



## **Gift Acceptance Policy**

### **1. Introduction**

- 1.1. The Council for British Research in the Levant (CBRL) welcomes philanthropic gifts which support the values of CBRL and enable it to advance its mission, support its strategic plan and enhance its programmes and services.
- 1.2. This Gift Acceptance Policy forms part of a framework for solicitation, review, acceptance, administration and stewardship of all philanthropic gifts to CBRL.
- 1.3. This policy and its related procedures will be reviewed regularly and updated appropriately.

### **2. Remit**

- 2.1. This Gift Acceptance Policy covers the solicitation, review, acceptance, administration and stewardship of all philanthropic gifts, bequests supporting CBRL from individual donors, charitable associations, trusts, foundations and corporate entities. It applies to all forms of philanthropic gift and donation, monetary and non-monetary ('gifts-in-kind'). Gifts of objects, 'gifts or services in kind', gifts of stocks and shares, as well as of books, book collections and archives, may be accepted or declined in line with the same principles and procedures as for monetary donations and where appropriate, in line with existing organisational policies. 'Gifts' will cover all categories outlined above for the purposes of this policy.
- 2.2. In line with its responsibilities for the effective management, control and use of CBRL's assets and resources, the Board of Trustees is ultimately responsible for accepting or declining donations to CBRL.
- 2.3. Development staff will be responsible for the administration and recording of engagement activity that may result in philanthropic income for CBRL.
- 2.4. Development staff will co-ordinate and lead CBRL's efforts to seek philanthropic support, record all engagement activity and ensure that all such information is securely held with the ability to report accurately on such activity to the senior management and Board of Trustees of CBRL.
- 2.5. Development staff will routinely receive and record gifts on behalf of CBRL below the £5,000 threshold, reporting regularly to the Board of Trustees on all philanthropic income.
- 2.6. This Gifts Acceptance Policy also highlights the importance of ensuring that information regarding engagement activity is channelled through development staff, and that they are informed at an early stage of any fundraising activity prior to a donation solicitation being made.
- 2.7. The Board of Trustees has delegated authority for accepting or declining philanthropic gifts to the Acceptance of Gifts Group (AGG; for Terms of Reference see the Ethical Acceptance of Gifts Policy), although any decisions deemed by the AGG to be sufficiently unusual, substantial, sensitive or complex will be referred to the Board of Trustees before acceptance.

### **3. Principles**

- 3.1. This policy follows guidelines for UK charities issued by the Charity Commission, the Fundraising Regulator and the Fundraising Code of Practice.
- 3.2. Decisions on the acceptance of gifts must adhere to the following principles:
  - 3.2.1. CBRL will protect its reputation, autonomy, integrity and academic freedom and will decline any gift which compromises these values or in any way restricts impartial, independent research or scholarship or its dissemination.
  - 3.2.2. CBRL will only accept gifts which are compatible with charity law, as set out by the Charity Commission, and other relevant law, including tax law and VAT as set out by HM



Revenue and Customs. It will not solicit or accept gifts that conflict, in their character or source, with CBRL's values or reputation. CBRL will only accept gifts that are within the law and compatible with its charitable objectives.

3.3. CBRL strives to be transparent about the source and purpose of all gifts. Where a donor wishes to remain anonymous, CBRL will take all reasonable steps to preserve the donor's anonymity subject to applicable law, including CBRL's statutory legal obligations under the Freedom of Information Act 2000. Any request for information about gifts from anonymous donors will be referred to CBRL's Freedom of Information Officer.

3.4. In deciding whether to accept or decline a gift, CBRL will conduct all reasonable enquiries and decline gifts where:

3.4.1. There is evidence that the gift itself arises in whole or in part from activity that:

- Is illegal (or contrary to the purposes of CBRL)
- Evaded taxation
- Violated international conventions
- Limited freedom of inquiry
- Suppressed or falsified academic research

3.4.2. There is evidence that the gift, or any of its terms, will require of CBRL:

- Any action that is illegal
- Any limitation to freedom of inquiry
- Any suppression or falsification of academic research

3.4.3. There is evidence that the gift, or any of its terms, will:

- Create unacceptable conflicts of interest for CBRL
- Give the donor undue influence over CBRL
- Contribute to lower academic standards or weaken procedures regarding the initiation, conduct and evaluation of academic activity
- Compromise CBRL's reputation.

