

Development and Alumni Relations Office

Brunel University of London

Acceptance of Donations Policy 2025

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1. Introduction

Brunel University of London is an exempt charity with the Charity Tax No: XN7223 and Royal Charter No: RC000079. We are registered with the [Fundraising Regulator](#) and we fundraise in-line with [our donor charter](#).

Philanthropy is an important source of support for the University's activities. These procedures set out the required responsibilities and obligations of those involved in the solicitation and acceptance of philanthropic donations so that:

1. Fundraising is carried out in a coordinated and efficient manner that reflects well on the University as a whole.
2. Donations are only accepted from sources and for purposes acceptable to the University and only after comprehensive due diligence is carried out.
3. Donations are accurately and comprehensively recorded, and documentation relating to the acceptance of a gift is acceptable from a legal and statutory perspective.
4. Donor relationships are sustained appropriately after a gift has been received.
5. The University complies with charity law.
6. The reputation of the University is maintained.

1.1 Definition of a donation:

A donation is a gift from all sources including individuals, companies, statutory bodies and trusts and foundations.

A donation does not confer full or partial ownership of a deliverable, financial benefit, or control to the funder in return for the funding. The gift must be owned in full by the receiving institution once it is received.

It is not always easy to differentiate a donation from a research grant or from sponsorship. The following general principles apply in relation to donations:

1. The initiative for the project tends to come from the University rather than the donor.
2. The results of the work have no commercial value for the donor.
3. The University determines the ownership of the research and any intellectual property arising.

The University will adhere to a professional Code of Practice in the solicitation of gifts and dealings with donors as set out below.

2. Acceptance of donations

2.1 Ethical Values

There should be no presumption that any offer of a donation will be accepted by the University. All discussions with donors, and within the University, must remain non-binding until a formal agreement is signed up to the date of execution of a donation agreement or formal exchange of letters accepting the donation.

Brunel University of London does not accept donations that are illegal, unethical, or that may harm its reputation or academic integrity. This can encompass, but is not limited to, refusing to accept a donation where:

1. It results from illegal or immoral activities;
2. The source of the gift or the activities of the donor are contrary to the objectives and [ethical values of the institution](#);
3. The gift represents a significant reputational or future financial risk to the institution;
4. The offer is dependent upon the satisfaction of conditions by the institution which are contrary to the institution's values and objectives, or unreasonable in relation to the nature of the donation.

2.2 Due Diligence

Brunel University of London will carry out due diligence on the nature of proposed donations and their sources of funding. No gift should be accepted by the University without due diligence coordinated by the development team.

For all major and recurring gifts, or where risks have been identified [thought to involve ethical issues], extensive due diligence will be carried out. This will include:

1. Further due diligence by the review of publicly available sources.
2. In-depth research by instructing professional prospect research services.
3. Human Rights/environment/other record checks – a review of research reports from NGOs e.g., Amnesty, Human Rights Watch, Greenpeace etc. to consider human rights, environmental or other ethical issues.

2.3 Responsible parties

In the first instance, the Head of Development and Alumni Relations must be consulted in deciding if a gift should be solicited or accepted, or whether further consideration is required.

Where there is concern about a potential solicitation or donation, the Head of Development and Alumni Relations will consult the Vice-Chancellor or the designated senior officer officiating on behalf of the Vice-Chancellor. If further consideration is required or for particularly complicated gifts, the Vice-Chancellor can refer the gift or its solicitation to the Council's relevant committee for a decision.

3. Solicitation of Gifts

3.1 Donor Charter

For all solicitation of gifts staff and volunteers will adhere to the code of conduct as presented in [our donor charter](#).

Fundraising solicitations on behalf of Brunel University of London will:

1. Be truthful; and
2. Describe accurately the University's priorities; its strategic aims and the intended use of any gift.
3. All fundraising solicitations by or on behalf of Brunel University of London will disclose the University's name and the purpose for which the funds are requested, in whatever format or media they are transmitted.
4. Volunteers, employees, and professional advisors who solicit or receive funds on behalf of the University shall:
5. Be advised of and adhere to the provisions of the Policy for the Acceptance of Donations, this Code of Practice, the University Financial Regulations, and the Anti-Bribery Policy;
6. Act with transparency, fairness, and integrity and as per applicable laws;
7. Adhere to the provision of applicable professional codes of ethics and standards of practice;
8. Cease solicitation of a gift from a prospective donor on request;
9. Disclose immediately to the Head of Development any potential, actual, perceived, or alleged conflict of interest.

The University will not sell or exchange personal details of donors.

3.2 Donor engagement

Gifts are accepted on the following understanding:

Academic Freedom and independence from influence: Brunel University of London accepts gifts on the clear understanding that the donor cannot influence [freedom of speech, the academic freedom or the independence of the University](#).

Admissions: Brunel University of London's selection criteria for admissions are based exclusively on academic achievement and potential and are independent of philanthropic support of the University. No 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 University.

Management of programmes: Donors accept that the management, and governance of programme and/or activities funded through philanthropy, rests solely with the University. This includes influence over academic appointments.

Donors will, however, be provided with appropriate and commensurate opportunities for continuing engagement with the programmes/activities that they have funded/are funding. The scope for this engagement will, for significant gifts, be enshrined in a Gift Agreement.

Any wish by a donor to restrict who can benefit from a donation will be considered by the University as per Charity Commission guidance to ensure compliance with the Equality Act 2010 (“the Act”). Where it is not possible to accommodate such wishes due to the provisions of the Act, the University will work with the donor to agree an alternative basis for the donation.

3.3 Complaints

The University will respond promptly to a complaint by a donor or prospective donor about any matter that is addressed in the Gift Acceptance Policy or this code of practice. If there is an issue or complaint, in the first instance please contact alumni@brunel.ac.uk or write to the Head of Development and Alumni Relations, Brunel University of London, Kingston Lane, Uxbridge, Middlesex UB8 3PH