

# **ROYAL COLLEGE OF ART**

## **Gift Acceptance Policy**

**Policy Owner: Director of Development & Alumni Relations**

**Next review: June 2023**

**Approval route:**

**ARC** (recommendation to Council 23.6.21)

**Council** (formal approval 14.7.21)

**The Gift Acceptance Policy will be reviewed every two years or more frequently if required.**

### **Table of Contents**

1. Summary of Gift Acceptance	3
2. RCA Mission	3
3. RCA Objectives	3
4. RCA Introduction	3
5. Gift Acceptance	4
6. Process for Reviewing & Accepting Gifts	5
7. Supporter Relations	8
8. Naming Policy	10
9. Review of Policies	13
10. Appendix	14

## **Summary**

The Gift Acceptance Policy sets out the principles that the Royal College of Art (RCA) will follow when seeking and accepting gifts from individuals and organisations; the processes for managing the risks associated with accepting and refusing gifts; and the commitment that it makes to supporters and prospective supporters.

The Policy is designed to minimise the RCA's exposure to risk and assist the RCA's Senior Management, Council, and Development and Alumni Relations Office (DARO) make consistent and objective decisions regarding the acceptance or refusal of gifts.

## **RCA Mission**

The Royal College of Art aims to achieve international standards of excellence in the postgraduate and pre-/mid-professional education of artists and designers and related practitioners. It aims to achieve these through the quality of its teaching, research and practice and through its relationship with the institutions, industries and technologies associated with the disciplines of art and design.

## **RCA Objectives**

To advance learning, knowledge and professional competence particularly in the fields of fine arts, in the principles and practice of art and design in their relation to industrial and commercial processes and social developments and other subjects relating thereto, through teaching, research and collaboration with industry and commerce.

## **Introduction**

The Royal College of Art has been fortunate enough to receive philanthropic gifts from many supporters throughout its history. The purpose of the RCA Gift Acceptance Policy Guide is to set forth comprehensive and consistently-applied gift policies that support the RCA and fulfil the RCA's mission, and respect donor intentions.

The RCA is dedicated to achieving excellence across a wide array of

academic programmes, preparing students for leadership in their chosen pursuits or for lives of meaning and value, advancing the course of knowledge and ideas through rigorous and imaginative inquiry, and serving society in the ways that a university distinctively can.

The RCA welcomes and appreciates all gifts that avoid legal, reputational and other risks that prevent the appearance or existence of conflict of interest, that preserve the RCA's authority over academic and administrative decisions, protect the RCA's right to results of research, and that are awarded subject to the terms that the RCA can, as a practical matter, satisfy completely.

The RCA seeks to develop relationships with a range of philanthropic supporters to fulfil the three strategic goals laid out in the [Strategic Plan 2016-21](#):

1. to advance art and design education
2. to create new knowledge in art and design education
3. to enhance knowledge exchange and foster innovation.

Philanthropic support from a range of donors is critical in achieving the ambitions set out in RCA's 2016-21 Strategic Plan.

As an exempt charity (**see appendix 1**) and global leader in the field of art and design education, the RCA has a responsibility to ensure that the relationships it pursues and the gifts it receives do not compromise its integrity; the trust of its supporters; or its commitment to students, staff and the global communities that it serves. In order to do so, and to avoid reputational risk, the RCA has defined standard procedures for the solicitation, review and acceptance of philanthropic gifts as laid out in this policy.

## **Gift Acceptance**

### Basis for Accepting Gifts

The RCA accepts funding from a wide variety of sources, including individuals, companies, trusts and foundations (**see appendix 2**). The following principles and procedures apply to all levels and kinds of gifts.

Gifts will be accepted when:

- they support the mission and publicly stated values and ethics of the RCA
- the source and purpose of the gift are consistent with the RCA's core strategic objectives
- the nature or level of the gift does not result in unacceptable current or future financial liabilities for the RCA
- the activity to be funded by the gift does not create unacceptable conflicts of interest for the RCA
- there is a clear understanding that the supporter cannot influence the academic freedom or the independence of the RCA
- there is no expectation that the 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 RCA
- supporters accept that the management, and governance of programme and/or activities funded through philanthropy, rests solely with the RCA. Any wish by a supporter to restrict who can benefit from a gift will be considered by the RCA in accordance with Charity Commission guidance to ensure compliance with the [Equality Act 2010](#) and where it is not possible to accommodate such wishes, the RCA will work with the supporter to agree an alternative basis for the gift
- due regard has been given to any reputational risk for the RCA which may derive from the acceptance of any particular gift
- the gift is consistent with relevant RCA policies (including, for example, its [Anti-Bribery and Anti-Money Laundering Policies](#), [Equality and Diversity Policy](#) and [Environmental Policy](#)).

