Charitable Donations Policy

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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 our responsibilities, and of those working for us or representing us, in observing and upholding our position on charitable donations; and

   (b) provide information and guidance to those working for us or representing us on the type of charitable causes that we wish to support and those that we will not support.

1.2 In this Policy we, us, and the University means the University of Law Limited.

1.3 In this Policy those working for us or representing us means those individuals described in paragraph 3.1 below.

1.4 In this Policy, third party means any individual or organisation you come into contact with during the course of your work, studies or provision of services for us, 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 working for us or representing us or on behalf of the University 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 of the University has overall responsibility for ensuring this Policy complies with our 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; and

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;

(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; and

(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 our approach towards ethical standards.

7. **PROCEDURE**

7.1 Prior to proposing any charitable donations you must take reasonable steps to ascertain and evidence to the University:

   (a) the specific purpose for which proposed donation or sponsorship will be used; and

   (b) that proposed donation or sponsorship

7.2 When proposing any charitable donations you must be transparent about the rationale and motive for your proposed donation, including declaring any expected benefits for yourself, the University or any other companies in the University’s group of companies.

7.3 You must not offer, make or give any donation without obtaining the prior approval of your Line Manager or, if you are a student, your Campus Dean.

8. **YOUR RESPONSIBILITIES**

8.1 You must ensure that you read, understand and comply with this Policy and the University’s Financial Regulations.

8.2 You 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 your Line Manager or Campus
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Dean or report it in accordance with our Voicing Concerns Policy as soon as possible.

9. **FINANCIAL RECORDS AND MONITORING**

9.1 It is essential that we keep full and accurate records of all our financial dealings. Transparency is vital; false or misleading records could be very damaging to us.

9.2 You must therefore declare and properly record (in writing) all charitable donations made in accordance with this Policy.

Next Review: February 2021

**Version history**

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<tr>
<td>V1.0</td>
<td></td>
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<td>February 2018</td>
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<tr>
<td>V1.1</td>
<td>Registry Officer</td>
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