ST. HUGH'S COLLEGE, OXFORD

# FUNDRAISING POLICY

Date Policy Ratified by Governing Body: 4 November 2026

Responsible Committee: Development and Alumni Relations Subcommittee

Date to be reviewed by: 4 November 2027

# Fundraising Policy

## Purpose and Principles

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 enhance the experience of the donor. The College takes a "know your donor" approach advocated by the Charity Commission. The College is registered with the Fundraising Regulator and follows its Code of Fundraising Practice.

The Fundraising Policy comprises the following:

1. Gift Acceptance Framework
2. Due Diligence
3. Naming and Recognition
4. Authority of Acceptance
5. Fundraising Complaints

## 1. Gift Acceptance Framework

### 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:

- The purposes of the donation are compatible with the purpose of the College as defined in its Statutes
- The purposes of the donation fall within the College's aims, objectives and strategic priorities
- The acceptance of the donation would create additional costs or burdens for the College
- There are reasonable grounds to consider that:
  - 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. Decisions regarding the acceptance of a proposed donation may be paused to allow for relevant proceedings to conclude.
  - 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, (iv) create unacceptable conflicts of interest, or (v) commit the college to a particular activity or limit its future freedom of action in a way that might impede future charitable delivery.

– 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.

**Gifts in kind**

Proposed donations of books or archive material to the College Library and Archives are subject to the Library Collection Management Policy and the Archives Collections Policy and are considered in consultation with the Librarian or Archivist.

Proposed donations of artworks to the College are subject to the Art Acquisition Policy and are considered in consultation with the Library Fellow and Curator of Pictures.

**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 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 the Bursar.

Those interviewing prospective students have no access to donation records for the candidates concerned or their families.

**Donors in vulnerable circumstances**

The College will not solicit a donation from any person who, in the reasonable judgement of the fundraiser, is not able to make an informed decision at that time. The Director of Development will refer to the Principal any instances where the capacity of a donor to make a decision is unclear.

If a donor is found to be lacking capacity to make a decision, St Hugh’s will put into place measures to ensure that donations are not solicited from them in the future by recording communication preferences in our database in compliance with the Data Protection Act.

Where a donation has been made in such circumstances and this was not apparent to the fundraiser, the donation will be returned. The College does not solicit donations from alumni who are 85 years and over, unless they have an ongoing and formalised relationship with the College.

## 2. 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.

All donations of £1m or more, and a donation of any value where the framework of considerations merits additional scrutiny, are referred to the Central University's Committee to Review Donations and Research Funding before acceptance.

**Coordination**

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.

## 3. Naming and Recognition

The College recognises the generosity of its donors. Recognition is offered at the College's discretion, is agreed with the donor in writing, and confers no influence over the College's academic, business or decision-making. A donor may ask to remain anonymous at any point, and that preference will be respected.

The College recognises donors through the annual donor roll, which lists the names of donors but not the value of individual gifts; donor circles, within which members are listed by bracket rather than by individual gift value and only with their permission; invitations to donor events; plaques or other physical recognition; and the naming of funds, posts, spaces and buildings.

**Naming**

A naming may be offered in recognition of a gift, or of a series of gifts from the same donor. A proposed naming of a building, or of an established academic post, is considered by Governing Body. All other namings are subject to approval under the Authority of Acceptance, at the level appropriate to the value of the gift.

The duration of a naming is agreed with the donor in writing before the gift is accepted as follows: for a named endowed fund or post, for so long as the fund exists; for a named building or space, for the useful life of that building or space, or for a stated term; and for a named prize, scholarship or programme, for a stated term.

Where a named building or space is substantially altered, demolished or repurposed, the College will make reasonable efforts to consult the donor or their representatives, and will consider whether the naming should be transferred to another part of the College.

