



This policy was approved by Governing Body on 6 March 2024.

Introduction

St Antony's College accepts financial gifts from a range of public and private sector partners in support of its work. Fundraising is a key element in furthering the life and work of the College.

As a charity (Registered Charity No. 1141293) and a constituent College of the University of Oxford, St Antony's must comply with all relevant legislation concerning philanthropic donations. It must also act in the interests of its Charitable Objectives and has a fiduciary duty to use all the resources available to it to further its aims for public benefit.

The Warden, Centre Directors, Fellows, and the Development Office, actively pursue the solicitation and acceptance of philanthropic gifts. These fundraising activities are monitored by the Development Director who ensures that fundraising regulations are adhered to.

This document outlines guidelines and a standard procedure for the acceptance of philanthropic gifts to support St Antony's and shall apply to all gifts offered to, and received by, the College including its regional area studies centres.

Code of Fundraising Practice and the role of Trustees

St Antony's, as a charity, has a responsibility to ensure that the processes of securing and receiving funds to support the life and work of the College do not compromise its integrity, reputation, charitable purposes, the trust of its supporters, or its commitment to its beneficiaries, staff, students and the wider public that it serves.

As Trustees, Governing Body Fellows are familiar with their obligations and responsibilities related to the acceptance of philanthropic donations. These responsibilities are based on charity law and follows guidance from the Fundraising Regulator. Section 2 of the Code of Fundraising Practice sets out the responsibilities of charitable institutions and those who govern them ([see here](#)).

Section 2.3 (accepting, refusing, and returning donations) points out that the governing body of a charitable institution must make sure that those fundraising on its behalf are aware that decisions relating to refusing or returning a donation must be made by the Trustees or are in line with a set policy ([see here](#)). The Trustees of St Antony's College are ultimately responsible for compliance with this policy.

Although ethics and values will be important in reaching the decision, these cannot be the decisive factors. The organisation needs to be able to demonstrate that acceptance of the donation would be detrimental to the achievement of its purposes.

According to the Charity Commission (Chapter 2, Compliance Toolkit), due diligence is an important part of trustee duty and is essential in safeguarding charity assets. It means carrying out proper 'checks' on those individuals and organisations that give money to the charity.

Guidelines for acceptable sources of funding

The College will not accept philanthropic donations that are inconsistent with the College's charitable purposes.

The College is careful to ensure that donations are in full accord with the fundamental principles of academic freedom and do not create potential conflicts of interests (that cannot be disclosed and appropriately managed) or otherwise harm its reputation.

The College will not accept philanthropic donations if accepting the proposed donation will:

- Create an unacceptable conflict of interest or duty; or
- Disproportionately damage the reputation of the College or wider Collegiate University or potentially the charities sector; or
- Disproportionately damage the College's relationship with its beneficiaries, students, benefactors, partners, alumni, collegiate community, or other external stakeholders.

The College will not accept philanthropic donations if the proposed donation arises in whole or in part from any known illegal activity. The College will not accept philanthropic donations if accepting the proposed donation will result in St Antony's or any of its members acting illegally, improperly, or unethically. This may include:

- Illegal or unethical activity, such as where the funding is believed to be a result of criminal activity, is linked to money laundering activity, or otherwise originates from or is associated with unethical activity.
- Bribery, either where the College believes it would be accepting a bribe or would be offering a bribe to the funder.
- Terrorism, where the funding is suspected to be associated with terrorist financing activity.
- Where any conditions attached to funding would require the College to act illegally or unethically in any way.

Gifts will not be accepted if the donor is actively involved in:

- the tobacco industry
- the gambling industry
- pornography
- arms manufacturing and export

In respect of funding opportunities from companies or individuals linked to the fossil fuel industry, the following considerations will be applied:

- The proposed use of the funding (either the proposed use is unconnected to fossil fuel extraction or is focused on enabling meaningful accelerations away from carbon usage and speeding the transition to net zero carbon); and
- The funder's commitment to net zero, as evidenced through credible plans to achieve net zero carbon by 2050 or sooner, consistent with the Oxford Martin Principles that provide a framework for engagement between climate-conscious investors and companies across the global economy ([see here](#)), involving:
 - A commitment to net-zero emissions
 - A profitable net-zero business model
 - Quantitative medium-term targets.

