

Maynooth University Foundation

Gift Acceptance Policy

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Accompanying Reading:

This policy should be read in conjunction with the following policies and procedures:

- [University Governance](#)
- [University Regulations](#)
- [Academic Policies and Procedures](#)
- [Finance](#)
- [Research Policies](#)
- Data and Privacy
- Relevant Legislation
 - [Universities Act](#)
 - [Companies Act](#)
- [Charities Regulation](#)
- [Computing Policies](#)
- [Equality and Diversity](#)

Purpose

Maynooth University Foundation is a private company limited by guarantee (CRO No: 308957) and a registered charity (CHY 13371).

The Maynooth University Foundation, and its Board of Directors, is responsible for and is the preferred vehicle for, the receipt of gifts by Maynooth University.

This policy, its procedure, process, and guidelines set out the approach of Maynooth University Foundation to the acceptance of gifts for the purpose of:

1. Providing guidance, standards for anyone who cultivates or receives gifts on behalf of Maynooth University.
2. Ensuring the application of an appropriate level of due diligence to gifts cultivated or received on behalf of Maynooth University.
3. Compliance with University policy, relevant legislation, and industry best practices.

This policy, its procedure, process, and guidelines are approved by Maynooth University and Maynooth University Foundation and apply to all parts of the University. All employees and representatives of the University must abide by these policies.

Background

The Maynooth University Foundation has an obligation to Maynooth University staff, students, alumni, and stakeholders to take reasonable steps to ensure that the sources and purposes of gifts are consistent with Maynooth University's principles and values, and do not undermine the reputation of the University, its commitment to integrity, transparency, and contribution to the public good.

The Maynooth University Foundation also must uphold the trust of gift providers, who have associated themselves, via their giving, with Maynooth University's reputation and values.

Policy Management

Maynooth University Foundation's work is administered by the Maynooth University Development and Alumni Relations Office (DARO). The Board of Directors and DARO hold responsibility for decision making regarding the acceptance and refusal of gifts to Maynooth University Foundation.

The Maynooth University Foundation is committed to upholding values that are core to the ethos and mission of Maynooth University ([see Appendix 1](#)), and this policy takes into consideration current University ethics policies and protocols. These include the [National University of Ireland's \(NUI\) Human Rights Principles and Code of Conduct](#), [Maynooth University Research Protocols for Compliance with Human Rights Principles and Codes of Conduct](#), [Research and Commercialisation](#), [Conflict of Interest](#) and the [MU External Activities Policy](#) and the [Maynooth University Research Ethics Policy](#).

Maynooth University Foundation will consider the legal and ethical principles underpinning the acceptance and refusal of gifts to Maynooth University Foundation and may seek legal or other advice in matters relating to accepting gifts, as required.

This policy, its procedure, process, and guidelines will be reviewed at least annually to ensure that they are reflective of changes in University policy, relevant legislation, accounting standards, changes in the industry. Any relevant matters arising, outside of the scope of this framework, will be reviewed by the Board of Directors.

Compliance

This policy applies to Maynooth University Foundation and anyone who cultivates or receives gifts on behalf of Maynooth University.

Anyone who cultivates or receives gifts on behalf of Maynooth University is required to notify Maynooth University Foundation before receiving gifts to ensure that they are accepted and processed in line with this policy.

The University reserves the right to take disciplinary action as appropriate in specific cases where this policy has consciously not been followed by an employee.

Gift Acceptance Policy

Maynooth University Foundation must, in considering or accepting a gift:

- Be satisfied that the Due Diligence Procedure has been completed ([see Appendix 3](#)).
- Have, as far as is reasonably possible, assessed the risk associated with any gift.
- Completed the relevant decision-making process for reporting and referring information regarding gifts as set out below.

Gifts

Maynooth University Foundation may accept gifts meeting the definition set out by the Council for the Advancement and Support of Education (CASE) in their annual survey of giving in the UK and Ireland¹. The CASE-Ross definition focuses on

- The source of the gift, and,
- The gift provider's intent in gifting.

See [Appendix 2](#) for more information.

Gifts may be financial, for instance, investments, or direct funding donations. Maynooth University Foundation may also receive non-financial gifts such as assets, resources, gifts-in-kind, or materials.