All reasonable steps will be taken to ensure that the RCA is aware of the source of funding for each gift and has satisfied itself that the funds do not derive from activity that was or is illegal, or runs counter to the RCA's core values of impartial, independent research scholarship and teaching. All proposed gifts must comply with the RCA's relevant statutes, laws and regulations regarding this issue.

The RCA will not accept gifts from sources which:

- are incompatible with the RCA's mission, objectives and publicly stated values and ethics
- compromise the RCA's status as an independent institution

- suppress or falsify academic research within the RCA
- limit or compromise freedom of enquiry within the RCA
- harms the RCA's relationship with its students, benefactors, research supporters, partners, local community or other external stakeholders
- creates unacceptable conflicts of interest
- cause material damage to the reputation of the RCA
- deter significant numbers of other supporters
- cause financial loss or any other damage to the RCA
- requires any illegal action on the part of the RCA
- are deemed to originate from sources or activities which are illegal, discriminatory, in violation of the international convention on Human Rights or any form of theft, bribery, fraud, tax evasion, money laundering or terrorist activity.

In addition, the RCA will not accept gifts of cash in line with the College's Anti-Money Laundering Policy.

### Ethical Considerations

Gifts should reflect the values of the RCA, its staff and student body, alumni and supporters. The RCA's Council adopts a socially responsible approach to its own activities and investments, and expects gifts from its supporters to take account of similar ethical considerations. Any gift should therefore be in line with the RCA's charitable aims, and the offer of gifts may be declined if perceived to conflict with the RCA's purpose.

### Equality and Diversity

The RCA is committed to providing an environment free from discrimination, bullying, harassment or victimisation, where all members of its community are treated with respect and dignity. It aims to create a culture of diversity within its community, providing a dynamic working and learning environment, where all members are valued for their contribution and individuality.

The Gift Acceptance Policy has been designed to adhere to this commitment and ensure that no-one receives less favourable treatment due to protected characteristics. Due consideration will be given to reports of donors contributing to violence or discrimination towards any identity group as well as allegations of

poor corporate practice, particularly with reference to labour rights, child labour, sexual exploitation and abuse or other safeguarding issues.

### Sustainability

The RCA recognises its responsibility to reduce the environmental impact of its activities and is committed to continuously striving to improve its sustainability performance.

This policy adheres to the College's Environmental Policy and due consideration will be given to the environmental impact and sustainability records of donors including any evidence of contribution to climate change or explicit environmental degradation and destruction.

## **Processes for Reviewing/Accepting a Gift**

### Due Diligence Review (see Appendix 3)

Decision-makers must be able to demonstrate that they have acted in the best interests of the RCA in each case. Typically, the best interests of the RCA will be furthered by increasing resources at its disposal and so great care will be taken over any decision to refuse a gift.

To assist decision-makers fairly determine whether a gift is acceptable the Prospect Researcher in DARO will conduct a Due Diligence Review of the prospective supporter. Because of the time and resources associated with due diligence, Reviews will not be conducted until an ask is planned with a defined ask amount.

Reviews will be conducted for:

- all planned asks of £100,000 and over
- all gifts, of whatever value, that have an associated naming opportunity(see Appendix 4).

In cases where initial discovery research has already identified potential risks the Director of DARO will have discretion to instigate a review at any stage or for planned asks or gifts below this threshold.

Due Diligence Reviews must be requested as soon as an ask is planned. Ideally four weeks' notice is required, however in special circumstances a Review may be completed within one week. All attempts will be made to ensure that Reviews should be completed prior to an ask being made.

Due Diligence Reviews will seek to identify the source of funds from which a gift will be made and highlight any potential risks, specifically those which contravene this policy. To do this the Prospect Researcher will use public sources including the Charity Commission and Companies House as well as subscription services and news aggregators. In conducting due diligence information about individuals will be compiled and stored. It is in both the RCA's public and legitimate interest to gather this information and all efforts will be made to ensure it does not breach General Data Protection Regulations (GDPR). Supporters will be informed that their data has been processed in this way at the first reasonable opportunity and provided with a copy of the RCA's Privacy Policy<sup>5</sup> explaining how and why the RCA has processed their data.

