

**Generosity versus altruism:
Philanthropy and charity in the US and UK**

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Karen Wright

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Abstract

International differences in giving levels are becoming increasingly well documented by a variety of sources. Less well explicated in both research and practice are the social understandings of the role and meaning of charitable giving in different countries and cultures. This paper contributes a comparative analysis of giving ethos and behaviour in two countries, the United States and the United Kingdom, in particular the relationship of giving to civic life. It identifies differences in giving ethos and behaviour in the two countries, and postulates two models—generosity and altruism—for explaining those differences.

Obvious disparities between the two countries exist when overall levels of giving are considered. In the United States, individual giving as a percentage of Gross Domestic Product has consistently hovered around 2%. By contrast, charitable giving in the United Kingdom has yet to reach 1% of GDP. Various strategies, including those imported from the US, have not been able to move that percentage significantly higher, and giving levels were in fact declining in the mid-1990s as incomes were rising. Intriguingly, while the two countries differ dramatically in the total amounts given, rates of participation in giving are quite similar.

These kinds of figures have encouraged some analysts to conclude that the giving culture in the UK is simply less well developed than in the US. This conclusion, however, neglects the complexity of the differences between the political structures, social attitudes, and the role of charitable giving in the two countries. Other countries and cultures may also suffer similar simplistic assessments in an era when the export of American civic concepts and strategies has become increasingly popular.

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1 Introduction: Concepts of philanthropy and charity

The first of many cultural paradoxes to be found in a comparison of giving in the United States and United Kingdom is the question of what to call it. ‘Philanthropy’—both the practice and the word itself—is very popular in the US. It is considered a positive and robust term and it is employed widely by both the left and the right. While giving to opposing causes, both ends of the political spectrum support wholeheartedly the value and importance of philanthropy. Lingering elite connotations are tempered by popular giving mechanisms such as United Ways, and by numerous ‘social change’ philanthropic efforts involving representatives of possible recipient groups in the decisions about the distribution of philanthropic resources.

In the UK, however, philanthropy has not been so popular. While it has enjoyed a very recent renewal of interest, spurred by modern visions of such things as e-philanthropy and social ‘investment’, for many in Britain it still carries disparaging connotations of Victorian ‘do-gooderism’ and is often seen as elitist, patronising, morally judgmental and ineffective, as well as old fashioned and out of date (Prochaska, 1988, 1990; Dickens, 1853). It is perceived as an idea whose time came, was proved unworkable, and went—to be replaced by a universal, fair, and more efficient welfare state. Moreover, the classic distinction drawn by William Beveridge¹ between philanthropic and self-help organisations rests on a sharp delineation between altruistic and self interested purposes and motivations, implying of course that philanthropy was—or at least should be—entirely selfless (Beveridge, 1948). In doing so, Beveridge both reflected and further reinforced public perceptions of philanthropy as an attitude of benevolent superiority. This distinction persists today; indeed, in many circles in modern Britain, philanthropy is the form of giving that ‘dare not speak its name’. In the UK ‘charity’ and ‘charitable giving’ are the preferred terms; though not entirely free of baggage, they are seen as more modern, egalitarian and respectful.

A further irony of this paradox is that in many ways the negative connotations applied to the concept of philanthropy in the UK are very similar to the meanings that the term charity carries in the US. The terms are used almost as mirror opposites in the two countries. Moreover, philanthropy is viewed in Britain as a somewhat dubious *attitude* or *stance*; charitable giving on the other hand is a comparatively positive *act*. In the United States the situation is reversed. Philanthropy is an act, and an increasingly commanding one, while charity is dismissed as a patronising and somewhat out of date attitude.

¹ William Beveridge is most widely known as the architect of Britain’s post-war ‘welfare state’. His strong commitment to the importance of voluntary efforts, explicated in his landmark book, *Voluntary Action* (1948), is less well appreciated.

2 Giving patterns

This section charts aspects of the giving patterns in the United States and United Kingdom that illuminate distinctive differences in how people give to charitable causes in the two countries. After a discussion of giving levels, it will explore giving patterns along three dimensions: donors, recipients and modes (or who gives, to whom they give, and how they give).

In this section and the next, the aim is to highlight rather than to caricature differences. Especially when placed against an international backdrop, there are a great number of similarities and common roots between the giving traditions in the US and UK. In particular, both have long histories of voluntary and community action, and of the creation of foundations and trusts, enlisting private funding for what are generally considered to be public purposes (Owen, 1965). Increasing global interaction and professional exchange also act to blur differences over time. Moreover, all cultures are full of crosscurrents and are in continual flux; the snapshots presented here will necessarily be incomplete. This analysis focuses on giving by the general public; giving by major donors and elite groups may well display somewhat different patterns from those discussed below. Finally, while striving to use comparable information from the two countries, both what information is collected and how it is collected varies somewhat between them.²

2.1 How much do people give?

The most common measure of overall giving levels is the total per cent of Gross National Product (GNP) or the equivalent Gross Domestic Product (GDP) which is given away to charitable organisations and causes. By this measure, the United States gives at a rate more than twice that of Great Britain. Giving in the US was 2.1% of GNP in 2000, and has been at levels of 1.9–2.1% of GDP since 1986 (AAFRC, 2000). Figures on UK giving usually estimate it at anywhere between 0.63% and 0.77% of GDP (Glennester, 1992; Salamon and Anheier, 1996a).

