibility of any other conflicts of interest, then they must declare their interest and withdraw from the decision-making process. Where withdrawal would mean a decision can no longer be made, or a meeting of the Authorised Decision Makers is not quorate, the decision should be referred up to the next level.
18. The University can at any time review and reconsider previous decisions taken in good faith relating to the acceptance or use of particular gifts, should circumstances have changed such that the gift would adversely impact the reputation, image, mission or integrity of the University, or now breach the University's Gift Acceptance policy.
19. On rare occasions, gifts may be received by the University and held in a suspense account prior to being officially accepted by the University. The suspense account will be ring-fenced to prevent expenditure occurring until the funding has been authorised by the appropriate Authorised Decision Maker. Examples in which funds may be placed into a suspense account include:
 - A donation is deposited directly into the University's bank account without the prior knowledge of the University. The University has not officially accepted the donation until the appropriate Authorised Decision Maker has approved the gift.
 - An unexpected and unsolicited gift is offered, and the timescale to complete the full authorisation process (via EB or Nominations Committee) might jeopardise the donation. In such circumstances a Gift Agreement should be signed and authorised, and due diligence be conducted and approved by the Director of DARO or Deputy Vice-Chancellor (Professional Services). It will be made clear to the donor that the gift will not be officially accepted by the University, nor publicity be given, until the appropriate Authorised Decision Maker has approved the gift.

3 Gift Acceptance Policy

All staff must take all decisions relating to the acceptance/refusal of gifts in the best interests of the University by taking a balanced view, fully informed of the purpose and background to the gift.

3.1 Ethical Policy

In line with Charity Law, and CASE Europe's *Ethical Principles Behind the Acceptance of Gifts* guidance, it is the University's policy to refuse gifts or funding that it judges to be illegally obtained or which might adversely affect its reputation or compromise its academic freedom or integrity.

This can encompass, but is not limited to, refusing to accept a gift or funding where:

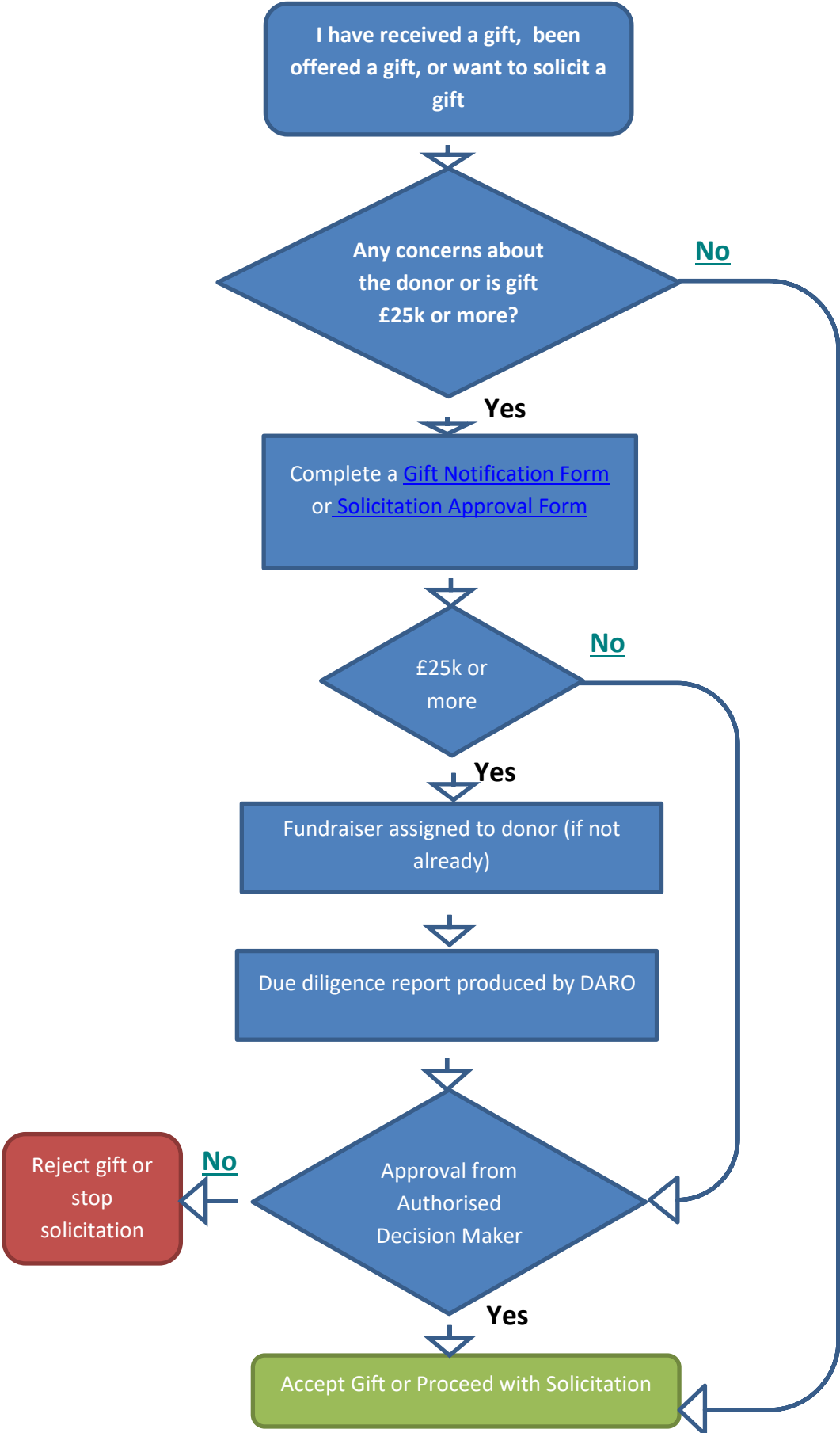
1. It results from illegal activities (including unlawful discrimination, violation of international conventions on human rights or any form of theft, bribery, fraud, tax evasion, money laundering or terrorist activity) whether in the UK or overseas.
2. It requires an action or actions on behalf of the University or its staff which are deemed illegal.
3. The activities of the donor/funder are contrary to the values and strategic goals of the University.

