Fundraising Policy

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Amendments	
Related Policies & Procedures	Financial Regulations 2020 Anti-bribery and corruption

SCOPE

1.1 This policy applies to all staff, members of Council, Court and those engaged in fundraising on behalf of LSHTM.

1.2 The following defines LSHTM's policy regarding philanthropic fundraising. It is relevant to all members of staff and provides information relating to roles, responsibilities and procedures regarding fundraising activity.

1.3 This document sets out LSHTM's policy for the acceptance of donations. It is intended for the LSHTM community and for prospective donors and their advisers, to ensure the equitable treatment of all donors. However, it is not intended to cover gifts and hospitality offered to individual staff.

PURPOSE AND OVERVIEW

2.1 LSHTM seeks to attract and secure donations in support of its mission to improve health and health equity in the UK and worldwide; working in partnership to achieve excellence in public and global health research, education and translation of knowledge into policy and practice.

2.2 The Development & Alumni Relations Office (DARO) is a key central resource to co-ordinate, lead and report on LSHTM's fundraising activity. This policy outlines LSHTM's approach to fundraising, ensuring activity is strategic, compliant and supports an embedded culture of philanthropy.

2.3 LSHTM adheres to regulations and guidelines applicable to fundraising as well as general legislation to ensure fundraising is transparent and compliant.

2.3.1 LSHTM observes the guidelines set by the Fundraising Regulator through its Code of Fundraising Practice.

2.3.2 LSHTM further follows applicable regulations provided by the Charity Commission, Chartered Institute of Fundraising and the Council for the Advancement and Support of Education (CASE).

2.3.3 The UK Bribery Act 2010 requires that donations received do not create an inappropriate advantage that can be afforded to the donor, such as the offer of a university place for a close relative or the award of a contract.

2.3.4 Other contextual legislation includes the Proceeds of Crime Act 2002, the Terrorism Act 2000 and the Money Laundering, Terrorist Financing and Transfer of Funds (MLR) 2017.

POLICY

Purpose of donations

3.1 LSHTM accepts donations for the following purposes:

3.1.1 To support the development of LSHTM's estate.

3.1.2 To support research activity in selected priority areas.

3.1.3 To support scholarships and projects aligned to strategies for recruitment, teaching development and widening participation.

3.1.4 Endowments in support of 3.1.1 to 3.1.3.

3.2 Specific priorities for fundraising (including areas of focus for research funding) are determined by the Director, as is the disbursement of any unrestricted funds received.

3.3 All fundraising approaches for research will be subject to relevant costing principles through RCP and approval procedures within Faculties.

Sources of donations

4.1 LSHTM accepts philanthropic funding from a wide variety of public and private sector sources willing to support it in accomplishing its mission, including:

4.1.1 Donations from individuals in the UK and overseas.

4.1.2 Grants from charitable trusts and foundations in the UK and overseas.

4.1.3 Donations from legacy bequests.

4.1.4 Grants from overseas governments or their agencies and foundations, as applicable.

4.1.5 Donations from companies in the UK and overseas.

4.1.6 Non-monetary 'Gifts in Kind' from the above.

4.2 Support from companies is considered philanthropic when it does not: form a contractual relationship; involve exclusivity of information or publication; include an element of consultancy or confer IP rights; or bring other forms of direct financial benefit. LSHTM may pursue collaborations that involve these criteria, but not consider any income generated as being philanthropic.

Principles for the acceptance of donations

5.1 When accepting any donation, endowment or legacy, LSHTM will consider compatibility with the purposes of LSHTM and consistency with the goals outlined in the institutional strategy. LSHTM will also ensure that any donation complies with relevant legislation and policies.

5.2 LSHTM will not accept a donation in cases where to do so would not be in its best interests. Examples include, but are not limited to, where a donation may:

- 5.2.1 Compromise LSHTM's status as an independent institution.
- 5.2.2 Be considered, following proportionate diligence enquiries, to have derived from unlawful activities in any country.
- 5.2.3 Lead to a conflict of interest with the ethics and principles of LSHTM.
- 5.2.4 Limit freedom of enquiry or compromise academic integrity.
- 5.2.5 Potentially cause harm to LSHTM's reputation.
- 5.2.6 Cause any damage, including financial, for example, deterring other donors.
- 5.2.7 Be excessively difficult or expensive to administer or have the potential to create unacceptable liability or future expense.
- 5.2.8 Fail to meet the requirements of the Equalities Act 2010.
- 5.2.9 Constitute any form of bribe.
- 5.2.10 Violate the terms of this policy or other LSHTM policies or regulations.

5.3 LSHTM will not accept philanthropic donations from organisations where the major part of their business demonstrates the following characteristics:

- 5.3.1 Explicit environmental damage.
- 5.3.2 Institutional violations of human rights, including exploitation of the workforce.
- 5.3.3 Discrimination against the individual in any shape or form.
- 5.3.4 Manufacture of armaments.
- 5.3.5 Manufacture or marketing of tobacco and related products.

5.4 LSHTM will identify if there are any present or upcoming LSHTM tenders that may be of interest to the donor. No donation will be accepted or discussed with the donor until LSHTM has ensured that there is no conflict of interest with procurement activity.

5.5 LSHTM will accept donations from relatives of current students but will make it clear within the donation agreement and related communication that the donation will in no way have any bearing or influence on how LSHTM will treat their relation as a student.

5.6 LSHTM will not accept donations for specific named posts where to do so would compromise processes for the promotion of staff.

Named recognition opportunities

6.1 Proposed donations at a significant level may be recognised through the conferment of an appropriate named opportunity, proportionate to the level of the donation.

6.2 Named opportunities may include a room or portion of a building; an academic position; or a scholarship.

6.3 Named opportunities will typically be offered for the duration of the donation, or other appropriate interval, up to twenty years.

