



Royal College of
General Practitioners

Donations Policy

Donations Policy	
Version No	3 – 2023 refresh
First draft reviewed by:	Assistant Director Finance Assistant Director Membership and Development General Counsel Head of English Faculties Heads of Devolved Nation Offices College Archivist Procurement Team
Second draft reviewed by:	Executive Director Planning & Resources
Third draft reviewed by:	Honorary Secretary
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Approved by	Governance Committee and Trustee Board
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This information can be made available in alternative formats, such as easy read or large

print, and may be available in alternative languages, upon request. Please contact Assistant Director Governance (governance@rcgp.org.uk)

Background and Purpose

Trustees have a legal obligation to protect the charities funds, assets and reputation. This policy is intended to ensure donations are accepted or given following due diligence checks and monitoring in line with [Charity Commission Guidance](#)

Who does the guidance apply to?

- All staff
- Trustees
- Council Officers, President and members
- Devolved Council Officers and members
- Faculty board members
- Volunteers
- Any clinicians employed or contracted by RCGP

The policy should be shared with all of the above during induction.

1. Introduction

1.1. This policy is intended to ensure donations are accepted, refused or given in line with [Charity Commission Guidance](#) and to avoid decisions that would negatively impact on RCGP.

1.2. RCGP welcomes donations which support its charitable objects. Donations can reduce costs of services for members and help RCGP to develop new activities.

1.3. All donation offers are subject to due diligence checks to ensure they do not harm the reputation or RCGP or have an adverse effect on RCGP finances and resources. If they do, RCGP may decide not to accept the donation.

1.4. This policy is primarily concerned with arrangements for accepting or refusing a donation. There are occasions when RCGP may wish to make a donation to further its charitable aims. Any donations made by RCGP require Trustee Board approval as described in section 5.

2. Key terms

Beneficiary: A person who is intended to receive benefit from a charity

Donation: A gift given by a person or organisation for philanthropic reasons to support RCGP's work.

Donor: A person or organisation who gives a donation to RCGP.

Due diligence: Process and steps that need to be taken so that trustees can be reasonably assured of the provenance of the donations received by RCGP and that any risks in accepting or refusing them are being managed.

Governing document: The legal document that sets out RCGP's purpose (the Royal Charter).

Grant: A sum of money given by Government or an organisation for a particular purpose.

Property: All assets – including cash, investments, land, buildings and RCGP's reputation.

Serious Incident: An adverse event which has occurred or could occur and result in

- Loss of RCGP's money or assets
- Damage to RCGP's property
- Harm to RCGP's work, beneficiaries or reputation

Sponsorship: Sponsorship is defined as funding from an external source relating to one of these specific activities:

- Sponsorship packages and exhibition stands at RCGP conferences and events
- Funding and sponsorship of awards
- Adverts within RCGP publications and on RCGP websites
- Research project funding
- Funding for specific sponsor led or RCGP led material, including events (both virtual and in person) and eLearning

Suspicious Activity Report (SAR) – A disclosure to the National Crime Agency under either the Proceeds of Crime Act 2002 or the Terrorism Act 2006.

Trustee – Charity trustees are the people who are responsible for the general control and management of a charity.

3. Accepting and Refusing Donations

3.1. RCGP Trustee Board is responsible for the donations policy and the processes required of staff when a donation is offered. Governance Committee is responsible for monitoring the application of the policy and providing advice to Trustee Board on the response to donations when this is required under the provisions outlined i

3.2. Executive Directors are responsible for processing donation offers, training staff who maybe asked to respond to donation offers and for providing assurance to trustees that this guidance has been applied.

3.3. There are companies and individuals from which RCGP will **not** accept donations under any circumstances: These are set out in RCGP's [Sponsorship policy](#).

3.3. RCGP may also refuse to accept a donation if the individual or organisation is associated with activities that are not compatible with RCGP's values or could undermine RCGP's status as a charity.

3.7. RCGP will not refuse donations without a clear rationale for doing so. A refusal could harm RCGP's reputation, and beneficiaries could potentially lose access to funds that may be used in developing services or activities that support them. RCGP takes a risk-based approach in line with the guidelines set out in this policy and an assessment of the potential reputational harm and impact (direct or indirectly) on finances and resources.

3.8. All donations will be subject to a risk assessment against four key risk areas:

- Legal – satisfactory evidence about the provenance of a donor and assurance these funds have not been generated through illegal activity.
- Financial – ensure the donor can honour the full amount of the donation and that no activities made possible by the funding are planned or started before it is given. Any donations with conditions must be referred to the Assistant Director Finance to confirm any costs arising from compliance with these do not outweigh the benefits of accepting the donation.
- Reputational – ensure the donor (individual or organisation) does not contravene the sponsorship policy or could cause controversy amongst members and beneficiaries that it is inconsistent with RCGP values.
- Dependency - the donation must not give the donor an undue level of influence over RCGP activities.