A clear distinction will be drawn between rumour or speculation and matters of confirmed fact or legal finding, while also accepting that the RCA may wish to consider the reputational risks that could be incurred through public perception of association with any potential supporter. Unproven allegations or rumours under any of the above points will not themselves prevent acceptance of a particular gift, but care will be taken in accepting any gift, or continuing negotiations towards a possible gift, where there is a significant potential damage to the RCA's reputation.

It is important to note that a review will not be exhaustive and limited to available resources and available time.

#### Gift Acceptance Group

Any instances where the due diligence process identifies potential issues in relation to this policy will be referred to the Gift Acceptance Group. The Group will be responsible for reviewing the due diligence report, identifying any further due diligence that may be required, and advising Council and/or the executive team on any issues that should be considered when deciding whether to accept a gift.

The members of the Gift Acceptance Group are:

Vice Chancellor  
Chair, Planning & Resources Committee  
Deputy Vice Chancellor  
Executive Director Operations  
College Secretary  
Director of Finance

A member of academic staff appointed from the membership of Senate.

The Group may conduct its business by conference call or by correspondence, as necessary. Three of the six members – one of whom must be either the Chair of Planning & Resources Committee or College Secretary (as Secretary to Council) – shall constitute a quorum.

Information will be presented to the Group by the assigned Fundraiser responsible for soliciting the gift.

The Group will automatically review all gifts with associated naming opportunities of £1 million and over in accordance with the RCA Naming Policy.

The Group will be made aware of any gift, of whatever value, where the supporter is likely to draw public attention.

#### Delegated Limits of Acceptance

RCA Council holds ultimate responsibility for the acceptance of gifts, even where decision making has been delegated.

Authority to accept gifts on behalf of the RCA rests with the following:

- RCA Council: any gift with a value of £1m or above
- Vice-Chancellor, Deputy Vice-Chancellor, Executive Director Operations, or Director of Finance: any gift with a value below £1m.

Before taking a decision on whether to accept a gift, Council or the appropriate member of the executive team will consider relevant documentation provided by DARO and any advice from the Gift Acceptance Group. Council may conduct its business by conference call or by



correspondence, as necessary.

At each of its regular meetings, Council will receive a report of gifts accepted on RCA's behalf by the executive team. The executive may escalate decisions on gifts of less than £1m if deemed appropriate.

Where gifts are to be received over a specified period, the thresholds above should be considered by reference to the total values anticipated.

Where gifts are to be provided over an unspecified period and the total value of the gift is unclear, the thresholds above should be considered by reference to the value of the gift over the first five years. Typically the maximum term for a multi-year gift will not exceed five years.

### Ongoing Relationships

It is acknowledged that the position of an existing supporter may change over time. Accordingly, where funding continues, updated Due Diligence Reviews will be conducted after five years of receipt and at five yearly intervals thereafter. If there is reason to believe a new risk may have emerged after a gift has been accepted and received within the five year period an Addendum will be created and escalated if considered necessary by the Vice-Chancellor.

### Gift Agreements

Once a gift is confirmed as acceptable, a Gift Agreement will be issued. All gifts of £50,000 and above require a Gift Agreement, or written documentation of terms of gift. All scholarship gifts require a Gift Agreement.

Gift Agreements detail the purpose of the gift, type of fund, payment schedule, stewardship/reporting and how they wish their names to appear in supporter-recognition materials. Any restrictions relating to the gift will be detailed in the agreement.

### Gift Agreement Negotiations & Process

- DARO to draft the Gift Agreement using an approved template (attached).
- DARO to work in collaboration with the supporter and relevant

RCA parties, including RCA Finance, to ensure all is accurately represented in the Gift Agreement.

- If over £100,000, the Gift Agreement will be sent to the Executive Director Operations and RCA Finance for final review.
- Gift agreements will be signed by an authorised signatory of the RCA i.e. Vice-Chancellor, Deputy Vice-Chancellor, Executive Director Operations, Director of Finance or College Secretary.
- Once signed, the Gift Agreement will be uploaded to the DARO database by the Database Assistant and will be shared with Finance and any other relevant RCA party (ie. Student Support, Programme, Centre, etc.) – see “Administration Following Receipt of Gift” for more information.
- A Gift Agreement must be signed by both parties, RCA and supporter, before a gift is made public or acknowledged in any verbal or written communication, including Annual Report & Accounts.

