TRINITY COLLEGE
UNIVERSITY of OXFORD

Fundraising Policy

Trinity is a registered charity, charity number 1143755, which seeks to raise funds for annual expenditure, the endowment and capital projects.

This document is not legally binding, but sets out the principles under which the college will seek to operate when undertaking its fundraising activities. It reflects Trinity's commitment to implementing, as far as possible, best practice in its fundraising activities, and is in line with the current guidance provided by the Fundraising Regulator.

Summary

Trinity is committed to the principle that primarily it solicits gifts from those individuals who have a relationship with the college – Old Members or Friends – or those individuals or organisations, such as trusts and foundations, that have been carefully identified as having a potential interest in supporting a specific activity or initiative.

The college believes in and maintains the principle that, wherever possible, all gifts should be made

- Without coercion and as an informed decision.
- With full transparency and agreement regarding the use of the gift by the college.
- In full confidence that acknowledgement and recognition will be as the donor wishes.
- Should a donation be made at a time when the donor was not able to make an informed decision, but this was not clear to the fundraiser, such a donation would be returned.
- Donors are made aware that they have the right to cancel any agreement they make to donate and that they also have the right to a refund.

If any individual or organisation asks to be excluded from fundraising approaches, this is recorded on the database and acted upon immediately so that they are excluded from all forms of solicitation, or those forms from which they have asked to be excluded. Under such circumstances and in line with current legislation, the Alumni & Development Office seeks to find out the forms and amount of communication preferred, recognising that some still wish to be solicited by certain methods, while others wish to receive no requests for gifts, but to receive other communications and to remain actively involved with the college.

Constituency

Trinity has about 5,500 contactable alumni on the database. It is from this group, primarily, that the college will focus the majority of solicitations, on the basis that they are the people most likely to support the institution where they studied. To this end, alumni are invited to make a donation to the college every year, unless they have specifically asked to opt out.

People who are not alumni of the college are known as 'Friends'. This category includes the parents of former students, some current parents and a number of individuals who have been introduced to the college by a member, or who have expressed their own independent interest in the college. They are also included in solicitations.

From time to time, the college raises money in small gifts from current parents, where they have given their contact information to the Alumni & Development Office. When parents are invited to join the mailing list, it is made clear that they may receive fundraising material and therefore those who join receive solicitations in the same way as other 'Friends'.

Individuals are not subject to constant requests for donations. They are not approached directly with a solicitation more than once in any financial year.

Where solicitations are made to trusts and foundations, the administrative and reporting requirements of the grant-making body are followed and were any conditions to be imposed on resulting grants, such conditions would be followed. Approaches to trusts and foundations from within Oxford are co-ordinated through the University Development Office and follow the University's protocols.

Means of Solicitation

The college employs a range of direct solicitation methods, which may include telethons and letters, as well as face-to-face approaches.

- **Telethons**
  From time to time, the college seeks to contact by phone those alumni and Friends who have not made a donation in any given year, who have an up to date telephone number and who have not indicated an unwillingness to receive calls. At the same time, some existing donors are contacted in order to thank them for their continuing support, update them on news from the college and, in some cases, invite them to increase their donation. All those to be called for the purpose of a donation are sent a pre-call letter (either in hard copy or by email) giving them the opportunity to opt out of that particular telethon or of telethons in general. The font size is the same as that of the letter as a whole, in line with Institute of Fundraising guidance. Alumni over the age of 75 are not called unless they have indicated that they enjoy such communication.

  Anyone who wishes to be excluded from telethons is removed from the calling list, and if the request applies to telethons in general, they are given a solicitation code to reflect this. If, during a telephone campaign, anyone asks not to be called, or not to be solicited at all, he/she is removed from the calling list. If a caller, a member of the Alumni & Development Office team or other member of the college becomes aware that an individual might be distressed to receive a call, or not have the capacity to make a decision on the telephone, he/she is removed from the calling list.

  Old Members or Friends who have signed up to the Telephone Preference Service and have not given explicit permission to the college to call them will be excluded from the telethon.