¹ <https://www.case.org/resources/case-ross-support-education-survey-united-kingdom-and-ireland>

Responsible Parties

All Parties

Anyone who cultivates or receives gifts on behalf of Maynooth University has a responsibility to notify Maynooth University Foundation before receiving gifts to ensure that they are accepted and processed in line with this policy.

Maynooth University Foundation

The Maynooth University Foundation, and its Board of Directors, is responsible for and is the preferred vehicle for, the receipt of gifts by Maynooth University. DARO administers Maynooth University Foundation's work.

Guidance for Maynooth University Foundation on the procedure for undertaking due diligence checks is outlined in this policy ([see Appendix 3](#)).

Director of Development and External Relations

The Director of Development and External Relations is responsible for overseeing the Gift Acceptance Policy's day-to-day functionality and delivering Due Diligence Reports to the Board of Directors and the specially convened Development Advisory Committee of the Maynooth University Governing Authority.

They will consider all Level 2, 3 and 4 gifts that may be referred to the Board of Directors and the specially convened Development Advisory Committee of the Maynooth University Governing Authority. They may also review and refer any Level 1 gifts where they deem such action appropriate.

Maynooth University Foundation Board of Directors

The Board of Directors meets a minimum of once per year and may arrange interim meetings to address time-sensitive matters.

In advance of each meeting, a register of Due Diligence Reports prepared by Maynooth University Foundation that meet the criteria for consideration by the Board of Directors (as specified in [Section 5\(c\) Gift Acceptance Procedure](#)) will be submitted to the Secretary of the Board of Directors at least seven days before a meeting of the Board.

The Diligence Reports Register consists of a summary of matters that the Board of Directors should consider in deciding whether to accept a gift or allow planned solicitation to proceed.

All information to be considered by the Board of Directors is strictly confidential and not for circulation. Members of the Board of Directors are discouraged from discussing the prospective gift(s) with other Members in advance of meetings. In all cases, the gift amount is not disclosed to members of the Board of Directors.

Members of the Board of Directors who cannot attend the meeting in person may provide comments, to the Chair (only), for consideration during the session.

Following the discussion of the register item in the meeting, the Chair will ask Board Members, having considered the circumstances of the gift, the Due Diligence Report and Gift Acceptance Policy, to decide on one of the following courses of action formally:

- To approve the gift (or allow planned solicitation to proceed)
- To reject the gift (or decline planned solicitation to proceed)
- To request further information to be provided
- To refer the decision to a specially convened Development Advisory Committee of the Maynooth University Governing Authority.

Decisions may be put to a vote if necessary.

When the Board of Directors cannot decide whether to approve or reject a gift without further consultation, it will refer the information to the specially convened Development Advisory Committee of the Maynooth University Governing Authority. The advice of the Committee will be referred to the Board of Directors for a final decision.

Where an urgent decision is required, outside of the Board of Directors' planned meetings, the Board may use email to reach a decision. In such cases, the Chair will ask members to provide comments by a given deadline, following which they will, after due consideration, approve or decline the gift or, if necessary, will convene a meeting as soon as possible for the gift to be discussed.

Specially Convened Development Advisory Committee of the Maynooth University Governing Authority

Maynooth University Governing Authority has responsibility for the University's strategic direction, the management and administration of its revenue and property and the general conduct of its affairs.

It normally meets six times per year.

A specially convened Development Advisory Committee of the Maynooth University Governing Authority will meet as required to consider and advise the Board of Directors on the acceptance of gifts (Level 4 potential gifts or other referrals).

Gift Acceptance Procedure

All gifts, and potential gifts, including legacies, should be notified to Maynooth University Foundation to ensure the appropriate checks and authorisation are completed before acceptance or solicitation of a gift.

Where a gift is deposited directly into Maynooth University Foundation's or Maynooth University's accounts without prior knowledge, the gift is not deemed to be accepted until the Gift Acceptance Procedure has been completed. Gifts received in this manner will be held in the account, but not expended, until the Gift Acceptance Procedure has been completed.

A similar procedure will apply where the time required to complete the Gift Acceptance Procedure would put receipt of the gift at risk. In these cases, the gift will be held as above,

and the provider will be informed that the gift is not officially accepted until the Gift Acceptance Procedure has been completed.

