University of Suffolk

UNIVERSITY OF SUFFOLK
CODE OF ETHICAL FUNDRAISING PRACTICE AND FUNDRAISING POLICY

All those involved in fundraising for any charitable organisation, including higher education institutions, have a responsibility to donors, to the organisation and to act in accordance with the agreed causes and objectives of the fundraising campaign. Openness, transparency and respect are required at all times to ensure the institution's integrity, mission and relationships with donors are not discredited.

The Development and Alumni Relations team and the Directorate of Finance and Planning are responsible for the day-to-day operation of this Code.

This Code will be reviewed by the University of Suffolk Board at least every two years, or more frequently if required.

Purpose and remit of this Code

The University of Suffolk actively seeks gift income from donors as a legitimate and vital element of its overall funding. This Code covers the acceptance and disbursement of such gifts and bequests (also referred to as donations).

This Code covers all fundraising activity, i.e. the solicitation or receiving of funds, on behalf of the University of Suffolk by employees, contractors, volunteers and professional advisors; all of whom will be considered 'fundraisers' for the purposes of this Code.

Any fundraising by students for particular projects or events sits outside of the remit of this policy, unless acting on behalf of the University, in consultation with the Development and Alumni Relations team.

This Code should be read in conjunction with the University of Suffolk Staff Financial Responsibilities Policy.

This code covers:
1. Legal and Statutory Considerations
2. Donor Rights
3. Financial Accountability
4. Acceptance and Disbursement of Funds
5. Specific Fundraising methods
6. Due Diligence

1. Legal and statutory considerations

The University of Suffolk is an exempt charity under the Charities Act 2011, regulated by the Office for Students (OFS) and a company limited by guarantee. Registered in England and Wales, company number: 05078498. Registered Address: Waterfront Building, Neptune Quay, Ipswich, IP4 1QJ. As such, the University of Suffolk will at all times observe the requirements of charity law and other applicable regulation and legislation.

The University is registered with the Fundraising Regulator and at the time of the latest review, this policy is consistent with its Code of Fundraising Practice and its related good practice. Any fundraising activity, including communications to potential donors and solicitations on behalf of the University of Suffolk, will adhere to relevant charity law and best practice guidance including guidance as set out by the Fundraising Code of Practice and the Charity Commission for England and Wales.

At all times, Fundraisers acting on behalf of the University of Suffolk will be aware of the sensitivity of information gathered and held on individuals and organisations, ensuring information gathered is treated with the utmost respect and is compliant with data protection regulations, in line with:

- the University of Suffolk Data Protection and Data Security Policy; and
- the Alumni Relations and Development Privacy Notice.

The University of Suffolk will seek Gift Aid and tax deductions on gifts that are eligible.

2. Donor Rights

a. All fundraising solicitations by or on behalf of the University of Suffolk will disclose the institution's name, address or other contact information, and the purpose for which the funds are requested.

b. The University undertakes to make publicly available on its website:
    a. Its most recently published annual report and financial statements
    b. Details of its exempt charitable status
    c. A copy of this Code

c. Donors and prospective donors are entitled to know, upon request, whether an individual soliciting funds on behalf of the University of Suffolk is a volunteer, an employee, a consultant or a hired solicitor.

d. Fundraisers acting on behalf of the University of Suffolk will comply with current data protection regulation, in line with the University of Suffolk Data Protection Policy and the Alumni Relations and Development Privacy Notice.

e. Donors and prospective donors will be treated with respect. The University of Suffolk adopts systems and procedures to make it as easy as possible for donors and potential donors to opt-out of fundraising communications and ensure we do not send fundraising communications to people who have indicated they do not want to receive them. We will stop sending fundraising communications to people we know to have died, and as far as possible ensure our databases are accurate and up to date.

f. We will respect requests for donor anonymity as far as legally possible.

g. Those in vulnerable circumstances will be treated sensitively and in accordance with our Policy on Fundraising from and Responding to People in Vulnerable Circumstances. In particular the

