



ST. HUGH'S COLLEGE, OXFORD

POLICY ON THE ACCEPTANCE OF DONATIONS

Date Policy Ratified by Governing Body: 05 Nov 2025

Author/Responsible Officer: Sian Cook, Interim Director of Development

Date to be reviewed by: 05 Nov 2027

Policy on the Acceptance of Donations

St Hugh's College is an independent charitable body, and accountable for the receipt and expenditure of funds for its charitable purposes. The College actively seeks donations in support of its objectives and is very grateful to its many donors.

The purpose of this policy is to provide guidance on the considerations determining the acceptability of donations, and to assist discussions with donors. It is intended to enable the College to make sound and timely decisions and not diminish the experience of the donor. The College takes a "know your donor" approach advocated by the Charity Commission.

Framework of considerations for accepting (or not accepting) donations

All proposed donations must relate to College's priorities or activities and be consistent with the College's charitable objectives. Before accepting any donation, the College will assess whether:

1. The purposes of the donation are compatible with the purpose of the College as defined in its Statutes
2. The purposes of the donation fall within the College's aims, objectives and strategic priorities
3. The acceptance of the donation would create additional costs or burdens for the College
4. There are reasonable grounds to consider that:
 - a. The proposed donation arises in whole or in part from activity that: (i) evaded taxation, (ii) directly violated international conventions that bear on human rights, (iii) limited freedom of inquiry, or (iv) 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 donation, or continuing negotiations towards a possible donation, where there is a risk of significant damage to the College's reputation.
 - b. The proposed donation, or any of its terms, will: (i) require action that is discriminatory and/or illegal, (ii) limit freedom of inquiry, (iii) suppress or falsify academic research, or (iv) create unacceptable conflicts of interest
 - c. Acceptance of the proposed donation or compliance with any of its terms will damage the College's reputation and deter other donors

The College will not accept any donation that does not meet these criteria or that is inconsistent with its charitable objectives.

Donations from prospective or current students, or their family members

No donation, no matter the size, will affect the admission or academic record of any current or future students, or have a bearing on any dispute between any current or future student and the College. Donations are not normally accepted from students. Any proposed gift of £10,000 or more from a prospective student or their family member, or one that might raise concerns about seeking influence, is drawn to the attention of the Principal and Senior Tutor.

Authority

Where proposed donations do not raise any concerns under the framework of considerations above, the Governing Body authorises their acceptance subject to approval by the following:

- Donations £250,000-£999,999: Development & Alumni Relations Subcommittee
- Donations £100,000 - £249,000: Principal

- Donations £10,000-£99,999: Principal. The Principal may delegate authority to the Development Director provided the appropriate Due Diligence is undertaken and the gift falls within College priorities.
- Donations under £10,000: considered pre-approved
The Subcommittee may in any instance refer the matter to the Governing Body for advice and will do so for gifts over £1M.

Where a restricted donation would fund or commit the College to a specific expenditure, the relevant College Committee or Officer with delegated authority for that expenditure will confirm approval before the donation is accepted.

The Principal and Fellows are the Trustees of the College and the Governing Body is ultimately responsible for ensuring that the College complies with charity law and for the acceptance and refusal of gifts even when the decision has been delegated. Normally donations will be accepted unless there is good reason not to do so. If a donation is declined, the decision will be communicated to the donor at the earliest opportunity. Governing Body will be kept regularly informed of donations over £10,000. A record of decision making will be kept.

Due Diligence

The College is aware of its obligation to protect the financial security and reputation of the College. Due Diligence is undertaken by the Development Office against the framework of considerations and is proportionate to the level of the donation, usually falling within three bands of increasing rigour of up to £99,999; £100,000 to £999,999; and £1M plus or where the donation might give rise to significant public interest or potential compliance risk. Due Diligence includes confirmation of the identity of the donor, the donor's relationship with the College, background checks using publicly available information and whether any additional assurances are required. Anonymous donations are not normally accepted except in specific circumstances such as charity donation box collections.

So that authoritative decisions on the acceptance of donations are taken in the light of sufficient evidence of Due Diligence, the resources of the University's Development Office Research Services and /or a third-party Due Diligence provider may be drawn upon.

It is expected that all donation procedures are undertaken by the College's Development and Alumni Relations Office to reduce the risk of uncoordinated approaches, to ensure that the correct procedures are followed, to identify at the earliest possible opportunity any prospective donor and to keep a record of donors and any terms of preference that are agreed in relation to donations. The Development Director should be made aware of any prospective gifts at the earliest opportunity.

Prospective donors are referred to the [St Hugh's College Privacy Notice](#) which sets out how the College handles and uses personal data.

Other considerations

Donations are received by the College in good faith and in accordance with this policy. They do not confer any influence on the College's academic, business or decision-making. Where funding has previously been accepted, if new information comes to light, the acceptance of the donation may

be reconsidered under the framework of considerations and returned.

Donations will be handled responsibly for the purposes of the College and in accordance, as far as is possible, with the donor's wishes. A donor's right to privacy and preferences for anonymity will be respected within the limits of the relevant law which applies at the time. College is registered with the Fundraising Regulator and follows its [Code of Fundraising Practice](#).

Status: To be read in conjunction with the College's [Anti-Bribery Policy](#) and [Financial Regulations](#).