3.2. Office holders and volunteers must refer any donation offers to their staff point of contact who will seek advice from their Executive Director.

4. Processing Donations

Roles and responsibilities

4.1. The key responsibilities for processing donation offers are:

- The Head of **Financial Control** is responsible for small cash donations made through the Charities Aid Foundation in line with the Code of Fundraising Practice and for compliance with Money Laundering Regulations (checks required for donations of £1000 and more).
- All donations above £5,000 and those where the financial controller wishes to seek further advice, are referred to the **Assistant Director of Governance** to co-ordinate the assessment of a donation offer in line with this guidance.
- The **Assistant Director of Finance** is responsible for advising on financial risks where conditions are attached to donations.
- The **Executive Director Planning and Resources** is responsible for approving or refusing donations up to £10,000 based on advice provided by the Assistant Director of Governance and for approving the recommendation to Governance Committee on large donations and donations with conditions attached.
- The **Executive Director Membership Development and Education** is responsible for advice to the Fellowship and Awards Committee on donor recognition and for donations to RCGP heritage collection where there are financial implications.
- The **Archivist and Heritage Manager** is responsible for approving or refusing donations to RCGP heritage collections which do not have financial implications.

4.2. Staff who receive an enquiry about donations should pass the request on to the financial controller or Assistant Director Governance to respond. This ensures donations are processed by those who have the appropriate training in financial and governance arrangements.

Small and One-off Cash Donations

4.3. Small cash donations are managed through RCGP's subscription to Charities Aid Foundation [here](#) and monitored by the finance team. All donations of £1000 and above are subject to anti money laundering checks by the team. Any concerns are raised with the Head of Financial Control who will refer these to the Assistant Director Governance if required.

4.4. The Assistant Director Governance is responsible for assessing donation offers above £5,000 and all those with conditions. They will carry out diligence checks to determine whether:

- the source of the donation and the motivation for giving is clear.
- this a one-off donation or whether previous donations have been made.
- the individual or organisation making the donation is known to RCGP or has an obvious connection.

- background or financial checks are required to assess any potential conflicts of interest or reasons why RCGP may not wish to be associated with the donor.
- there are any conditions attached to the donation and what impact will these have.
- there are any financial or resource implications arising from acceptance of the donation.

4.5. The Assistant Director Governance will refer these to the Executive Director of Finance and Resources who can approve or refuse donations without conditions up to £10,000.

Large Donations and All Donations with Conditions Attached

4.6. RCGP considers a donation to be large if it is above £10,000 – including where accumulated small donations exceed this threshold. Offers of a large donation and any donations with conditions attached carry a greater level of risk as set out above.

4.7. Donations with conditions require additional financial controls and spending restrictions, and the Assistant Direct Governance will evaluate these in consultation with the Assistant Director of Finance to determine:

- The estimated costs of administration.
- Whether additional RCGP funds will be required to meet the terms of the conditions
- Whether the activity required to meet the conditions could undermine delivery of RCGP strategic objectives.

4.8. The Assistant Director Governance will seek additional advice from the Chief Executive Officer donations exceeding £25,000 are offered with conditions to ensure these will align with the RCGP Strategy. If they do not RCGP may decide to refuse the donation.

4.9. Any conditions should not undermine the College's independence. Donations which are akin to loans (where the capital is repaid at the end of a term) are never acceptable.

4.10. Donations above £10,000 and all donations with conditions attached must be reported to Governance Committee on the form provided at Annex 1. This will be submitted by the Assistant Director Governance and advice on whether to accept or refuse the donation approved by the Executive Director of Planning and Resources.

4.11. Donations above £25,000 are subject to scrutiny as in paragraph 4.10 and referred to the Trustee Board following review by the Governance Committee. The Trustee Board decides on whether to accept or refuse the donation.

4.12. When a donation with conditions is accepted, a restricted fund is established which requires an agreed spending profile and report of spend against this. This

should be set out in an agreement letter to the donor setting out how the conditions will be met, including the circumstances under which the donation may be returned.

4.13. The Executive Director of Planning and Resources will sign any agreement letters required (with the exception of awards which are subject to arrangements described in paras 4.17.- 4.21).

4.14. All donations are recorded by the finance team on receipt of funds with approval documentation provided by the Assistant Director of Governance.