University of Suffolk will encourage donors to seek independent advice if it has any reason to believe that a proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members.

h. The management and governance of all programmes fully or partly funded by gifts rest solely with the University of Suffolk.

i. The University of Suffolk undertakes to investigate any complaint made against it or its nominated representatives which concerns matters that fall within the remit of its Code of Ethical Fundraising Practice or otherwise within the remit of the Fundraising Regulator. The University undertakes to respond to any complaint received from a donor or prospective donor in a fair, proportionate and appropriate manner.

Complaints Procedure

The complaints procedure which should be followed is:

- All complaints should be addressed in the first instance in writing to the Development Director or alternatively the Chief Operations and Transformation Officer of the University of Suffolk.
- The complaint will initially be assessed to ensure that it falls within the remit of the University's Code of Ethical Fundraising Practice or otherwise within the remit of the Fundraising Regulator.
- Once this is confirmed, the Development Director or the Chief Operations and Transformation Officer will instruct an investigating officer to establish the facts of the case in a thorough, objective and prompt manner.
- The Development Director or the Chief Operations and Transformation Officer will then determine the appropriate action to be taken, taking account of the Code of Ethical Fundraising Practice and guidance of the Fundraising Regulator.
- The outcome of the investigation, with reasoning, will be communicated to the originator of the complaint without undue delay.
- The outcome of all complaints and investigations will be reported to the University of Suffolk Executive Committee at its next meeting to review any lessons that can be learnt from the complaint and to inform future fundraising activity.

In the event that the complaint concerns either the Development Director or the Chief Operations and Transformation Officer, then the complaint should be addressed to the Chair of the University of Suffolk Board of Directors. The University also adopts a whistleblowing policy for use in appropriate circumstances.

The University of Suffolk Executive Committee and University of Suffolk Board will be informed, at least annually, of the number, type and disposition of complaints received from donors or prospective donors about matters that are addressed in this Code.

3. Financial Accountability

a. The University of Suffolk's financial affairs will be conducted in a responsible manner, consistent with the ethical obligations of stewardship and the requirements of applicable higher education and charity regulators.

b. The University of Suffolk's fundraising activity will comply with the Statement of Recommended Accounting Practice (SORP) as directed by the Directorate of Finance and Planning.

c. Annual financial reports on fundraising activity will be factual and accurate in all respects, disclosing:

   a. The total amount of fundraising revenues.
   b. The total amount of fundraising expenses.
   c. Identify government grants and contributions separately from philanthropic donations.
   d. Be produced in accordance with accounting standards and practices.

d. The Development and Alumni Relations team will liaise with the Directorate of Finance and Planning to ensure all income is attributed to the correct finance codes and any unspent funds are discussed with the donor to agree an appropriate course of action.

e. At least annually the Directorate of Finance and Planning, in conjunction with the Development and Alumni Relations team, will submit for review the income arising and the costs incurred of fundraising to the University of Suffolk Board, ahead of publication as part of the University's Annual Report.

4. Acceptance and Disbursement of Funds

Acceptance of Donations

The test of compliance with this Code must be undertaken prior to solicitation wherever possible, rather than at the point of acceptance.

The responsibility for the acceptance and refusal of gifts and bequests rests ultimately with the University of Suffolk Board. The University of Suffolk Board delegates decision making to the University of Suffolk Executive Committee in accordance with agreed delegated authority limits. The delegated authority limits for the acceptance of gifts is stated within the University's financial regulations and Delegation of Financial Authority Policy.

It is generally accepted that in most cases the interests of the University of Suffolk as a charity will be furthered by increasing the resources available to it. Donations will only be rejected in exceptional circumstances and if, having considered relevant factors and disregarded irrelevant ones, there is reasonable belief that such a decision would be in the best interest of the charity. The University of Suffolk Executive Committee will make the decision to refuse a donation after receiving appropriate due diligence reports, and in accordance with its Gift Acceptance Policy.