However, rates of participation in giving in the two countries are actually quite similar. Over 70% of US households surveyed by Gallop for the Independent Sector (Saxon-Harrold, 1999) reported that they had made a contribution in the past year (1998), while UK National Opinion Poll data reveal participation rates of 66% of adults for the same year (NCVO, 1999). US participation levels remained relatively constant during the 1990s, while UK rates exhibited a pattern of decline in the

² For example, the primary ongoing survey of giving in the US, conducted by Gallup for Independent Sector, asks about household giving on an annual basis, while in the UK the major survey, conducted quarterly by NOP for the National Council of Voluntary Organisations, asks individuals about their giving in the past month. The Gallup survey will be affected by recall problems, while the NOP survey may miss monthly variations. Both surveys will tend to miss outlying responses, in particular large donations. While a detailed and systematic comparison of these figures is much needed, it is a project in itself and beyond the scope and intent of this analysis.

same period. This decline appears to have been arrested in 2000 (Hems and Passey, 1998; NCVO, 2001).

Average gifts per household show significant disparities. Households in the United States contributed an average of \$754 in 1998, amounting to 1.7% of their total income; contributing households donated \$1,075 dollars each, or 2.1% of household income, and 2.5–3.3% of household expenditure (Saxon-Harrold, 1999). According to the 1994–1995 Family Expenditure Survey in the UK, contributing households gave indicated average (mean) annualised gifts of £132 per household and median gifts of £24 per household, totalling 0.63% of average household income (Banks and Tanner, 1997). Extrapolating from monthly figures, National Opinion Poll data indicate 1998 annualised giving levels of £108 (Hems and Passey, 1998). NCVO reports that the 3% of the population giving £50 per month or more (in its term ‘elite givers’) gave nearly half of total donations (NCVO, 1999).

Before drawing conclusions based on these comparisons, however, there are some rather significant qualifications to be made. First, it must be kept in mind that perceptions that the US is richer and has more disposable income are in large part true. When GDP per person is measured at purchasing power parity exchange rates, the US levels are nearly 50% higher than the UK (*The Economist*, 2000).³ Religious giving dominates US contributions in a way that is absent in the United Kingdom. Religious giving made up 43.6% of total US giving in 1998 (AAFRC, 1999), while only 16.2% of UK giving (Passey and Hems, 1997), reflecting vastly different levels of church attendance, among other things. In an effort to compare like with like, it might make some sense to exclude religious giving when evaluating giving to charitable causes in the two countries. However, such a step is less useful than it might at first appear to be, since religious organisations can serve as an important vehicle for charitable work at local and international levels. Moreover the degree of financial involvement in charitable activity varies both by denomination and by congregation, making it quite difficult to quantify on a general basis.

Developments in the 1990s significantly affected giving levels in each of the countries—but in opposite directions. In the US there were large increases in overall giving levels in the late 1990s; giving increased a total of 36.8% in the three years 1996 to 1998 (AAFRC, 1999). Prior to that time, giving was increasing by 5–8% each year (Saxon-Harrold, 1999). These increases were fueled by its strong economy, and especially by the unprecedented growth in the value of the stock market, in which the majority of US households now participate, largely via pension plans. The US tax code provides significant tax benefits to donors for any gifts of appreciated stock; there is no capital gains

³ OECD data show Britain at approximately \$22,500 per capita while the US is at \$33,500 per capita (*The Economist*, 2000).

tax to be paid on the stock, and the donor can claim a deduction from her own tax for the full current value of the stock.

Unlike the US, both giving levels and participation in giving declined in Britain during the later 1990s, despite an increasingly strong economy. Total charitable donations in 1997 were £4.51 billion, down from £5.3 billion in 1993, a fall of 31% in real terms. They rose somewhat in 1998 to £4.94 billion, amid a booming economy. The average monthly gift decreased between 1993 and 1997, and the median gift of £1 is less than half of the £2.50 it was in 1993 (NCVO, 1999). Participation rates also declined; NCVO reports that while 81% of those surveyed in 1993 reported making a charitable donation in the past month, only 66% said that they had done so in 1998. The Labour government introduced significant changes in the tax treatment of charitable giving in spring 2000. While recent data (CAF and NCVO, 2001) suggest that this decline may well be levelling off and perhaps even turning around, it is too early to know what long-term effect the tax changes might have on overall donations and especially on participation rates.

There has been a great deal of controversy in particular about the effect of Britain's national lottery on charitable giving in the UK. Established in November 1994, it grew rapidly into the largest lottery in the world. Proceeds from the lottery are used to fund large public projects as well as the arts, charities and recreation. Indeed, lottery funding is now the most significant single source of funding for many of these organisations. Participation in the lottery is widespread and diverse; 52% of adults surveyed reported buying lottery tickets every week. The majority of those surveyed saw purchasing lottery tickets as a good way of helping charity (Passey and Hems, 1997). When asked whether buying lottery tickets would affect the amount they would give to charitable causes, 48% said they thought they would give less to charity, and 49% said it would make no difference to their giving (there was no option to indicate the possibility of giving more rather than less). Interestingly, those in the highest income quartile were most likely to anticipate a reduction in personal giving because of participation in the lottery; those in the lowest quartile were least likely to do so. An average of 28% of those surveyed said they had already cut their charitable giving because of the lottery (Jowell, 1996).