4. The gift/funding derives from, or is directed to, an activity that limits freedom of enquiry or runs counter to the core values of impartial, independent research, scholarship and teaching.
5. The conditions tie the gift/funding to a specific activity which causes unacceptable conflicts of interest for the University and/or is not in keeping with the values and strategic goals of the University.
6. It will cause unacceptable damage or injury to third parties.
7. It will harm the University's reputation and relationship with other philanthropic donors, research funders, partners, students or prospective students.
8. The gift arises from individuals or organisations where the major part of their business demonstrates the following characteristics (in line with the University's Treasury Management Policy):
 - Explicit environmental damage
 - Manufacture and sale of armaments to military regimes
 - Institutional violations of human rights, including exploitation of the work force
 - Discrimination against the individual in any shape or form
 - Manufacture and sale of tobacco products
9. It can be clearly shown that the cost to the University of accepting a gift will be greater than the financial or intellectual value of the gift itself.
10. The gift may give rise to an actual or perceived conflict of interest between the donor and their activities and the area of work or research being funded. Examples that *may* represent potential conflicts of interest include:
 - a) the donor, or a member of their immediate family, is a current student or applying to study at the University. The University will only accept philanthropic gifts from students or their immediate family if there is no personal or academic gain for that student from making such a gift.
 - b) The organisation in which the donor or their spouse have a significant material interest (as a director, shareholder or senior employee) holds, or could potentially compete for, a University contract as a supplier. The Procurement Unit should be informed of the proposed gift, so that they may advise on the level of risk attached, e.g. a tender exercise could be made vulnerable to the risk of legal challenge on the basis that the winning bidder gained undue influence by making a donation to the University. In general, negotiations concerning philanthropic gifts should not be held whilst the University is undertaking, or planning to undertake, a procurement exercise where the organisation offering the gift could potentially be a (winning) bidder.
 - c) If the donor stands to gain financially from providing this gift (e.g. if the gift is to fund research from which the donor, or their company, would benefit financially)
 - d) If the donor is, or is to become, an employee (including honorary or visiting appointment) of the University
11. If the Authorised Decision Maker is to be a beneficiary of the gift, e.g. through direct funding of their area of work, or there is the possibility of any other conflicts of interest, then they must declare the interest and refer up to the next level by informing the Prospect Research Team.
12. Staff and members of the University Council must follow all of the University's policies and procedures at all times. The requirement to follow the University's Financial Regulations when involved in fundraising activities or bidding for funding and the stewardship of the funds raised is of paramount importance.

