

## Donation Acceptance policy

### 1 Introduction

- 1.1 This document sets out ARTIUM's due diligence policy and policy on the acceptance of Donations.
- 1.2 This policy outlines the ethical nature of ARTIUM's due diligence processes and the acceptance of money that is used to advance ARTIUM's strategic objectives.
- 1.3 This policy covers the acceptance, recording, oversight, and reporting requirements related to all Donations received.
- 1.4 This policy should be read in conjunction with the Privacy Notice and GDPR Compliance policy and the Donor Recognition policy.

### 2 Definitions. The following definitions are used in this policy:

**Donor** is any person who has made a monetary donation through the ARTIUM platform.

**Donation** is transfer of money to ARTIUM made through the ARTIUM platform.

**Project** is the work or activities which is to be undertaken upon the award of funding.

**Scholar** is the named person who has proposed a Project for which funding has been awarded or who is proposing a Project for which funding is requested.

### 3 Acceptance Principles

- 3.1 The source of the Donation must be consistent with ARTIUM's strategic aims and values.
- 3.2 The Donation must comply with all statutes, laws, and regulations in force.
- 3.3 Reasonable steps must have been taken to determine that the Donation was not illegally or immorally obtained, or breaches sanctions regulations at the time of Donation.
- 3.4 The Donation must not create an unacceptable conflict of interest for ARTIUM with regard to issues including, but not limited to:
  - 3.4.1 the ability of ARTIUM or its Scholars to pursue free and independent academic enquiry.
  - 3.4.2 the ability of a single person to be both a Scholar and a Donor.
- 3.5 The Donation must not result in an unplanned financial or operational liability.
- 3.6 The Donation should not create unwarranted reputational and/or ethical risk for ARTIUM.
- 3.7 ARTIUM does not accept Donations with restrictions or conditions (beyond those offered by ARTIUM at the time of donation), including time-limited donations or loans. Any condition or restriction placed upon a Donation at the time of donation cannot be later amended or changed.
- 3.8 ARTIUM does not accept donations of property, real estate assets, or cryptocurrency.

### 4 Acceptability of Donations

- 4.1 No money gained in another country through behavior that is illegal in England and Wales, even if the behavior is legal in the country where the money was gained, will be accepted.
- 4.2 When a donation is found to be unacceptable, it will not be accepted.
- 4.3 When a donation fails a due diligence check as outlined in Clause 5, it will not be accepted.

### 5 Due Diligence Procedures for Review of Donations

- 5.1 Generally, unless there is cause for further investigation, ARTIUM will not undertake proactive or enhanced due diligence screening.
- 5.2 ARTIUM recognises that legitimate giving vehicles (including but not limited to Charities Aid Foundation/Charities Aid Foundation USA, Donor Advised Funds, and ArtFund) are often used to protect Donors' identities and donations from these intermediary organisations who have completed satisfactory due diligence will be accepted on that basis.

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- 5.3 Donations below £10,000, whether single donations or the cumulative result of recurring donations, will usually be accepted without further investigation. If any reputational or other risk is identified proactively, due diligence checks will be undertaken.
- 5.4 Due diligence checks will be undertaken for all Donations between £10,000 and £100,000, whether single donations or the cumulative result of recurring donations.
- 5.5 Enhanced due diligence checks will be undertaken for all Donations exceeding £100,000.
- 5.6 Notwithstanding the above, enhanced due diligence checks will also be undertaken whenever there is a known risk factor, including:
  - 5.6.1 unsolicited donations;
  - 5.6.2 anonymous donations or those made through an intermediary;
  - 5.6.3 donations from foreign sources or in foreign currency;
  - 5.6.4 donations of atypical value;
- 5.7 Due diligence checks include:
  - 5.7.1 source of wealth and/or origin of funds;
  - 5.7.2 reputational risks of receipt linked to existing philanthropy in the public domain;
  - 5.7.3 potential major conflicts of interest;
  - 5.7.4 unacceptable operational or financial burdens caused by gift receipt.
- 5.8 Enhanced due diligence checks include all of the above plus:
  - 5.8.1 advanced internet searches for key words;
  - 5.8.2 company ownership;
  - 5.8.3 directorships;
  - 5.8.4 source of wealth/investments;
  - 5.8.5 government links;
  - 5.8.6 family background;
  - 5.8.7 company background.

## 6 Accountability and Responsibilities of Artium

- 6.1 ARTIUM has the responsibility to ensure that the sources of Donations and the way in which Donations are received and processed do not in any way undermine ARTIUM's or Donors' reputation or create any unacceptable conflicts of interest.
- 6.2 In order to comply with anti-bribery, anti-money laundering, and financial accounting procedures:
  - 6.2.1 A record of all decisions will be kept, and will be updated each time a decision is made. Every entry in the record will include:
    - 6.2.1.1 What was agreed, including the outcome of any votes.
    - 6.2.1.2 Any actual or potential conflict of interest, and mitigation steps.
    - 6.2.1.3 Risk identification and mitigation.
    - 6.2.1.4 Any professional advice sought, and how it informed the decision.
    - 6.2.1.5 Decisions delegated to others, and the terms of delegation.
    - 6.2.1.6 Date and time, attendance and apologies, confirmation of quoracy.
    - 6.2.1.7 Reasons for the decision.
  - 6.2.2 A record of concerns and complaints will be kept, and will be updated each time a concern or complaint is raised. Every entry in the record will include:
    - 6.2.2.1 The details of the concern or complaint.
    - 6.2.2.2 The actions taken in response.
    - 6.2.2.3 Lessons learnt.
    - 6.2.2.4 Any changes to policy and procedure to prevent it happening in the future.
- 6.3 All decisions will be subject to periodic review, and the thresholds in Clause 5 will take into account a Donor's cumulative giving.

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## 7 Donation Acknowledgments

- 7.1 Donors will be provided with appropriate acknowledgement and receipt of their donation and provided with updates as to the progress enabled as a result of their donation, in a timely manner—either personally or via online updates to which donors can be directed.
- 7.2 Any financial information provided by ARTiUM to Donors does not constitute formal financial advice and in no even will ARTiUM be liable to you for any direct, indirect, special, incidental, consequential, exemplary or punitive damages, losses or causes of action, or any other type of damage, arising from your use of the information provided.
- 7.3 For more information the acknowledgment of Donations, see the Donor Recognition policy.

## 8 Jurisdiction

- 8.1 This policy is governed by the laws of England and Wales. All matters relating to the policy are subject to the exclusive jurisdiction of the courts of England and Wales.
- 8.2 If any provision of this policy is found by a court or other legitimate body to be illegal, invalid, or unreasonable, it will not affect the remaining policy which will continue in force.

## 9 Equality, Diversity, and Inclusion

- 9.1 This policy has been designed to ensure that no one receives less favourable treatment due to protected characteristics.

## 10 Contact and Policy Review

- 10.1 To discuss this policy, make suggestions, or request support in relation to matters covered in this policy, please contact [artium@durham.ac.uk](mailto:artium@durham.ac.uk).
- 10.2 This policy will be reviewed at least annually and updated in response to feedback and evolving best practice.

### Annex: Version control

Version	Date Implemented	Changes
1.0	2025-05-27	Initial version.