

Policy for the Acceptance of Donations

Effective Date:	August 2024
Supersedes:	March 2018
Next Review:	June 2025

1. Purpose & Scope

- 1.1 Guy's & St Thomas' Charity, Evelina London Children's Charity, and Guy's Cancer Charity are charities registered with the Charity Commission for England and Wales. Their sole corporate trustee is Guy's and St Thomas' Foundation, a charitable company limited by guarantee registered in England and Wales (company number 9341980 and charity number 1160316) whose registered office address is The Grain House, 46 Loman Street, London, SE1 0EH. The trustees of Guy's and St Thomas' Foundation are expected to act in the best interests of these Charities, which usually means advancing its purpose by generating philanthropic income, in line with their individual charitable objectives. The Fundraising Regulator also requires that organisations 'must not refuse or return donations, except in exceptional circumstances'.
- 1.2 This policy sets out the conditions under which donations will be both solicited and accepted.
- 1.3 The policy provides a clear set of principles that allow fundraising to take place sustainably, in line with our values, to comply with regulatory requirements, and to ensure fundraising is conducted in a professional and ethical way which builds trust with our stakeholder communities.
- 1.4 Charities have a responsibility to accept philanthropic donations which further their objectives, provided they comply with all relevant regulation as set out by the Charity Commission and the Fundraising Regulator. In addition, we are required by law to comply with all relevant legislation when soliciting and accepting donations, including legislation on bribery, proceeds of crime/ money laundering, terrorist financing, and mental capacity.
- 1.5 The policy covers all philanthropic donations over £100,000 solicited or otherwise received from individuals, charitable trusts/ foundations, and organisations. It also covers relationships established by our fundraising team with individuals for the purpose of enabling the generation of donations: for example, with ambassadors or fundraising board members.
- 1.6 This policy applies to all staff who undertake fundraising for us, or who generate philanthropic income raised for the benefits of the Charities.
- 1.7 This policy does not cover:
- Research grants (both philanthropic and non-philanthropic)

- Non-philanthropic international or commercial partnerships

2. Definitions

- 2.1 Philanthropic donation (as set out by the CASE-ROSS Support of Education Survey):** A donation or gift made voluntarily by an individual or organisation, which is of philanthropic intent and does not provide the funder ownership of a deliverable, financial benefit, or control of the funding.

3. Policy

- 3.1 We will accept philanthropic donations which meet our charitable objectives, except for in the following circumstances:
- 3.2 We will not solicit or accept donations of funds that they judge to be unethically or illegally obtained. This includes but is not limited to donors who fail to meet the requirements of the Equality Act 2010.
- 3.3 We will not accept gifts from tobacco companies (meaning a company, entity or organisation (or groups or combinations of the same) whose business other than for an insignificant part (less than 10% of its revenue), is the development, production, promotion, marketing, or sale of tobacco in any country of the world, or is a subsidiary or a holding company or affiliate of the same).
- 3.4 We will not accept gifts from entities involved in the manufacturing, export and/or selling of arms.
- 3.5 We will not accept gifts from entities involved in the creation, export and/or selling of pornography.
- 3.6 We will not solicit or accept donations that represent an unacceptable conflict of interest. This might include but is not limited to:
- Companies or products that are counter to the values or ethos of the individual Fundraising Partners. This definition may vary between partners and separate guidance should be sought on individual partner stipulations.
 - Terms of donation cannot be reasonably met by the fundraising partners
 - Donation gives rise to an actual or perceived conflict of interest between the donor, the recipient of funding (e.g Principal Investigator), and the relevant partner.
- 3.7 We will not accept a truly anonymous donation, in which the fundraising partners only deal with an intermediary who is not willing to identify the donor. In the case of Donor Advised Funds, the fundraising partners must be satisfied that there are appropriate due diligence measures in place to vet donors who wish to give anonymously through this or a similar mechanism.

- 3.8 We will not accept a gift if, by doing so, it would compromise their beneficiaries academic or clinical integrity. This includes but is not limited to:
- Uncritical promotion of a particular cause
 - Limitations placed on the findings and publication of research or teachings of the curriculum
 - Limitations placed on the selection or appointment of research or clinical posts
 - Attempts to gain preferential clinical treatment
4. We will carefully consider whether, by accepting a gift, the partner organisations would face a level of reputational risk disproportionate to the advantages gained from it.
5. The Fundraising Partners will not fundraise from individuals who are considered unable to make independent financial decisions.

6. Delegation of Authority

- 6.1 Our fundraising team shall administer this policy and escalate for the purpose of ruling on decisions in line with this policy.
- 6.2 The Executive Director of Charities holds overall accountability for escalating risks to the appropriate review group.
- 6.3 Where there is ambiguity as to whether gifts should be sought where risks are identified based on the above principles, this will be escalated to a review body to opine on.

7. Implementation

- 7.1 For donations or potential donations under £100,000, the appropriate checks will be carried out to verify the donor's identity and flag any concerns related to Anti-Money Laundering/ Proceeds of Crime regulation.
- 7.2 Gift Acceptance research will be conducted to ascertain risks under the principles of the policy for donations or potential donations that are:
- £100,000 or greater (one-off or cumulative), including legacy notifications
 - Above £10,000 where these are actively solicited by the fundraising team
 - Where risk has been identified against the principles of the policy
 - For new ambassadors or fundraising board members
 - Where naming recognition is being sought
- 7.3 All potential donations of £1 million or greater must be escalated to the Executive Director of Charities for review.
- 7.4 The fundraising team is responsible for implementing and monitoring the policy and facilitating effective decision-making where decisions are escalated.

8. Non-Compliance

- 8.1 Staff who fundraise independently of the fundraising team and do not adhere to the principles of this policy create unnecessary risk to the Charities and will be held accountable.
- 8.2 Staff should always seek advice from the fundraising team when looking to fundraise to ensure best practice and the greatest return.

9. Governance

- 9.1 The policy will be reviewed every three years as standard, and more frequently if required.