In instances where a gift is made to the College, without a signed Gift Agreement in place, and per Charity Commission guidance for accepting philanthropic donations, these donations will be received, banked, recorded on the Raiser's Edge database and the donor thanked/receipt of the donation acknowledged.

#### Administration Following Receipt of Gift

DARO / Database Assistant will work with relevant fundraisers and RCA Finance Department to ensure that all gifts are recorded on the database in a timely manner.

- The bank account will be checked daily by the Development Management Accountant (Finance) and all new incoming gifts, including pledge payments, and appropriate fundraisers notified.
- Cheques received directly will be recorded and then passed to the Development Management Accountant (Finance) for deposit.

Gifts will be recorded on the ‘Gifts’ tab of the database with relevant coding so the source of gift (e.g., individual, corporation, foundation, organisation, etc.) and gift aid implications are accurately reflected and can be easily reported upon.

Adequate records of all gifts shall be maintained by DARO in accordance with accepted accounting procedures to allow a proper audit trail.

## **Supporter Relations**

### Fundraiser Responsibilities

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

- be advised of and adhere to the provisions of this Gift Acceptance Policy and other relevant RCA policies and regulations
- 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 supporter on request
- disclose immediately to the Director of DARO any potential, actual, perceived or alleged conflict of interest.

### Supporter Expectations

Supporters and prospective supporters can expect:

- to be informed about the priorities and strategic aims of the RCA
- that the RCA 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 RCA, or in the case of funding an academic position, a change in personnel, the use of any gift will be discussed with the supporter 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 RCA, 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/General Data Protection Regulation 2018
- to have their questions relating to their gift answered in a timely and transparent manner

- to be provided promptly on request with copies of the RCA's most recent published financial statements.

### Complaints

The RCA will respond promptly to a complaint by a supporter or prospective supporter about any matter which is addressed in this policy. A designated member of DARO will attempt to satisfy the complainant's concern in the first instance. A complainant who remains dissatisfied may request in writing a review of their complaint by the College Secretary of the RCA or his/her nominee, and will be advised of the outcome of this review in writing.

### Giving Circle Membership

Giving Circle members can expect:

- Invitations to RCA events, relevant to the details and level of their support
- named recognition in the RCA Annual Report (as donors/sponsors)
- ongoing communications regarding the RCA and significant news in advance of wider public audiences.

## **Naming Policy**

### **Recognition via Naming**

A supporter may be recognised for a gift through the naming of a fund, physical space, collection, faculty position, scholarship/fellowship, or other means. Because of the visible nature of many naming opportunities, the following policies have been developed in order to achieve consistency across the RCA.

#### General Naming Policies

- Naming opportunities are not afforded to governments, sitting heads of state, or a person/family so closely associated with a sitting head of state that there is little distinction in practice.
- The RCA may not accept a gift whose name could reasonably inferred to be a RCA endorsement of an entity, product, service, government or commercial venture.
- The RCA may choose to revoke a name (on a building or fund), should the gift commitment supporting the named opportunity not be fulfilled. Should such action be taken, the RCA will contact the supporter or his/her representative to inform them of such action.

#### Ethical and Reputational Issues

Preservation of RCA's values and reputation are an important factor that the RCA considers when determining whether to accept a gift. The Gift Acceptance Group will give careful consideration to any prospective gift from an individual or entity whose associations or activities may conflict with the strongly held values of the RCA community, such as respect for the rights, difference and dignity of others; honesty and integrity; and a commitment to diversity, creativity and innovation.

The RCA reserves the right to remove a name to any fund, position, physical space or other tangible or intangible item or asset, where the continued use of such name may reasonably be viewed as compromising the reputation of the RCA as a result of the illegal or immoral acts of the individual or entity named. Should such action be taken the RCA will contact the donor involved in the naming, or the representative thereof.

### Naming in Recognition of Corporations

When accepting gifts from corporations, the RCA will be careful to avoid instances of real or perceived endorsement, “co-branding” or conflict of interest. For this reason, gifts that might bear the name of a corporate entity, such as a Chair, programme, or other funds may be referred to the Gift Acceptance Group.

