



**Donations Policy: Ethical Guidelines on the Acceptance of Benefactions**

<b>Review Committee:</b>	Development Committee
<b>Last Approved by the Governing Body:</b>	12 June 2019 [GB Minute 7585(b)]
<b>Review Policy:</b>	Every 3 years
<b>Date of Next Review:</b>	Easter 2022
<b>Responsible Officer and Location of Policy:</b>	Development Director; website
<b>Accessible to:</b>	Public

- The Governing Body delegates the acceptance of benefactions to the Master, save that for all benefactions over £1m, or that are likely to give rise to significant public interest, the Master will seek the advice of the President, the Bursar and the Senior Tutor and will present that to the Governing Body for decision. In such cases, the Development Director will ask the University to carry out a due diligence review on behalf of the College, and will present the findings of that review to the Governing Body before a final decision is made.

In the case of major donors identified with a high level of risk, the Development Director will request they be reviewed by the University's CBELA committee (Committee on Benefactions, External and Legal Affairs) prior to any advanced gift negotiations taking place.

- Substantial benefactions of less than £1m should be reported and discussed as follows:
  - Single or accumulated gifts of £100,000 (gross) shall be reported to the Development Committee.
  - Gifts of £100,000 - £1m (gross) should be discussed formally by the Master, Bursar, Senior Tutor and Development Director, and approved by the College Committee.

- Charity law places certain constraints on charities, and in recommending acceptance of any benefaction the Development Director shall make available to the Master, the College Committee and the Governing Body information under the following headings:

- Are the purposes of the benefaction compatible with the purpose of the College as defined in its Statutes?
- Do the purposes of the benefaction fall within the College's policies and strategic plan?
- What additional costs or burdens, if any, would acceptance of the benefaction create for the College?
- Is there published evidence that the proposed benefaction arises in whole or in part from activity that
  - evaded taxation?
  - violated international conventions that bear on human rights?
  - limited freedom of inquiry?
  - suppressed or falsified academic research?

In the case of unproven allegations of criminality against a potential donor, no account shall be taken of mere rumour, but care will be exercised in accepting any benefaction, or continuing negotiations towards a possible benefaction, where there is a risk of significant damage to the College's reputation.

- Is there evidence that the proposed benefaction, or any of its terms, will
  - require action that is illegal?
  - limit freedom of inquiry?
  - suppress or falsify academic research?
  - create unacceptable conflicts of interest for the College?
- Is there evidence that acceptance of the proposed benefaction or compliance with any of its terms will damage the College's reputation, including deterring other benefactors?

Although benefactions that are worth less than £100,000 may not be subject to detailed scrutiny by the Master, President, Bursar and Senior Tutor, acceptance will nevertheless be considered explicitly against these ethical guidelines.

- All members of the Governing Body involved in fundraising are encouraged to consult the Development Director at an early stage in their discussions with a potential benefactor. The Development Director can advise on the use of these guidelines, and consultation will also reduce the risk of uncoordinated approaches to a single potential donor; spread familiarity with the process for accepting benefactions; and may allow an early warning of anyone unknowingly approaching a potential benefactor whose donation is not likely to be acceptable.