6.4 Proposed named opportunities to recognise philanthropic support are considered by SLT with approval by the Director.

6.5 Naming opportunities also form part of due diligence procedures for donations (see section 9 below).

Donation agreements

7.1 Donation agreements outlining the purpose and associated restrictions of philanthropic support will be created for any donation in excess of £10,000, or at the request of the donor.

7.2 Donation agreements will be signed on behalf of LSHTM by the Chief Operating Officer.

7.3 The signing authority for standard donation agreements under £10,000 will be the Director of Development & Alumni Relations.

7.4 Any deviations from standard templates for donation agreements will undergo legal review.

LSHTM's responsibility to donors

8.1 LSHTM will comply with the guidance set in the Code of Fundraising Practice to ensure that fundraisers take all reasonable steps to treat donors fairly.

- 8.1.1 Fundraising material will be truthful, honest and transparent, with appropriate approvals in place to ensure it meets regulatory standards for advertising and marketing.
- 8.1.2 LSHTM will maintain a publicly available commitment to donors, outlining the level of service they can expect from LSHTM.
- 8.1.3 Fundraisers should not make approaches where they have good reason to believe, that a person lacks capacity to make a decision to donate, or is in vulnerable circumstances.
- 8.1.4 LSHTM will maintain systems to receive, record and report on any complaints made about its fundraising activity.

8.2 LSHTM will ensure that all donors are appropriately thanked and acknowledged for their support, and kept informed of the use of their donation or other strategic priorities as applicable depending on the level and purpose of the donation.

8.3 LSHTM is unable to return donations, except when the conditions of the donation provide for it to be returned in exceptional circumstances, or where specified by law.

8.4 If it becomes impossible or impractical to meet the conditions of a restricted donation because of a change in law, change in LSHTM practices, policy, academic priority, or other unforeseen circumstances, the Director of LSHTM, in consultation with the donor, may use the donation for a related purpose which most closely reflects the spirit and intent of the donation.

8.5 A donor's right to remain anonymous externally will be maintained, but full details will be recorded within relevant LSHTM systems and shared with those who have direct involvement in approval, processing, stewardship and audit. A donation will only be accepted where the identity of the donor is provided.

PROCEDURE FOR THE CONSIDERATION OF AND ACCEPTANCE OF DONATIONS

9.1 The Director of Development & Alumni Relations has responsibility for all appropriate due diligence on donations and to maintain ongoing review of all existing seven-figure donors to LSHTM.

9.2 Appropriate measures will be maintained to ensure that an assessment of potential donations is undertaken at the earliest possible opportunity in any fundraising approach.

- 9.2.1 New approaches in excess of £10,000 will be reported to the Director of Development & Alumni Relations.
- 9.2.2 New approaches in excess of £100,000 will be reported to the Chief Operating Officer and Secretary & Registrar, with contextual information including the background of the relationship, level of the potential donation and alignment to strategic fundraising priority.
- 9.2.3 New approaches in excess of £1,000,000 will be reported to the Director, with contextual information including the background of the relationship, level of the potential donation and alignment to strategic fundraising priority.

9.3 Donations will be considered for acceptance through the following decision-making bodies as applicable. Full approval must be obtained prior to acceptance of a donation by LSHTM.

- 9.3.1 Donations of up to £99,999: Director of Development & Alumni Relations.
- 9.3.2 Donations ranging £100,000 - £249,999: Director of Development & Alumni Relations, Chief Operating Officer and Secretary & Registrar.
- 9.3.3 Donations ranging £250,000 - £499,999: The Director and/or Provost on behalf of the Senior Leadership Team.
- 9.3.4 Donations ranging £500,000 - £1,000,000: Donation Acceptance Panel consisting of the Director of Development & Alumni Relations (Chair), Secretary and Registrar, Chair of Council or another designated member of Council, Chair of Court and Director or Provost.
- 9.3.5 Donations over of £1,000,000: The Donation Acceptance Panel will review the proposed donation, making a recommendation to Council.

9.4 Any potential or actual donation or pledge referred to in 9.2 and 9.3, which in the opinion of the Director of Development & Alumni Relations has a controversial dimension, can be escalated to the next level of authority.

ROLES AND RESPONSIBILITIES

10.1 Members of Council, as Trustees, have overall responsibility to accept donations given to LSHTM for purposes consistent with its mission and objectives, with discretion to consider other factors relevant to LSHTM's best interests.

10.2 The Donation Acceptance Panel is responsible for determining whether the source and purpose of donations is compatible with LSHTM's principles and making appropriate recommendations to Council.

10.3 The Director of Development & Alumni Relations has overall responsibility for this Policy and for ensuring that it is effectively implemented, that progress is monitored, and that the Policy is regularly reviewed.

10.4 All DARO staff, and any third parties engaged to fundraise on behalf of LSHTM, must comply with the standards outlined in this Policy and the Fundraising Code of Practice.

10.5 DARO has overall responsibility for coordinating LSHTM's fundraising activity in relation to seeking charitable and philanthropic support and should be the first point of contact for any matters relating to philanthropy. This approach will not only ensure that staff are provided with the relevant information and support but will also help to deliver fundraising that is planned, appropriate, adheres to good practice and makes a tangible contribution to the strategic aims of LSHTM.

10.6 All philanthropic donations must be coordinated through DARO in order for LSHTM to meet its legal obligations as a charity, to protect donor rights and expectations, manage requests from across LSHTM and maximise the value of support received (e.g. through Gift Aid).

10.7 DARO must therefore be informed, in accordance with due diligence procedures, of an intended approach to a donor before it is made, or of any approaches from a donor which have been made, as soon as possible.