All gifts where the donor wishes to remain anonymous will be subject to the same process of checks and authorisation as named donors. Donor information will be collected and stored confidentially by Maynooth University Foundation to undertake Due Diligence checks, but the donor's name will be redacted from Due Diligence reports.

When the source of a gift to the Maynooth University Foundation is unknown, all reasonable steps will be undertaken to check the donation against the applicable Areas of Review as outlined in the Due Diligence Procedure.

Level 1

A gift/potential gift valued at €10,000 or less (applicable to the one-off or cumulative value) will, by and large, not require the compilation of a Due Diligence Report. However, Maynooth University Foundation will complete appropriate Due Diligence checks related to the gift and gift provider.

Maynooth University Foundation may determine that a Level 1 gift requires preparing a Due Diligence Report before a gift being accepted or an ask is made.

Responsibility for acceptance of potential or actual Level 1 gifts rests with Maynooth University Foundation where no Due Diligence Report is required. When a Due Diligence Report is compiled responsibility for acceptance of potential or actual Level 1 gifts rests with the Director of Development and External Relations.

Level 2

All one-off and cumulative gifts valued between €10,000 - €250,000 will be subject to the Maynooth University Due Diligence Procedure. Maynooth University Foundation will complete the requisite Due Diligence checks and prepare a Due Diligence Report before a gift is accepted or an ask is made.

Responsibility for acceptance of potential or actual Level 2 gifts rests with the Director of Development and External Relations. They may refer Level 2 gifts to the Board of Directors for consideration where they deem such action appropriate.

Level 3

All one-off and cumulative gifts to Maynooth University valued between €250,000 – €2,999,999 will be subject to the Maynooth University Due Diligence Procedure. Maynooth University Foundation will complete the requisite Due Diligence checks and prepare a Due Diligence Report before a gift is accepted or an ask is made.

All Level 3 gifts will be considered by the Board of Directors.

Level 4

All one-off and cumulative gifts to Maynooth University valued €3,000,000 or more will be subject to the Maynooth University Due Diligence Procedure. Maynooth University

Foundation will complete the requisite Due Diligence checks and prepare a Due Diligence Report before a gift is accepted or an ask is made.

All Level 4 gifts will be considered by a specially convened Development Advisory Committee of the Maynooth University Governing Authority committee, following a recommendation by the Board of Directors. The advice of the Committee will be referred to the Board of Directors for a final decision.

The specially convened Development Advisory Committee of the Maynooth University Governing Authority will include:

- A member of the Audit & Risk Committee.
- At least one member of the Finance Committee.
- The Director of Development and External Relations.
- The University President, and
- The Chair of the Maynooth University Governing Authority.
- A member of the Maynooth University Foundation Board may also be invited to attend, pending a request from either the University President or the Chair of the Maynooth University Governing Authority.

Repeat Check

Recognising that one-time approval by Maynooth University Foundation, the Director of Development and External Relations, the Board of Directors, or a specially convened Development Advisory Committee of the Maynooth University Governing Authority is not in itself a guarantee that the gift or gift provider may remain risk-free in the future, steps will be taken to ensure ongoing vigilance of an approved gift.

Maynooth University Foundation will re-check each gift that the Board of Directors has considered annually until the full value of the gift has been received, or the relationship with the gift provider is deemed to have ended. Should areas of concern arise from these actions, the Board of Directors may reconsider the matter.

Details of the current Due Diligence Status of active gifts and their review date will be presented to the Board of Directors, for information, as part of the Due Diligence register.

Should any party become aware of information that may influence the Due Diligence Status of a gift, gift provider or potential gift provider, the party should notify Maynooth University Foundation to ensure the appropriate checks and authorisation are completed; a referral is made to the relevant decision-making authority.

Maynooth University Foundation will monitor the cumulative value of gifts from providers. Repeat gift providers will be subject to the process detailed above and where the cumulative value of gifts from a provider reaches or exceeds a gift threshold detailed in Section C above.

Appeals

All decisions on gift acceptance are made on a case-by-case basis in acknowledgement that the reasons to accept a gift may change over time.

Should a Maynooth University employee, gift provider or potential recipient disagree with the application of the gift acceptance procedure, the Director of Development and External Relations will review the case to determine if the gift acceptance procedure has been followed. Review findings will be presented to the Board of Directors for a final decision. There will be no further right of appeal beyond the decision by the Foundation Board.

