College Policy for the Review of Proposed Donations

Criteria

Attached is the list of criteria against which donations are assessed. These criteria follow very closely, but are not identical to, the criteria used by the University’s Committee to Review Donations (CRD).

Procedure

A. The procedure is that all proposed donations in excess of £100,000 EXCEPT THOSE which

1. are to be made by repeat donors already known to the College (see B.2 below) whose circumstances or reputation have not markedly altered for the worse since the time of making the original donation OR

2. are to be made for the first time by a donor previously known to the College (see B.2 below) in another capacity (e.g. as an alumnus, adviser or acquaintance in good standing) (for the avoidance of doubt, the phrase “known to the College” shall mean that the person was known not solely to the Master or the Development Director but to other Governing Body members and/or the institution more generally)

will be submitted for review in the first instance by a special session of Finance and Planning Committee consisting of its Governing Body members alone. (All further references in these procedures to Finance and Planning Committee are to this inner group.) Time pressures are likely to require a special convening of this group from time to time. The submission will be accompanied by a note from the Development Office as to the background and purpose of the donation, any issues they believe relevant, the due diligence exercise undertaken and showing how the individual criteria of assessment are met.

The level of detail to be submitted may vary according to how well known the proposed donor is to the College.

B. 1. Below the threshold of £100k it will not be necessary for information to be submitted unless the Master and the Development Director were sufficiently uncertain that they felt the need for Finance and Planning Committee review. In addition, where a subsequent donation takes the total over £100k the Master and Development Director will use their discretion to decide whether referral to Finance and Planning Committee was desirable.

2. Regarding the judgments which have to be made under A.1 and A.2 above in relation to donations above the £100k threshold, as to the changing nature of a prospective donor’s reputation or circumstances, or the extent to which a prospective donor shall be regarded as “known to the College”, these may be made jointly by the Master and the Strategic Development Director or their designated deputies (at Governing Body level) without prior reference to the Finance and Planning
Committee, but with early retrospective reporting afterwards to the Finance and Planning Committee.

Finance and Planning Committee is empowered to approve or to decline a donation without recourse to Governing Body. However, in any case i.e. (even when below the £100k threshold) where the Finance and Planning Committee has any doubt or concern or the nature of the donation is such that the Committee wished in any event to refer it to Governing Body, it will be sent with the accompanying material to Governing Body for a decision. (If Governing Body was not scheduled to meet for some time, consideration would have to be given, on a case by case basis, how to deal with this.) There is a presumption that any proposed donation taken to Governing Body will, if approved by Governing Body, be sent on to the University’s Committee to Review Donations (‘CRD’) and the acceptance of the donation by the College will be subject to CRD having approved it.

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Criteria against which a proposed donation should be assessed:-

(a) (i) Is there a record (in documentary form and/or in the form of records of meetings and/or telephone conversations) of the information available, obtained or supplied on which reasonable reliance has been placed showing the source of the money?

(ii) are the nature and purpose of the donor’s existing or intended relationship with the College clearly identified?

(iii) is there sufficient credible evidence that a proposed donation would originate from an activity that is illegal under UK law (regardless of where the activity occurred) or unethical? If so, the donation must be refused.

(b) is there sufficient credible evidence that a proposed donation, or any of its terms, would:

(i) impinge on academic freedom or limit freedom of enquiry?

(ii) require or promote activity that is illegal or unethical, including the giving or receiving of an improper advantage which may also constitute bribery or which has other serious adverse consequences?

(iii) create conflicts of interest for the College and/or the individual beneficiaries of the donation?

(iv) do serious harm to the reputation of the College?

(v) seriously harm the College’s relationship with other benefactors, partners, staff, students, or other stakeholders?