While this analysis focuses largely on individual giving, it may be of interest to note that parallel differences can be found in levels and patterns of corporate giving in the two countries. Corporate giving in the US has generally averaged 1% of pre-tax profits; in 2000 it had climbed to 1.2% (AAFRFC, 2000). Corporate giving clubs in a number of cities encourage companies to be generous in giving to their communities, and stipulate that members must agree to give 2–5% of pre-tax profits in order to belong. Major corporations also offer programs matching employee donations. In Britain the corporate Percent Club, while originally modelled on those in the US, has required a commitment to give just 0.5% of pre-tax profits. However, in the past three years they have set a 'new millennium

standard' of 1% of pre-tax profits and the majority of their members have achieved the new level (Business in the Community, 2000)⁴. Matching gift programs are rare in the UK and overall levels of corporate giving average 0.2% of pre-tax profits, reflecting what is on the whole a less strong tradition of corporate giving and community involvement.

2.2 Donors

The picture of who is most generous in the two countries is again a paradoxical one. In the US larger gifts have been more likely to come from men, who have had greater access to income and who may see giving as a social requirement for career success; and from retirees, who may have accumulated assets at their disposal. In the UK, the picture is far different. Committed givers are more likely to be women. Retirees, who most often rely on a small state pension, and are far less likely to have significant property or stock assets, are lower than average givers. In both countries, however, those who identify themselves as generous or committed givers are actually that, indicating that identity reinforcement may be key to continued high levels of giving. Also in both, volunteering is related to giving, but there may be differences in the nature of the relationship vis-à-vis particular organisations. In the US the assumption is that volunteering and giving are complementary—one gives to the organisation where one volunteers. In the UK the presumption has been virtually the opposite, that people who volunteer for an organisation will not necessarily be more likely to give to it financially; fundraisers report resentment, even outrage, from volunteers at being asked for money when 'I have already been giving my time'.

2.3 Recipients

The causes to which people choose to contribute reflect values not only about social priorities, but also their view of the remit of giving itself. Is philanthropy a way to 'give back', expressing appreciation for what one has received, such as gifts to hospitals and universities? Or is it one's duty to those less fortunate? Not surprisingly, there are some significant differences in how that role is understood and expressed in the two countries.

US: Charity begins at home

Americans believe in giving to needs they can directly see, feel and understand. The bulk of their financial support goes to organisations in which they are or have been personally involved—their church, the college or university they attended, or a hospital that helped their family. Giving in the US is predominately locally rather than nationally focussed and organised. In 1998 individuals gave the largest chunk of their charitable contributions to religion (43.6%) followed by (largely higher)

⁴US figures do not include in-kind contributions of marketing and advertising. In the UK such in-kind contributions make up a significant part (20%) of their percentage.

education (14.1%), health (9.7%), charitable foundations (9.7%), human services (9.2%), public/society benefit (6.2%), the arts (6.0%), the environment (3.0%) and international affairs (1.2%) (AAFRC, 1998).⁵ Many Americans are of the opinion that ‘why should you send help halfway across the world when there are people in need right here?’

UK: Charity for all

While some surveys have found not entirely dissimilar attitudes, in practice the British display quite different priorities. For them, the most compelling needs are often not their own (or local ones) but those of others who are far less well off and often very different from them. International aid often gets the largest piece of the charitable pound followed closely by medical research, child and family welfare, religion, heritage, and a particular favourite, animals. Among the 12 largest national charitable organisations (with size measured in terms of fundraising income), four were in health, three each in overseas aid and human welfare, and one devoted to heritage preservation (Steeds, 2000). Unlike the US where churches are largely dependent on the contributions of members of congregations, the established Church of England largely funds its clergy and buildings from its corporate holdings, though other religious organisations are more directly in need of major ongoing financial commitments from members. Higher education is also predominantly financed through state grants for student tuition at the undergraduate level, as well as separate government funded teaching and research awards. In 1990, 69% of higher education funding was public, while 26% came from fees and less than 6% from private giving (Kendall and Knapp, 1996). Although these proportions will have shifted significantly away from this position over the intervening decade, there is still a marked contrast, particularly in public perceptions, in dependency on private giving with the US. Furthermore the tradition, pervasive in the US, of widespread alumna giving to their alma mater is a relatively undeveloped one in the UK; Oxford University initiated the first modern university capital campaign in 1988.

2.4 Giving methods

The overwhelming majority of giving in the US is done using methods that require donor deliberation (or ‘planning’ as the term is used in the UK). Churches ask members to make an often quite sizeable yearly pledge, paid in weekly instalments through the collection plate. Employees of medium and large businesses and organisations are solicited each year to make a donation to their local United Way or other charities with the gifts drawn out directly from their paycheques. Mail campaigns ask potential donors to consider the merits and urgency of their cause, often detailed in pages of print and pictures, and 79% of American households report having given a check to a charitable organisation

(Saxon-Harrold, 1999). One effect of the US donor-benefit tax deduction for charitable gifts is that many donors sit down at the end of the year to consider what they want to give to charitable organisations and to which ones they want to give. Organisations are eager to encourage this process with their traditional year-end solicitation mailings.

Solicitation strategies in the UK are evolving, developing unique models, such as the Comic Relief campaign, as well as becoming more like those in the US. Yet they still rely most heavily on ‘spontaneous’ methods that were developed in the late nineteenth and early twentieth centuries, and have remained largely unchanged since then. Spontaneous giving accounts for the overwhelming majority (83%) of gifts, and more planned methods account for 17% of donations.⁶ The single ‘most effective’ fundraising method in the UK, which accounts for 35% of all donations, is the collecting tin. Now usually plastic, it has a slot for coins which volunteers shake at passers-by at high pedestrian traffic points such as underground stations or shopping areas, sometimes while wearing costumes or singing. The next most popular methods are door-to-door collections and raffles (NCVO, 1998).