3.4.4. Further, when deciding whether to accept a donation, CBRL will consider, and be guided by, the following questions. If any of these questions cannot be answered satisfactorily, CBRL retains the right to refuse the donation. Would the gift:

- Help CBRL fulfil its mission, support its strategic plan, and enhance its programmes and services?
- Expose CBRL to undue adverse publicity or reputational risk?
- Require unacceptable financial expenditure and/or use of CBRL's resources?
- Unreasonably inhibit CBRL in seeking gifts from other donors or stakeholders?
- Require CBRL to grant undue favour, influence or benefit to particular persons or organisations (e.g. awardees, particular classes of awardees, the donor or the donor's family or friends)?
- Require CBRL to deviate from its normal policies and procedures?

#### **4. Procedures for the acceptance of philanthropic gifts**

4.1. CBRL will review any decisions taken in good faith relating to the acceptance of particular gifts should subsequent events or additional information come to light which justifies such a review.

4.2. All potential donations of £5,000 and above will automatically require due diligence of the donor, in accordance with the Ethical Acceptance of Gifts Policy. Screening will be conducted by development staff and/or, when required, external consultants.

4.3. All potential gifts to CBRL of £5,000 or above shall be referred to the AGG for consideration.



- 4.4. Where there is any reason, based on the above principles or the results on an ethical screening, that the AGG cannot come to a decision, the Chair of the Board will determine whether the donation should be accepted or declined or referred to the Board of Trustees for its consideration.
- 4.5. All potential prospects and stakeholders will be made aware of the existence of CBRL's policy at an early stage in the discussions.
- 4.6. For all philanthropic gifts of £5,000 or above, a gift agreement shall be put in place. All gift agreements will include the following:
  - 4.6.1. Statement that they confirm to this Gift Acceptance Policy
  - 4.6.2. Statement that the management or governance of any activity, academic or otherwise, that is funded through a donation rests solely with CBRL.
  - 4.6.3. Statement of the purpose of the gift.
  - 4.6.4. Signatures of the donor (whether an individual donor, or the representative of the organisation), and the Director of CBRL. Where the donation is more than £5,000, the Gift Agreement will also be signed by the Chair of the Board.
- 4.7. For all gifts made in instalments, or where naming is involved, a gift agreement must be put in place. All such gifts will be at the discretion of the Director/ development staff, and it is their responsibility to ensure that the donation adheres to the above principles irrespective of whether there is a formal gift agreement or not.
- 4.8. All philanthropic gifts below £5,000 will adhere to established procedures, with approval for acceptance being made by the Director. A gift agreement will not be required unless deemed necessary by the AGG (see Ethical Acceptance of Gifts Policy).

## **5. Review**

- 5.1. Any previous decision relating to the acceptance of a donation will be reconsidered if subsequent events or the subsequent availability of information require it, according to the Ethical Acceptance of Gifts Policy. The response in such circumstances will be reported to the Board of Trustees.

## **6. Reporting**

- 6.1. Development staff will report to the Board of Trustees on all donations made to CBRL on an annual basis.