  Calls are not made from the college phone lines, but anyone who attempts to call back will receive a message with the number of the Alumni & Development Office should the recipient wish to contact the college.

Callers are current Trinity students or recent leavers, professionally trained at the start of every telethon, and expected to speak to each other and those they call with courtesy and respect. One of the purposes of the call is to solicit a donation, but it is also to check contact details, convey news from the college and learn news from the individual, seek feedback on events and publications and garner support for the careers network. When it comes to asking for a donation, callers are informed about the projects for which the college seeks support and given guidance about how to ask. They follow the legal requirements when asking for direct debits and gift aid. The college employs a telethon consultant – since the first telethon in 2004, this has been Rux Burton Associates - to oversee the telethon and to provide supervision during the calling. The college enters into a formal, written agreement with the consultants. Training is provided by members of the Alumni & Development Office and the caller supervisor from RBA. A member of the Alumni & Development team visits the call room every day during calling. A member of the Alumni & Development team reviews the call notes and sends a letter to everyone who receives a call.

Under no circumstance would a caller be aggressive – requests for donations are made carefully to ensure that no-one feels pressured into making a gift.

Callers are employed by the college and paid an hourly rate for the time that they work. Their salary is not calculated on the amount they raise, so callers should not feel under undue pressure to focus on the fundraising element of the call, but can pay equal attention to building or strengthening the relationship alumni and Friends have with the college.

- **Direct Mail**

  Once a year, hard-copy fundraising materials, which usually include a leaflet about supporting Trinity and a donation form, are sent out. The college checks that those who have requested that they are not mailed, or are not solicited, will not receive these solicitations. Such requests are recorded on the database.

  Every attempt will be made to ensure deceased constituents are excluded from such mailings.

- **Face-to-face solicitations**

  Fundraising members of the Alumni & Development team, but most particularly the Director of Development, meet potential and current donors where appropriate to solicit gifts. The solicitation of a major gift is likely to entail a series of meetings, which, since the pandemic, have been online.

  Every request for a meeting, whether made by letter, email or telephone, where a solicitation, or a conversation leading to a solicitation, is envisaged, will explicitly indicate that this is the purpose, or part of the purpose, in the request.

  Fundraising approaches make it clear that the solicitation is on behalf of the charity. The fundraiser would not typically accept a gift as 'cash in hand' on the day of the meeting. If during the course of the meeting, the fundraiser believes that the potential donor is not capable of making an informed decision about a donation, such a donation will not be solicited. In such circumstances, a note would be made on the database and were any further solicitations to be made, they would be by mail only.

- **Legacies**
  Written communications soliciting legacies make it clear that the content is not intended to provide legal advice and that recipients should obtain their own professional advice. There is an agreed form of words for anyone wishing to leave a legacy to Trinity; the phrasing is accurate, approved by lawyers and accompanied by our charity details. Neither the college, nor any individual within the college is involved in the drafting of wills in its favour. Legacies are used for the purpose stipulated, or, where the purpose has not been stipulated, it is chosen by the college with the involvement of the executors. The college would not use the legacy for a different purpose without agreement from the Charity Commission.

- **Fundraising Events**
  When such events take place outside the college, the venues are carefully chosen to ensure that they afford equal access. Risk Assessments will be carried out and licensing permissions obtained. All promotional material will clearly indicate the purpose for which any money is raised.

The college also uses a range of indirect methods of solicitation, primarily through the inclusion of a donation form when booking for an event or with another mailing, and through links in e-newsletters and other communications.

- From time to time, alumni and other potential donors are contacted by email which may include information about giving, such as links to the website. The college can always be identified as the originator of the message. It is always possible to opt out of receiving email communications.

- Donation forms and information about giving may be included on the back of event booking forms and with publications.

- The college website also contains a wide range of material about how and why people might support Trinity by making a donation.

Whatever form an approach takes, any accompanying marketing material is carefully prepared to ensure that it does not cause serious or widespread offence, fear or distress. Where it includes examples of projects for which the college seeks donations, or case studies about individuals who have benefited from such donations, the information is checked to ensure it is accurate and does not mislead potential donors. The contents are not designed to prompt donations by creating guilt or embarrassment.