Solicitation methods are important because they determine expectations about when people give, and most especially how much they give, as well as how they ultimately understand the nature of giving. In the US weekly donations to churches, usually payments on a yearly pledge, average fifteen dollars. The most popular methods in the UK elicit far smaller gifts; donations to collecting tins average just fifty pence (\$0.80), while door-to-door collections bring in an average gift of one pound (\$1.60) (Pharoah, 1996). UK giving is dominated by methods that assume through traditional expectations and physical design that donations will most likely be made in coins, sharply limiting the likelihood that they will receive larger amounts. These ‘spare change’ methods not only constrain the amounts received for philanthropic purposes, but also ensure that charitable giving remains quite vulnerable to other demands on an individual’s spare change—most notably the option of purchasing a lottery ticket. A brief comparative overview of giving patterns follows in table 1:

⁵ These categories are dominated by alumni gifts to universities and colleges (education); hospitals (health); and the establishment of family foundations either independently or through a community foundation (charitable foundations).

⁶ Such ‘planned’ methods include writing a cheque, payroll giving, membership subscriptions and special appeals. More recent figures (NCVO and CAF, 2001) indicate that the overwhelming dominance of spontaneous methods may be eroding somewhat while the incidence of ‘planned’ or intentional giving has grown to over 20% of gifts.

Table 1: Giving patterns

| | US | UK |
|----------------------|--|---|
| Levels | 2.0+% of GDP 1.7% of avg. household income Household gift: \$754/yr* | <1% of GDP 0.63% of avg. household income Household gift: £108/yr+ Annual gift: £24 |
| Participation | 68–75% of households contribute (1991–1998) | 65–81% of households contribute (1992–2000) |
| Modes | Church collection: \$15.00/wk* Payroll deduction: \$170/yr* Direct mail solicitation Telephone solicitation | Collecting tin: £0.50/gift* Door to door collection: £1/gift* Raffles |
| Donors | High - men, retirees, high perceived generosity | High - women, disabled, high perceived generosity |
| Causes | Religion, human services, health, youth | International aid, medical research, welfare, religion, animals |

Sources: Saxon-Harrold, 1999; AAFRC, 1999; Passey and Hems, 1997; Salamon et al, 1996
 Note: £1 equals approximately \$1.45–1.65; * = mean; + = median

3 Explanatory factors

What might help explain why giving patterns look the way they do in the United States and Britain? Multiple viable explanations collude to produce differences in perspectives and practices in the two countries. These explanations include: expectations of public and private sectors; attitudes towards money, income and wealth; tax policy; and the strength of fundraising practices and institutions, including churches.

3.1 Expectations of public and private sectors

The framers of the American Constitution were concerned about constraining the power of government, fearing the potential for abuse inherent in unlimited power. The Constitution itself and its Bill of Rights strongly reflect this quite Lockian view. Their explicit structures are reinforced by long-standing traditional beliefs that government—especially national government—should have only a limited role (de Tocqueville, 1994). Despite some of the lowest tax rates in the developed world, many Americans view themselves as victims of federal taxation they see as akin to theft. The large majority (63%) see their tax levels as ‘too high’, while 33% thought they were ‘about right’, and presumably only 6% thought they were too low. Government itself is perceived with moderate to high levels of contempt for its capability, efficiency and ethics. In 1992, 75% of Americans surveyed indicated that they ‘trust the government in Washington’ either ‘never’ or only ‘some of the time’ (Putnam, 2000).

While the British government receives its share of often quite pointed criticism, it is still viewed as the fundamental vehicle for collective choices and actions towards social betterment, and probably the most capable and effective actor towards those goals. And after over a decade of leadership of the Conservative party, the majority (58%) of UK voters in 1994 thought that the best option for the welfare state was to raise taxes and spend more. Only 4% wanted to reduce taxes and spend less,

though these priorities may not have been entirely matched in actual voting behaviour (Taylor-Gooby, 1993). The current Labour government elected in late 1997 pledged to maintain prior Conservative taxation and spending levels, and until mid-2000 largely stayed by that pledge, despite criticism from the Liberal Democrat Party, as well as some of its own constituencies. It has since announced major spending initiatives in education and health.

In the United States both the left and the right have greatest faith in non-governmental solutions, and private giving is a universally positive value, supporting robust community efforts to create and sustain a desirable quality of life for its members. In the UK private giving, and particularly philanthropy, is perceived as an inefficient and piecemeal strategy that has been obsolete for decades. An overwhelming majority of 88% of UK residents felt that ‘the government ought to help more and not rely on charity to raise needed money’. Furthermore, when asked whether ‘giving to charity lets government off the hook’ 66% agreed or strongly agreed; only 15% disagreed (Jowell, 1994). For the British, then, private giving has traditionally been not only perceived by many as a rather suspect and ineffective strategy for the creation of a good society, but also in some significant sense as a direct threat to it.

3.2 Attitudes towards money and wealth

Put simply, in the United States money is seen as a good thing. Wealth is considered a nearly universal measure of achievement and success. People who have become rich are viewed with respect; those who have inherited wealth are viewed by some with suspicion. As the dominant indicator of class status in America, wealth is relatively explicitly discussed and visibly displayed. At the same time, money is in many ways a great leveller in a society whose mythology holds that anyone who works hard enough can become rich. Money is at least the primary entrance ticket to social status, and ‘anyone’s money is as good as anyone else’s’. Philanthropy in particular has been a way to demonstrate both social leadership and significant personal wealth, and as such has often been used as a vehicle for entrance into elite circles.

