



Lincoln College

Donations Acceptance Policy

Lincoln College, Oxford, is a registered charity (no. 1139261) which, as part of its continuing activities, seeks to raise philanthropic funds for annual expenditure, endowment, and capital projects in accordance with its charitable objects. In so doing, it follows guidance from its regulator, the Charity Commission, and the Fundraising Regulator's Code of Practice.

Background and purpose

This Gift Acceptance Policy has been approved by the Governing Body of the College to provide all who may be concerned with the solicitation and acceptance of gifts (including College Officers, the Development Committee, and the Development Office) with guidance on the acceptance or refusal of philanthropic support and sponsorship of the College and its activities and provide assurance to stakeholders

Philanthropy at Lincoln

Lincoln College seeks funding from individuals and organizations both in the UK and internationally who have an active relationship with the College or from those individuals and organizations that have been carefully identified as having a long-standing or potential interest in supporting a specific activity or initiative. It recognizes that donations play an important part in furthering the College's charitable aims of teaching and research, and that some of these activities would be diminished without such philanthropy.

The College also recognizes that as a registered charity, it has a responsibility to ensure that the receipt of donations does not compromise its integrity, charitable purposes or reputation. In assessing these matters, the College will be guided by the Charity Commission advice and by guidelines used by the University of Oxford's Committee to Review Donations and Research Funding (CRDRF).

Methods of solicitation

Gifts to the College are currently solicited by a range of fundraising methods which include, but are not limited to, the following:

- Face-to-face solicitation
- Telephone fundraising

- Direct mail appeals
- Email and digital appeals
- Legacy promotion

Acceptance of gifts

Responsibility for the acceptance and refusal of gifts rests ultimately with the Governing Body of the College, even when decision-making has been delegated. The Governing Body must be able to demonstrate that it has acted in the best interests of the College in each case.

The Governing Body is responsible for approving this policy which sets out the framework within which gifts and legacies to the College may be accepted. The policy will be kept under review by the Planning Committee as required and, in any event, reviewed not less frequently than every five years.

The Development Director will be responsible for providing information to the Governing Body through the Development Committee and Planning Committee about the solicitation and acceptance of gifts. The Development Director will regularly provide the Development Committee, Planning Committee and the Governing Body with a report of all new major gifts made or pledged in support of the College. The Governing Body may also refer donations to, or seek guidance from, the University's Committee to Review Donations and Research Funding.

The College accepts gifts in accordance with the following principles:

- Consistency with charitable objects: gifts to be consistent with the College's charitable objects.
- Academic independence: gifts to be accepted on the basis that donors have no influence over the academic freedom and independence of the College.
- Reputational risk: the College will balance the benefits of accepting gifts against reputational risks to the institution.
- Procedure for acceptance: gifts to be accepted in a timely fashion, subject to approval of the terms of the donation in accordance with the delegated authority outlined in the following section, with due consideration given to speed and accuracy.
- Anonymity: gifts to be accepted only if the identity of the donor (or, in the case of corporate donors, the ultimate beneficial owner) is known to the College. Although donors may reserve the right to remain anonymous in published donor lists, it is important that the identity of the donor is known to the College so that it may undertake due diligence appropriate to their gift. This would also apply if a donation is received through a third-part intermediary.
- For donations given for a specific purpose above £25,000, a Memorandum of Understanding is required to ensure that both donor and Governing Body agree to the terms and purpose of the donation.

Delegated authority for gift acceptance

In general, the assumption is that large donations (> £25,000) from new donors, or donations with a restricted purpose, will be notified to the Governing Body via the relevant Committee, to ensure that the College can agree to the terms of the donation or suggest appropriate amendments, consistent with the principles above.

For new donors of such donations, the Development Director will provide a short biographical description of the donor and their relation to Lincoln College. The University's Committee to Review Donations and Research Funding will be asked to review gifts of more than £100,000 made by donors who have not previously given to Lincoln or the University.

The Governing Body delegates authority for the acceptance of gifts to the Governing Body, Rector (or Sub-Rector), Development Director, or Bursar according to the following levels:

- Gifts above £1,000,000: Governing Body
- Gifts of £125,000–£1,000,000: Rector, Development Director, and Bursar
- Gifts of £25,000–£125,000: Development Director

Gifts under £25,000 for established projects or the Annual Fund are considered part of the College's Annual Fund fundraising activity and may be accepted by the Development Director or Development Office staff.

Risk management

The College, through the Development Committee and Planning Committee, will agree and review a risk management procedure for gifts on a regular basis which will be implemented by the Development Office across its fundraising programmes and activity.

The main areas for attention are as follows:

- Where there are reasonable grounds to believe that the donation might be associated with illegal activities (including under the Sanctions and Anti-Money Laundering Act 2018, Proceeds of Crime Act, the Bribery Act or antiterror financing legislation).
- Where there are reasonable grounds to believe that acceptance of the funding or any of its terms may not be in the best interests of the College in relation to any of the following: its beneficiaries, its academic freedom and independence, any conflict of interest, future financial liabilities, reputational risk or cost, dependence on conditions, the vulnerability of donors, and deterrence of other donors from future support.

Refusal of donations

The Governing Body must act in the best interest of the College when deciding whether to accept, refuse, a particular donation.

The Governing Body will refuse the offer of a donation when, in the Governing Body's reasonable opinion:

- The purpose of the donation is not consistent with the College's charitable objects;
- The proposed donation or any of its terms will meaningfully impinge on academic freedom;
- There is doubt about the legality of the source;

The Governing Body may decide to refuse the offer of a donation when, in the Governing Body's reasonable opinion, the benefits associated with the donation are outweighed by risks associated with the donation. Such risks include, but are not limited to, the following:

- The purpose of the donation does not align with the College's fundraising objectives;
- There is real doubt as to the appropriateness of the source of the donation.
- The Governing Body considers that the donation or any of its terms will either do serious harm to the reputation of the College; or will seriously harm the College's relationship with other benefactors, partners, staff, students or other stakeholders.

In the event of a donation being declined by the Governing Body, the College, through the Development Office, will keep a record to indicate why it was refused and any such refusal will be communicated officially and appropriately to the donor(s) at the earliest possible opportunity.

Other considerations

Vulnerable donors: if information comes to light that a donation has been received from an individual who may lack mental capacity to make a decision to donate, the College will decline or return the donation.

Recognition of donors: Lincoln wishes to recognize the generosity of donors to the College. The benefits and services provided as part of this stewardship are at the sole discretion of the College and the Governing Body or its delegated committee reserves the right to remove access to the benefits and services, either temporarily or permanently.

Approved; Hilary 2025