*Approved by the Board of Trustees*

*March 2022*



## **Ethical Acceptance of Gifts Policy**

### **1. Introduction**

- 1.1. To ensure that philanthropic donations will add to rather than detract from the reputation or philanthropic health of CBRL and to protect CBRL from the legal and financial risks of accepting gifts, a procedure is set out below to reflect due diligence in the review of proposed gifts for ethical and reputational risk. 'Gifts' will refer to philanthropic income for the remainder of this document, as defined in the Gift Acceptance Policy.
- 1.2. Philanthropy plays a key role in helping CBRL meet its key strategic goals. Whilst this policy sets out some of the checks and balances that help to protect CBRL's reputation and values, it is important to ensure that the act of making a gift should remain a positive and pleasurable experience for the donor.
- 1.3. This procedure also highlights the importance of ensuring that information regarding fundraising engagement activity is channelled through development staff. Development staff are responsible for the administration and recording of engagement activity that may result in philanthropic income for CBRL and as such, they should be informed at an early stage of any fundraising activity prior to a donation solicitation being made.
- 1.4. The responsibility for due diligence applies to all members of CBRL; staff and members of the Board of Trustees. If any circumstances that could present an ethical or reputational risk regarding donations of any amount come to light, development staff / CBRL's Director should be made aware at the earliest opportunity.

### **2. Procedures for the ethical acceptance of gifts**

- 2.1. To ensure CBRL's integrity, the acceptance of gifts must adhere to the latest approved Gifts Acceptance Policy .
- 2.2. For any potential donations of £5,000 and above, or for a material donation in nature of the same value threshold, a due diligence assessment of the donor will be made. If a donor makes a further gift of £5,000 or more, a new assessment will be required.
- 2.3. A money laundering assessment will be made in accordance [CBRL's Anti-bribery, Fraud and Corruption Policy](#). Any concerns must be passed to the Treasurer as a matter of urgency.
- 2.4. A screening for ethical and reputational risk will be made in accordance with the following procedures:
  - 2.4.1. CBRL will only accept a donation if the identity of the funder is known. Whilst CBRL may agree that it may not be able to publicly acknowledge the name of the donor if so requested by the donor, their identity must be explicitly known to CBRL/ development staff in order to carry out the necessary due diligence.
  - 2.4.2. In accordance with the Charity Commission/Fundraising Regulator/Fundraising Code of Practice, large donations from unknown donors, or where the source of funds cannot be verified, must be reported as a serious incident.
- 2.5. All requests for assessment should be directed to development staff who will schedule an assessment. The assessment and the approval process can take a month to complete.
- 2.6. Upon receipt of a request, a set of standard questions will be asked in writing. These will help the screening process, ensuring that the right prospect is being screened, that any known risks are flagged and the prospect's relationship with CBRL is made clear. The standard questions are:
  - I. Who is the subject of the screening?



- II. Where the subject is a company or a foundation, a due diligence assessment will focus on the parent company or the subsidiary making the donation and will ask, who is the controlling individual of the parent company or organisation?
  - III. What country is the subject based in?
  - IV. What contact has the subject had with which staff members?
  - V. How have you verified their identity?
  - VI. How did CBRL's relationship with the potential donor arise? For example, did they initiate contact, or did we initiate contact?
  - VII. If a philanthropic solicitation is in progress or is planned please provide details of:
    - The project (include overview, partners, duration, etc)
    - The anticipated gift amount
    - The current status of the solicitation
    - Are you working to a specific deadline? If so please provide details
    - What do you know about the subject? Do you have any additional comments, concerns or know of any other details that may help guide us?
- 2.7. Development staff will complete a screening assessment for ethical and reputational risk, using a web search engine such as Google, looking at data over the last six years. A minimum of 50 results will be reviewed. Where the donor is based in the Levant, screenings will include Google searches in Arabic. If required by the Acceptance of Gifts Group (AGG), further searches may be undertaken.
- 2.8. The web search will aim to identify areas which could cause an ethical or reputational risk. The areas covered by the search include allegations or proven cases in relation to:
- Fraud, bribery, corruption, and organised crime
  - Human rights abuses including child labour, human trafficking, and poor working conditions
  - Terrorism
  - Environmental damage
  - Human health and wellbeing
- 2.9. The potential areas of concern will be set out in detail in the screening and sources will be cited throughout. A summary of concerns will also be included as part of the screening assessment.
- 2.10. The assessment for ethical and reputational risk will include:
- A summary of concerns
  - Subject's name
  - Responses received from the fundraiser/staff (including Trustees) to the questions asked in section 2.6
  - A summary of the subject's background
  - The source of the subject's wealth
  - The history of engagement and fundraising with CBRL, where known
  - Philanthropic history
  - The results of the assessment for ethical and reputational risk, the date it was conducted, and source material referenced.
- 2.11. There may be circumstances where third parties are contacted to provide additional information or support during an assessment, for example when a transformative gift has been proposed or the case is sufficiently complex. Development staff will seek assistance to provide the necessary level of assurance.
- 2.12. Where CBRL's Director is not involved in the cultivation of a donor and/or the ask, they will be sent the screening for initial consideration of how to proceed; whether more information is required or if the screening should be referred to the Chair of the Board for consideration,