In the US wealth is more respected when it is created rather than inherited. While there is interest in providing for certain community and individual needs—education in particular—for succeeding generations, there is little perceived need to preserve capital for them—they can create their own. In this context there is great opportunity, even expectation, for private giving (Odendahl, 1990). This perspective was of particular interest to the English philosopher, politician, and social reformer John Stuart Mill, who was concerned about the effect of intergenerational concentrations of wealth

promoted by the *traditional* practice of primogeniture⁷ on the fairness of political processes in his country (see his *Principles of Political Economy*, 1848).

Money is not clearly such a good thing in the UK. Financial success is viewed by some with admiration, by others with suspicion; they see it as unseemly, and very likely a result of the exploitation of others. Inherited wealth for a few is considered a given worthy of greater respect than self-made wealth. It is accepted as long as it is not accompanied by ‘excessive’ or obvious consumption of material goods (Lewis et al, 1995; and Furnham and Rose, 1987). It is in many ways a family trust, to be preserved whole (or added to) for future generations, and not to be squandered by self-indulgent consumption—or for that matter given away through large-scale philanthropy.

On more modest levels, ordinary perceptions of wealth and money also differ greatly between the two countries. In the US, a two-earner home-owning household with jobs in manufacturing and services will most likely see itself as ‘middle class’. Extensive government subsidies of home ownership and widespread use of credit for home improvements and consumer purchases create a lifestyle beyond the scale of current earnings. This ‘*perceptual wealth*’ also supports the practice of significant private giving even among households with relatively modest means.

This contrasts sharply with common views of household resources in the UK. Instead of holding an inflated view of their own wealth, people in Britain tend to take the opposite tack. When asked to rate their own income levels, only 3.5% perceived themselves as high income, a very sizeable 46.6% classified themselves as low income, and 48.6% put themselves in the middle income category (unpublished data, Jowell, 1995).

This attitude of ‘*perceptual poverty*’ is highlighted when actual income is compared against income self ratings (see table 2):

Table 2: Self-rated income by actual income (in quartiles)

| Self-reported income | Lowest quartile | Second quartile | Third quartile | Highest quartile |
|-----------------------------|-----------------|-----------------|----------------|------------------|
| High | 0.9% | 0.7% | 2.7% | 9.7% |
| Medium | 16.8% | 41.8% | 68.0% | 77.7% |
| Low | 81.1% | 57.3% | 28.9% | 12.6% |

Source: unpublished data, British Social Attitudes Survey, 1995

⁷ Primogeniture is the practice of leaving the entire family estate to the eldest son. It promoted the concentration of wealth over generations, and perhaps also the emigration of other siblings abroad to countries like the US.

These figures reflect under-rating of income as actual income goes up. It is most striking in the top two income categories; in the highest quartile more people rate themselves as low income than high income, while in the second highest quartile more than ten times the number of people rate themselves as low income as rate themselves high income.

These quite different perspectives are further supported by this international comparison of perceptions of social standing in table 3. Respondents in all countries were asked to place themselves as on one of ten 'rungs of a ladder' representing different positions in the social structure.

Table 3: Perceptions of social ranking (%)

| | Top 3 rungs | 4th to 7th rung | 8th to 10th rung |
|---------------------|--------------------|--|---|
| USA | 18 | 72 | 10 |
| Australia | 10 | 84 | 6 |
| Italy | 10 | 84 | 7 |
| West Germany | 10 | 81 | 9 |
| Britain | 8 | 75 | 17 |
| Hungary | 3 | 74 | 24 |

Source: Jowell et al., 1989

The people of Britain rated themselves generally lower on the social ladder than the populations of every other country sampled except Hungary. Moreover, those in the United States are more than twice as likely as those in Britain to see themselves on the top rungs of the social ladder. This pattern has particular pertinence to charitable giving in the UK, where philanthropic giving has traditionally been considered to be the responsibility of those in the top levels of society.

3.3 Tax policy

While basic national income tax rates do not differ greatly between the US and the UK, there are dramatic differences in the treatment of charitable giving in the two countries. Tax incentives for giving in the US are well established, having been part of the tax code since the eighteenth century, and are significant in size, amounting to nearly seventeen billion dollars in tax expenditures (Howard, 1997). The tax status of charities is so central that they are defined legally by their treatment in the tax code as non-profit 501 (c) 3 organisations; donations to such organisations will be considered tax-deductible. The key feature of US tax incentives for giving is that they directly benefit the donor. Donors who itemise deductions (in practice those who own homes and are thereby able to qualify for the mortgage interest deduction) are able to deduct the full charitable value of their contributions

from their taxable income.⁸ These deductions may be spread across up to three years. While professional fundraisers claim that this incentive does not determine the decision to give, merely the amount given, it does introduce significant elements of self-interest into the practice of giving. In the words of the one American community foundation executive discussing his strategy for building the foundation's endowment: 'I sell the tax deduction' (personal conversation, August 1995).

Most people in the UK do not file yearly tax returns; they have their taxes taken out directly from their 'pay packet'. As a consequence, there is far less emphasis on strategies for reducing one's taxes. As the proportion of the population which does file (the self-employed and many higher-rate payers), increases, this may change. Until very recently there have been no general tax benefits for charitable giving; those tax incentives which existed prior to the recent changes required gifts of more than £250 or a continued commitment to give for at least two or three years. In both cases the benefit went directly to the charity. For example, a charity which receives a £300 gift from a donor would be able to apply to the Inland Revenue for the amount of the tax that donor would have owed on £300, resulting in another £50–75 for the charity. Such 'tax effective' giving accounted for just 10–11% of all UK donations in 1995 (Pharoah, 1996), and required planned effort by both the donor and charity, as well as cumbersome paperwork on the part of the donor.