Policy Review

Maynooth University Foundation will review this policy and related processes at least annually, to ensure they remain fit for purpose. Recommendations for amendments to the policy will be brought to the Board of Directors' policy, with possible referral to the Maynooth University Governing Authority and/or University Executive.

For more information, please contact:

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| | | | |
|----------------------------------|------------------|--|---|
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| Revision Number | 1.0 | Document approved by | Maynooth University Foundation Board of Directors and Maynooth University's Governing Authority |
| Approval Date | | Responsibility for implementation | Maynooth University Foundation Board of Directors |
| Revision Date | September 2022 | Responsibility for review and audit | Development and Alumni Relations Office and Maynooth University Foundation Board of Directors |

Appendix 1: Maynooth University Principles and Values

Maynooth University is committed to the following values:

- Scholarly rigour
- Academic freedom
- Integrity and ethical behaviour
- Collegiality, transparency, and trust
- Equality, inclusiveness, and social justice
- Operational excellence, organisational flexibility, and responsiveness
- Dignity, respect, and care for the individual

The following principles inform the development and implementation of the [University Strategic Plan 2018-2022](#):

- The University is a learning community, the strength of which lies in its talent and diversity, which can be extended and enhanced through engagement and strategic partnerships.
- The University best serves the needs of a democratic society through free and untrammelled enquiry and the formation of graduates who are educated to question, analyse, reflect, think critically, act creatively, and contribute positively to society.
- Academic freedom is a central principle of a university committed to free enquiry; it carries with it a range of academic duties and responsibilities.
- The space for critical reflection and creativity are essential features of a successful academic institution.
- A collegial learning community is established and maintained by achieving an appropriate balance between our individual interests and the common good of the University community, realising the benefits of academic autonomy and collegial interaction.
- Equality, diversity, inclusion and interculturalism underpin academic excellence and enhance research and learning.
- The University community has an obligation to put its capacities, insights, knowledge and learning at the service of society in facing the challenges of today and tomorrow.
- Mass participation in higher education requires constant attention to the effectiveness of our approaches to teaching and learning and the nature of the learning environment, to engage and challenge a more diverse student body, with very different backgrounds, abilities, interests, goals, and aspirations, supporting each student to achieve their full potential.
- The University relies on the knowledge and practices of different disciplines: a diversity of strong disciplines is essential to rigorous scholarship and learning, to effective interdisciplinarity, and to the vitality of the University.

- The University has an obligation to show leadership in sustainability, biodiversity, and care of the environment.
- The University is committed to preserve, promote, and use the Irish language, not least through the implementation of its Scéim Teanga, and to preserve and promote the distinctive cultures of Ireland, through teaching, research and in all aspects of University life.
- The University will ensure that the visibility and relevance of the Irish language continues to increase across the campus.
- Evidence and examples of best practice from across the University, and from other universities, are a fundamental resource in developing strategies for the future, encouraging and supporting academic initiative and sharing knowledge which has been tested in practice.

Appendix 2: CASE-Ross

In examining whether gifts to Maynooth University Foundation consideration will be given to the definitions set by the Ross-CASE survey. It compiles annual information on philanthropic giving to higher education institutions in the UK. These definitions centre on the source of the income and the intent behind it. The objective is to determine if the gift is philanthropic in nature:

‘all giving which does not confer full or partial ownership of a deliverable, financial benefit, or control to the funder in return for funding. The gift must be owned in full by the receiving institution once it is received.’

The CASE-Ross Survey states that if any **one** of the following exclusions apply, the gift does not constitute a philanthropic gift.

| Exclusion Criteria | Description |
|----------------------------------|---|
| Contractual relationship | A contract exists between the two parties which commits the recipient institution [the University] to provide an economic benefit for compensation, where the agreement is binding and creates a quid pro quo relationship between the recipient institution [the University] and the donor. <i>Contract income, including income for clinical trials, is ineligible.</i> |
| Exclusive information | The funder is entitled to receive exclusive information, or other privileged access to data or results emerging from the programme of activity. |
| Exclusive publication | The funder is entitled to exclusive rights to publication of research or other results through their own branded communication channels (website, report etc). |
| Consultancy included | Consultancy for the donor or a linked organisation is included as part of the agreement. |
| IP rights | The agreement assigns to the donor any full or partial rights to intellectual property which may result from the programme of activity. This exclusion extends to the provision of royalty-free licenses (whether exclusive or non-exclusive), to the funder, and to granting the funder first option or similar exclusive rights to purchase the rights to any subsequent commercial opportunities. If the written agreement includes any actual or <i>potential future</i> benefit of this kind, it must be excluded. |
| Other forms of financial benefit | Any other direct financial benefits are required by the funder as a condition of the funding (e.g., discounted courses, training etc). |
| Funder control | The funder retains control over operational decisions relating to the use of funds once the gift has been made. This includes control over appointment and selection procedures to academic posts and student scholarships. |

