



Fundraising Practice Policy

Reviewed January 2026 by the Director of Development and Deputy Director of Development

LMH is a registered charity, charity number 1142759, which seeks to raise funds for annual expenditure, the endowment and capital projects. Funds are given during the donors' lifetime and in many cases as a bequest in their will.

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 LMH's commitment to implementing best practice in its fundraising activities, and is in line with the current guidance provided by the Institute of Fundraising. It should be read in conjunction with the Policy on fundraising with and responding to people in vulnerable circumstances and the Gift Acceptance Policy.

Summary

LMH is committed to the principle that it solicits gifts from those adult individuals who have an active relationship with the college – alumni or friends, or those individuals or organisations which have been carefully identified as having a potential interest in supporting a specific activity or initiative.

The college believes and maintains the principle that 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.
- 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.
- In full confidence that the donor will be acknowledged and recognised as he/she wishes.

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, the Development Office seeks to find out the forms and amount of communication preferred.

Constituency

LMH has approximately 9000 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 donations to the college, unless they have specifically asked to opt out.

'Friends' includes a number of individuals who have been introduced to the college, or who have expressed their own independent interest in the college. Generally, alumni and friends are approached with a solicitation no more than three times per financial year.

Means of Solicitation

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

- **Telethons**

The college may seek to contact by phone those alumni 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 receive 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 80 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 that reflects 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 and their solicit codes are updated. If a caller, a member of the Development Office team or other member of the college becomes aware that an individual may 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.

Alumni whose household telephone numbers are registered with the Telephone Preference Service are reviewed by the Director and Deputy Director and are only called if their relationship with the College is such that it is believed they would wish to be called.

Callers are current LMH students and are trained at the start of every telethon, and expected to speak to 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 discuss any relevant volunteer opportunities. 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. Requests for donations are made carefully to ensure that no-one feels pressured into making a gift. They follow the legal requirements when asking for direct debits and gift aid. A member of the Development team oversees the calling and call notes and conducts all appropriate follow up.

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 they do 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 have with the college.

- **Direct Mail**

Up to three times a year, fundraising materials (hardcopy and/or email), which usually include a leaflet about supporting LMH and/or a donation form, are sent out either alone or as part of a mailing such as LMH News. The college checks that those who have requested that they are not mailed, or are not solicited, will not receive direct fundraising appeals. 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 Development team, meet potential and current donors where appropriate to solicit gifts. The solicitation of a major gift is likely to entail a series of meetings. Contact reports are saved to the fundraising database recording salient details of the discussion and substantive conversations are followed up in writing.

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. Further details about such procedures may be found in the Policy for fundraising from Vulnerable Persons.

The fundraiser would not typically accept a gift as 'cash in hand' on the day of the meeting.

- **Email and Giving Days**

From time to time, alumni and other potential donors are contacted by email either with a direct ask (such as part of a Giving Day) or with links to giving as part of a more general email. The college can always be identified as the originator of the message. It is always possible to opt out of receiving email communications.

- **Website**

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

- **Fundraising Events**

If taking place outside the college, the venue for such an event would be carefully chosen to ensure that it permits equal access. Risk Assessments would be carried out and licensing permissions obtained. Best practice will be followed for all fundraising activity taking place off site.

- **Volunteers**

Occasionally, the college uses volunteers to solicit donations from their peer group. In such cases, the wording of the solicitation is agreed with the volunteer. The volunteers are not provided with contact data to make the approach themselves (to ensure GDPR compliance) and sign Volunteer Agreements to cover their conduct as a representative of the College.

Acceptance of donations

Subject to the below, 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 spent at the college's discretion in pursuit of the charitable purposes of the college.

The Development Director, Principal or Governing Body may decide to refuse the offer of a donation because the purpose of the donation does not match its fundraising objectives or if there is doubt about the appropriateness or legality of the source. Anyone who seeks to make a donation in excess of £1M is automatically subject to background checks by the university and, if necessary, such donations will be 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 communicated in appropriate language so that it does not cause offence. More detail can be found in the LMH Donations Acceptance Policy most recently approved by Governing Body Michaelmas Term 2025.

Gift Aid and Tax Efficient Giving

The college does not attempt to claim gift aid on any donations which 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 or email to a donor who has gift-aided his/her gift serves as a receipt for tax purposes. If requested donors can be provided with a schedule of their donations during the course of a tax year to assist with their income tax returns.

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

Handling of donations

In line with Institute of Fundraising best practice, cash and cheques are banked at the earliest possible opportunity. Cash and cheques that have not yet been banked are stored securely. Charity vouchers such as those made through the Charities Aid Foundation are sent to CAF via their online portal to be processed and the money is passed to LMH by bank transfer. Card transactions are PCI-DSS compliant. Direct Debits are processed by Buffalo Donor Debit (CTT Charity Payment system, a third party) and all donors are provided with a timely confirmation of their gift and a copy of the Direct Debit Guarantee.

Donations of shares are co-ordinated between the donor's and the college's brokers by the College's Treasury. The Development Team remain in close contact with the donor to maintain good communications throughout the process.

Data Protection

Personal data is processed fairly and lawfully in line with our legal requirements. 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.

