

COURTAULD

Gift Acceptance Policy

Sensitivity	<i>Public</i>
Effective date	<i>15/06/2026</i>
Policy area	<i>Governance/ Gift Acceptance</i>
Responsible officer	<i>Advancement Operations with Director of Advancement oversight</i>
Approved by	<i>Ethics Committee</i>
Consultation	<i>SMT</i>
External references	<u>Exempt charities (CC23) - GOV.UK</u> ; <u>Charities: due diligence, monitoring and verifying the end use of charitable funds - GOV.UK</u> ; <u>The Charities Statement of Recommended Practice (SORP) - GOV.UK</u> ; <u>Code of Fundraising Practice Fundraising Regulator</u> ; <u>Code of Ethics for Museums - Museums Association</u> ; <u>The UK Sanctions List - GOV.UK</u>
Internal references	<i>The Courtauld Strategic Plan: <u>The-Courtauld-Strategy-2024-2029.pdf</u></i>
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1. Introduction

The Courtauld Institute of Art is a company limited by guarantee (registered number 04464432) and an exempt charity regulated by the Office for Students (UKPRN: 10007761), and is dependent on philanthropic gifts as a vital component of its income. In keeping with its charitable status, the Courtauld actively solicits philanthropic support that is aligned with its values, strategic objectives and financial needs.

The Courtauld is extremely grateful to the donors whose generosity supports its teaching, research, gallery, collections, and programmes. The Courtauld aims to ensure that donors are appropriately acknowledged and recognised, and donations are used as intended.

2. Purpose and Scope

- 2.1. The purpose of this policy document is to clearly set out the guidelines that govern the acceptance of donations to the Courtauld.
- 2.2. This policy is intended to provide a transparent and rigorous framework to ensure good governance and manage risk in accepting philanthropic funding.
- 2.3. All members of staff should adhere to this policy when considering approaching prospective donors.

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3. Related procedures

- 3.1. Fundraising Best Practice Policy
- 3.2. Courtauld's Anti-Fraud, Bribery and Corruption Policy

4. Gift Acceptance Policy

- 4.1. The Courtauld seeks and encourages charitable donations (gifts) from a range of sources including companies, charitable trusts and foundations and individuals; including alumni and members.
- 4.2. Gifts are accepted at the Courtauld's discretion.
- 4.3. The mission of the Courtauld is to advance the understanding of the visual arts of past and present across the world, through pioneering research, innovative teaching and inspiring exhibitions, and through the sensitive stewardship of our internationally renowned collection. All gifts considered must fully respect this mission.
- 4.4. The Courtauld is committed to the following values:
 - 4.4.1. We will put our students and visitors at the heart of all we do.
 - 4.4.2. We hold a deep commitment to scholarly values and are dedicated to creating and sharing knowledge widely through innovative research, teaching, display, exhibitions and debate.
 - 4.4.3. We will actively link the visual arts with other disciplines and fields of enquiry.
 - 4.4.4. We will embed a culture of innovation that generates new ideas and opportunities which will leverage our unique strengths and ensure that the Courtauld is relevant, contemporary and sector-leading.
 - 4.4.5. We will conduct our business in a socially responsible and ethical manner, protecting the environment and benefiting society.
 - 4.4.6. We aim to develop and invest in our staff, ensuring the right structures, skills, talents, experience and mind-sets to achieve our ambitions and objectives are in place.
 - 4.4.7. We believe in the exemplary stewardship of the works of art in our care, for the benefit of current and future audiences.

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4.5. The Courtauld's strategic priorities are:

- 4.5.1. Transforming our Campus
- 4.5.2. Diversifying our Community
- 4.5.3. Enriching our Teaching and Research
- 4.5.4. Activating our Gallery
- 4.5.5. Developing our Partnerships
- 4.5.6. Harnessing our Digital Potential

4.6. In accepting gifts, the Courtauld will consider and be guided by the following criteria.

4.6.1. Gifts should:

- 4.6.1.1. Align with and support the Courtauld's mission, values and priorities.
- 4.6.1.2. Help advance the Courtauld's strategy and aims.