Appendix 3: Gift Acceptance Procedure: Due Diligence

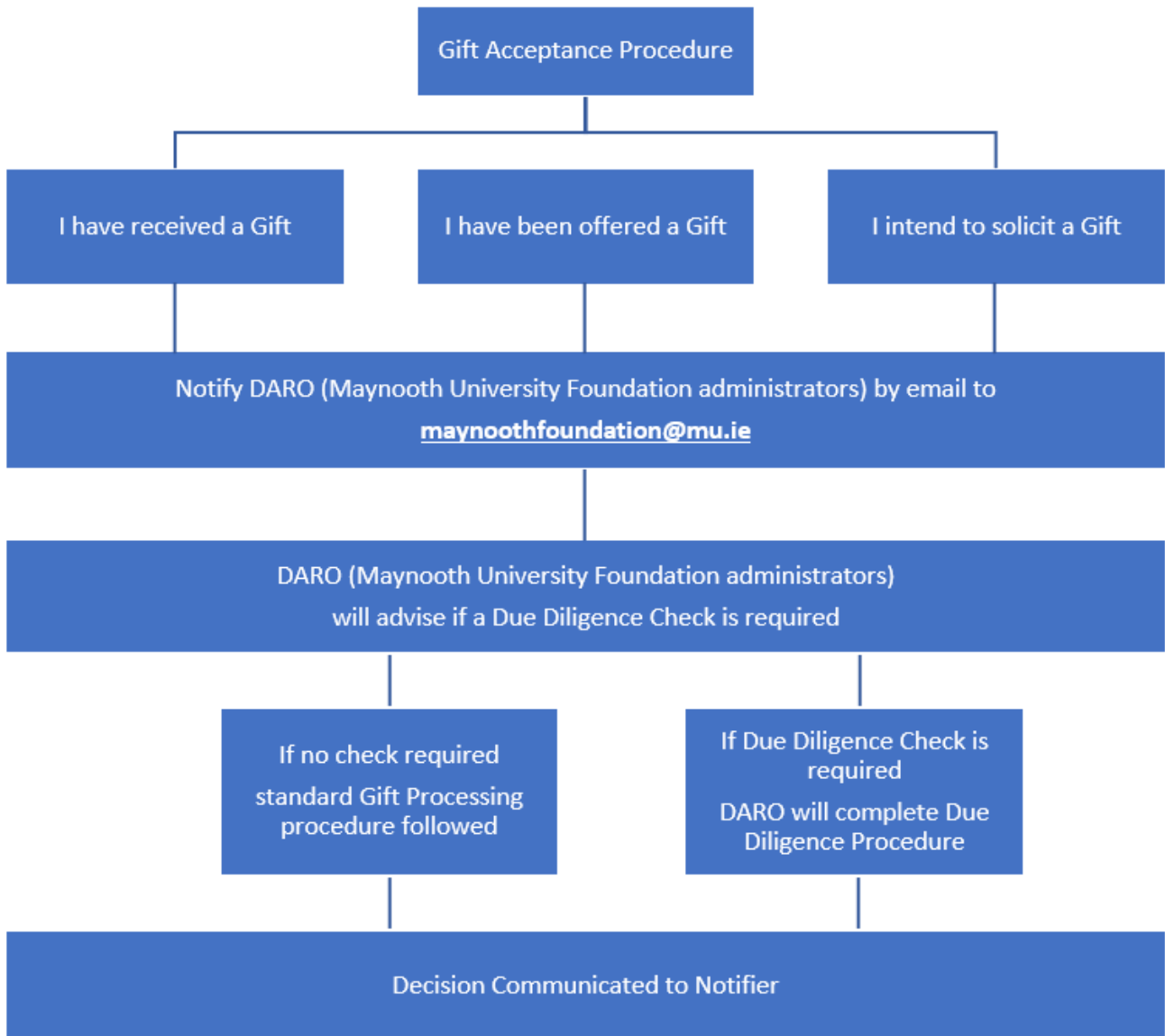
1. Introduction

Due diligence is defined as reasonable steps taken to ensure that a gift is compliant with the Maynooth University Foundation Gift Acceptance Policy and Maynooth University's Principles and Values. The procedure outlined herein provides guidance, for all stakeholders, on:

- The steps to be taken prior to gift solicitation or acceptance, and
- The reporting structures relevant to those steps.

2. Gift Acceptance Procedure

All gifts, and potential gifts, should be notified to DARO (administrators for the Maynooth University Foundation) to ensure the appropriate checks and authorisation are completed **prior** to acceptance or solicitation of a gift.



3. Due Diligence Procedure

Due Diligence Checks will be undertaken by Maynooth University Foundation. While the following criteria will be applied to determine the level of Due Diligence Check to be completed all gifts will be subject to an initial research process and, in certain cases, a risk assessment to determine whether a more formal Due Diligence check is required.

If the gift/potential gift is from an individual or organisation and meets one or more of the following criteria:

1. The gift/potential gift is valued at €10,000 or more.
 - a. Note: The €10,000 threshold applies to the value of once-off gifts and the cumulative value of gifts from an individual or organisation.
2. The gift/potential gift is unsolicited.
3. The gift/potential gift is from someone who is/was/is being considered, a Member of the Maynooth University Foundation Board of Directors, Maynooth University Governing Authority or Maynooth University Executive.
4. Maynooth University Foundation determines that further investigation is required.
5. The gift/potential gift is from a Faculty/Department/Office involved with or connected to the individual or organisation which could influence the work of the individual or organisation and/or their clients.
6. There is a link to any area listed in the Areas of Review in [Section 4, Appendix 3](#).

If criteria 2 to 4 applies:

- Maynooth University Foundation will undertake Due Diligence Check including the Areas of Review in [Section 4, Appendix 3](#).
- If no Areas of Review are identified, the Due Diligence Check is deemed to be complete.
- Outcome of Due Diligence Check communicated to notifier.

If criteria 5 or 6 applies, Areas of Review are identified, or Maynooth University Foundation determine it is necessary:

- In-depth checks using the process in [Section 4, Appendix 3](#) will be undertaken.
- A Due Diligence Report will be compiled.
- Report referred to relevant decision maker, based on gift level.
- Decision communicated to notifier.

If the gift/potential gift is from a Trust, Foundation, Charitable Entity or identified as a Grant.

- In-depth checks using the process in [Section 4, Appendix 3](#) will be undertaken.
- A Due Diligence Report will be compiled.
- Report referred to relevant decision maker, based on gift level.
- Decision communicated to notifier.

A Due Diligence Report is completed for all gifts/potential gifts where:

- The gift/potential gift is valued at €250,000 or more
 - Note: The €250,000 threshold applies to the value of once-off gifts and the cumulative value of gifts from an individual or organisation.
- The gift/potential gift would require permanent recognition such as the naming of a building.
- Areas of review are identified.
- The provider engages in activities that could pose a threat to the reputation of Maynooth University.
- The provider is resident or undertakes business in countries with UN sanctions.
- The provider is a Politically Exposed Person.

4. Areas of Review

Below is a non-exhaustive list of areas that will be examined as part of the Due Diligence Check of gift providers:

- Identification and confirmation of primary source of the gift and its intention.
- The ability of the gift provider to fulfil a promised gift.
- Pending court cases and criminal allegations involving the gift provider.
- Derivation, or potential derivation, of the gift or association of the gift provider with inappropriate or illegal activity including, but not limited to, corruption, bribery, tax evasion, fraud, money laundering, unlawful discrimination, terrorist activity or human rights violations.
- Repression, or support of repression, of civil liberties, freedom of expression and freedom of enquiry by the gift provider.
- The involvement of the gift provider in activities contrary to Maynooth University's Principles and Values.
- Whether conditions of the gift require actions that are deemed to be inappropriate, are contrary to Maynooth University's Principles and Values², create an unacceptable conflict of interest for the University, could harm the University's reputation or relationships or are otherwise deemed not to be in the best interests of the University.
- Whether legal action could arise from acceptance of the gift, for example intellectual property or copyright implications.
- Whether acceptance of the gift could result in an undue burden on the University.
- Gifts from a Trust, Foundation, Charitable Entity or identified as a Grant will be assessed for compliance of the gift provider with the relevant regulatory body³ and their most recent accounts and principal funding sources.
- The gift is ethically sound and complies with applicable University policies including [National University of Ireland's \(NUI\) Human Rights Principles and Code of Conduct](#), [Maynooth University Research Protocols for Compliance with Human Rights Principles and Codes of Conduct](#), and the [Maynooth University Research Ethics Policy](#) and all related statutes, laws, and regulations.

² <https://www.maynoothuniversity.ie/about-us/university-strategic-plan>

³ Recognised regulatory bodies include: The Charities Regulator (Ireland), The Charity Commission for England and Wales, The Office of the Scottish Charity Regulator, The Charity Commission for Northern Ireland, The USA Inland Revenue Service³, The Canada Revenue Agency.

- Any or all matters deemed appropriate for review by Maynooth University Foundation.

5. Due Diligence Report

A Due Diligence Report will be compiled by Maynooth University Foundation, and, where information is available, provide:

- An overview and, where known, the outcome of the areas of review.
 - If allegations have been made, efforts will be made to find the outcome of the allegations.
- Involvement
 - For example, as a director or shareholder in any companies that indicate concern.
- Supporting evidence
 - Such as, relevant links to businesses, government or ruling officials or other indications of concern.
- Affiliations with groups, bodies and organisations that indicate areas of review.
- Philanthropy/gifts accepted.
 - Note: Gifts accepted at other charities does not necessarily mean there is no cause for concern, as the robustness of other institutions' due diligence procedures is unknown.
- A summary review of media coverage.
- Where applicable, a summary on the state in which the gift provider is based or has a majority of their operations or business dealings.
- If the individual is linked to a ruling body—for example, a royal family or government—the ruling body and state should be reviewed against the records and reports of independent human rights organisations.
- In certain cases, it may be necessary to complete a full Due Diligence Report on a state, its record on human rights, civil liberties, terrorism, democracy, any sanctions against the country, etc.

See [Appendix 4](#) for the Due Diligence Report to be completed by Maynooth University Foundation.

Where necessary and appropriate, Maynooth University Foundation will seek additional advice from others, for example, from external suppliers of due diligence intelligence, advisors on reputational risk or geopolitical experts.

Once completed Due Diligence Reports should be submitted by Maynooth University Foundation to the gift canvasser, copying in the Director of Development and External Relations.

It is the responsibility of the gift canvasser to review the report and take the following action, as appropriate:

- Discuss the report with Maynooth University Foundation to gain further insights or request further information.

- Notify the Director of Development and External Relations if the report shows any areas of review or uncertainty.
- If there are no areas of review or uncertainty, solicitation of Level 1 and 2 gifts may proceed.
- For Level 3 and 4 potential gifts, Due Diligence Reports will be referred by the Director of Development and External Relations to the Board of Directors, and subsequently, for Level 4 potential gifts, to the specially convened Development Advisory Committee of the Maynooth University Governing Authority before solicitation may occur.

Due Diligence Reports meeting any of the criteria listed in Section 4, regardless of whether there are concerns, will automatically be referred to the Director of Development and External Relations (for referral to the Governing Authority as required).

It is the responsibility of Maynooth University Foundation to ensure that Due Diligence Reports, research notes, details of the decision process and decisions taken, and any other relevant documentation are recorded and stored appropriately.