Appropriate technical and organizational measures are taken against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of, or damage to, personal data. Each element of our data processing is kept under regular scrutiny, and documents in appropriate assessments. The Development team work closely with the Data Protection Officer to ensure compliance.

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

Database and Security

All alumni and donor data is held securely on the Development and Alumni Relations System (DARS) which is a database that is owned and managed by the University of Oxford. Lady Margaret Hall is a participant in the DARS database. The data protection statement for DARS can be found here <https://www.alumniweb.ox.ac.uk/oao/dataprotection>.

DARS access is via two-factor authentication and only those who need to see financial data have the relevant permissions and training to do so. Those who are working with the 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 telethon consultants – files are encrypted.

Paper files are stored securely in the Development Office and credit or debit card details are not recorded on the database, but are stored securely until disposal. Confidential waste of this nature is disposed of separately and regularly.

The Development Office produces monthly bank reconciliations for the Accounts team. The spreadsheets are stored on the office's shared drive, which is part of a secure network. Access is limited to members of the Development Office, the Accounts team and IT support. Gift Aid claims are prepared and securely submitted to HMRC by the Development Office.

'One off' gifts and event payments made online are processed initially via the secure online website provided by Blackbaud Internet Services (BBIS). Payment Card transactions are processed by First Data Merchant Services, whose service complies fully with current legislation.

Where donors request Direct Debits to be set up the instructions are defined in the secure website provided by our direct debit processing bureau. Direct Debits are processed by Buffalo Donor Debit (CTT Charity Payment system, a third party) Buffalo Donor Debit.

Acknowledgement, Recognition and Stewardship

LMH 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 email or letter from the Development Office and those who make larger donations will receive a message from the Development Director, Principal or other member of the community, as appropriate.

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

When donors are listed as members of a donor circle the amount of their donation is not listed but they are, with their permission, listed within the circle donation bracket.

From time to time, other forms of recognition are offered in line with the value of the gifts, such as a plaque in an area of college relevant to their gift, and/or an invitation to the annual Founders and Benefactors dinner.

In line with the Donation Acceptance Policy, there are no circumstances in which a gift will be accepted when the donor expects a place or employment at the college to be offered, and there are no circumstances in which such a place or employment shall be offered in recognition of a donation. All places and employment at LMH are gained through academic or professional merit alone and, to that end, those interviewing prospective students or employees have no access to donation records for the individuals concerned, or their families.

In line with the University's *Policy Governing Gifts from Families of Current and Prospective students*, there are no circumstances in which any donation will be accepted or solicited if there is a reasonable likelihood that acceptance of such a donation might result in actual or perceived influence in decision-making at the University, or in improper behaviour by any of its members. Further details on the College's Policy relating to separation between Admissions and Development can be found in the Donation Acceptance Policy.

Fundraising complaints procedure

At LMH, we believe that philanthropy should be an enjoyable experience. We work hard to ensure that all our interactions with current and potential donors are of the highest quality. We are registered with the Fundraising Regulator, demonstrating our commitment to best practice.

Despite our best efforts, however, we recognise that there may be occasions when a donor wishes to register their complaint. We take all feedback and complaints seriously and seek to address them quickly and appropriately. To achieve this open and timely communication is essential.

A fundraising complaint

Fundraising concerns or complaints should pertain to an action or area which is within the remit of Lady Margaret Hall, Oxford. All complaints are handled sensitively and confidentially. Only those directly involved in investigating the issue will have access to the details.

How to complain

Throughout the complaint process, we will treat you fairly and with respect, keep you informed of progress, respond promptly, and let you know how to escalate a complaint if you wish to pursue it further.

1. Tell us

It is recommended that a complaint be raised within 12 weeks of the incident.

You may register your concern or complaint, providing as much detail as possible, in any of the following ways:

- Email: development@lmh.ox.ac.uk
- Post: Development Office, Lady Margaret Hall, Norham Gardens, Oxford, OX2 6QA.

Please include your name and contact details so that we can get back in touch with you easily. We are unable to respond to anonymous complaints.

2. We will respond

We aim to acknowledge all complaints in writing within 5 working days (with the exception of the Christmas period when the office may be closed for up to 10 calendar days).

Your complaint will be fully investigated and the outcome of our investigation will be communicated to you within 20 working days of the receipt of your complaint. If it is not possible to give a response within that timescale, we will contact you to explain why and to provide an indication of when a full response can be expected.

3. If you are not satisfied

If you are not satisfied with our response, please let us know within 20 working days of sending and we will escalate your complaint to the Director of Development, Treasurer or Principal as appropriate. They will follow the aforementioned timelines for acknowledgment and investigation and will investigate the matter themselves and then write to you setting out the outcome of their review and the rationale for their decision.

What to do next

If you are still not satisfied and would like to make a complaint to the Fundraising Regulator regarding Lady Margaret Hall, Oxford, please contact them via the online complaint form.

The Fundraising Regulator

The Fundraising Regulator is the independent regulator of charitable fundraising in the UK. It sets and promotes the standards for fundraising practice and adjudicates complaints from the public about fundraising where these cannot be resolved by the charities themselves. Lady Margaret Hall, Oxford is registered with the Fundraising Regulator and subscribes to the Code of Fundraising Practice.

Anna Bates
Director of Development