

# GIFT ACCEPTANCE POLICY

---

## Introduction

All those involved in fundraising for charitable organisations, including universities and colleges, whether they are fundraising professionals or volunteers, have a responsibility to donors, to the organisation, and to the cause that is being supported. At the heart of fundraising ethics lies the need to ensure that our mission, our sense of personal integrity, and the trust of the donor are not violated. This requires openness, transparency and respect. Further, there is a need for Univ to ensure that it does not expose itself by accepting donations from questionable or inappropriate sources. To this end this Gift Acceptance Policy has been created for use by University College, and in particular its Development Office.

## Gift Acceptance Policy

1. The Governing Body delegates the acceptance of gifts to the Development and Communications Committee, save that for all Gifts over £1m, or that are likely to give rise to significant public interest, the Master will seek the advice of the Bursar and the Senior Tutor and will present that to the Governing Body for decision. In such cases, the Development Director will ask the University to carry out a due diligence review on behalf of the College and will present the findings of that review to the Governing Body before a final decision is made.

In the case of major donors identified with a high level of risk, the Development Director will request they be reviewed by the College's Due Diligence Review Group (CDDRG) prior to any advanced gift negotiations taking place.

2. Substantial Gifts of less than £1m should be reported and discussed as follows:

New gifts of £10,000-£99,999 shall be subject to an internal due diligence process conducted by the Development Office.

Single or accumulated gifts of £100,000 (gross) shall be reported to the Development and Communications Committee.

Gifts of £100,000-£1m (gross) should be discussed formally by the Master, Bursar, Senior Tutor and Development Director, and approved by the Development and Communications Committee.

3. Charity law places certain constraints on charities, and in recommending acceptance of any gift the Development Director shall make available to the Master, the College Committee and the Governing Body information under the following headings:

- (a) Are the purposes of the gift compatible with the purpose of the College as defined in its Statutes?
- (b) Do the purposes of the gift fall within the College's policies and strategic plan?

(c) What additional costs or burdens, if any, would acceptance of the gift create for the College?

(d) Is there published evidence that the proposed gift arises in whole or in part from activity that

- evaded taxation?
- violated international conventions that bear on human rights?
- limited freedom of inquiry?
- suppressed or falsified academic research?

In the case of unproven allegations of criminality against a potential donor, no account shall be taken of mere rumour, but care will be exercised in accepting any gift, or continuing negotiations towards a possible gift, where there is a risk of significant damage to the College's reputation.

(e) Is there evidence that the proposed gift, or any of its terms, will

- require action that is illegal?
- limit freedom of inquiry?
- suppress or falsify academic research?
- create unacceptable conflicts of interest for the College?

(f) Is there evidence that acceptance of the proposed gift or compliance with any of its terms will damage the College's reputation, including deterring other benefactors?

Although Gifts that are worth less than £100,000 may not be subject to detailed scrutiny by the Development Director, Bursar and Senior Tutor, acceptance will nevertheless be considered explicitly against these ethical guidelines and according to the internal due diligence process mentioned in Point 2 above.

4. All members of the Governing Body involved in fundraising are encouraged to consult the Development Director at an early stage in their discussions with a potential donor. The Development Director can advise on the use of these guidelines, and consultation will also reduce the risk of uncoordinated approaches to a single potential donor; spread familiarity with the process for accepting Gifts; and may allow an early warning of anyone unknowingly approaching a potential donor whose donation is not likely to be acceptable.

## **Annexe to Gift Acceptance Policy**

The College's Due Diligence Review Group (CDDRG) for consideration of major donors identified with a high level of risk comprises:

- Development Director
- Finance Bursar
- College Accountant
- A Member of the Development and Communications Committee

The internal due diligence for gifts between £10,000 and £99,999 that is referred to in Point 2 of the policy refers to:

- background checks from publicly available information
- checking existing information held on the College's alumni database
- requesting further background checks from the University of Oxford Development Office's Research Services