Appendix 4: Due Diligence Report

| | |
|--|--|
| Gift Source: | |
| Notified by: | |
| Due Diligence Report Required: | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Reason for Due Diligence Report: | |
| Area(s) of Review Identified: | |
| Summary of media coverage: | |
| Other relevant information: | |
| The identity of the donor is known | <input type="checkbox"/> Accept <input type="checkbox"/> Reject |
| The gift is consistent with the University's strategy, values, and its charitable status | <input type="checkbox"/> Accept <input type="checkbox"/> Reject |
| The ultimate source of funds for this gift is clear. | <input type="checkbox"/> Accept <input type="checkbox"/> Reject |
| This gift will not give rise to any material conflicts of interest. | <input type="checkbox"/> Accept <input type="checkbox"/> Reject |
| This gift will not give rise to [substantial] harm to the ethical integrity or reputation of the University. | <input type="checkbox"/> Accept <input type="checkbox"/> Reject |
| Research completed by: | |
| Date of checks: | |
| Outcome: | <input type="checkbox"/> Accept <input type="checkbox"/> Reject <input type="checkbox"/> Request further information <input type="checkbox"/> Refer to Director of Development <input type="checkbox"/> Refer to Board of Directors <input type="checkbox"/> Refer to Governing Authority |

Appendix 5: Due Diligence Process

Areas of research focus based on category of Gift provider

| Area to Research | Category of Gift Provider | | |
|--|--|---|---|
| | Individuals (and associated organisations) | Organisations | Trust, Foundation, Charitable Entity |
| Gift Provider | Yes | Yes | Yes |
| Source of Gift | Yes | Yes | Yes |
| History of Giving | Yes | Yes | Yes |
| Relationships <ul style="list-style-type: none"> • Politically Exposed Persons (PEPs) • Groups and Bodies such as <ul style="list-style-type: none"> ○ Universities ○ Research Institutes ○ Think Tanks ○ Cultural organisations ○ Other Organisations ○ Businesses • Government or Ruling Officials • Associates • Family members that indicate concern | Yes | Yes (excluding associates and family members) | Yes (excluding associates and family members) |
| Residency and/or Area of Operation | Yes | Yes | Yes |
| Corporate Responsibility policies | N/A | Yes | N/A |
| Officeholders | N/A | Directors, Executives and Shareholders | Trustees |

Sources to be used for research based on category of Gift provider

| Sources | Category of Gift Provider | | |
|---|--|---------------|---|
| | Individuals (and associated organisations) | Organisations | Trust, Foundation, Charitable Entity |
| Review information supplied by Gift Provider | Yes | Yes | Yes |
| Open internet research including social media | Yes | Yes | Yes |
| News monitoring and databases | Yes | Yes | Yes |
| Website/s <ul style="list-style-type: none"> • Individual and/or Organisation's • Associated Individuals and/or Organisations | Yes | Yes | Yes |
| Risk Data <ul style="list-style-type: none"> • Lexis-Nexis Due Diligence Attributes • Vision-Net | Yes | Yes | Yes |
| Legal Information for relevant jurisdiction <ul style="list-style-type: none"> • Courts Desk (news and legal intelligence platform built covering UK & Irish legal data) | Yes | Yes | Yes |
| Company Data (direct and relevant in-direct companies) <ul style="list-style-type: none"> • Companies registry for relevant jurisdiction • Financial records/annual reports <ul style="list-style-type: none"> ○ Provided, publicly available or acquired from relevant companies' registry | N/A | Yes | Yes |
| Disqualified Directors search for relevant jurisdiction | Yes | Yes | Yes |
| PEP databases <ul style="list-style-type: none"> • SIPO - Ireland • Stubbs Gazette | Yes | Yes | Yes |
| Regulator of charities for relevant jurisdiction <ul style="list-style-type: none"> • Ireland • UK | N/A | N/A | Yes |

| | | | |
|--|-----|-----|-----|
| Academics with knowledge of subject | Yes | Yes | Yes |
| Corporate Watch | N/A | Yes | N/A |
| Transparency International | N/A | Yes | N/A |
| Sanctions <ul style="list-style-type: none"> • Central Bank of Ireland • Department of Jobs, Enterprise, and Innovation - Sanctions • Department of Foreign Affairs and Trade • EU Financial Sanctions • EU Service for Foreign Policy Instruments (FPI) • EU Common Foreign and Security Policy (CFSP) • UK Treasury • UN Security Council • UN Global Compact | N/A | Yes | N/A |
| Watch Lists <ul style="list-style-type: none"> • Europol • Interpol • FBI | Yes | Yes | N/A |
| Human Rights <ul style="list-style-type: none"> • Human Rights Watch • Business- Human Rights • Amnesty International | N/A | Yes | N/A |
| Ethical Consumer | N/A | Yes | N/A |
| Other sources as relevant | Yes | Yes | Yes |