3.2 Policy on Anonymous Gifts

1. The identity of all donors making gifts over £1k must be known by the University before accepting a gift or entering into any gift or 'gift in kind' negotiation.
2. At a minimum, disclosure of identity must be made to the Director of DARO and either (in order of preference) the President and Vice Chancellor, Registrar or Chair of Council. The donor's identity will also, where agreed with the donor, be confidentially disclosed to a member of the Prospect Research Team in order to allow due diligence to be conducted, as set out in this policy. The identity of the donor is to be kept in a restricted confidential file within the Director of DAROs Office.
3. It is the donor's right to restrict knowledge of their identity to the above-named officers and/or to seek anonymity in relation to the public promotion of the gift.
4. Action to accept or solicit a gift must be suspended until this disclosure is made and abandoned if it is not forthcoming.
5. In keeping with the *Memorandum of Assurance and Accountability between HEFCE and Institutions*, HEFCE expects the University to report any gifts of more than £25,000 from unknown donors, or where the source cannot be verified, as a serious incident.
6. A six-monthly confidential report will be produced for the Chair of Council by DARO one month in advance of each meeting of Council, detailing current donors who have requested anonymity. In the case of donors who wish to withhold their identity from the Chair of Council, details of the gift, including the amount, the area supported and the Officers to whom the donor's identity has been revealed, must be reported. This will be produced by the DARO Prospect Research Team and provided to the Director of DARO for review prior to submission to Chair of Council.

4 Procedures for All Staff involved with Philanthropic Funding



4.1 Procedure for Approval to Solicit

4.1.1 Proposed Solicitation less than £25,000

'General' due diligence must be conducted for solicitations less than £25,000 by the person soliciting the gift before proceeding with the solicitation.

This includes:

- Confirming the identity of the proposed donor (i.e. not anonymous), and that they do not raise any red flags or suspicions that might then require 'enhanced' due diligence. This could include politically exposed persons (PEP), or donations from sensitive areas such as Russia, Saudi Arabia, China etc.
- Confirm the proposed donor is not involved with activities highlighted within the *Ethical Policy*
- Confirm the proposed gift does not come with conditions, e.g., requiring additional investment by the University.

This decision should be recorded on the constituents record on Raisers Edge as a '*Custom Field / Attribute*' category '*PHIL – Due Diligence Stage*'.

4.1.2 Proposed solicitations of £25,000 or more

Authorised Decision Maker: Head of Philanthropy.

- i) A Solicitation Approval form must be submitted by the assigned fundraiser to duediligence@leicester.ac.uk.
- ii) A "light touch" due diligence Report will be prepared by the Prospect Research Team and reviewed by the Senior Manager (Prospect Development).
- iii) The due diligence report will be presented by the Prospect Research Team to the Head of Philanthropy for a decision.

For due diligence reports with no concerns arising:

- iv) The Head of Philanthropy will sign the appropriate section of the due diligence report and return to the fundraiser, copying in the Prospect Research team.

For due diligence reports with concerns:

- v) The report will be discussed at a meeting of the DARO Senior Management Team (SMT), chaired by the Director of DARO.
- vi) Where appropriate, members of staff relevant to the gift may be invited to the meeting.
- vii) Following the meeting, the Prospect Research Team must be informed of the decision via the due diligence inbox (duediligence@leicester.ac.uk).
- viii) There are three possible decisions: Accept; Reject; Refer to Next Level

4.2 Procedure on Receipt of a Gift

- I. All gifts received, regardless of value, must be reported to the Development and Alumni Relations Office on a [Gift Notification Form](#). The only exceptions to this are:
 - a. gifts received through an online donation form set up by the Development and Alumni Relations Office (including JustGiving)
 - b. gifts made in response to an official appeal which are accompanied by an appeal donation form
- II. For gifts with no due diligence concerns under £25k, the form should be sent to giftadmin@leicester.ac.uk.