A fossil fuel company shall be considered as one engaged in exploration or extraction of oil, coal, tar sands, natural gas, or in fracking; if in doubt, the above guidance should be applied.

There are also other sectors that consume fossil fuels in large quantities (e.g. airlines or cargo) or are otherwise heavy polluters (such as mining). As there are no guidelines such as the Oxford Martin Principles in place for these industries, it will usually not be possible to refuse gifts from abovementioned sectors on this basis.

The College will only accept philanthropic donations from students (or their parents) if there is no inappropriate personal or academic gain for any student from making such a donation. If an unsolicited gift from a student (or their parents) arrives, this will remain anonymous until after graduation and not shared with anyone beyond the Development Office.

Gift Acceptance Procedure: a Risk-based Approach

Trustees delegate day-to-day responsibility for decisions on donations acceptance and refusal to the College's Committee to Review Donations (CRD). Members of the CRD are the Warden, Bursar, Accountant, the Governing Body Delegate for Finance, and when a Centre is the recipient of the proposed gift, an 'independent' Governing Body Fellow for whom there is no potential conflict of interest. In case of a gift benefitting the College at large (i.e. not one of the Centres) and originating from a region one of the Trustee works on, they will be asked to use the CRD and use their expertise. The CRD gives a verdict as to whether there is any reputational risk involved when:

- The College (or one of its Centres / Programmes) receives a substantial pledge for a gift (>£100k). This process is administered by the Development Director.
- The College (or one of its Centres / Programmes) would like to nominate a new paying member for an Advisory Board.
- The Development Director has doubts about a prospective donor giving less than £100k.

In a situation where it is not from the outset clear whether a gift is inconsistent with the College's charitable purposes, the CRD makes a risk assessment. According to the Charities Commission, charities can apply a risk-based approach to what action is reasonable or proportionate to take to ensure trustees comply with these duties.

The risk will be rated according to the table below (Risk Assessment). As part of this process, the following will be set out:

- The Development Director will collect publicly available information on the prospective donor and share this with the Committee in advance of the assessment.
- A Microsoft Form facilitates this process. When a member indicates a risk, they will be asked to provide arguments as to why accepting a gift would be detrimental to the best interests of the College.
- Once all members of the committee have submitted the form, the Development Director will report back.

When at least two members of the CRD have rated the risk as medium, the College will seek guidance from the University of Oxford CRD on whether the donation should be accepted by the College. These cases will also be brought to the attention of the Management Executive Team, acting on behalf of the trustees of the College before taking a final decision to accept a donation. When three or more members indicate the risk as high, the College will refuse the gift.

Each year, the Development Director will submit an (anonymised) annual report to Governing Body on the number of gifts accepted, queried, and rejected.

For gifts pledges over £1million, the College will ask the University of Oxford Committee for Review of Donations for its view. The advice of the University's Committee will be followed.

Risk-Assessment

| Risk rating | Score | Source of Donation |
|-------------|-------|---|
| No risk | 0 | |
| Low | 1 | Minor rumour / speculation / protest at behaviour by the proposed individual or organisational donor, considered by some to be unethical (but legal) |
| Medium | 2 | Significant rumour / speculation / protest at behaviour by the proposed individual or organisational donor, which is considered by some to be unethical (but legal) or Allegations of illegal or unethical activity by an individual or organisation which is not the direct source of funding but is nonetheless closely associated with that source |
| High | 3 | Unproven allegations or rumour / speculation of illegal activity by the proposed individual or organisational donor, where the illegal activity relates directly to the source of funding for the donation, or can be reasonably assumed to be a significant underlying source of funding for the donation or Proven (in court of law) allegations of illegal activity by a proposed individual or organisation which is not directly connected to the source of funding but is nonetheless closely associated with that source |