

# Charitable Donations Policy

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## **1. ABOUT THIS POLICY**

- 1.1 The purpose of this Charitable Donations Policy (this “Policy”) is to:
- (a) set out the University’s responsibilities, and of those working for the University, representing the University or enrolled as students at the University, in observing and upholding the University’s position on charitable donations; and
  - (b) provide information and guidance to those subject to the policy on the type of charitable causes that the University will and will not support.
- 1.2 In this Policy the University means the University of Law Limited.
- 1.3 Those subject to this policy means those individuals described in paragraph 3.1 below.
- 1.4 In this Policy, third party means any individual or organisation that those subject to this policy come into contact with during the course of work, studies or provision of services for the University, and includes, but is not limited to, actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## **2. OVERVIEW**

- 2.1 Charitable donations made by those subject to this policy must be in line with this policy.
- 2.2 This policy only permits charitable donations to charitable causes that are transparent, legal and ethical under local laws and practices.

## **3. WHO MUST COMPLY WITH THIS POLICY?**

- 3.1 This Policy applies to all persons working for the University or on our behalf in any capacity, including employees at all levels, agency workers, contractors, and students.

#### 4. WHO IS RESPONSIBLE FOR THIS POLICY?

- 4.1 The Board of Directors has overall responsibility for ensuring this Policy complies with the University's legal and ethical obligations, and that all those under our control comply with it.
- 4.2 The Campus Deans have primary and day-to-day responsibility for implementing this Policy.

#### 5. WHAT IS A CHARITABLE DONATION?

- 5.1 A **charitable donation** is a cash contribution or cash equivalent contribution to a charity, a not-for-profit organisation running a charitable programme or a charitable cause.
- 5.2 Please note that excluded from this Policy are:
- (a) pro bono schemes set up by the Pro Bono department of the University which are subject to our Pro Bono Employability Protocol;
  - (b) personal donations, sponsorship and support by any person which takes place during their own time and outside University premises.

#### 6. PROHIBITED CHARITABLE DONATIONS

- 6.1 The University does not permit charitable donations to any charities, not-for-profit organisations running a charitable programme or charitable causes where the immediate recipients of the charitable donations, sponsorships or other support:
- (a) are involved in or are reasonably suspected as being involved in terrorist financing; or
  - (b) have not provided adequate information to assure the University that the charitable donations, sponsorships or other support will not be used in any way to finance terrorism.
- 6.2 Terrorist financing is the raising, moving, storing and using of financial resources for the purposes of terrorism. Charities and not-for-profit organisations play an important role in ensuring that the funds they collect are not diverted to terrorist organisations.
- 6.3 In addition, the University also prohibits the following in relation to any charitable donations:

- (a) using an intermediary (other than an official processor of donations, e.g. Gift Aid) to offer, make, give or any donation, sponsorship or support;
- (b) offering, making or giving any donation which could be linked to a political party, to the campaign of any candidate for elected office or in support of any elected official;
- (c) offering, making or giving any donation to an organisation which is not registered as a charity or which is not running a charitable programme;
- (d) offering, making, or giving any donation to organisations that discriminate on the basis of race, ethnicity, nationality, religion, gender, sexual orientation, age or disability; or
- (e) offering, making, or giving any donation to any organisation which is in legal or financial conflict with the University, damages the University's reputation or which does not share the University's approach towards ethical standards.

## **7. PROCEDURE**

7.1 Prior to proposing any charitable donations, reasonable steps must be taken to to ascertain and evidence to the University:

- (a) the specific purpose for which proposed donation or sponsorship will be used; and
- (b) that the proposed donation or sponsorship does not contravene this policy
- (c) the rationale and motive for the proposed donation, including declaring any expected benefits for the donor/fundraiser, the University or any other companies in the University's group of companies

7.2 7.2 Prior approval of the line manager or Campus Dean, where the donor/fundraiser is a student, must be obtained prior to the donation/fundraising taking effect.

## **8. YOUR RESPONSIBILITIES**

8.1 Donors/fundraisers must read, understand and comply with this Policy and the University's Financial Regulations.

8.2 Donors/fundraisers are encouraged to raise concerns about any issue or suspicion of the financing of terrorism or any other prohibited charitable donations at the earliest possible stage by notifying a Line Manager or Campus

Dean or report it in accordance with the University's Voicing Concerns Policy as soon as possible.

## 9. FINANCIAL RECORDS AND MONITORING

- 9.1 It is essential that the University keeps full and accurate records of all financial dealings. Transparency is vital; false or misleading records could be very damaging to the University.
- 9.2 Donors/fundraises must declare and properly record (in writing) all charitable donations made in accordance with this Policy.

## Version history

Version	Amended by	Revision summary	Date
V1.0			February 2018
V1.1	Registry Officer	Change to coding convention	24/03/20
V1.2	Senior Quality Officer	Further naming convention clarifications	31/03/20
V1.2	Registry Assistant	Extension approved for 1 year	October 2021
V1.3	Director of Student Experience, Wellbeing and Inclusion	Review	January 2024
V1.3	Approved by Academic Board		8 February 2024