

# Donor Acceptance Policy

<b>Date last updated</b>	January 2026
<b>Reason for last update</b>	Regular review of policy/QA6
<b>Next review date</b>	January 2027
<b>Version</b>	2.1
<b>Last amended by</b>	Kate Parrinder
<b>Amendments</b>	<ol style="list-style-type: none"> <li>1. UPDATED: changed name of policy from "Gift Acceptance Policy"</li> <li>2. ADDED: clarification in section 2 about types of funding</li> <li>3. ADDED: new section 6 on donor due diligence</li> <li>4. DELETED: multiple sections to avoid overlap or conflict with the recently drafted Named Fund Agreement template, specifically: "Fund options and philanthropy services", "Fund advisors", "Succession arrangements", "Management of investments", "Cost contributions", "Fundraising activities and fund expenses", "Fund inactivity and closure" and "Ultimate responsibility and resolution of disputes" (and note added to 2.4 referring to the Named Fund Agreement)</li> <li>5. UPDATED: renumbered sections 7 and beyond</li> <li>6. UPDATED: Explanation of terms used in this policy – some removed that corresponded to removed sections of the policy</li> </ol>
<b>Owner</b>	Kate Parrinder
<b>Job title</b>	Deputy CEO
<b>Approved by Oxfordshire Community Foundation Board of Trustees</b>	April 2026
<b>Related procedures (if applicable)</b>	Thanking and banking process; Named Fund Agreement

## Purpose

Oxfordshire Community Foundation (OCF) is proud that donors choose it as the route for their philanthropy. The purpose of this policy is to set out for donors the basis on which the foundation accepts gifts to support them to give effectively.

## Introduction

Oxfordshire Community Foundation is a registered Charitable Incorporated Organisation (CIO number 1151621) benefiting communities particularly, although not exclusively, in Oxfordshire. It is governed by a board of trustees. A staff team led by the Chief Executive has delegated responsibility for day-to-day activities.



OCF nurtures philanthropy, engages partners and builds a culture of giving to benefit our area now and for generations to come. This is done through donors giving through donor-advised funds, collective themed funds or making unrestricted donations for OCF to use at its discretion.

A donor-advised or named fund can be set up by an individual, a family or an organisation, often in the donor's name or that of someone or something with whom they feel closely associated. Alternatively the fund can be anonymous. Donors may set up a named fund with a gift of a minimum value set by the board from time to time. Donors who establish a named fund will enter into a Named Fund Agreement, which sets out the detailed terms governing the operation, management, investment and closure of the fund. Where provisions in this policy overlap with the Named Fund Agreement, the terms of the Agreement take precedence.

Themed or collective funds are an alternative type of restricted fund supported by one-off or regular gifts from a number of donors who share a common interest. Other funders use OCF's services to administer rounds of grant funding on their behalf, in particular statutory funders or trusts and foundations, and these are treated as collective or themed funds.

Other donors give to OCF's unrestricted funding programmes, such as Patrons and Friends, which are used to fund OCF's core running costs. Unrestricted donations may also be allocated to grant-making at OCF's discretion, usually as part of a themed or collective fund.

## Legal and fiscal context for gift

All assets donated to OCF are irrevocable gifts, including those restricted to named funds/donor-advised funds. They become the foundation's property (unless specific alternative provision is made in line with paragraph 5.4 below), and its board carries the legal responsibility for ensuring that donations are used for charitable purposes in line with any restrictions agreed with donors.

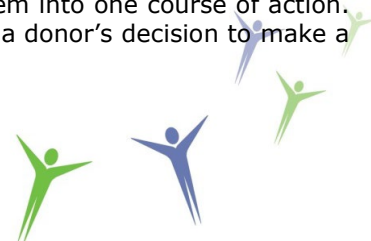
Subject to compliance with HMRC regulations, cash donations from UK taxpayers are eligible for Gift Aid, which means that the foundation can claim an additional 25% of the value of the gift (at current rates). Gift Aid received is added to funds alongside the original donation unless otherwise agreed with the donor. Higher-rate taxpayers may be able to claim additional tax relief on their donations, and should seek advice from an independent advisor about this.

For OCF to claim Gift Aid, and for donors to benefit from other tax advantages relating to charitable gifts, the donor must part with ultimate control over the donated asset. Actual or perceived direct control by donors may jeopardise the basis on which gifts are made and the charitable status of the foundation. Donors and fund advisors cannot therefore act independently of the foundation in relation to their fund. Donors, fund advisors and related parties (e.g. donor's family members or business interests) also cannot receive any direct private benefit from support from their funds.

## Philanthropy advice

OCF engages donors living, working or interested in its area of benefit. It recognises that donors have a range of interests, and wants them to make informed choices about their giving. Its main purpose is to support philanthropy that benefits local causes. However, the foundation can provide independent advice to donors who want to give in other ways or geographies, subject to a contribution to costs, as long as their giving accords with OCF's charitable objects.

OCF always respects the wishes of potential donors, and never pressures them into one course of action. It will disclose the key issues that could reasonably be expected to influence a donor's decision to make a



gift. It will be made especially clear that all donations other than planned gifts (and those outlined in paragraph 5.4) are irrevocable, and that items such as market value and investment return can vary.

OCF also recommends that prospective donors obtain independent professional legal and/or financial advice regarding any proposed gift.

### Types of gifts the foundation can accept

OCF may accept outright and irrevocable gifts made by living donors on a one-off or regular basis, unless the circumstances outlined in 5.4 apply. The foundation can also accept planned gifts that take effect on the donor's death.

