



Newnham College Donations Ethics Policy

Introduction

Newnham College is an independent charitable body, and like all charities, needs to be accountable, transparent and show integrity.

The College is very grateful indeed for the support it receives from its alumnae and other supporters. The purpose of these guidelines is to provide an objective policy to be applied if necessary and it is hoped this will assist discussions with donors if there is any question as to whether a donation can be made.

Whilst the College is self-governing and independent of Cambridge University, consideration will be given to consulting the Cambridge University Development Office where appropriate.

Charity law places certain constraints on charities, and the College must consider the following when accepting a gift:

1. Are the purposes of a proposed gift compatible with the College's purpose set out in its Statutes of advancing learning education and research among women in Cambridge and elsewhere and with its overall objectives?

2. Is there published evidence that the proposed donation arises in whole or in part from activity:
 - i. that is illegal (including contraventions of the Proceeds of Crime Act, the Bribery Act, International Conventions on Human Rights or anti terror-financing legislation, money laundering), fraudulent or evades taxation?
 - ii. that violates international conventions that bear on human rights?
 - iii. that limited freedom of inquiry?
 - iv. that 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.

3. Is there evidence that the proposed gift, or any of its terms will:
 - i. require the College to undertake activity that is illegal, counter to its values or counter to the public interest?
 - ii. compromise the College's status as an independent institution?
 - iii. compromise the College's academic integrity, limit freedom of inquiry or involve suppression or falsification of academic research?
 - iv. create unacceptable conflicts of interest?
 - v. harm the College's reputation, attract public opprobrium or negatively affect its relationships with or deter other benefactors, partners, potential students or research supporters?
 - vi. cause the College financial damage, or impose conditions which are too onerous or expensive to fulfil

4. Is the source of the donation unverifiable or is the College being asked to deal with an intermediary who will not disclose the identity even in strictest confidence to the Vice Chancellor or the Cambridge University Development Office?

5. If a donor is prepared to disclose their identity, in confidence, only to the Vice Chancellor or the Cambridge University Development Office, then Newnham College will decide on a case-by-case basis whether it is comfortable with this position – this may depend on whether it is satisfied by the written reassurances provided to it by the Cambridge University Development Office as to the information it has seen in relation to the identity of such donor. It is to be expected however that the donor of any gift, no matter the size, should usually be prepared to disclose his/her/its identity to the Principal.

Although the level of scrutiny behind the decision to accept a gift will be dictated by its provenance, whether or not the donor is already known to the College and the potential impact of the gift on the College, acceptance will nevertheless be considered explicitly against these ethical guidelines.

Prospective or current students

The following additional criteria shall be applied where the gift is from a prospective or current student (or family member of a prospective or current student):

- i. Any gift, no matter the size, made will not affect the admission or academic record of any current or future student; and neither will it have a bearing on any dispute between any current or future student and the College.
- ii. The College will not accept a gift of more than £5,000 from an individual or her family, either when the College is aware that the individual is actively contemplating applying to Newnham, during the application process, or once a conditional offer has been made to that individual.
- iii. Although pledges are not legally binding in the UK, the College will not accept a pledge in any of the above circumstances.
- iv. The College cannot accept a gift from a student or her family of more than £5,000 whilst she is studying at Newnham.
- v. The College will accept a non-legally binding pledge whilst a student is at Newnham, but it will be explained clearly in writing to the donor that the College cannot take account of the pledge in any dealings with the student, and that as the pledge is non-legally binding, the pledgor may withdraw at any time.
- vi. Notwithstanding the above, if the student is a family member of an alumna and that alumna had previously been giving regular amounts to the College of £10,000 or less per annum it would be inappropriate to refuse to continue to accept those gifts.

Acceptance of donations

Final responsibility for accepting donations rests with the College Council.