The University of Suffolk will not accept a gift of any size which might:

- Compromise its independence or that of its partner institutions
- Impact negatively on teaching or research activity
- Limit the freedom of the institution to act within its objects
- Create unacceptable conflicts of interest
- Result in unmanageable reputation damage
- Result in financial loss or damage
- If there are reasonable grounds to believe that an individual lacks the capacity to make a decision to donate

The University of Suffolk will take all reasonable steps to ensure the ultimate source of a gift or bequest is legal and not derived directly or indirectly from illegal activity.

Any gift, for whatever amount, that may attract significant external interest will be notified to the University of Suffolk Executive Committee prior to its acceptance. The University of Suffolk Executive Committee will assess any risks associated with the source of funds and the purpose of the donation and will decide how to proceed in consultation with the Development and Alumni Relations team and the Directorate of Finance and Planning. At times it may be necessary to consult with the University of Suffolk Board.

Projects and activities for which funds may be sought will be identified and agreed by the University of Suffolk Executive Committee. These priorities will evolve over time and will be regularly reviewed and reapproved by the Executive Committee.

All University of Suffolk staff, contractors or volunteers who seek to raise funds for University of Suffolk must do so in liaison with the Development and Alumni Relations team to ensure compliance with this Code. Efforts to secure donations by any University of Suffolk School, Centre or Directorate must be brought to the attention of the Development Director before activity commences.

Gift Agreements

The University of Suffolk, in liaison with the donor, will make every effort to clarify in writing the agreed purpose of all donations of £10,000 or over in advance of confirmation of gift acceptance by the University.

Depending on the size and nature of the gift and its intended purpose, the University of Suffolk may require a gift agreement for significant gifts be completed by the donor in advance of confirmation of gift acceptance by the University.

The decision as to whether a gift agreement is required will be made by the University of Suffolk Executive Committee, in liaison with the Development Office and the Directorate of Finance and Planning. Any gift agreement will indicate the requirement for a gift to be compliance-tested against this policy.

Gift agreements will be required for all donations of £10,000 or over from new donors.

The University of Suffolk Director of Finance and Planning is responsible for reporting a new gift agreement to the University of Suffolk Executive Committee.

Types of Donation and Payment Methods

Types of gifts that may be accepted include:

- Cash or equivalent
- Personal property
- Shares
- Property or land
- Legacies or bequests

Payments can be made by debit or credit card via the University of Suffolk website, via bank transfer or by completing our official donation form. Cheques are accepted and should be made payable to University of Suffolk Ltd. Individual cash donations of over £250 will not be accepted.

Disbursement of Donations

All donations will be handled responsibly and in accordance with the law, and will be used to support the vision and objectives of the University of Suffolk.

Under the terms of the Code of Fundraising Practice as issued by the Fundraising Regulator (UK), the University of Suffolk must use any restricted or designated donations for the purposes for which they are given, unless consent is given for change of use by the donor. If circumstances require change of use, for example programme or organisational changes, alternative uses will be discussed with the donor or the donor's legal designate(s). Where this is not possible, for example if the donor is deceased or legally incompetent, the University will apply to the Charities Commission for change of use.

Unrestricted donations will be disbursed by the Executive Committee and disbursements will be administered via the Development and Alumni Relations team.

Adequate records of gifts will be maintained by the Development Office and the Directorate of Finance and Planning in accordance with University of Suffolk's standard accounting practices.

As a charity The University of Suffolk has an overall duty to put all of its assets towards achieving that organisation's charitable objectives, and only under exceptional circumstances will it give back donations that have been accepted in accordance with this policy. In exceptional circumstances a decision to accept a gift will be reviewed and a decision to return a gift will always be the decision of the University of Suffolk Board on the recommendation of the Director of Finance and Planning or Chief Operating Officer after seeking appropriate legal advice, if deemed necessary. Any decision to return or refund a gift will be fully documented.