In a concerted effort to spur giving, sweeping changes in Britain's tax treatment of charitable gifts introduced in 2000 have eliminated the floor of £250 for single donations and the ceiling of £1,200 for donations made through payroll giving. Consequently, all charitable donations are now eligible for tax benefits. Requirements for multi-year commitments no longer exist, and the paperwork involved in claiming donations has been reduced. The Treasury has also departed from previous strategies and introduced some of the first direct tax benefits for donors contributing publicly traded securities, who are able to avoid capital gains tax and receive a deduction from their taxable income. With this single exception, however, the incentive structure retains its altruistic character (NCVO, 2000).

This altruistic benefit structure continues to be clearly supported by the British public. When asked whether they would like to give to charity in a way that would reduce their own tax bill, 52% disagreed and only 14% agreed. When asked if they would prefer to give in a way that would give extra benefit to the charity, 46% agreed and 20% disagreed (CAF, 2001). Among British charitable organisations there has not been strong interest in the possibility of introducing a general US-style

⁸ The charitable deduction for non-itemisers was eliminated by the 1986 Tax Reform Act. Former President Clinton proposed it again in his 2000 State of the Union address, and it has also been proposed by President George W. Bush as part of his package of measures including opening up federal funding for non-501(c)3 religious groups. In part because of the restriction of the charitable deduction to itemisers, nearly 88% of the total value of the deduction is currently claimed by those making \$50,000/year or more, and 52% by those making \$100,000/year or more (Howard, 1997).

donor-benefit tax structure. In addition to logistical hurdles, they believed it would mean that donors would give for the wrong reasons—their own interests rather than those of others.

Despite these dramatically different perceptions of the nature of the tax treatment of charitable gifts, financially astute observers have pointed out that there is really not a great deal of difference in ultimate financial effect between the policies of the two countries. In both cases the net effect is that a donor will be able to make a gift larger than she or he might otherwise afford because of the tax treatment (Banks and Tanner, 1998). In the US the donor gives the full amount and then later is able to deduct it from tax owed for the year. In the UK the donor can make a lesser donation knowing that after filling in forms provided by the recipient organisation the government with ‘match’ the donation with the amount of tax which would have been paid to Inland Revenue on the gift.

3.4 Strength of fundraising institutions and practices

Few people give without being asked to do so. The strength and sophisticated nature of fundraising strategies in the US—the ‘supply side’—are often invoked to explain why giving levels are so high. While ‘being asked’ is the most powerful predictor of whether someone gives (Saxon-Harold, 1999), there is not a lot of difference between the US and UK in how frequently people are asked to give. The key is not *how often* people are asked, but *what* people are asked to commit—their spare change or a cheque or ongoing pledge—which returns to a focus on methods.

However, there is another perspective on the role of fundraising practices and institutions, which sees them as the means and arenas by which the habit of giving is created and nurtured in society. In this sense, their nature and strength will differ between societies, but can also vary over time in any one society. The analysis below examines institutions and strategies in both countries that help develop giving as a social practice. Some, such as payroll giving, are ‘purpose built’ for fundraising, while others, such as religion, have had significant influence on the practice of giving despite professing other (presumably higher) purposes.

Religion

America is the most actively religious country in the western world. Britain is the least. Fifty-four per cent of US households report regular (monthly or more often) church attendance. Twenty per cent of British households were regular attendees (Jowell et al., 1989), and just 7.5% were weekly attendees in 1999, down from 9.9% in 1989 (Christian Research, 2000). The figures for Britain would be even lower without (more devout) recent immigrants (BSAS, 1987).

Religious attendance and giving are closely related in a number of ways. Faith institutions are major recipients of donations in both countries, the most major in the US. Regular contact reinforces connection and identification, expressed in US congregations through the usually yearly significant

financial commitments of their members, which are necessary for the financial survival of the congregation. But perhaps more importantly, religious institutions also function as places where the habit of giving is actively practised—people are generally asked to give every time they attend services.

Different religions have different giving traditions and practices. These traditions not only shape what is given and how much is given, but also what the act of giving means. Is it an expression of community identity and social justice, a responsibility of privilege, part of communal reciprocity, or simply a duty to God? US giving has been dominated by religions stressing communal reciprocity, whereas dominant faiths in the UK have tended to view giving as a religious duty and responsibility of privilege.

Universities

Among their many other functions, universities have the potential to develop major segments of the population into donors by asking them to contribute significant sums to an institution with which they are certainly familiar—and to which they hopefully feel some allegiance. How significant a role they can play is of course dependent on the size of the population which has been enrolled in universities. In the US access to higher education is widespread, with more than half of the population having attended colleges or universities. Moreover, there is a growing pattern, even expectation, that professionals in mid-career will return for further graduate courses or to finish undergraduate degrees. In the UK by contrast university education has traditionally been far more limited, with less than 15% of the population having attended university in 1979. Recent initiatives to dramatically expand access to higher education have raised the current percentage of those who are university educated to approximately one third of the population, with an ultimate target of 50% of the population (Universities UK, 2001). Mature students are still far less common than in the US, and the financing options for graduate education are far more limited.