### Naming for Current Faculty or Staff Members

Current faculty and staff members may only be recognized through the naming of funds after their retirement or after the staff member is no longer employed by the RCA. The proposed recognition must be reviewed by the individual’s unit, be consistent with the individual’s record of service, and be approved by the Vice-Chancellor. This policy applies to scholarship and other funds and named professorships.

### Naming a Professorship/Chair

- The minimum for a permanent endowment professorship is £3m if a new position is added to the RCA. Permanently endowed professorships may be established and/or named for a minimum of £2m to fund an existing position.
- The current-use minimum for an expendable endowment professorship is five years and is calculated at Full Economic Cost, plus inflation, to be determined by RCA Finance.

Please note that if a position is planned by a School (ie. part of current budget and/or academic plan), it is considered an existing position. New Chairs are additional positions that are not already in an academic plan or budget.

- The RCA may set a gift or gift package minimum that is higher than the minimums described above. For example, the RCA might offer a gift opportunity for a professorship that is £4m, whether all endowment or £3m endowment plus £1m in current-use funds to cover costs related to the Chair.

Named endowment funds may only be activated after the endowment fund minimum has been reached.

### Naming a School

RCA Schools may be named only once, and the naming of a School links it for 40 years to an individual or family. Therefore, the decision to name a School would be made only in a very rare case, and must be made with great

deliberation.

### Physical Space Naming

In recognition of a gift (for construction or some other designation), the RCA may name physical space. The gift agreement for naming space must include language about the status of the naming if the complete pledge is not fulfilled by a specified time.

### Duration of Naming

No space will be named for more than 40 years, unless exceptionally agreed by Council. Please reference “GenerationRCA Naming Opportunities” for maximum years for naming recognition.

Gift Agreement for naming space must include language on duration of naming. Buildings do not last forever, so the RCA will not commit to naming a physical space for more than 100 years. After the agreed period of years stated in the gift agreement, the RCA may rename the building if a new donor is needed to replace or substantially renovate the structure. The current named donor may be given the first opportunity to make a follow-on gift. The terms for naming space must include a clause that states that programming needs and the use of the building may change over time. In such an event, the RCA will make good faith efforts to inform the donors (or their designee) before any such change is made.

If the RCA concludes that it is necessary to substantially alter or remove the structure (or if Council requires that it do so) before the end of the period of naming recognition, the RCA will make good faith efforts to inform donors (or their designee) before any such decision is made, and will consult with them on appropriate alternative forms of recognition.

Regarding an existing space or building that has a non-pecuniary honorific title (i.e. where a space or building has been named in honour of a former member of staff, or other distinguished figure associated with the RCA) the RCA reserves the right to rename the space in recognition of a donation at the appropriate level as outlined in RCA Naming Policy. If such a donation results in the name of a former staff member or other distinguished individual being removed from a space, then the RCA will, where appropriate, consider alternative ways of continuing to respect the individual’s work for the RCA.

### Funding Requirements for Physical Space Naming

- The gift amount for named recognition should be equal to at least

- 50% of fundraising target of the space to be named.
- The minimum philanthropic requirement - the fundraising target - is 75% of a project's total budgeted capital cost for new construction projects and 50% for renovation projects.
- With respect to naming of physical spaces for new construction, the actual recognition may occur when at least 50% of a pledge commitment has been paid.
- Pledge payments must be paid over five (5) years unless prior approval is given by RCA Finance.

#### General Naming Procedures:

- All endowed funds must be approved by RCA Director of Finance
- Any recommendation to remove a name must be reviewed by the Development Committee
- Decision-making authority for naming rests with the RCA Council, in consultation with RCA Senior Management team and Development Committee.

#### Giving Circle Membership

The RCA recognises our most generous supporters through two Giving Circles:

- Vice-Chancellor's Circle: Individuals £50,000+, Organisations £100,000+
- Chancellor's Circle: Individuals £500,000+, Organisations £1,000,000+

Membership will be awarded when the following eligibility requirements have been met:

- The overall minimum giving amount meets the criteria
- The Gift Agreement or Grant Offer has been signed by all parties
- The first pledge payment has been received by the RCA.

The RCA reserves the right to withdraw membership to Giving Circles should gift agreements or grant offers not be honoured.