5. Specific Fundraising Methods

a) Social media fundraising

The University may employ social media to fundraise, including marketing and communications, building donor relations for fundraising purposes, and holding online fundraising events or information events relating to our fundraising. These might be carried out by posting information, live chats, podcasts, or other types of livestreamed or recorded activities, including online gaming.

We will be open and honest on social media about our fundraising activity, including who the beneficiaries will be and the intended impact of our fundraising activity.

b) Online fundraising platforms

Where an online fundraising platform is used to fundraise on behalf of the University, we will ensure that fundraising is carried out responsibly, and that any fees charged are clearly visible to donors before asking for financial details. We will ensure there is transparency about how any fees are calculated and how much of a donation the University will receive. Ways to remove a fee will be available and easy to apply.

c) Payroll Giving

Payroll Giving is a tax-efficient scheme where donations are taken from employees' pay before tax is taken. We will be clear to donors that they are free to end an agreement to donate at any time, and that no benefits will be offered to donors in return for donating.

d) Grant applications and monitoring

Grant applications will be prepared responsibly, making sure we have the appropriate permission to include any referees in the application.

We will act appropriately following a grant decision, including making sure we understand and can meet any conditions relating to the grant; meeting the administrative requirements of the grant-making body and the terms and conditions of the grant agreement. We will only appeal against a rejection if there are appropriate reasons to do so.

We will communicate appropriately with the grant-making body, including letting them know if there are any serious problems with the funded project; closely following their reporting guidelines and requirements; and asking for, and receiving, their written permission before changing how a grant is spent.

e) Legacies

The University of Suffolk will make sure that all fundraising activity relating to legacies considers the freedom of the potential testator to provide for their family and others; and any sensitive circumstances of the potential testator and their family and friends, where known.

We will make sure any information we provide for potential testators to include in their will or related documents is clear and accurate and will be clear that any suggested wording does not represent legal advice. Suggested wording about the University will include our full name and address, and charitable registration details.

The University of Suffolk will not normally act as executor, unless we have the legal power to perform this duty, it is in the University's best interests and there are no risks or potential conflicts of interest.

Potential testators will be treated with respect, and we will make sure that we are open about the reason for inviting someone to an event where legacies will be discussed and will not act in a way that could be considered unreasonably pressurising. We will carry out meetings in a way that is sensitive to the potential testator's interests and concerns; and keep a record of all meetings and communications with potential testators. We accept a potential testator's right to invite other people to all meetings, decline a meeting; or end a meeting at any time.

University of Suffolk fundraisers will not draft, or be directly involved in drafting, wills. The appropriate disciplinary procedures will be followed where we believe a fundraiser has taken advantage of their position to encourage someone to leave them a personal legacy.

The University of Suffolk will not pay the costs involved in making a will, nor will it recommend a will-writing service or solicitor. We always recommend that a potential testator should get independent legal advice.

Legacy donors will be encouraged to discuss their intentions with the Development Director before they are captured in a will, to ensure the donor's wishes can be observed. Where a testator has set conditions on their legacy, including specifying a specific purpose or project, the University will consider whether it can meet the conditions or use the legacy for the restricted purpose before accepting it.

'Express wishes' that form part of a legacy donation are not legally binding under the terms of an individual's will. Nonetheless the University will designate such donations according to the wishes of the donor wherever possible and for a minimum term of five years. As a charity that values the wishes of its supporters, the University will only undesignated express wish donations in exceptional circumstances and will require authorisation from the University of Suffolk's Executive Committee.

6. Due Diligence Process

This outlines the mechanisms and processes for ensuring that the University of Suffolk meets its legal obligation to take all reasonable steps to check the ultimate source of a gift or bequest is legal and not derived directly or indirectly from illegal activity.

