



Oriel College

UNIVERSITY OF OXFORD

ETHICAL DONATIONS POLICY

Version: v.2

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A. Introduction

Oriel College is a constituent part of the University of Oxford, and is therefore part of a global, outward-facing institution. Its core objectives of teaching and research are supported to a significant extent by donations and research funding. Funding from a variety of sources is welcomed and is necessary for the College to continue to fulfil its mission.

The College is immensely grateful to all benefactors for their support, but must ensure that all donations it receives does not jeopardise the successful and community-minded fulfilment of its mission.

B. Information Security Classification

This policy represents an important part of the College's outward-facing strategy and allows us to demonstrate our commitment to operating in an ethical and sustainable way, showing potential benefactors how they can best contribute to the growth of the College and its story moving forward.

As such, the policy will be posted on the College's website. Copies are also available from the governance officer (governance@oriel.ox.ac.uk) or from the Development Office.

C. Delegated Authority

The College's Governing Body have delegated responsibility for this policy to the Ethical Donations Committee, which is intended to review all donations within the scope of this policy, ensuring that each donation adheres to the standards set out in **section E**.

The Development Director has responsibility for overseeing this policy's operation, updating it at least every three years, or in line with relevant legislative changes. The Director of Development will ensure that donations for review are brought to the Committee's attention on a termly basis, or as required.

D. Policy Statement

The College is careful to ensure that funding does not impinge on academic freedom or create potential conflicts of interest (that cannot be disclosed and appropriately managed), or otherwise cause reputational harm. In addition to considering reputational issues and the wider interests of the College, funding is also reviewed in light of the College's responsibilities as a charity.

Funding is therefore only requested or accepted if it will not have an influence on decision making at the College, will not interfere with its charitable objectives of teaching and research, will not harm the reputation of the College, and if it will not result in the College acting illegally, improperly, or unethically.

E. Procedure

The following section indicates the process and criteria against which donations and gifts should be judged.

Gifts which exceed £50,000

For gifts which exceed £50,000, the Development Director will compile a termly report for the consideration of the Committee to review donations. Each gift, or pledge, in the report will be measured against the following questions:

1. Do you know or have reasonable grounds to suspect that:
 - a. In accepting the gift, the College would be acquiring the proceeds of crime or be otherwise involved in money laundering activity?
 - b. In accepting the gift the College would be accepting a bribe or offering a bribe to the donor or funder?
 - c. In accepting the gift, the College would be involved in terrorist financing activity?
 - d. Any conditions attached to the gift would require the College to act illegally in any way?
2. Would acceptance of the gift be in the best interests of the College?
3. Are the purposes for which the gift is to be used known, and do they fall in whole, or in part, outside of the charitable objects of the College?
4. Is there credible evidence that a proposed donation, or any of its terms, would:
 - a. Impinge on academic freedom or limit freedom of enquiry.
 - b. Create conflicts of interest for the College or University and/or the individual beneficiaries of the donation?
 - c. Do serious harm to the reputation of, or cause significant public scandal to, the College?
 - d. Seriously harm the College's relationship with other benefactors, partners, staff, students, or other stakeholders?

If successive donations are made, a review of the donor would occur five years following the first donation.

For gifts more than £100,000

Questions 1-4 above should be asked, and professional research assistance should be considered if further investigation is required.

For legacy gifts

Questions 1-4 above should be asked, in addition to the following:

For cases where the legacy has been pledged and not yet received, would it be morally wrong to accept the legacy and, if so, does the College have the requisite power to refuse it?

Are there any other grounds on which the legacy could be refused?

Received or historic gifts

Gifts received by the College which might be deemed to be in breach of the above criteria may be examined by this Committee at the request of any member of Governing Body, at the discretion of the Committee. In this event, the length of time since the gift was received, the benefit received by the College from the gift, and any legal implications around wishing to return a gift, should be borne in mind.

Timing

Gifts of over £50,000 and above are normally solicited by the College which allows time for pre-approval. Any unsolicited gifts will be approved by the committee in circulation if necessary.

