

THE
HISTORIC ENGLAND FOUNDATION

IN SUPPORT OF  Historic England

Ethical Fundraising and Partnerships Policy

1. Introduction

- 1.1. The Historic England Foundation is pleased to collaborate with external organisations and individuals to achieve shared objectives that observe our corporate values.
- 1.2. This policy has been devised to ensure clarity and openness to those from whom we will accept either money or other benefits, those with whom we will collaborate and form partnerships as well as our wider audiences and stakeholders.

2. About The Historic England Foundation

- 2.1. The Historic England Foundation exists primarily to support the work of Historic England - the public body that helps people care for, enjoy and celebrate the history that surrounds us now, and in the years to come.
- 2.2. Historic England is the public body that champions and protects England's spectacular historic environment. Through our work we help people across England to understand, value and enjoy it.
- 2.3. We champion historic places so that everyone, from individuals and communities to government and homeowners can look after and care for heritage. We make sure they understand and appreciate the benefits England's heritage brings and why it should be respected, cherished and enhanced.
- 2.4. The Historic England Foundation cares passionately about these places, the stories they tell, the ideas they represent and the people who live, work and play among them.
- 2.5. We open up heritage for everyone using digital resources, media campaigns, our archive, publishing and exhibitions.

3. Key principles

- 3.1. The Historic England Foundation is prepared to enter into a funding relationship with an individual or organisation if, following appropriate levels of due diligence research, it is satisfied that:
 - a. All decisions around the funding relationship are taken in accordance with Nolan's "7 principles of public life" (see Appendix 1);
 - b. The relationship will enable and not compromise our work as laid out in the Historic England Corporate Plan, which is available [here](#);
 - c. The relationship will not compromise Historic England's statutory role nor any legal and ethical standards that apply to the organisation's statutory and other public duties, nor will it compromise the Historic England Foundation's responsibilities as a Registered Charity;

- d. The relationship does not present a conflict of interest for Historic England or compromise our integrity and is congruent with our values of being Expert, Constructive and Championing;
 - e. The relationship does not present disproportionate risk to Historic England's reputation;
 - f. The relationship would provide sufficient benefit to Historic England, in support of its statutory duties and corporate objectives, and without detriment to the wider public interest; this benefit must outweigh any risk of disadvantage to Historic England through the association with the third party;
 - g. Any benefit to the prospective supporter associated with the donation is clearly understood and stated (for example, in a gift acceptance agreement, a donation form or a donation receipt confirmation), and no further benefit could be expected or assumed;
 - h. The Historic England Foundation has satisfactory responses to its enquiries about the identity and background of the prospective supporter. This will include investigating the source of funds in order to comply with the Proceeds of Crime Act 2002, the Bribery Act 2010, and the Money Laundering Regulations 2017.
- 3.2. Offers of financial support should only be refused in exceptional circumstances. However, The Historic England Foundation retains the right to refuse a grant, donation or sponsorship where the due diligence research demonstrates that the proposed partnership would be in conflict with our statutory and public duty roles.

For example, it may be evident that acceptance would:

- Lead to the loss of funding from other supporters / funders (including statutory) to the same value or more;
- Result in the loss of staff or impact on our ability to recruit new staff;
- Impact on our ability to make recommendations to Government in relation to planning and listing cases.

4. Scope

- 4.1. Subject to the exceptions below, this policy applies to all partnerships, associations, sponsorships, significant donations, grants and other contractual relationships that The Historic England Foundation may become involved with, including donations in-kind (such as time, equipment, facilities, people) and commercial relationships (such as corporate sponsorships, corporate partnerships, and licensing). The policy does not apply to contracts for goods or services at market rates.
- 4.2. It applies to relationships with individuals, companies, trusts, and private foundations but not to statutory bodies such as the Heritage Lottery Fund or any UK government support.
- 4.3. The principles of the policy should apply to decisions to accept any payments and in-kind donations of any value. Historic England's Executive Team approval only applies to transactions in excess of £25,000 in value, except where the supporter's cumulative giving exceeds £25,000, or where additional due diligence research has been commissioned following initial checks concerning the prospective supporter or the origins of the money. Any gift

below £25,000 where additional due diligence research has not been deemed necessary will be determined by Historic England's Director of Corporate Strategy and Business Improvement and the Head of Partnerships and Philanthropy.

- 4.4. This policy does not apply to any collections management activity, including acquisitions, disposals, borrowed or loaned items for exhibition purposes. These activities are governed by their own policies and procedures.

5. Procedure

- 5.1. Before any contractual commitment is entered into by The Historic England Foundation, the Historic England Partnerships and Philanthropy Team will carry out an initial assessment through desktop research using public resources, following the Due Diligence Guidelines and completing the relevant Due Diligence Checklist.
- 5.2. Additional research will be triggered if the initial assessment indicates any areas for concern.
- 5.3. The results of both the in-house research and any additional due diligence research will be considered by the Head of Partnerships and Philanthropy who will seek advice as required from colleagues, depending on the nature of the risk identified.
- 5.4. All prospective supporters with a proposed gift level of over £25,000, or those under this gift level that have triggered additional due diligence, will be presented to Historic England's Executive Team for consideration. The risk of the partnership will be classified as high, medium or low based on the inherent nature of the business practice, public perception of the prospective supporter and Historic England's statutory responsibilities.
- 5.5. High-risk potential partnerships will be referred to Historic England's Business and Finance Committee and the Trustees of The Historic England Foundation (if relevant) for a decision.
- 5.6. Medium-risk potential partnerships (and approved high risk partnerships) will undergo a risk mitigation exercise involving the Partnerships and Philanthropy Team, project / programme delivery teams and other experts as required.

6. Conditions

- 6.1. The Historic England Foundation will reserve the right to withdraw from any relationship if:
- a. It becomes apparent that information given to The Historic England Foundation with regards to the supporter's position was misleading in a way that materially affects our assessment of their suitability under this policy;
 - b. As a result of the supporter's actions subsequent to entering into the relationship, other stakeholders or funders withdraw their support.

7. Transparency

- 7.1. A full list of supporters giving over £1,000 in a particular financial year will be maintained on the Historic England website and in The Historic England Foundation's Annual Accounts unless anonymity is requested.

Appendix 1 – Nolan’s Seven Principles of Public Life

Selflessness

Holders of public office should act solely in terms of the public interest.

Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty

Holders of public office should be truthful.

Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.