Volunteers

Occasionally, the college has used volunteers to solicit donations from their peer group. In most cases, the wording of the solicitation is agreed with the volunteer, and the request is sent out from the Alumni & Development Office if it is a direct mailing, or, for an email approach, sent from the office on behalf of the volunteer. Should a volunteer wish to approach, on behalf of the college, individuals or organisations not currently on the college's database, the volunteer would be asked to ensure that resulting gifts are made directly to the college and not to the volunteer.

The volunteers are not provided with data to make the approach themselves. If, in the future, volunteers should be provided with data to make the approach themselves, they will be asked to sign a written agreement about confidentiality, use of data and acceptance of donations.

Children

Children are not permitted to be either volunteers or donors. If children under 13 years of age attend events, the college does not take or publish photographs that would allow them to be identified without the consent of their parents or guardian.

Acceptance of donations

Donations take the form of single payments or regular gifts. The former may be made by bank transfer, cheque, voucher, shares or cash, and the latter by direct debit, standing order, payroll and regular giving, or through agencies such as the Charities Aid Foundation.

All gifts given for a restricted purpose will be received and used solely for the purpose agreed between the donor and the college. Many gifts are unrestricted and are therefore directed towards the current priority or Annual Campaign and spent at the college's discretion. The full value of every gift (including gift aid if applicable) is used for the charitable purposes of the college; there is no administrative or overhead charge.

The Governing Body would not refuse or return a donation except in exceptional circumstances. In such a case, it may decide to refuse the offer of a donation because the purpose of the donation does not match the college's fundraising objectives or if there is doubt about the appropriateness or legality of the source. Anyone who makes a donation in excess of £250,000 is automatically subject to background checks by the University and such donations are referred to the University's Committee to Review Donations. Should a donation be refused for any reason, records will be kept to indicate why it was refused and any such refusal will be couched in appropriate language to avoid causing offence.

Gift Aid and Tax Efficient Giving

The college does not attempt to claim gift aid on any donations that do not meet HMRC guidance, but it is committed to reclaiming gift aid on all gifts made by UK taxpayers where a gift aid declaration has been made. To that end, every acknowledgement letter to a donor who has gift-aided his/her gift serves as a receipt for tax purposes. Donors may be provided with a schedule of their donations during the course of a tax year to assist with their income tax returns, if they request this information.

The college works with Oxford University to provide tax efficient means of making a gift through 'Americans for Oxford' and to issue tax receipts to Canadian donors.

Handling of donations

In line with the Fundraising Regulator's Code of Practice, cash and cheques are banked at the earliest opportunity and whenever possible, sizeable cheques or cash payments are banked on the same or the following working day. Cash and cheques that have not yet been banked are stored securely. Charity vouchers such as those made through the Charities Aid Foundation are claimed online where this is possible, or sent to CAF to be processed and the money is passed to Trinity by bank transfer. Card transactions are made through Barclays Merchant Services and all handling is PCI-DSS (Payment Card Industry Data Security Standards) compliant. Donations of shares are co-ordinated between the donor's and the college's brokers.

The Alumni & Development Office produces monthly bank reconciliations for the Bursary and an annual download of all donations; this information is reviewed by the college auditors. Where the office is charged for transferring payments, the total donation amount is recorded as income and the charges are shown in the accounts as 'expenditure'. Gift aid claims are prepared by the office but made online by the College Accountant. The spreadsheets are stored on the office's shared drive, which is part of a secure network. Access is limited to members of the Alumni & Development Office and the IT support team.

Data Protection

Personal data is processed fairly and lawfully. It is only used for specified and lawful purposes and is not processed in any manner incompatible with those purposes. As far as possible, personal data is accurate, kept up to date and processed in accordance with the rights of data subjects. Personal data is not transferred to a country or territory outside the European Economic Area (EEA) unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects. Agencies or third parties that process data on behalf of the college, such as the telethon consultants and mailing houses, are required to sign a written, data handling agreement with the college to comply with current legislation.