- III. For gifts with due diligence concerns *or* where the gift value is \geq £25k, the form should be sent to duediligence@leicester.ac.uk, for review.

4.3 Procedure for Approvals of Gifts

- The value of a gift under consideration will affect the reputational risk to the University. As a result, due diligence has been divided into four acceptance levels with increasing scrutiny and level of authority required as the value of the gift increases.
- The Prospect Research Team should be notified of any referrals made to the next level of approval via duediligence@leicester.ac.uk, in order to maintain an audit trail of the decision making process.

4.3.1 Level 1: Gifts up to £25k

Authorised Decision Maker: Member of staff who has received the gift.

Gifts <£25k are generally accepted by the University after general due diligence checks by the receiving member of staff, with the following exceptions:

- The identity of all donors making gifts over £1k must be known to the University and a record kept (see 3.2 Policy on Anonymous Gifts).
- If it is immediately apparent that a gift might be contentious e.g., a gift from the tobacco industry, then the gift must be referred to Level 2 for a decision, regardless of gift size. See Ethical Considerations for guidance.

4.3.2 Level 2: £25k up to £100k

Authorised Decision Maker: Director of DARO.

- A due diligence report will be prepared by the Prospect Research Team and reviewed by the Senior Manager (Prospect Development).
- The due diligence report will be sent to the relevant decision maker depending on the findings of the report.

For due diligence reports with no concerns arising:

- If no risks have been recorded any member of DARO SMT has delegated authority from the Director of DARO to make a decision on the report and can then skip to stage vi) of the process below.

For due diligence reports with concerns:

- The report will be discussed at a meeting of the DARO SMT, chaired by the Director of DARO.
- Where appropriate, members of staff relevant to the gift may be invited to the meeting.
- A decision will be made to either: Accept; Reject; or Refer to Next Level
- Following the decision, the Prospect Research Team must be informed via the due diligence inbox (duediligence@leicester.ac.uk).

4.3.3 Level 3: £100k and less than £1m

Authorised Decision Maker: Executive Board (ExB)

- i) A due diligence report will be prepared by the Prospect Research Team and reviewed by the Senior Manager (Prospect Development).
- ii) The due diligence report will be sent to the relevant decision maker depending on the findings of the report.

For due diligence reports with no concerns arising:

- iii) If no risks have been recorded the Deputy Vice-Chancellor (Professional Services) has delegated authority from ExB to make a decision on the report and can then skip to stage viii) of the process below.

For due diligence reports with concerns:

- iv) The due diligence report will be sent to the Director of DARO to record their opinion on the acceptability of the gift on the due diligence report.
- v) If reputational risks have been recorded, the due diligence report will be passed to the Deputy Vice-Chancellor (Professional Services) in the first instance, prior to elevation to the ExB for a decision.
- vi) The due diligence report will be discussed at a minuted meeting of the ExB, chaired by the President and Vice-Chancellor.
- vii) Where appropriate, members of staff relevant to the gift may be invited to the meeting.
- viii) A decision will be made to either: Accept; Reject; or Refer to Next Level
- ix) Following the decision, the Prospect Research Team must be informed of the decision via the due diligence inbox (duediligence@leicester.ac.uk).

4.3.4 Level 4: £1m+

Authorised Decision Maker: Nominations Committee

- iii) A due diligence report will be prepared by the Prospect Research Team and reviewed by the Senior Manager (Prospect Development)..
- iv) The due diligence report will be sent to the Director of DARO to record their opinion on the acceptability of the gift on the due diligence report.
- v) The due diligence report, along with the Director of DARO's opinion, will be passed to the Vice Chancellor's Chief of Staff by the Prospect Research team for inclusion in the papers to be considered Executive Board. The Executive Board will also provide an opinion on the acceptability of the gift.
- vi) The due diligence report, will be passed to the Nominations Committee by the Prospect Research team.
- vii) The due diligence report will be discussed at a minuted meeting of the Nominations Committee. If a gift decision is urgently needed and the timing does not fit with a scheduled meeting of the Committee, a decision will be sought by electronic means.
- viii) Where appropriate, members of staff relevant to the gift may be invited to the meeting.
- ix) A decision will be made to either: Accept; Reject; or Refer to Next Level (Full University Council)
- x) Following the meeting, the Prospect Research Team must be informed of the decision via the due diligence inbox (duediligence@leicester.ac.uk).