The benefits offered to these Giving Circles are exclusive and not conveyed by the RCA to other organisations or individuals for gifts less than the agreed values.



## **Review of Policy**

The Gift Acceptance Policy will be reviewed and updated as required (but at least every two years) to ensure it continues to be ethical, adheres to charitable legislations and honours supporters and their gifts.

## **Appendices**

### **Charitable Status and Regulation (Appendix 1)**

#### Exempt Charity

As a Higher Education Institution, the RCA is an exempt charity and a body incorporated by Royal Charter Number RC000456. Exempt charities are organisations whose purposes are charitable but which are accountable to a body other than the Charity Commission – the RCA is accountable to the Office for Students (OfS), the principal regulator of universities in England as defined by the Charities Act and the Higher Education and Research Act. The RCA complies with OfS's Regulatory Framework and Public Interest Governance Principles.

Although exempt from registering with the Charity Commission, higher education institutions must observe the requirements of charity law and other relevant legislation in relation to the receipt and expenditure of funds.

#### Professional Membership

The RCA is a member of CASE (Council for Advancement & Support of Education), a professional association serving educational institutions and the advancement professionals who work on their behalf in alumni relations, communications, development, marketing and allied areas. As such, the RCA fully subscribes to the following:

1. CASE Europe: Ethical Principles Behind the Acceptance of Gifts
2. CASE Statement of Ethics
3. Principles of Practice for Fundraising Professionals
4. Donor Bill of Rights

The RCA is a member of the Fundraising Regulator, the independent regulator of charitable fundraising. As such, the RCA fully subscribes to the Fundraising Code of Practice.

### **Considerations for Specific Methods/Types of Gift (Appendix 2)**

The RCA receives a range of philanthropic gifts, including cheques, online transfers, gifts-in-kind and legacies/bequests.

#### Gifts solicited by other Schools & Centres

Typically, DARO will lead on all activity relating to the solicitation, receipt and administration of philanthropic gifts to the RCA. However, all RCA employees are encouraged to adopt a philanthropic mind-set in order to assist the RCA fulfil its mission and so it is likely that other schools and centres will engage in fundraising activities. In instances where other programmes and centres have solicited and/or received philanthropic gifts directly, this policy should still be adhered to and DARO should be informed as early as possible so relevant due diligence can be conducted and to ensure the gift is administered in accordance with standard procedures. The soliciting programme or centre will have lead responsibility for the stewardship of the supporter with support, if relevant, from the DARO team.

#### Gifts-in-Kind

A gift-in-kind is an item such as equipment, software, product or service that a supporter voluntarily transfers to the RCA without charge or consideration. Supporters must complete a gift-in-kind form that includes the name of the supporter, a description of the item(s), the retail value of the item(s) and permission to publicly recognise the gift. Once accepted, the donated item(s) become the property of the RCA, which retains the right to dispose of a gift-in-kind as it sees fit, unless another arrangement has been made with the supporter. The acceptance of gifts made to a specific school or the RCA collections shall be arranged directly with those responsible for the programme or centre, however DARO must be informed of proposed and received gifts-in-kind in order to record the gift on the database so that a full picture of the RCA's relationship with the supporter is maintained.

### Bequests/Legacies

Notification of intention/pledge to leave a gift under the terms of a Will during the lifetime of the supporter should be recorded on the database so that the supporter can be stewarded appropriately. A light-touch Due Diligence Review should be conducted when the pledge is made and a further full review when the pledge is fulfilled.

### Anonymous gifts

There are three scenarios in which the RCA may be offered an anonymous gift:

1. The RCA knows who the supporter is and they have requested to remain anonymous. The gift will be accepted pending usual procedures and anonymity will be respected so far as is legally and practically possible. The gift will still be recorded on the database but the supporter's intentions will be clearly marked so that the gift is not acknowledged publicly. The Gift Agreement form will include the opportunity for supporters to specify their acknowledgment requirements.
2. A gift offered via an intermediary who will not identify the supporter. The gift will be referred to the Gift Acceptance Group who will determine the level of risk.
3. An entirely anonymous gift which is sent directly to the RCA or received in the bank account with no prior notification or associated information enabling the identification of a supporter. The RCA will seek advice from external bodies which may include legal advisers, or the Charity Commission with the option to refer to it to the Gift Acceptance Group and/or Council to determine the level of risk.