Appropriate technical and organisational measures would be taken against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of, or damage to, personal data.

Data is not, and has never been, sold to third parties.

Data is processed on the basis of legitimate interest and Trinity's privacy and data handling policies are easily accessible and they have been updated to take account of GDPR. Links to the data protection policy are included under the email signatures of members of the Alumni & Development Office and the policy is printed on the back of donation and booking forms.

Data is shared with the University of Oxford Development Office, which has easily accessible privacy and data handling policies that have been updated to reflect the requirements of GDPR legislation.

If an individual makes a subject access request, the Alumni & Development Office, working with the college's Data Protection Officer, provides, within one month, the information requested in a concise, transparent, intelligible and accessible way, using plain language. The information is delivered in a secure format and the recipient is asked to sign and date an acknowledgement of receipt.

Database and Security

All alumni and donor data is held securely on the Trinity database. This database is password protected and only those who need to see financial data have the relevant permissions to do so. Those who are working with the Alumni & Development team on a temporary basis, such as students, are expected to maintain confidentiality.

From time to time, when financial data is transferred outside the college – for example in order to set up direct debits, or to the telethon consultants – files are encrypted.

Paper files were stored securely in the Alumni & Development Office, but they are now being scanned and the paper files destroyed. Those files which have yet to be scanned continue to be stored securely in the former Alumni & Development Office, where the scanning is taking place. Credit or debit card details are not recorded on the database, but are stored securely in the College Office until disposal. Confidential waste of this nature is disposed of separately.

'One off' gifts made online are taken by Blackbaud Merchant Services, which complies with current legislation. Gifts are processed by the Alumni & Development Office. Online direct debits are set up via Blackbaud NetCommunity, a secure website. Data is downloaded by the Alumni & Development Office and sent to Access PaySuite the direct debit bureau, through a secure website.

Complaints Procedure

The college's policy for the handling of complaints is displayed on the website and follows Fundraising Regulator's guidance.

An initial complaint would be made to the Director of Development and it would be fully investigated. If she were not able to resolve it to the satisfaction of the complainant, the matter would be passed to the President. A response would be provided to any complaint within ten working days and ideally, much more quickly. Should it not prove possible to respond within this timescale, the complainant would be kept up to date and the reason for the delay would be explained.

If a complaint has been made about a member of staff, where possible this person would be informed and the person concerned would be given an opportunity to respond to the allegations.

The college will regularly review the complaints it receives and consider the lessons that can be learnt and how to improve the service provided and the experience of donors.

Acknowledgement, Recognition and Stewardship

Trinity is committed to the public and private recognition of its donors where it is desired. Each donor can expect to receive a formal and personalised letter from the Alumni & Development Office and those who make a donation of £1,000 or more will receive a letter from the President.

The names of all donors are recorded in the annual Report unless they have requested anonymity. The annual Report does not list the value of individual gifts.

Major donors who are members of the Ralph Bathurst Society, Sir Thomas Pope Fellows or Honorary Fellows are also listed in the Annual Report, but again there is no indication of the amount they have given and they may choose to be anonymous. From time to time, other forms of recognition are offered in line with the value of the gifts, such as an invitation to the annual Benefactors Lunches.

In no circumstances will a gift be accepted where the donor expects a place or position at the college to be offered, and in no circumstances will such a place or position be offered in recognition of a donation. All places and positions at Trinity are gained through academic or professional merit alone and to that end, those interviewing prospective students or employees do not have access to donation records for the individuals concerned or their families.

Since 2016, all parents of current students who made a donation have been listed as anonymous donors. If they continue to give thereafter, or if their gift qualifies them for membership of the Ralph Bathurst Society or for election to an Honorary or a Sir Thomas Pope Fellowship, they will cease to be anonymous once the student has left the college.

Reviewing Policies

The college's fundraising policy will be brought to the Development Committee each year for review and, when approved, it will be endorsed by the trustees and an updated version will be displayed on the college website.

Sue Broers
Director of Development
June 2022