4.6.2. Gifts should not:

- 4.6.2.1. Be derived from an unlawful source or be believed to relate to any illegal activities.
- 4.6.2.2. Be derived from a source listed on international or legal exclusion lists, or UK sanctions lists.
- 4.6.2.3. Expose the Courtauld to undue adverse publicity or reputational risk.
- 4.6.2.4. Require unacceptable expenditure of additional Courtauld resources.
- 4.6.2.5. Compromise the Courtauld's academic freedom.

4.6.3. The following guidance will be observed: [the GOV.UK guidance for exempt charities \(CC23\)](#) [the Charity Commission's Due Diligence toolkit](#), [the Charities Statement of Recommended Practice \(SORP\) \(FRS102\)](#), [the Fundraising Regulator's Code of Fundraising Practice](#), [the Museums Association Code of Ethics for Museums](#), and [the UK Sanctions Lists](#).

4.7. The Gift Acceptance Policy will be maintained by the Advancement department and reviewed by the Ethics Committee.

4.8. All donations will be solicited, or supported, by the Advancement department.

- 4.8.1. The Advancement department is unable to support or endorse applications or proposals for funding made by students to support their studies

4.9. The Advancement department will not endorse or advocate for student admissions. Admission decisions are made independently by the academic admissions team based solely on merit and established entry criteria. Philanthropic contributions carry no

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bearing on the admissions process and will not be accepted as a consideration for student enrolment.

- 4.10. All donations with an expected value of £10,000 or higher will be subject to due diligence checks and escalation procedures prior to a request being made, or once the donation has been received in the case of unsolicited donations.¹
- 4.11. The Ethics Committee will consider the following to determine whether a gift should be accepted:
- 4.11.1. all new funders with the capacity to make a gift of £500,000 or more
 - 4.11.2. all new funders with the capacity to make a gift of £250,000 or more, which have been referred to the Committee on the grounds that acceptance of the gift may breach the guidelines in section 4.6 above
 - 4.11.3. all funders, which have been referred to the Committee on the grounds that acceptance of the gift may breach the guidelines in section 4.6 above, and a decision on our ability to accept or refuse the gift has not been reached.
- 4.12. The Ethics Committee will have oversight and review the following:
- 4.12.1. gifts with a proposed value of £100,000 or more
 - 4.12.2. gifts from donors who have cumulatively donated £250,000 or more
 - 4.12.3. sources of funding from donors approved over three years ago where the supporter remains actively engaged with the Courtauld.
- 4.13. The Governing Board will consider and review gifts of £5,000,000 or more to determine whether the gift should be accepted.
- 4.14. Due diligence will be undertaken in a manner that is efficient and proportionate to the scale of the gift.
- 4.15. Most cases will be considered by the Ethics Committee before an approach for funding is made, but there may be exceptions, as noted below.
- 4.15.1. Some cumulative gifts that exceed £250,000 will have already been received in advance of the Ethics Committee.
 - 4.15.2. In the case of Legacy gifts, it is likely that the Courtauld will only become aware of an intended gift, once the donor is deceased and probate has started.

¹ The Courtauld's escalation pathway starts with review by the Head of Advancement Operations, rising to Director of Advancement, the Marit Rausing Director and finally to the Ethics Committee and Governing Board. Where a decision to accept or reject a gift cannot be reached in the first instance by the designated approver, the decision will be escalated higher.

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- 4.16. Gifts must not be publicly recognised until a decision on acceptance is reached.
- 4.17. The Courtauld will be transparent about gifts received in terms of their sources and purposes. In cases where a donor wishes to remain anonymous, such anonymity will be respected so far as is legally and practically possible. Anonymous gifts will be subject to the Courtauld's gift acceptance procedure and the Courtauld will not accept donations where the source of the funds in question is unknown.
- 4.18. All decisions relating to the acceptance of gifts must also comply with the Courtauld's Anti-Fraud, Bribery and Corruption Policy, which is part of the Financial Regulations.
- 4.19. Records of Gift Acceptance Decisions will be held by the Advancement department.

5. Review

This policy is to be reviewed annually by the Ethics Committee, following a review and updates by the Donor Relations Manager, Head of Advancement Operations, Head of Philanthropy and Partnerships, Director of Advancement and Director of Governance and Student Services.

Last reviewed by the Ethics Committee, 15 June 2026

Next review by the Ethics Committee, June 2027