OCF welcomes the following types of outright gifts:

- Cash of any amount, noting that donations to establish named funds must meet the minimum requirements set by the board from time to time
- Publicly traded shares at fair market values, with the board having full discretion over the sale of any gifted shares
- Listed securities such as bonds, and unlisted securities for which there is an established market
- Land and buildings, subject to the foundation's discretion they may be sold and/or generate revenue for charitable purposes surplus to any costs
- Personal property, provided the items are saleable and at a value which will offset any costs the Foundation incurs in selling.

For donations made into named funds, additional terms apply, as set out in the Named Fund Agreement.

OCF may also be named as the beneficiary of planned gifts, including residuary legacies, pecuniary legacies and specific legacies of named items or property. These gifts may be restricted or unrestricted.

OCF may accept a donated asset with a condition that some or the entire amount may be returned, in the exceptional case where the donor is an institution donating assets comprising its untraceable client/dormant accounts in line with its own legal and regulatory requirements. In such circumstances, the foundation may provide an indemnity stating that it will refund any monies that the institution might be liable to pay to a person or body. The indemnity is limited to the book value of the donation received.

OCF may also work with donors who wish to undertake social investment, where their gifts are 'recycled' and some or all of the donated assets may ultimately be returned. Such arrangements will be subject to separate policies and agreements.

Known donors who make one-off or regular gifts to support themed or collective funds will receive a receipt and thank-you email/letter, including the details of a staff member to contact about the fund and asking them if they wish to be kept informed about the impact of grants made from the fund.

OCF reserves the right not to accept a gift if the board determines that the restrictions, liabilities or reputational risks in doing so would be too great, or if we have insufficient information on its provenance.



## Donor due diligence and acceptance of gifts

OCF will carry out proportionate due diligence checks on prospective donors to understand their identity, background and the lawful origin of the funds. This is in line with Charity Commission expectations that trustees must be assured of the provenance of charitable funds, and be confident that donations come from appropriate and legitimate sources.

OCF will use a risk-based approach when assessing donations. Enhanced checks may be undertaken for higher-risk situations, including but not limited to:

- unusually large (£50k or above) or unsolicited donations
- gifts from overseas donors or those based in high-risk jurisdictions with weak regulatory environments
- gifts routed through multiple intermediaries or complex corporate structures
- anonymous or unverifiable donors or donations, especially where the size or circumstances are unusual
- requests to return funds within a short period or in a different currency
- arrangements that require OCF to act as a conduit for passing funds to third parties
- any expectation of improper influence, private benefit or preferential treatment
- donations accompanied by conditions that require close scrutiny, or could compromise OCF's independence
- donations that could cause reputational damage to the foundation, or actively act counter to its mission or charitable objects.

These expectations reflect the Commission's guidance on identifying and managing risks associated with donor relationships, and reflect commonly observed red-flag scenarios in the Commission's "Know Your Donor" guidance.

Enhanced checks may include researching a donor's corporate records, seeking verbal confirmation of donor status, obtaining references from a trusted source, or escalating a concern to the board of trustees.

If deemed necessary, in particular in high-risk situations as outlined above, OCF will screen high-value prospective donors against applicable UK sanctions and proscription lists. OCF will not accept gifts from sanctioned individuals or entities, or from sources linked to terrorist or other criminal activity. This aligns with the Commission's requirement that trustees ensure charitable funds are not misused for financial crime or terrorist purposes. Checks will be carried out using the UK Sanctions List search (FCDO), and, where appropriate, OCF will also refer to the Home Office list of proscribed terrorist organisations.

OCF may request reasonable information from donors to enable trustees to assess and manage any risks associated with accepting a gift. Where OCF cannot be satisfied about the legitimacy or suitability of a donation, the foundation may refuse or return it. Decisions and the reasons for them will be documented.

Where due-diligence checks raise concerns relating to potential criminal activity, or where OCF has grounds to suspect that a donation may be linked to financial crime, the matter will be escalated internally and, where appropriate, reported to the relevant authorities in line with Charity Commission expectations.



## Donor recognition and publicity

The foundation will acknowledge donors appropriately, and publicise their involvement in line with their wishes. Donors may remain anonymous if they prefer. In all cases, the foundation will keep the details of its particular agreements with donors confidential, subject to its legal and regulatory accounting requirements.

## Variations to this policy

OCF may vary the terms of this policy from time to time. Changes will be notified to current fundholders or their advisors.

## Explanation of terms used in this policy

- Gift Aid: a scheme whereby the Government increases the value of donations by UK taxpayers to UK registered charities by allowing the beneficiary to reclaim basic rate tax on the gift. Higher-rate taxpayers can also claim extra relief on donations.
- Grant: a financial award made by the foundation from its funds to support charitable activities, usually to registered charities or charitable community groups, but sometimes to public bodies or individuals, subject to OCF's Grant-making policy.
- Charitable objects: the foundation's purpose according to its governing document as a Charitable Incorporated Organisation.
- Named funds: flow-through or endowment funds set up by donors at OCF; also known as donor-advised funds.
- Named Fund Agreement: a legally binding document agreed with donors who establish named funds setting out how the fund will be managed, what activities the foundation will undertake and how the donor(s) will be involved.
- Restricted funds: a legal and accounting term describing a fund which the foundation must use for certain specific purposes defined by the donor.
- Unrestricted funds: a legal and accounting term for funds which the foundation may use at its discretion to support its charitable purposes.