### Withdrawal of a naming

Governing Body may withdraw a naming where:

- The donation is returned
- Information comes to light about the source of the funds, or about the conduct of the person or organisation named, such that continued association would damage the College's reputation or deter other donors
- The basis on which the naming was agreed have not been met

Where withdrawal is under consideration, the College will make reasonable efforts to inform the donor or their representatives in advance and to hear their representations. The decision, and the reasons for it, will be recorded.

### Legacies

The College may choose to recognise a person who has notified the College of a legacy intention during their lifetime, on the same terms as other donors and subject to their wishes. A legacy intention is not a binding commitment and creates no obligation on either party.

## 4. Authority of Acceptance

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. A record of decision making will be kept.

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.

| Value of donation | Approval required | Due diligence band |
|---|---|---|
| Under £10,000 | Considered pre-approved | Up to £99,999 |
| £10,000 to £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 | Up to £99,999 |

| | | |
|---|---|---|
| £100,000 to £249,999 | Principal | £100,000 to £999,999 |
| £250,000 to £999,999 | Development and Alumni Relations Subcommittee | £100,000 to £999,999 |
| £1m and above | Governing Body, following referral to the Central University's Committee to Review Donations and Research Funding | £1m plus |

Governing Body will be kept regularly informed of donations over £10,000.

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 must confirm approval before the donation is accepted.

A proposed donation may be referred to the next level, or directly to Governing Body, at any stage where the framework of considerations warrants it.

## 5. Fundraising Complaints

St Hugh's College is committed to the highest standards of fundraising practice. The College is registered with the **Fundraising Regulator** and adheres to the **Code of Fundraising Practice** and ethical fundraising principles of openness, honesty, respect and accountability. The College values its alumni, donors, and friends and takes all feedback seriously.

A complaint can be made by any individual or organisation who is unhappy with any aspect of the College's fundraising. The College maintains a record of complaints to inform improvements in its fundraising practice. The College's registered complaints contact with the Fundraising Regulator is the Director of Development.

### Stage 1: informal resolution

A complainant may contact the Development Director with details of the complaint by email to development.director@st-hughs.ox.ac.uk, by telephone on +44 (0)1865 274900, or by post to the Director of Development, St Hugh's College, St Margaret's Road, Oxford OX2 6LE.

The College aims to acknowledge receipt within five working days, with the exception of the Christmas period when the office may be closed for up to 10 calendar days, and to resolve a complaint within twenty working days of receipt. If that is not possible, the complainant will be kept informed.

### Stage 2: formal review

A complainant who is not satisfied with the outcome may escalate the complaint within one month of the response date to the Principal. The Principal will appoint, at their discretion, a review panel comprising three senior members of the College, or qualified external people, who have not been involved in the action or events that are the subject of the complaint. The College aims to provide a final written response within twenty-five working days.

**Stage 3: external review**

A complainant who is not satisfied with the College's response, or with how the matter has been handled, may refer the complaint to the Fundraising Regulator, the independent body that sets and monitors the standards for charitable fundraising. Details are at www.fundraisingregulator.org.uk or by telephone on 0300 999 3407.

*To be read in conjunction with the Anti-Bribery Policy, Archives Collections Policy, Art Acquisition Policy, Conflicts of Interest Policy, Code of Practice on Freedom of Speech, Financial Regulations and Scheme of Delegated Financial Authority, Library Collection Management Policy, Safeguarding Policy, Serious Incident Reporting Policy and Procedures, UG Admissions Conflict of Interest Policy, and the Privacy Notice for Development and Alumni Relations.*

## 6. Governance, Ownership and Review

The Development and Alumni Relations Subcommittee is responsible for the oversight of this Policy and for ensuring that it remains current, effective and aligned with the College's strategic objectives and governance arrangements.

The Policy will be reviewed at least every two years, and additionally where required to reflect changes in legislation, regulation, sector best practice, College policies or procedures, or other relevant developments.

Any material amendments arising from such reviews will be recommended by the Development and Alumni Relations Subcommittee to the Finance and General Purposes Committee and, where appropriate, to the Governing Body for approval.