



SOCIETY OF ANTIQUARIES OF LONDON

THE SOCIETY OF ANTIQUARIES OF LONDON GRANTS AND DONATIONS POLICY

1. Introduction

The Society of Antiquaries of London (SAL) receives no public funding and is reliant on individuals, companies, trusts and foundations and legacies to support its activities.

SAL actively seeks private donations and trust funding to support core activities, including the conservation and care of its assets as well as activities to provide greater public access. SAL encourages philanthropic support in line with its charitable status, and views growing such support as a key element in being able to fulfil its mission. In order to meet current and future financial needs, it is recognised that SAL must be proactive and energetic in its approach to fundraising, seeking supporters not only from within the UK but also internationally.

SAL is committed to ensuring that its fundraising activities are conducted with integrity and public accountability. Whilst fundraising is a priority for the organisation, this objective must be considered alongside the potential risks to public trust.

2. Policy Scope

This Grants and Donations policy is designed to ensure due diligence and an appropriately documented, timely and efficient process which can be undertaken in a manner conducive to fundraising which is both effective and ethical. SAL actively seeks and can accept philanthropic donations from the following sources in accordance with this policy:

- Donations from individuals
- Grants from charitable trusts and foundations
- Donations and support from companies
- Donations from legacy bequests

This policy applies to the acceptance of monetary grants and donations made by an organisation or individual for the benefit of SAL. For the avoidance of doubt this does not include donations made by visitors using donation boxes, contactless donations points, or by purchasing admission or event tickets with a gift aided donation. Appropriate procedures concerning gifts of Library and Museum objects or collections are carried out by the Library & Collections Committee.

3. Context

In principle, members of Council (the charity's Trustees) are expected to accept money given to SAL for purposes consistent with the charity's objectives and values. In addition, the UK Bribery Act 2010 requires the charity to ensure that the receipt of a donation is not related to some inappropriate advantage that be afforded to the donor, such as the award of a contract.



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Other relevant legislation includes the Proceeds of Crime Act 2002, the Terrorism Act 2000 and the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 under which it is an offence to receive, retain or convert money or property known or reasonably suspected to be the product of criminal activity.

SAL has consulted the guidance issued by the Charity Commission for England & Wales Charities: due diligence, monitoring and verifying the end use of charitable funds and the Fundraising Regulator: Code of Fundraising Practice (June 2021) in the drafting of the policy.

4. Procedure for grants and donations

Initial due diligence will be conducted by the Development team for all proposed donations over £5,000 and will be subject to review with the Head of Development, CEO and, if necessary, members of Council (Trustees).

The CEO will agree one of the following options and may consult the President and Officers to advise on reputational risk prior to deciding either:

- 3.1 to approve the progression of the donation or funding
- 3.2 to reject the progression of the donation or funding
- 3.3 to request further research or due diligence as appropriate
- 3.4 to refer the case to Council

Any proposed donation from a new donor in excess of £20,000 shall be referred to Council.

5. Risk Assessment

Should a prospective funder be deemed to be contentious, the Head of Development will consult with the Senior Management Team as necessary and make a recommendation to the General Secretary CEO about how to proceed.

Where necessary, further information and advice will be sought from third parties, such as professional search firms, international due diligence providers, and individual contacts who may have further knowledge of prospective supporters.

The Head of Development and CEO will seek the further advice and agreement of the President, the Officers and Members of Council as appropriate. Should concerns be raised under the guidelines above about a donation, grant or legacy that has already been accepted, the Head of Development and the CEO will review whether it is appropriate to retain the gift.



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6. Role and responsibility of Members of Council

Council (the charity Board of Trustees) shall be required to approve or ratify grants and donations to SAL where concerns have been raised by the Head of Development and CEO. It is necessary for the ultimate decision to be separate from the Head of Development, who manages the relationship with Funders and Donors on SAL's behalf.

The Head of Development and CEO will be responsible for conducting the necessary research and background checks to inform the decision to be made by Council. Council may require further research before it reaches a decision.

The decision whether to accept or reject a potential Grant/Donation shall be the responsibility of the Council. If a decision is urgent, Members of Council can respond by email.

7. Acceptance Principles

The following principles will be borne in mind by staff and Council when making any decision to accept donations:

6.1 SAL recognises some sources of support or potential support may create a risk of causing significant damage to SAL's reputation or may be from organisations whose activities are at odds with those of SAL.

6.2 SAL will consider each Trust/Foundation, pledged donation or sponsorship carefully in accordance with the due diligence reasonably available to the Head of Development, CEO and Senior Management Team.

6.3 It is for the Council to decide in the light of the information before them whether to accept financial support where concerns are raised.

6.4 SAL will not accept funds where:

(a) The donation is made anonymously through an intermediary who is not prepared to identify the donor to anyone at SAL

(b) There are reasonable grounds to suspect that the donor has acted unlawfully in acquiring the funds from which the donation is to be made, including money laundering the proceeds of crime.

(c) Acceptance of the funds would, in the judgment of the Council, significantly damage the effective operation of SAL in delivering its mission whether by:

i) creating unacceptable conflicts of interest;

ii) causing material damage to the reputation of SAL;

iii) causing undue harm to SAL's relationship with other benefactors, partners, visitors or stakeholders;



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iv) or in some other way.

8. Restricted Donations

Where a gift is proposed to be made for restricted purposes, the Head of Development, prior to accepting such a donation, will consult with the CEO and Senior Management Team on whether the proposed project would be an appropriate project for SAL in the circumstances including:

- whether the proposed project is an effective way of furthering SAL's mission
- the intended impact of the proposed project;
- the anticipated financial cost of involvement in the proposed project;
- the impact the proposed project would have on SAL's reputation;
- whether the proposed project could be carried out in a manner that is lawful and consistent with relevant guidance.

8. Date of Approval

The policy was reviewed by Council on 8 December 2022. It will be reviewed in two years' time.

See Guidance relevant to the Assessment of Grants & Donations to SAL

FUNDRAISING REGULATOR: CODE OF FUNDRAISING PRACTICE

<https://www.fundraisingregulator.org.uk/sites/default/files/fr-code/English-Code-of-Fundraising-Practice-October-2019.pdf>

COMPLIANCE TOOLKIT: PROTECTING CHARITIES FROM HARM Chapter 2: Due diligence, monitoring and verifying the end use of charitable funds:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550682/Chapter_2_Summary.pdf