4.3.5 Reporting

- The Deputy Vice-Chancellor (Professional Services) will formally report the following decisions to the next meeting of Council:

- i) Rejection of a gift, regardless of value
- ii) Acceptance of gifts £1m+
- A six-monthly confidential report will be produced by the Director of DARO for the Chair of Council as detailed in [3.2.6](#)

4.4 Procedures for Repeat Donors

- Due diligence must be refreshed on donors where authorisation to accept a gift from the same donor has been given within the preceding five years.
- Gift acceptance may then be authorised directly by the Director of DARO or Deputy Vice-Chancellor (Professional Services), so long as the donation sought or offered is at the same authorisation level as the previous authorised gift AND there are no additional concerns arising following refreshed due diligence.
- Where the gift exceeds the previous authorisation level, or where the refreshed due diligence reveals any new concerns, then the standard authorisation procedures should be followed.
- The original authorisation expires after five years, and so a new due diligence authorisation must be sought for further gifts.

5 Appeals Process

- 1.1 Should a donor, or potential recipient of a gift, disagree with a decision to reject the gift, a review of the procedures followed will be undertaken by the Director of DARO to confirm that the Authorised Decision Maker has followed the procedures as laid out in this document. The matter will then be presented to the University Council for a final decision. There will be no further right of appeal beyond the decision made by the University Council.

6 Due Diligence – Other DARO Responsibilities

1.2 Naming (Philanthropic or Honorific)

The University's Prospect Research Team will undertake Due Diligence for naming associated with philanthropic or honorific recognition. The University's 'Naming Policy' and associated procedures cover this in detail.

Due Diligence is required for **all** naming proposals, irrespective of the value of philanthropic contribution.

The authorised signatory will be dependent on the entity proposed to be named, which may differ from the authorised signatory for the philanthropic due diligence report (see Naming Policy).

1.3 Governance Office

DARO will undertake full due diligence reports on behalf of the Governance Office for an agreed range of circumstances. These are

- i) Honorary degree nominees
- ii) Council membership applicants
- iii) Individuals shortlisted for the role of Chancellor

This due diligence will be performed by the Prospect Research team. The authorised signatory for these reports will be the University's Registrar and Secretary.

1.4 DARO Curated Activity

1. Events

DARO will conduct 'light touch' due diligence for DARO related events when there is planned personal contact with the Vice Chancellor at the event. This will include interactions such as: dinners at Knighton Hall; the Vice Chancellor's table at annual Alumni Awards Dinner; other similar small gatherings where it would be considered a personal dinner with the VC.

For small curated events where attendee numbers are likely to be ≤ 10 , checks should be performed on prospective guests before invitation.

For events with less than 100 attendees and a larger invitee list, checks will only be performed on confirmed attendees. Should any red flags arise, this would not lead to an automatic disqualification (depending on severity of red flag), but the Vice Chancellor would be appropriately briefed in advance of the event.

For events that are not led by DARO, but DARO are asked to provide suggested invitees, light touch due diligence will be performed on proposed invitees prior to them being put forward.

Large scale events with ≥ 100 attendees will not have due diligence checks performed on guests, but mini biographies, typically written for guests 'of note' which would be deemed a suitable check. Other attendees may be flagged by their relationship with the University (e.g. Jo Bloggs - 1979 BA Combined Arts).

This due diligence will be performed by the Prospect Research team and the authorised signatory is the Director of DARO / Head of Engagement / Head of Philanthropy dependent on who is the event lead.

2. Volunteer Boards

DARO will conduct full due diligence reports for volunteering positions which carry a high level of University endorsement and are associated with the DARO office (e.g. Alumni Association Committee, Philanthropy Advisory Board, American Friends of the University, Campaign Board, Chapter Presidents).

