

## GIFT INCOME – DEVELOPMENT OFFICE ETHICS STATEMENT

1. A key role of the Development Office is to secure philanthropic income for The Open University. This is where there is no direct benefit for the individual, trust, foundation or corporation in making a donation, but a clear financial benefit for The Open University.
2. The Development Office and the awarding of degrees, fee waivers, staff recruitment or any other benefit the university can offer are completely independent of each other.
3. The Development Office publishes an annual list of donors to the institution on its website and in its annual review, excluding those donors who have asked not to be included in such a list.
4. The Development Office follows the Charity Commissions advice on due diligence<sup>1</sup>. Our due diligence policy and process set clear parameters for accepting donation and raising awareness of the potential negative implications of accepting gifts from donors.
5. Prior to the Development Office accepting a donation the following due diligence process is undertaken:
  - < £25,000: due diligence is conducted only if there is concern about the background of the donation or the motivations of the donor<sup>2</sup>;
  - £25,000 to £100,000: appropriate due diligence will take place<sup>3</sup>;
  - > £100,000: appropriate due diligence will be conducted.
6. In the case of donations from individuals or organisations where their activities may mean that accepting a donation could be perceived as a negative benefit to The Open University the due diligence can be escalated as follows:
  - a. The Director of Development may choose to refer a decision if it transpires the gift originates from an individual or organisation which may now, or in the future, prove embarrassing for the university or if accepting a donation contravenes another University policy.
  - b. Such as a referral will be made to the External Engagement Director and subsequent to that the University Secretary.
  - c. The University Secretary, on behalf of the University, will advise the Director of Development as soon as possible as to whether a gift can be accepted, being mindful of the potential implications of declining a donation.

January 2013. Updated May 2017

1. [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550687/Chapter\\_2.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550687/Chapter_2.pdf)
2. However, it is important to note that any member of staff can alert the Prospect Research Manager or Director of Development if they are concerned about the background of any donation, or the motivations of a donor, in order to trigger appropriate due diligence.
3. See footnote 2.