irrespective of the size of the donation. The Chair of the Board will decide whether to refer the matter further as outlined in section 3, if not covered by section 2.2. of this Policy.

- 2.13. Where CBRL's Director is the lead fundraiser, the screening should be referred to the Chair of the Board [or to the President, if the Chair is the fundraiser] for consideration. The Chair of the Board will decide whether to refer the matter further as outlined in section 3, if not covered by section 2.2. of this Policy.
- 2.14. The due diligence assessment and the results of the review will be stored on CBRL's CRM and in the development office's digital files. The digital files will be retained for 7 years and then destroyed. The record of the decision (date of decision and yes/no) will be kept on the CRM indefinitely. The minutes of the AGG assessment meeting or, where decisions are made over email, the email correspondence, will be kept in accordance with CBRL's policy on retention of committee meeting minutes.
- 2.15. If evidence comes to light after receipt of the donation that subsequently gives rise to concern, a reassessment will be made in accordance with the procedures outlined above.

### **3. Acceptance of Gift Group (AGG) Terms of Reference**

- 3.1. The purpose of the AGG is to review potential donations referred to it, especially in relation to due diligence screenings. It will be convened as required at the request of the Chair of the Board.
- 3.2. The AGG membership is made up of members of the development committee excluding the fundraiser(s) (for the particular gift) and development staff who have conducted the ethics screening. Other colleagues within CBRL will be invited if the Group requires additional input or if it would be beneficial for them to attend. In exercising its authority, the AGG may seek any necessary external advice.
- 3.3. Membership of the AGG will consist of at least two Trustees and at least one of the following: Director, Chair of the Board of Trustees or the President, as appropriate, and at least one staff member.
- 3.4. The Chair of the Development Committee will act as the AGG Chair in order to coordinate the workings of the AGG without any input in the decision making.
- 3.5. The Director and development staff can attend meetings to support the workings of the Group. Decisions by the Group will be made on a majority basis.
- 3.6. The AGG will correspond over email or will convene as required at the request of the Chair of the Board. The AGG will advise the Chair of the Board if the proposed donation should be progressed, whether more information is required or if it should be referred to the Board of Trustees for consideration.
- 3.7. Development staff will report to the Chair of the Board and the Board of Trustees on cases of due diligence assessment on request and on an annual basis.
- 3.8. The paperwork for meetings of the Group will be sent as a time limited, password protected link ahead of meeting to members' 'cbrl.ac.uk' email address.
- 3.9. The material sent out to members of the AGG will be held in accordance with CBRL's Data Protection Policy. All material must be securely disposed of following confirmation of the minutes. This includes deleting all emails as well as those files that have been downloaded and saved. Any printed material should be shredded.
- 3.10. These procedures will be subject to regular review.
- 3.11. To evaluate the ethical and reputational risks of potential donations in accordance with the principles set out in section 2 of the Gifts Acceptance Policy to ensure CBRL's integrity, the acceptance of donations must adhere to the following key principle:



- CBRL will not solicit or accept gifts that conflict, in their character or source, with the values or reputation of CBRL.
- 3.12. When deciding whether to accept a donation CBRL will consider, and be guided by, the following questions. If any of these questions cannot be answered satisfactorily, CBRL retains the right to refuse the donation, in accordance with the procedures outlined in the Gift Acceptance Policy. Would the donation:
- 3.12.1. Expose CBRL to undue adverse publicity or reputational risk?
  - 3.12.2. Inhibit, unreasonably, CBRL from seeking gifts from other donors or stakeholders?
  - 3.12.3. Contravene CBRL's anti-discrimination or run counter to CBRL's strategy for diversity and inclusion?
  - 3.12.4. Require CBRL to provide special consideration, or other special advantage, for the donor designate, their family or friends?
  - 3.12.5. Require CBRL to deviate from its normal hiring, promotion or contracting procedures?
- 3.13. On reviewing the material provided, the AGG will advise the Chair of the Board if:
- 3.13.1. The proposed donation should not be progressed. If the proposed donation should not be progressed the AGG must clearly state its reasons.
  - 3.13.2. More information is required, specifying clearly what additional detail is necessary.
  - 3.13.3. If the proposed donation should be referred to the Board of Trustees for its consideration. If the proposed donation should be referred, the AGG must clearly state its concerns.
  - 3.13.4. There is any additional information that the committee believes appropriate to consider in formulating advice to the Chair of the Board or Board of Trustees.
- 3.14. The quorum for the AGG will be three members, at least one of whom must be a current member of the Board of Trustees.
- 3.15. The AGG's Terms of Reference will be reviewed periodically, normally every three years.
- 3.16. Where the AGG meets either in person or virtually, the Chair of the AGG will confirm that all those in attendance have read the material provided. The Chair will ask if members have any concerns with the level of ethical and reputational risk associated with the proposed donation. Following members' responses and committee discussion, the Chair will summarise the main points and a vote will be taken. Where members of the AGG are called to make a decision via email, then the Chair will ensure a timely email response from all members.
- 3.17. Meetings of the AGG may be called at short notice in accordance with business needs.
- 3.18. To enable the group's decisions to be acted on promptly, minutes recording the group's decision will be made by development staff and circulated by email in a password protected document for confirmation as soon as is practical following the meeting of the AGG.

*Approved by the Board of Trustees  
March 2022*



## **CBRL Naming Policy**

### **1. Background**

- 1.1. This document sets forth CBRL's naming guidelines. CBRL recognises the importance of naming opportunities for its 'assets', which include (but are not limited to):
- 1.2. Outdoor and indoor areas, features and objects, academic posts, research activity, library collections, projects, scholarships, grants and prizes.
- 1.3. Naming such parts of an institution is common practice in academic organisations. It provides an opportunity to recognise those who have made exceptional contributions (not just financial) to CBRL in support of its mission.
- 1.4. To ensure that the naming of any asset is undertaken in the best interests of CBRL, we must ensure that there is a clear, transparent and professionally managed process for decision-making in this area and that any naming ultimately supports CBRL's mission and its strategic objectives.
- 1.5. Naming actions must not detract from CBRL's values, dignity, integrity, or reputation, nor should any naming actions confer special privileges, create a conflict of interest, or give the appearance of a conflict of interest.

### **2. Introduction**

- 2.1. CBRL has previously named assets. The Kenyon Institute is one such example. We have also named travel grants when an individual has donated the full cost of the grant.
- 2.2. Naming provides an opportunity to recognise those who have supported CBRL's mission. This support could be made in many different ways – through years of service to CBRL, through philanthropy in support of our strategic aims, through other exceptional contributions to CBRL and its mission or to the broader field of Levantine scholarship.
- 2.3. Naming is of considerable significance to CBRL because the name bestowed can reflect how CBRL perceives itself, its mission and its values through association with an individual, group or organisation. Names may be attached to parts of the estate or academic activity for a significant period of time and will therefore be visible to the public.
- 2.4. The range of naming opportunities are limited – and therefore valuable to CBRL and its reputation – and must therefore be used thoughtfully and consistently.

### **3. Remit**

- 3.1. This policy applies to naming and re-naming CBRL assets such as part of the estate; academic units; posts and associated activity; resources; funds to support research or study; scholarships; collections or equipment.