This due diligence will be performed by the Prospect Research team and the authorised signatory is the Director of DARO.

3. Other Volunteering

DARO will conduct light touch due diligence for certain other volunteering opportunities such as mentors or guest speakers arranged by DARO.

Other volunteering positions, such as profile givers etc would not have any additional due diligence unless there were apparent red-flags. Risk assessments and safeguarding measures should already be in place to provide further cover regardless of whether due diligence is performed or not.

New volunteering programmes will be assessed early in the planning phase by DARO SMT as to whether the programme should be added to due diligence procedures.

This due diligence will be performed by the Volunteer Officer for non-board related volunteering positions. The authorised signatory is the Director of DARO or Head of Engagement.

4. Alumni Awards

DARO will conduct due diligence reports for nominees shortlisted for Alumni Awards.

The Alumni Engagement team will perform due diligence for Alumni Awards. The authorised signatory is the Director of DARO or Head of Engagement

6.1 Appendix 1: Role and responsibilities of Council and Authorised Decision Makers

Ultimate responsibility for all decisions about the acceptance of gifts, even where decision making has been delegated to staff or volunteers, must rest with the members of the University Council.

- The members (and their delegates) must take all decisions relating to the acceptance/refusal of gifts and funding in the best interests of the University.
- Members must act reasonably and prudently in all matters relating to the University and need always to bear in mind that their prime concern is its interests. They must not let any personal views or prejudices, nor short term financial pressures on the University, affect their conduct as members. They must exercise an appropriate degree of care in administering the University.
- The members must be able to demonstrate that they have acted in the best interests of the University, irrespective of any individual or collective personal interest or predilection, in each and every case. The members (or their delegates) have a duty to consider carefully, on the basis of the evidence available to them, whether the interest of the University will be better served by accepting or refusing the gift or funding and to act accordingly.
- In making these judgements, members and their authorised decision-makers must not allow individual or collective personal, political or commercial interests, nor personal views on political or ethical issues, which are not directly related to the interests of the University, affect their judgment.
- Consequently, where members decide to delegate their responsibility to staff, to volunteers or to local groups/branches, they must ensure that clear areas of responsibility are established within agreed management structures. Clear procedures for the delegation of decision-making must be established in writing and agreed formally by the members.
- In such cases the members must be able to demonstrate clearly how the best interests of the University have been served in accepting or refusing the gift or funding in question.
- Members must derive no personal benefit (individually or collectively) from gifts, funding, loans or other material support offered to the University.

Appendix 2: Forms

6.2 A2.1 Gift Notification Form



UNIVERSITY OF
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Philanthropic Gifts Gift Notification Form

FOR USE BY DARO STAFF AND DEPARTMENT & COLLEGE STAFF HANDLING THE RECEIPT OF PHILANTHROPIC GIFTS

All staff involved in fundraising should refer to the university guidelines regarding the acceptance and refusal of gifts “Gift Acceptance: Due Diligence”

Tick to confirm due diligence has been performed and result recorded on donor record.

Please include all documentation, including envelopes, photocopy of cheque/CAF voucher, accompanying letters etc. which came with the gift for forwarding to the Development and Alumni Relations Office (DARO).

Donor Details

Name (please include all names if a joint gift):

Constituent ID:

Company/Group/Association if applicable:
(e.g. Rotary / Masons)

Address:

Name(s) of University staff who secured/facilitated the gift:

Gift Details

Value of Gift:

Date received:

Tick if gift to be linked to a proposal

Pay Method

- Cheque Stocks or Shares
 Credit Card CAF
 Bank transfer Gift in Kind
 Cash Other (Please Specify):

Type of Gift:

- Single Gift** **Legacy Notification**
 Payment towards existing pledge
 Pledge (a written promise of a gift or a gift to be made over a specified time period)

Pledge Payment Schedule

(please attach or provide detail below):

(Where a donor wishes to set up a regular ongoing gift please refer to DARO for a Direct Debit gift form)

Gift Canvassed by:

Can Gift Aid be recovered on the gift?

Yes (please attach original Gift Aid form, not a photocopy)

No

Unsure/Not discussed with Donor
(DARO will be in touch with the Donor)

What prompted the donor to make the gift?