Due diligence is the range of practical steps that the University of Suffolk takes to be reasonably assured of the provenance of funds donated, is confident that it knows the people and organisations that it works from a fundraising perspective and that any associated risks are identified and managed.

Working to guidelines produced by the Charity Commission for England and Wales, the University of Suffolk applies the ‘Know Your’ principles to due diligence activity.

The ‘Know Your’ principles are:

- Know Your Donor
- Know Your Beneficiaries
- Know Your Partner

The core elements of due diligence applied by the University of Suffolk are:

- Identify – know who you are dealing with.
- Verify – where reasonable, and the risks are high, verify identities.
- Know an organisation’s/individual’s business – research the business(es) and be assured they are appropriate to be involved with.
- Know what their specific business is with University of Suffolk – ensuring their objectives meet those of the University of Suffolk.
- Watch out – be aware of unusual or suspicious activities, conduct or requests.

The Charity Commission for England and Wales require charities to report any anonymous donations with a value of over £25,000 as a ‘serious incident’, but this requirement does not prohibit the University from accepting such donations. It is the University of Suffolk’s responsibility to look out for suspicious circumstances, put adequate checks and safeguards in place, ensure record keeping is accurate and that any concerns or suspicious activity is reported to the appropriate authorities.

Depending on the size of the potential donation and the associated background of the donor the general questions in Appendix 1 will be applied to mitigate risk and ensure reasonable steps have been taken to check the provenance of funds, individuals and organisations. It is usually accepted that due diligence checks will be made for all donations by new donors of £10,000 or above and in exceptional circumstances donations below £10,000.

It is the responsibility of the Development and Alumni Relations Team, in conjunction with the Directorate of Finance and Planning, to undertake due diligence checks. Appendix 1 provides a proforma checklist for this purpose.

Small and regular donations

In accordance with the guidance from the Charity Commission, University of Suffolk is not expected to know the identity or take steps to find out the identity of each small cash donor. It is not considered reasonable to check the provenance of small, one-off donations or donations made at events. The University of Suffolk will not routinely apply the due diligence checks above to donations below £10,000, but is likely to consider making limited checks for donations by new donors between £5000 - £10,000.

For any small regular donations that the University of Suffolk receives via Direct Debit, the University of Suffolk automatically records the name, address and bank details of the donor, along with any associated

Gift Aid declaration. The University of Suffolk is unlikely to make any further additional checks against these payments, unless there is some reason for suspicion.

Legacies and Wills

For any funds due to be received via gifts in Wills, the University of Suffolk will routinely request to receive a copy of the Will in advance of accepting the funds to allow the University of Suffolk to make any background due diligence checks if required.

Acceptance and administration of legacy shares. Shares received via a legacy form part of the overall value of a legator's gift in their will; they are therefore viewed in the context of their presumed intended use as monetary donations rather than as investment opportunities. As such, all shares donated as part of a legator's gift in their will will be encashed immediately at the time of probate as part of the process of the administration of the Estate, rather than to take in specie. This protects the University, as well as the presumed intentions of the deceased, from any stock market volatility and therefore financial risk.

7. Donor Recognition

Significant gifts to the University of Suffolk offer opportunities to recognise the generosity of a donor by inviting them to name the project they have funded. These may include the creation of permanently named endowed funds and/or the naming of a building or other space. Naming opportunities may also be offered in recognition of extraordinary philanthropic contributions made by benefactors to the University, but where their gift has not contributed towards the cost of the specific project in question. *The University of Suffolk Naming of Buildings, Rooms, Facilities and Spaces Policy* establishes a framework that ensures naming opportunities are offered in a consistent and transparent way and should be observed wherever negotiations of significant gifts are underway.

Appendix 1
University of Suffolk Donation Due Diligence Proforma

The due diligence procedural questions below will be routinely applied to gifts made by new donors of more than £10,000. The answers to these questions will be used to make the decision of accepting or refusing a donation.