### Endowments

Gifts to establish endowment funds will not be accepted if the fund is not expected to reach the minimum fund activation level through gifts received within five years. Such gifts may be accepted as current-use gifts or added to existing endowments, pending discussion with the supporter.

### Company Gifts

In accordance with the ROSS-CASE Survey of Philanthropic Giving for Higher Education, gifts from companies in the UK and overseas are acceptable sources of philanthropic funding if the giving has philanthropic intent AND does not fall under one of the seven exclusion criteria:

- Contractual relationship
- Exclusive information
- Exclusive publication
- Consultancy included
- IP rights
- Other forms of financial benefit
- Supporter control

RCA will be careful to avoid instances of real or perceived endorsement, “co-branding” or conflict of interest.

### **Due Diligence (Appendix 3)**

Questions to consider when conducting due diligence include:

1. How analogous are the potential supporter’s values to those of the RCA?
2. Is the relationship likely to attract unfavourable media comment?
3. Is the relationship likely to engender opposition/protest from the general public or stakeholders aligned to the RCA (students, alumni, fellows, prospective students etc.)?
4. Is the relationship likely to engender opposition/protest from special interest groups?
5. Is the relationship likely to be viewed in negative terms by OfS or other stakeholders?
6. Is the relationship likely to be viewed in negative terms by current funders/potential funders of the RCA?
7. Is a connection to the relationship likely to be damaging to the RCA's standing within the higher education and arts sectors?
8. What is the likely impact for and response from other potential partners?
9. Is the financial benefit likely to be outweighed by any additional costs of managing the relationship (such as extra security personnel and management time)?
10. Is the relationship likely to cause on-site demonstrations or any other disruption or discomfort to our staff and students?
11. Does the potential supporter demonstrate clear governance and adherence to the rule of law?
12. How is the potential supporter likely to be perceived amongst our audiences?

Due Diligence methodology includes:

- Identity checking - a review using sources which confirm a prospect's identity e.g. Raiser Edge, Charity Commission, Companies House, electoral registers and 192.com
- Checking for high risk indicators – an internet search using the prospect's name and the following terms: tax evasion, fraud, human rights, falsification, falsification of academic research, bribe, bribery, controversy, crime, etc.
- Biographical information search – desk research looking at standard biographical information e.g. family members, career history.
- News source review – broader reading of news sources regarding the prospect, seeking background information and any indications of controversy.
- Business database check - a check on business databases to analyse how a prospect acquired their wealth, including analysis of subsidiary companies, and to identify potential conflicts of interest e.g. Wealth Insight, Companies House.
- Charitable involvement review - a check of connections to and activities of associated charitable organisations using the Charity Commission website and Trustfunding.org.
- Public records check - a search of online court papers for outcomes of legal proceedings involving the prospect and/or associated companies.
- Bankruptcy and court judgement check, using databases e.g. 192.com or Tracesmart.
- Further internet search – further search engine research to locate possible connections to persons of disrepute e.g. fraudsters, criminals or controversial figures.
- Human Rights/environment/other record checks – a review of research reports from NGOs.  
e.g. Amnesty, Human Rights Watch, Transparency International, Greenpeace etc. to consider human rights, environmental or other ethical issues.
- Signatories - The due diligence report should be approved and signed by the College Secretary.

#### **RCA Privacy Policy (Appendix 4)**

The RCA's alumni and supporters are at the forefront of everything it does and it is committed to upholding your personal rights and protecting your privacy. RCA's full [Data Protection Policy and Fair Processing Notices](#).

DARO's privacy policy takes into account guidance set out by the Institute of Fundraising's Code of Fundraising Practice and the Information Commissioner's Office. The RCA is also a member of the Fundraising Regulator and so we adhere to their Code of Fundraising Practice. All of DARO's activity is compliant with the Data Protection Act (1998) and the Privacy and Electronic Communication Regulations (2003) to ensure that it does not obtain, process, store or exchange data unlawfully. RCA staff and affiliated volunteers who solicit funds on our behalf must adhere to the provisions set out in this policy. DARO's privacy policy is upon request.

### **Delegated Limits of Acceptance (Appendix 5)**

<b>Group</b>	<b>£ / Limit</b>
RCA Council	Any gift with a value of £1m or above
Vice Chancellor / Deputy Vice Chancellor / Executive Director Operations/ Director of Finance/ College Secretary	Any gift with a value below £1m.