(e.g. response to a University Appeal)

- University Appeal MGT
 Unknown/Ad-hoc Other (specify below):

Does the donor stipulate any reporting requirements associated with the gift?

Has the donor stipulated how the gift is to be used or any restrictions on use?

- Yes (please attach details or specify below)
 No

Has the donor made any conditions which must be met in order to receive part or all of the gift?

- Yes (please attach details or specify below)
 No

Stewardship

Status of Departmental thank you letter
 (examples available from DARO)

- Sent (please attach)
 To be sent

Can DARO thank the donor and invite them onto the University stewardship programme?

(the Donor will receive a University thank you letter with an "opt in" to receive further information about the University, including an invitation to the annual Benefactors' Reception and a copy of the Philanthropy Impact Report)

- Yes
 No (please give reasons below)

Does the Donor wish to remain anonymous?
 (name will not be listed on the online Donor Roll)

- Yes
 No

Has the donor specified any other stewardship requirements?

- Yes (Please detail below)
 No

Financial Reporting and Gift Processing

Please enter details of where the gift has been or will be coded (the GL Code for gift income is 14385):

GL Code:

Cost Centre:

SIO:

Date Banked:

Form completed by:

Name:

Email:

Tel Ext:

Department:

IF YOU HAVE ANY QUESTIONS ABOUT THIS FORM PLEASE CONTACT THE DEVELOPMENT & ALUMNI RELATIONS OFFICE:

giving@le.ac.uk / 0116 252 2354

For DARO Office use only:

- All income and pledge in current financial year
 Payment of existing pledge
 New Pledge to notify finance

6.3 A2.2 Solicitation Approval Form



UNIVERSITY OF
LEICESTER

Solicitation Approval Form

FOR USE BY ALL STAFF CONSIDERING ASKING FOR A PHILANTHROPIC GIFT OF £25K OR MORE

All staff involved in fundraising should refer to the university guidelines regarding the acceptance and refusal of gifts: [Gift Acceptance Policy](#)

If external to the Development & Alumni Relations Office, a member of the Philanthropy Team will be in touch to discuss the intended solicitation

Questions related to the completion of this form should be directed to the Prospect Research Team duediligence@leicester.ac.uk, extension 3466

Please include all relevant documentation, including any details on the proposed gift and area to be funded.

Your Details	
Name	
Position	
Department	
Prospective Donor Details	
Name	
Address	
How did the prospective donor come to the University's attention?	
Additional Biographical Details (e.g. occupation, place of business etc.)	
Proposed Solicitation	
Value of Gift	
For Gifts £1m+, has approval for the intended purpose been granted by ExB? (attach details)	
Purpose of Gift, including alignment with University Strategic Plan	
Other members of staff involved in the solicitation	
Does 'naming' form part of the solicitation? (Provide details and link to Naming Form)	

PLEASE RETURN THIS FORM TO THE PROSPECT RESEARCH TEAM duediligence@le.ac.uk

Appendix 3: Due Diligence Reporting

6.4 A3.1 Due Diligence Reports

Due diligence reports are written by the Prospect Research Team within DARO.