Potential Donor:
Potential Donation Amount:
Date:
Due Diligence Completed by:
Submitted to:

General information

- Who is the donor or donors?
- What is already known about them?
- Do we already have a relationship with them?
- Do additional identity checks need to be made? If yes, full use should be made of web searches checking news stories, legal cases, if an organisation is registered with regulators, authorities, company accounts or governing documentation. It may also be useful to search social media.
- Are the donors UK tax payers and has a Gift Aid declaration been completed?
- In what form is the money being received?
- Have any public concerns been raised about the donor or their activities? If so, what was the nature of the concerns and how long ago were they raised? Was it a legal matter? Did the police or a regulator investigate the matter? What was the outcome?
- Is there any adverse publicity about the donor? If yes, will this cause reputational concern for University of Suffolk?

The nature of the donation and any conditions

- How big is the donation?
- Is it a single donation or one of a number of regular donations, or the first of multiple future donations?
- Is it an unusual or substantial one-off donation?
- Are there conditions attached to the potential donation? What are they? Are they reasonable?
- Is the donor proposing to make a loan to University of Suffolk and therefore the funds are only retained for a period of time before being returned to the donor?
- Is the donation conditional on particular individuals or organisations being used to apply the funds?
- Is the donation conditional on particular individuals benefiting from the use of the funds?
- Is the donation being made in sterling or another currency?
- Are any of the donors based, or does the money originate, outside of the UK? If so, from which country? Does this pose a particular risk?
- Is the proposed giving mechanism typical or unusual?
- Any additional concerns with the potential donation?

If any of the above questions reveal evidence of crime University of Suffolk is obligated to report this to the police/and other appropriate authorities.

Under the Counter-Terrorism and Security Act 2015 the University of Suffolk is obligated to immediately report any suspicion that a donation is related to terrorism funding to the police.

In the case of suspected money laundering, reports will be made to either the police, a customs officer (HMRC), or an officer of the Serious Organised Crime Agency.

Appendix 2
University of Suffolk Equality Impact Assessment – Initial Screening

Directorate:	Marketing Communications and International
Policy/Procedure Title:	Code of Ethical Fundraising Practice and Fundraising Policy
Name of the manager responsible for this assessment:	Sarah Westwood, Development Director
Name(s) of any other people involved in this assessment:	
Date of assessment:	Jan 2025
Is this new or existing?	Existing

Section 1: Purpose

What is the purpose of the policy?	To ensure the solicitation, acceptance and disbursement of philanthropic gifts to University of Suffolk are managed in an open, transparent and respectful way, ensuring that the institution's integrity, mission and relationships are not discredited.
Does the policy, procedure or process involve, or have consequences for, the people University of Suffolk serves and employs	This Code covers all fundraising activity, i.e. the solicitation or receiving of funds, on behalf of the University of Suffolk by employees, contractors, volunteers and professional advisors. Any fundraising by students for particular projects or events sits outside of the remit of this policy, unless acting on behalf of the University, in consultation with the Development and Alumni Relations team. Observance of the Code ensures the University acts towards its supporters with integrity and transparency, and within the law, at all times.

Section 2: Impact

3.	How is the policy seeking to achieve its purpose?	The policy details the rights of donors, the fundraising practices that will be used and how we will work within data protection, legal and financial requirements and best-practice guidance.
4.	Does the policy require decisions to be made in relation to individuals or groups of individuals?	Yes ☑