University fundraising in America is big business. Large and sophisticated development departments focus on developing lifetime allegiance from a donor base of alumni whose gifts are expected to increase in value over their lifetime—and beyond. Legacies and other ‘planned gifts’ are disproportionately given to higher education institutions.⁹ Students expect that they will not only pay the bulk of the costs for their education, usually via loans, but will likely continue to support their universities through future donations. Development and alumni relations departments ensure that alumni are kept informed about the institution—and each other—building ongoing identification with the university community. Alumni are asked for annual gifts as well as for special appeals.

In the UK development departments are far less well resourced, and face a number of unique challenges. Most current British alumni did not pay for their own education, and many still firmly believe that it is the government which should be responsible for paying the costs of a university education. This is despite the fact that—especially with the major expansion of publicly funded ‘places’ in higher education to broaden access—they may be rather naïve about the percentage of those costs actually being paid by the ‘public purse’. In the past, legacies (planned gifts in the US) have played a significant role, but unlike America, such gifts now go primarily to medical and animal organisations, not universities. In fact, education ranks 8th or 9th among charitable causes, and higher education is a small part of that general category. The creative estate planning instruments used heavily by university development offices in the US to leverage major gifts simply do not exist in the UK. Many university trustees resist the idea that they should ask others to give money—or even that they should give any themselves, as they are giving their time and lending their reputation to the institution. Moreover, development staff are themselves often seen as ‘passing the begging bowl’ rather than being accorded more professional status.

Payroll giving

Probably the most powerful and efficient institutional mechanism for generating significant giving across income levels in the United States is payroll giving, most notably but not exclusively the United Way campaigns.¹⁰ These yearly campaigns are locally organised, usually with significant corporate leadership. In many areas the overwhelming majority of private and public employers actively participate, devoting company time to promoting the drive, and using company resources to handle the paperwork. Authorised donations are automatically deducted from pay by the employer, given to the local United Way (or other organisation), and then distributed to agencies in the area. Some 26% of US employees are in workplaces with United Way Campaigns (United Way of America, 2000b); donations average over \$170 per employee over the course of a year (United Way of America, 2000a). Federal employees, comprising 2% of the nation’s workforce, have the option of contributing through the Combined Federal Campaign.

Efforts to organise a similar system in Britain have met significant challenges. When initially introduced in 1986–87, there was little local enthusiasm for the idea, and it is now organised nationally rather than locally. Nearly half (48%) of small employers surveyed at that time by the Department of Trade and Industry were ‘opposed on principle’, responding that it was inappropriate for employees to be asked to donate at work (Saxon-Harrold, 1987). Only 20% of employers

⁹ Such instruments include lifetime annuities held by the institution, as well as charitable remainder and charitable lead trusts.

surveyed thought it was a good idea. The result is a national scheme or system wherein national and regional charitable organisations collect and distribute funds. There is little active corporate leadership, and few corporate promotional campaigns. Just 1% of UK employers participate in the programme, and an average of 3% of their employees sign up to make donations; the majority of donations are under £5 per month (Romney-Alexander, 2000).

Community foundations

Community foundations are unique institutions that not only provide funding for community work, but crucially for this analysis, also provide both education and assistance to potential donors with sizeable resources. Highly successful in the US, where they have existed for nearly 200 years, they were introduced into the UK in 1986.¹¹ Since that time the Charles Stuart Mott Foundation has invested heavily in the creation and support of community foundations in the UK, along with a co-ordinating body, the Association of Community Trusts and Foundations (ACTAF), now the Community Foundation Network (CFN). After ten years, these foundations had relatively small combined assets of £36 million, and gave out grants of £10 million in that year, up from £19.5 million two years before (ACTAF, 1997).

These early levels reflect in part the challenges of applying a US model to UK society. There are a number of pieces that may contribute to this puzzle: the meaning and locus of community, the tradition of preserving family assets, and the nature of tax incentives, among others. In the past few years, as the model came to be modified to local conditions, and to be better understood by potential donors, community foundations have multiplied and their assets have grown significantly, totalling £73.5 million in 1998 (CFN, 2000).

The combined effect of these factors—expectations of public and private, attitudes towards wealth and money, tax policy, and the strength of fundraising practices and institutions—creates a unique and comparatively fertile climate for giving in the United States, a climate that much research and especially fundraising practice often takes for granted as being universal. Clearly the climate is not the same in Britain, which has a distinct—and often distinctly different—climate for giving. Furthermore, it cannot be simply be assumed that what has flourished in one climate will do the same in another.

¹⁰ In a number of cities in the US, there has been a proliferation of payroll giving funds devoted to particular causes such as the environment, women and girls, African-Americans and social change activism.

¹¹ Unlike private foundations, community foundations in the US are legally constituted as ordinary 501 (c) 3 non-profit organisations (charities) which gives them the ability to receive tax-deductible donations from the public, and thus to be both a recipient and a funding entity. This status makes it possible for community foundations to establish sub-funds, designated either by purpose, organisation or family/individual name.

4 Generosity versus altruism

The picture painted above is one of contrasting conceptions not only of why, how and to whom giving should take place, but also of whether or not private giving in itself is a good thing. This section aims to pull together a comparative analysis of the social meaning and practice of philanthropy and charitable giving—a giving ethos—for the United States and the United Kingdom. It proposes two paradigms—generosity in the US and altruism in the UK—for understanding the cultural context in which charitable giving takes place in each country. Such an analysis may be able to provide a basis for understanding each country’s ‘giving culture’ as well as for assessing which policies or institutions might likely be effective in each.