Prerequisites for accepting a gift

The following principles should be adhered to when considering all gifts:

- The source of funds must be known to the Committee before any gift can be accepted.
- Donations must not and cannot ever be linked with admissions to the College, which are handled separately.

Donor Anonymity

The College agrees to respect a donor's right to anonymity, but their identity will be known to the members of the Committee in respect of a decision to accept such a gift.

Review Procedure

The names of non-anonymised donors will be kept on record, along with the date of their most recent donation to the College.

Donors will be reviewed in the following circumstances:

- At least once every five years.
- Donors who appear in the mainstream media will be flagged by the Development Office and their donations may be subject to review. This is to guard against reputational risk to the College.
- As part of the Development Office's audit procedure at the end of each financial year, a random sample of donors will be taken from the College's records and will be reviewed.

Declining a gift and unethical gifts

In the event that any of the questions or procedures listed above cannot be answered satisfactorily, the Committee will recommend to Governing Body that the gift be declined.

The College accepts that, while a donation may not be illegal, it may be deemed to have come from an unethical activity.

Notwithstanding the criteria cited above, a gift should be deemed unethical if it contravenes the stipulations of this policy.

This stance considers with the College's policy on ethical investment, which may be found in the **Ethical Investment Policy**.

The Governing Body retains the right to reject a gift in their sole discretion.

Geography

Gifts given to College by alumni or donors resident in countries subject to UK Government sanctions at the time of their donation or gift will be subject to review.

F. Scope

Review of donations as described in sections **E and G** is mandatory for donations to all parts of the College. Any member of College seeking to raise donations for the benefit of the College is obliged to do so in consultation with the Development Office.

As per **section E**, the processes for admitting new students to the College and accepting gifts and donations **MUST** be kept entirely separate.

G. Training and Responsibilities

No additional training is required to comply with the stipulations of this policy.

According to the delegated authority outlined in **section C**, donations which satisfy the following criteria should be brought by the Director of Development for consideration at the Ethical Donations Committee:

1. Every proposed donation of £50,000 or more.
2. Any proposed donation under £50,000 which either the Development Director draws to the Committee's attention on the grounds that its acceptance may breach gift acceptance criteria outlined in **section E** of this policy, or any member of the Development Office or Governing Body draws to the Committee's attention.
3. Any proposed donation from a current student, their relatives or guardians, which exceeds £100 per academic year for the duration that the student is enrolled as such in the College.

The Development Office will provide termly lists of donations to the Committee. Any member of the Committee or any member of Governing Body can raise a donation received as needing review and can ask for a Committee meeting to be convened.

H. Internal Help and Raising Concerns

If any College member has concerns regarding the ethical status of a proposed gift or donation to the College, or has concerns that any received gift or donation has not been properly considered, they should in the first instance raise their concerns with the Director of Development.

If any College member's concerns relate to the conduct or investigations of the Director of Development, they should refer their concerns to the Treasurer, or in their absence the Provost.

I. Consequences of Non-Observance

Depending on the severity and wilfulness of the oversight concerned, potential punitive measures may range from reminding the individual concerned of this policy, through to disciplinary action taken in conjunction with the HR department.

The College takes its commitment to operating in an ethical, responsible and sustainable way extremely seriously and will treat breaches of this commitment with the severity required.

J. Further Help

Questions regarding this policy and its stipulations should be referred to the Director of Development.

K. Reference

This policy should be read in conjunction with the following College policies:

- **Ethical Investment Policy**
- **GDPR and Data Protection Policy**
- **Fundraising and Vulnerable People Policy**
- **Fundraising Complaints Procedure**

L. Version Control Table

Version	Owner	Agreed by Ethical Donations Committee	Agreed by Governing Body	Reason for amendment	Amended by	Next review	Further notes
v.1	Director of Development	13 January 2016	09 March 2016	This is the original version.	Director of Development	March 2026	v.1 was approved by the General Purposes Committee
v.2	Director of Development	5 March 2026	TBC	Review Cycle	Head of Alumni Engagement and Operations; Governance Officer	February 2029	