International Donations

4.15. International donations above £10,000 must be reported to Council as part of the annual report on international activities provided by the Executive Director of Professional Training and Standards.

Legacies

4.15. A legacy in a will is treated as a donation. These will be referred to the General Counsel for advice on the terms of the Will e.g. whether there are any conditions attached, or an indication in the Will of the individual's wishes.

Anonymous Donations

4.16. RCGP can accept donations where there is a request that the donor or donors remain anonymous. The Assistant Director Governance will review concerns about the provenance of a donation and in the case of donations above £5000 whether the identify can be independently verified. RCGP will report any anonymous donations in excess of £25K to the Charity Commission.

Awards and naming rights

4.17. RCGP will consider philanthropic donations which include requests for donor recognition, i.e. naming of awards, collections or property after an individual. These requests are granted entirely at RCGP's discretion and for an agreed period.

4.18. National donor-funded awards can be named after an individual who has made a nationally recognised contribution to RCGP, and members can readily identify achievement with the individual, e.g. they have held national office, have made an outstanding contribution to the advancement of general practice. Funds should cover the costs of the prize and administration of the award for a minimum period of five years.

4.19. No naming opportunity will be granted where it is considered that association with the proposed name may adversely affect RCGP's reputation or affect it legally or financially. Naming of physical assets should be in keeping with the RCGP overall branding and convention for naming designated areas of property and heritage assets.

4.20. All agreements to accept donations which involve naming rights are considered as awards and must be approved by the Fellowship and Awards Committee. The Governance Committee is responsible for confirming the donation can be accepted in principle and the period for which funds will be available for an award.

4.21. The Executive Director Membership Development and Education will be responsible for advice to the Fellowship and Awards Committee.

Grants

4.22. Grants may be offered by an organisation for a specific purpose and are usually timebound e.g. to support RCGP educational activities. These are subject to the [Sponsorship Policy](#) and require a written agreement or when this is a legal requirement, a contract must be signed with the donor.

4.23. Grants require a restricted fund to be established and therefore require approval from the Executive Director of Planning and Resources to do so. This is to ensure the costs and proposed management arrangements for the restricted funds do not outweigh the benefits. Grants should not be sought or accepted if they do not align with strategic priorities.

4.24. Grants up to £25K can be approved by the Assistant Director responsible for the business activity, and up to 100K can be approved by the Executive Director responsible for the business activity. This is generally the Executive Director Membership, Development and Education but can include others e.g.

- International activities – the Assistant Director International and the Executive Director Professional Training and Standards
- Devolved Nation activities – the Executive Director Policy and Engagement

4.25. The Executive Director who approves the grant must be satisfied that it is in line with the Sponsorship Policy and for international activities the statement on Working with Repressive Regimes.

4.26. Agreement letters and contracts are subject to financial delegations in the Contract Management Guide for general grants which are:

- Up to £25K approval by Assistant Director
- Between £25K and £100K by the Executive Director
- Between £100K and £250K by the Chief Executive Officer
- Over £250K approval required by two members of the Trustee Board.

Annual Review of Donor Relationships

4.27. All long-standing donor relations, including awards which have been named in recognition of a donor, are reviewed annually. This is co-ordinated by the Assistant Director of Governance at the end of the financial year.

5. Non-Cash Donations

Donations to RCGP Heritage Collections

5.1. RCGP welcomes all types of donations related to the history of general practice, including documents and records, instruments, equipment, photographs, artworks and medical teaching models which are in line with the [Heritage and Collections policy](#).

5.2. The Archivist and Heritage Manager will consider whether the donations meet the criteria used to assess historical value set out in the policy. They will assess the financial implications e.g. need for additional storage or insurance and determine whether the costs outweigh the benefit of accepting the donation. Donors are required to confirm transfer of ownership of the asset to RCGP in the donation form provided by the Archivist and Heritage Manager .

5.3. If the donation has financial implications, the Archivist and Heritage Manager will refer the offer to the Executive Director Membership, Development and Education for a decision on whether to accept or refuse the donation.

Other non cash donations

5.4. Other non-cash donations are benefits in kind which may include hospitality or pro bono work. Gifts and hospitality should not be requested and only accepted in specific circumstances set out in the Code of Business Conduct policy for staff, or [Conflicts of Interest policy for members](#).

5.5. Offers made to provide pro bono work should ensure there are no legal or reputational issues raised by acceptance of the work and that it does not create unacceptable conflicts of interest. The work should not result in unacceptable current or future financial liabilities, or any inference made that the donor will receive favourable treatment in procurement of future services.