4.1 Generosity (US): ‘Charity begins at home’

Generosity is an apt characterisation of the giving ethos in the United States. As used by Julian Wolpert in his extensive studies of giving in 83 US cities (1993), it implies bounteousness but does not require altruism. US giving is heavily interlaced with self-interest, either directly through tax benefits, benefits from the supported charity, or social status; or indirectly through the achievement of social goals which one might desire, such as better child care, civil rights, better parks etc. Moreover in America these self-interested motivations are not only acceptable, but are socially approved. Givers want to feel, in the words of Michael McPherson, President of Macalester College, ‘both good and smart’ and organisations bend over backwards with promotional gifts, status rewards, etc. to help them feel that way (personal conversation, November 1998). The concept of ‘enlightened self-interest’ in which individual and community interests are seen to be in a reciprocal relationship, drives both individual and especially corporate giving. Giving is seen as an expression of personal and social identity and goals. For example, both the Jewish and sexual minority communities in the US are particularly generous givers, in part because they may see their gifts as supporting community institutions which are outside and even excluded from mainstream resources. In the US giving and volunteering are integral components to civic involvement; indeed they may be considered far loftier expressions than actual political involvement. Giving modes are predominately purposeful and planned, and yield relatively higher average gifts. Gifts are largely directed towards theoretically ‘particular’ causes, in which the giver may directly participate, such as a church or performing arts group, or ones where they may have received some direct benefit in the past, such as a college or university. Moral motivation rests on values of individual initiative and reciprocity.

4.2 Altruism (UK): ‘Charity for all’

Altruism connotes pure selflessness, and for the most part, the British expect that giving should be altruistic, even self-sacrificing. They have traditionally rejected mixed motives for giving, and are quite suspicious—particularly of philanthropic giving—because it is so rarely able to live up to popular expectations of purely altruistic motives. Tax benefits reflect these altruistic principles with considerable popular support. However there is a subtle paradox here—people express increasing acceptance that their own giving may involve both altruistic and self-interested motives, but they must be seen as independent in order to preserve the ‘genuineness’ of their charitable intention. British corporate giving has been dominated incongruously in recent years by a ‘business case’ rationale, which justifies community involvement in terms of corporate interests in customer and employee loyalty. Giving is seen largely as a private decision, and peripheral to both social identity and civic responsibility, though new government initiatives aim to bring them closer together. ‘Spare change’ modes dominate giving, yielding small gifts, and making giving vulnerable to other demands on pocket change. In a pattern reflective of William Galston’s ‘cosmopolitan altruism’ (1993), universal causes such as Oxfam and Save the Children, in which there is little direct or indirect benefit to the giver, receive the bulk of UK donations. Far fewer gifts go to organisations where the donor has had a direct association, such as a church or university. For the British, moral motivation is deeply rooted in collective duty, a concept that would be quite foreign to Americans, just as enlightened self-interest does not translate across the Atlantic in the other direction. While reason is the most socially legitimate ground for moral motivation, it has paradoxically been a powerful emotion which has generated some of the most generous giving in recent years, most notably the £72 million donated by almost three million people to no specific aim or group in the wake of the death of Diana, Princess of Wales.

These two models are summarised below in boxes 1 and 2:

**Box 1: GENEROSITY (US)
‘Charity Begins at Home’**

- 1. Giving is heavily interlaced with self-interest (with social approval)**
- 2. Giving is more a public than a private activity.**
- 3. Giving is an expression of personal and social identity and goals**
- 4. Giving and volunteering are significant components of civic involvement**
- 5. Giving modes are intentional ‘planned’ and yield high average gifts**
- 6. Predominant focus: ‘particular’ causes in which donor is directly involved and reciprocity**
- 7. Predominant moral motivation: individual initiative and reciprocity**

**Box 2: ALTRUISM (UK)
'Charity for All'**

- 8. Suspicion and rejection of mixed motives for giving**
- 1. Giving is more a private than a public activity**
- 2. Giving is generally peripheral to social identity and goals**
- 3. Giving is generally peripheral to civic responsibility**
- 4. 'Spare change' is the dominant mode of giving, yielding low average gifts**
- 5. Predominant focus: 'universal' causes in which the donor is not directly involved**
- 6. Predominant moral motivation: social (collective) duty**

5 Conclusion

The United States and Britain are seen by many as relatively similar countries, sharing a history, many aspects of heritage, and some would say a common language. Politically, they continue to have a 'special relationship' despite changing fortunes and international roles. Basic philanthropic institutions—trusts and foundations, charity law, membership and subscription mechanisms have grown from the same (English) roots. And yet why and how they practice giving is, as we have seen, in many ways quite different. This has not stopped the interest in transferring institutions and policies from one country to another. The original transfer from England to the US has been succeeded by a reverse transfer of US charitable institutions to the UK.

There is currently world-wide interest in promoting the development of institutions and practices that contribute to a thriving civil society. Models for these institutions and practices have drawn heavily from the experiences of the United States. As is apparent from the above analysis, policies and institutions are created—and are effective—within particular cultural contexts. Before assuming that similar policies or practices will meet with comparable success elsewhere, it is critical to assess the compatibility of relevant existing structures, norms and beliefs in the two cultures. In effect, such assessment means that institutions and policies, if desired and appropriate, must be translated, rather than simply transferred, into forms that reflect local cultural values and practices. To neglect to do so is to invite the failure of sometimes major efforts built on the best hopes and intentions.

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