		It covers all decisions in relation to: donors (individual and groups), fundraisers (fundraising practice and communications) and the management of donations.
5.	What is the decision-making process and is it fair and transparent?	The decision-making process relates to building a profile of and accepting a gift from an individual, organisation or trust. A process of due diligence will be undertaken as outlined in the policy, to ensure the legitimacy of funds being gifted. Any research will be conducted from public sources of information and the process is clearly outlined in the policy.
6.	How will this policy contribute to our values and operating principles?	This policy is intended to support all of the University's values and operating principles and will ensure that any fundraising is delivered in an ethical way. The work that this policy supports raises funds to support our students, facilities, resources and staff.
7.	Please give details of what equality training is/will be provided for decision makers?	All those who undertake due diligence checks and those who are involved in the disbursement process will have completed the Equality Online training.
8.	What links to other policies are there attached to this policy?	• University of Suffolk Anti-Corruption Policy • University of Suffolk Data Protection and Data Security Policy • University of Suffolk Delegation of Financial Authority policy • Alumni Relations and Development Privacy Notice • *The University of Suffolk Naming of Buildings, Rooms, Facilities and Spaces Policy*
9.	Are there any external considerations? (legislation/government directive etc)	Legal and statutory considerations are as detailed in the relevant section of this Code. This Code in particular references the Code of Fundraising Practice issued by the Fundraising Regulator (UK).
10.	Who are the stakeholders and what are their interests?	• Internal stakeholders – Directorate of Finance and Planning, Marketing, Communications and International Directorate, Vice-Chancellor's Office, Alumni Relations and Development Office, Executive Committee & any other staff who solicit or process charitable donations to the University. • External stakeholders – potential donors and current donors, relevant UK regulatory bodies as detailed in the Code. • Interests: Rights and expectations, how funds are accepted and disbursed, due diligence checks.
11.	To summarise, what outcomes do we want to achieve and for whom?	To ensure all fundraising activity and activity connected to management of donations is effective, fair, legal and compliant, and adequately protects the interests and rights of both the University and the donor. To ensure that donors are

		treated with respect, integrity and in an open appropriate manner, and to ensure we comply with financial processes, charity law and data protection.

Section 3: Evidence decision for impact – Data Collection

12.	Identify any baseline data or gaps in data available about the impact of this policy in relation to equality groups.	All new gift agreements are being monitored and reported, the proposed purpose of any restricted gifts will be considered as per the policy before being accepted, any complaints from donors or other interested parties will be reported as outlined in the policy. All due diligence will be reviewed by a secondary party to ensure valid reasoning and appropriate research.

Section 4: Impact on students, staff and the wider community

		Positive Impact?	Potential negative consequences /Inequalities?	No Potential Impact?	Type of impact, reason and any evidence
13.	Disability				All donations given and the reasons for the donations being made may provide opportunities for positive impact on a particular group(s) for genuine reasons, for research or student recruitment for example, all in accordance with University of Suffolk mission and operating principles and values. Monitoring of new gifts and reasons for them will be undertaken and reviewed for any adverse impact. It may be appropriate to complete an
	Gender and transgender				
	Race /ethnic origin				
	Religion /Belief				
	Sexual Orientation				
	Age				
	Marriage and civil partnership				

	Pregnancy and Maternity				assessment in line with the Equality Impact Assessment Procedure for any initiative considered relevant.
	Could other socio-economic groups be affected?				

Section 5: Opportunities for positive promotion/action

14.	*What steps have been taken to positively promote equality? Please refer to guidance notes* As specified above.

Section 6: Outcomes

15.	As a result of this assessment, have you identified any opportunities to improve the inclusivity of this policy? If so, what are they?	No
16.	Do you consider this policy should be the subject of a more detailed Impact Assessment?	No. EIA assessments may be undertaken for any initiative identified as relevant to the EIA policy.
17.	What is your rationale for this outcome?	Appropriate process in place.
18.	How will this policy be monitored?	This policy will be monitored by University of Suffolk Executive Committee.
19.	Do you plan to revisit this assessment? If so, when?	As appropriate when gifts are received.

We are satisfied that an initial screening has been carried out and a full impact assessment is not required.

Completed by: Sarah Westwood Role: Development Director Date: 23.1.25

Thank you for completing this assessment. Please retain a copy for your records and attach this as an annex to the relevant policy. An electronic copy should be sent to the EIA Working Group (see email grouping