6. Suspicious Donations

6.1. A suspicious donation is one that seems unusual or out of the ordinary and can include unusually large amounts of funding, conditions or complex banking and transfer arrangements. Donations to charities have been used to facilitate money laundering or other criminal activity therefore care must be taken where the credentials of the donor or organisation involved cannot be verified.

6.2. The Assistant Director Governance will arrange for financial checks by the procurement team, probity checks by the Governance team and seek legal advice if necessary.

6.3. RCGP will decline a donation if there are concerns about the provenance of the donation or insufficient evidence available to determine this.

7. Donations Made by RCGP

7.1. RCGP funds can only be used in support of its charitable objectives. The same principles apply when we give donations as to when we accept them.

- We do not give donations to those individuals and companies set out in the sponsorship policy.
- Donations should only be made where the funds support RCGP charitable aims.
- There should be a written agreement about how the funds will be used.

7.2. Donation requests which are not subject to an RCGP awards programme are considered by the Governance Committee. Details of donations will be declared in the RCGP Annual Report.

Awards

7.3. Similar principles apply when we give awards as to when we accept donations, namely that we will **not** give awards, prizes or grants to any individual or organisations set out in the [Sponsorship Policy](#).

7.4. Those responsible for granting a financial award, prize or grant must have a clear adjudication framework in place and processes for carrying out probity checks e.g. Declarations of Interest, fit and proper person.

7.5. Awards processes may need to include prior written assurance that the money will only be used for the purposes granted. This is unlikely to be required for a small personal cash prize (e.g. £50) but likely to be required if a larger grant is made (e.g.) for a research project.

7.6. Arrangements for grants made by the Scientific Foundation Board are set out in the Contract Management Guide. The Executive Director Policy and Engagement approves the contract with the grant recipient on behalf of RCGP.

8. Complaints

8.1. Complaints about the matters covered in this policy can be made on the RCGP on-line [complaints form](#) or by contacting governance@rcgp.org.uk.

8.2. RCGP staff who are aware about actual breaches of this policy, or who are concerned that there has been, or may be, a breach, should report these concerns to the Assistant Director of Governance. Further information about how concerns should be raised are set out in the Whistleblowing Policy.

Policy Name	Donations policy
Owner	Assistant Director Governance

Date Approved	
Date of next review	24 months
Does the policy require training for implementation	<p>All staff are required to be aware of the policy and this is posted as an update on the staff intranet.</p> <p>Staff who have responsibility for processing donations have professional qualifications in either financial management or governance appropriate to ensuring compliance with this policy.</p>
Will implementation be monitored	Through annual review process by the Assistant Director Governance.
Is there a cascade mechanism in place to communicate the policy?	Through the staff intranet. The policy is posted on the RCGP website.
Are there linked policies/procedures	<p>Conflicts of Interest Policy</p> <p>Sponsorship Policy</p> <p>Code of Business Conduct Policy</p> <p>Procurement Manual</p> <p>Working with Repressive Regimes Statement</p> <p>Heritage Collections Management Policy</p> <p>Complaints policy</p> <p>Whistleblowing policy</p>

Annex 1

Reporting donations above £10,000 and all donations with conditions attached.

This form to be completed prior to acceptance of a donation over £10,000 with or without conditions and donations less than £10,000 with conditions. Once completed the form to be submitted to the Assistant Director Governance (Governance@rcgp.org.uk) for reporting to Governance Committee

1.	Executive Director	
2.	What is the donation? If not cash estimated value of donation If cash, is it a lump sum or paid in instalments?	
3.	Do you know who the donation is from? Please list the name or organisation including contact name, and contact information. (If easier attach a copy of the correspondence to this form).	Yes/No If no, please provide as much information as possible on how the origins of the donation
4.	Has the donor stated a wish to be anonymised?	
5.	What is RCGP's relationship with the donor? (i.e. RCGP member, family; organisation which works with RCGP etc)	If unknown leave blank
6.	Did RCGP proactively seek the donation? If yes, please explain how	
4.	Are there conditions attached to the donation?	

	Please attach correspondence.	
8.	What is the rationale for recommending whether the donation should be accepted or refused?	
Checklist		
Reputational risk to the College		
Does the donor or organisation contravene any aspect of the Sponsorship Policy?	Yes/No If Yes, please specify:	
Does the donor or organisation have any international links that may contravene the Principles guiding decisions on work with international partners/Human Rights Policy?	Yes/No If Yes, please specify:	
Are any conditions attached to the donation acceptable?	Yes/No If No, please specify	
Financial risk to the College		
Does the donation flag up any of the 'suspicious donations' criteria?	Yes/No If Yes, please specify	
Decision: (i) Donation approved (ii) Donation rejected (iii) Further information required		