1. Due diligence reports are prepared based on a review of material that is publicly available which can be used to examine the background and financial condition, business operations and contractual obligations of a person or organisation.
 - a. **Sources used for assessing wealth:** Net wealth is assessed based on: annual income; property; shareholdings; and assets. This in turn is derived from either declared business income; remuneration as found in company annual reports; as listed in Bureau van Dijk's directory of Directors and Shareholders (FAME); Zoopla, Business week, Level Business; Sunday Times Rich List; /Pro-online Research High Net Worth alerts; Lexis news searches; news alerts. The Prospect Research Team use the standard of UK individuals giving 5% of net wealth.
 - b. **Sources used for assessing reputation:** Xapian, Nexis Diligence,192.com, Bureau van Dijk, FAME, Who's Who, Charity Commission, , Business week, Level Business, i-Wave. In addition, Corporate Social Responsibility policies are also reviewed (where available), as well as coverage within the world press via LexisNexis, a business intelligence database. When reviewing press articles, we will use only professional journalistic sources (mainly broadsheets), and give credence to issues confirmed by two reputable sources.
2. The legal and reputational rights of potential donors must be considered as part of any due diligence undertaken in assessing the acceptability of a proposed gift. In this regard a clear distinction will be drawn between rumour or speculation and matters of confirmed fact or legal finding, while also accepting that institutions must consider the reputational risks that could be incurred through public perception of any particular donor.
3. The positive benefits of accepting the gift must be fully understood and communicated on the due diligence report. The assigned keyworker should also provide their opinion as to the acceptability of the gift on the due diligence report.
4. Where insufficient information has been provided on either the Gift Notification Form or Solicitation Approval Form, further details will be sought. Where Authorised Decision Makers require further detail, the member of staff submitting the Gift Notification Form, or other members of staff involved, may be invited to join the due diligence discussion at an appropriate point.
5. The Philanthropy Team will seek appropriate legal and financial advice for correctly dealing with gifts, as required.

6.5 A3.2 Due Diligence Report Template

A due diligence report will be completed by the Prospect Research Team for:

- i) All gifts \geq £25k in value
- ii) Gifts below $<$ £25k in value where there is cause to believe the University's Ethical Policy might be compromised
- iii) All prospects believed to be capable of making a gift over \geq £25k in value, prior to solicitation.

Due Diligence Report		Due Diligence Reference Number:	
1. Confirmation of Identity			
Name			
Date of Birth			
Home/Contact Address			
Work Address			
Nationality			
Active Directorships (reg'd with Companies House)		Name	Appointment Date
Electoral Role			
Other			
2. Details of the Proposed Gift, including: value, purpose and the benefits of accepting the gift (Solicitation Approval or Gift Notification Form to be attached).			
3. Source of the gift			
4. Reputational and Financial Risk			
Disqualified Director Check ¹			
Reputational Risk Check			
<i>(Please see the Appendix 1 for the list of resources used when compiling due diligence)</i>			
5. Conflicts of Interest			
6. Summary of Findings			
7. Authorised Decision Maker			
8. Opinion Provided By (if applicable)			

Reviewed by	Approval	Date	Signature
[Insert Authorised Decision Maker]	<input type="checkbox"/> Solicitation		
[Insert Authorised Decision Maker]	<input type="checkbox"/> Gift		
[Insert Authorised Decision Maker]	<input type="checkbox"/> Naming		

Prepared by	
Checked by	

¹ <http://wck2.companieshouse.gov.uk/>

6.6 A4 Due Diligence Resources

Resources used in order to complete due diligence include, but are not limited, to the following:

- Ancestry.co.uk
- Charity Commission Website
- Companies House Company Register
- Companies House Directors Register
- Companies House Disqualified Directors Register
- Company Annual Accounts and Reports
- FAME, a comprehensive database of public and private companies across the UK and Ireland
- Financial Services Authority
- Google, using specific keywords, as well as a negative word string, to search for news reports, industry specific information and reputational risks, as well as other information that may not otherwise appear in Nexis or the other resources
- ICIJ Offshore Leaks Database
- iWave, which provides wealth and philanthropic information, as well as business addresses
- Legal judgments, where relevant and available
- Nexis Diligence, which provides access to news, legal news and business information from a range of sources, including UK national and regional newspapers, international newspapers and news wires, and foreign language news sources in Dutch, French, German, Arabic, Spanish and Portuguese
- Organised Crime and Corruption Reporting Project
- Who's Who
- Xapien, an automated online research tool, using Artificial Intelligence and Natural Language Processing, coupled with vast cloud compute resources to produce due diligence reports.

Where the due diligence is undertaken on an internationally based or registered individual, company, trust or foundation, the relevant Company Register, Charity Register or Directors Register is used, where available, in order to confirm identity and legal oversight.

Additionally, where there may be ambiguity concerning the spelling of names, checks are undertaken on all of the potential variations of names. Should there be a possibility that the information is in a language other than English, the keywords used during any Google news searches are translated into the relevant language, with the search results translated back into English. Nexis automatically undertakes non-English language-based searches, which are translated back into English.