



Donations and Due Diligence Policy

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Policy/Regulation Owner:	Debbie Graver – <i>Head of Data, Research and Finance</i> Development, Alumni and Campaigns Office

1. Overview and Purpose

- 1.1** The University is required to follow the legal requirements set out by the Charity Commission and, in addition, to follow the Code of Fundraising Practice when soliciting and accepting donations.
- 1.2** The Charity Commission requires that Charity trustees must use their charity's funds and assets only in furtherance of the charity's purposes. They must avoid undertaking activities that might place the charity's funds, assets or reputation at undue risk.
- 1.3** This Due Diligence Policy has been developed in accordance with the recommendations of the Review of Philanthropy in UK Higher Education (HEFCE 2012) that all universities should have clear processes and governance mechanisms for acceptance of gifts as part of their normal ethical and risk management framework
- 1.4** The Code of Fundraising practice requires proportionate due diligence to be carried out to avoid breaches of the code.
- 1.5** This policy is intended to establish the parameters for undertaking due diligence on donations and other activities relating to philanthropy at the University. Specifically, the policy will lay out:
- 1.5.1** When due diligence is required to be undertaken
 - 1.5.2** The arrangements for requesting and conducting due diligence searches
 - 1.5.3** The University arrangements for signing off due diligence reports.
- 1.6** This policy is supported by specific guidance and training materials. This policy should be read in conjunction with other related policies and the University's privacy notices. Specific relevant policies are:
- 1.6.1** Gift Acceptance Policy
- 1.7** Any queries about this policy should be directed to the Head of Data, Research and Finance or Director of Development, Alumni and Campaigns at rad.dac@uea.ac.uk

2. Scope

- 2.1** This policy applies to the following:

2.1.1 Philanthropic donations which are being solicited or have been received by the University.

2.1.2 Gifts in Kind which are offered to the University by a donor.

2.1.3 Sponsorship received for events which are run by the Development, Alumni and Campaigns Office.

2.1.4 Alumni and other supporters who are being considered for membership of fundraising or alumni boards.

2.2 Donors or sponsors can be an individual, partnership, trust, foundation, institution, charity or business.

2.3 The majority of the activity covered under this policy will be conducted by the Development, Alumni and Campaigns Office (DAC) who mostly look after philanthropic transactions within the University. However, where philanthropic activity happens elsewhere in the University then those leading the activity should liaise with DAC at the earliest opportunity.

2.4 Where donations are for research then consideration should be paid to the National Security and Investment Act 2021 and the provisions of the Higher Education Export Controls Association. However, donations which are purely philanthropic and where there is no benefit for the donor and the donor does not have any control over the spending of the funding are exempt from both the Act and its provisions. If there are special circumstances surrounding the donation which give the donor any control, then RIN must be consulted.

Adherence to approved policy and regulations is fundamental to the effective operation of the university. This policy has been developed in alignment with sector best practice to promote consistency, accountability, and compliance with relevant standards. Observing the policy ensures that decisions and actions are informed, equitable, and aligned with institutional values.

3. Definitions

Term	Definition
Philanthropic Donation	A philanthropic donation is a voluntary gift intended to support the public good and is given without any financial benefit or control for the donor. This could include shares, artwork, property or other non-monetary donations.
Donor	Any individual or other legal entity who has or intends to give philanthropic gifts to the University.
Sponsor	Any individual or other legal entity who has provided financial or in-kind support for DAC activities on the basis that they will receive public acknowledgement for their support.

Gift in Kind	A non-financial gift of goods or services provided to the University instead of money where the intention is that this will be given philanthropically.
RIN	Research and Innovation Services

4. Roles and Responsibilities

4.1 Development Managers and those soliciting gifts or managing relationships are responsible for the identification of circumstances where due diligence is required and for highlighting this at as early stage as possible. If there is a plan to solicit a significant gift, then due diligence should be considered prior to the solicitation.

4.2 The Research and Data Team within DAC are responsible for initiating and carrying out the due diligence. External assistance should be sought as required.

4.3 The Head of Data, Research and Finance will review recommendations from Due Diligence reports prior to the report going to the appropriate level for sign off.

4.4 The level of sign off for due diligence reports is as follows:

Size of donation	Officers to accept gift
Up to £1,000,000 and Volunteers	Director of Development, Alumni and Campaigns or Chief Finance Officer
Up to £5,000,000	The Vice Chancellor
£5,000,000 and over	Council

4.5 Reports may be escalated to a higher level of sign off where there are significant concerns that acceptance of the gift will cause UEA reputational damage or in circumstances where there may be a significant financial or legal liability for the University if the gift is accepted.

5. Policy Statement

5.1 Charity Commission guidance on the acceptance of donations states that we need to ensure that:

5.1.1 Gifts are lawfully obtained and can be used for charitable educational purposes

5.1.2 Donors and partners are legitimate, ethical, and appropriate for association with the institution

5.1.3 Funding relationships do not compromise our academic independence, institutional integrity, or public trust

5.1.4 Risks—financial, legal, ethical, or reputational—are identified and managed responsibly

5.2 Both the Charity Commission and the Institute of Fundraising state that due diligence should be proportionate to the size and nature of the donation.

5.3 To maintain proportionality, UEA will undertake due diligence in the following circumstances:

5.3.1 Where the likely gift is more than £25,000

5.3.2 Where cumulative gifts from a donor exceeds £25,000.

5.3.3 Where there is a naming or sponsorship opportunity offered as part of the stewardship of the gift e.g. a named scholarship

5.3.4 Where an alum or other supporter is being considered for membership of a high-profile fundraising or alumni board.

5.4 Whilst due diligence in 5.3 is mandatory, there will be occasions when it is felt that appropriate due diligence is required on gifts not covered in section 5.3 to ensure that we meet our responsibilities in section 5.1. In these circumstances appropriate due diligence will be undertaken on the donor.

5.5 Due diligence can be triggered by completing the Due Diligence Request Form or by emailing rad.dac@uea.ac.uk

6. Compliance and Monitoring

6.1 The University undertakes regular and routine monitoring of compliance with this policy.

6.2 Clear documentation must be maintained to support all due diligence decisions made.

7. Related Documents

7.1 Gift Acceptance and Returns Policy

7.2 Due diligence process documentation.

8. Revision History

Version number	Approval date	Approval mechanism	Details of change
9.0	26/02/26	Finance Committee	Regular review, transfer to new Policy Framework structure