### **4. Principles**

- 4.1. Decisions on the acceptance of gifts and naming a CBRL asset must adhere to the following principles. In deciding whether to accept or decline a gift, or naming a CBRL asset, due consideration must be given to the following matters:

### **5. Renaming**

- 5.1. Any naming will normally be for the useful life of a CBRL asset;
  - i. Where an asset is named for a limited period of time, CBRL reserves the right to re-name the asset on the expiration of that time





- ii. If an asset must be replaced, substantially altered in its form, nature or use, CBRL reserves the right to re-name the asset
- 5.2. Where a named asset is linked to a particular activity, for example, a research programme, and that activity no longer meets CBRL's strategic priorities, CBRL reserves the right to end that activity and naming.
- 5.3. When an asset is proposed for re-naming, reasonable efforts will be made to inform all appropriate parties in advance. If they are deceased, reasonable efforts will be made to inform the next generation of family members in advance of the re-naming.
- 5.4. CBRL shall retain the right to revoke a naming where retention of the name would be prejudicial to CBRL's reputation
- 5.5. Where a naming is linked to a donation, the donation must also adhere to CBRL's Gifts Acceptance Policy:
  - i. If the naming is linked to a donation there should be a gift agreement which clearly states the conditions upon which CBRL accepts the naming and basis upon which an asset may be re-named or a naming may be revoked.
  - ii. If the donation is not paid in full or in accordance with the gift agreement outlining the terms of the donation, CBRL reserves the right to end the naming associated with the donation.
- 5.6. Those named or proposing a naming should be made aware of this policy.

## **6. Procedures for Naming**

- 6.1. In line with its responsibilities for the effective management, control and use of CBRL's assets and resources, the Board of Trustees is ultimately responsible for accepting, or declining, a proposal to name a CBRL asset.
- 6.2. Recommendations for the naming of a CBRL asset may be derived from any part of the organisation but should be sent in writing to CBRL's Director for review and to development staff to complete an ethical and reputational risk assessment.
- 6.3. For all naming of philanthropic donations, the decision to approve, reject or amend the naming proposal will be delegated to the Chair of the Board and the AGG, in consultation with the Director.
- 6.4. The Chair of the Board will determine whether the naming should be accepted or declined or referred to the Board of Trustees for its consideration.
- 6.5. A decision to re-name or revoke a naming will be made following the same thresholds and procedures as for approval set out above.
- 6.6. Where physical signage is required as part of the naming it will confirm to the style used in the building where it is located and adhere to CBRL's brand guidelines.
- 6.7. Recommendations for the naming of any CBRL asset – existing or future – should be made in writing to the Chair of the AGG for circulation among AGG members and include:
  - i. Name and contact details of the proposer;
  - ii. A clear description of the asset that is being proposed to be named (e.g., a building, room, position, scholarship, collection etc.);
  - iii. The full name as it should appear on the asset;
  - iv. Whom or what the asset is being named after – and if appropriate, full details of this individual or organisation, including their connection to CBRL;
  - v. A statement outlining why this name is appropriate to be associated with CBRL and this asset in particular;



- vi. Whether this is a new activity/ asset, the re-naming of an existing activity/asset or the naming of a previously un-named activity/asset;
  - vii. If this asset is already named or was previously named, the full details of the previous naming and why a new naming is appropriate;
  - viii. When naming will commence;
  - ix. The period of time that the naming should last (i.e. in perpetuity, for a fixed period of time);
  - x. How the name should be recognised, for example, as a plaque on a door, listed on a website or in a job title;
  - xi. If relevant, the amount of philanthropic support provided to CBRL for the naming of the asset, and whether there will be any ongoing financial or other support required;
  - xii. Whether there are any concerns or conditions attached to the name, the activity or potential restrictions on other naming proposals
- 6.8. Recommendations for naming that are linked to a philanthropic donation must specifically include the following in any gift agreement:
- i. The name of the donor
  - ii. The amount of the donation
  - iii. The payment schedule
  - iv. Any stewardship requirements, for example any naming ceremony, recognition by CBRL, how the asset will be referred to, etc.
- 6.9. A copy of the naming proposal and decision will be deposited on CBRL's database.
- 6.10. Development staff will report to the Board of Trustees on names that have been approved on an annual basis.

*Approved by the Board of Trustees*

*Match 2022*