

COMMITTEE TO REVIEW DONATIONS AND RESEARCH FUNDING

Guidelines for the acceptance of donations and research funding

The collegiate University, aware of its position within, and responsibility to, the wider community in which it operates, has drawn up the following guidelines regarding the acceptance of donations and research funding ("funding"). The guidelines comprise a set of specific criteria against which the acceptance or otherwise of potential funding will be assessed, together with more general principles and practices to be observed. The guidelines may be of assistance and interest to those within the collegiate University and to potential and existing funders.

A. *Acceptance (or rejection) of donations and research funding*

1. Illegal activity:

Funding must be rejected where it has been established, or are there reasonable grounds to suspect that, by accepting the funding:

- (a) the University would be acquiring the proceeds of crime or be otherwise involved in money laundering activity;
- (b) the University would be accepting a bribe or offering a bribe to the donor or funder;
- (c) the University would be involved in terrorist financing activity (including by laundering or simply acquiring terrorist property); and/or
- (d) any of the conditions attached would require the University to act illegally in any way.

In no circumstances should any funding be accepted or solicited if there is a reasonable likelihood that the acceptance of such funding might result in the University acting illegally, actual or perceived influence in decision-making at the University or improper behaviour by the University or any of its members.

2. University as a charity:

As a charity, the University must ensure that the acceptance of any funding would not interfere with its core objectives, the provision of teaching and research. The University should also be mindful of the need to promote academic freedom, and that conflicts of interest created by funding arrangements might have the potential to limit the activities of the University. The University should therefore consider whether:

- (a) the purposes for which the funding is to be used are known, and, if so, do they fall in whole or in part outside the charitable objects of the University;
- (b) accepting the funding might impinge on academic freedom or limit freedom of enquiry; and/or
- (c) accepting the funding might create conflicts of interest for the collegiate University and/or the individual beneficiaries of the funding.

If the University decides that acceptance of the funding would not be in its best interests as a University, the University must refuse it.

3. Wider interests of the University:

The University should consider whether acceptance of the funding would be in the best interests of the University. For example, would accepting the funding:

- (a) originate from an activity that is unethical, require or promote any activity that is illegal or unethical, or which might have other serious adverse consequences?

- (b) create a link, or a perceived link, between the University and any person or entity which has received serious adverse public comment or coverage?
- (c) seriously harm the collegiate University's relationship with other benefactors, research funders, partners, staff, students, or other stakeholders?
- (d) otherwise do harm to the reputation of the collegiate University?

Where a funder has a 'tarnished' reputation, the University will consider gifts from that funder if the behaviour which led to the funder's reputation being tarnished has clearly ceased.

4. Tobacco funding:

Funding will not generally be accepted if the potential funder is actively involved in the tobacco industry. Detailed tobacco funding guidelines (Cancer Research UK and Wellcome Trust) are attached below.

5. Fossil Fuel funding¹:

To help mobilise and strengthen the University's research capabilities, we will consider industrial research funding or donations from fossil fuel companies or linked entities and individuals for which:

- either (i) the use of the funding within the University has no connection to fossil fuel prospecting or extraction or implications for long term increases in carbon emissions and is focused on delivering societal benefit (for example research on the development of a new cancer therapy);
- or (ii) the use of the funding within the University may have some use connected to the fossil fuel industry but only where the purpose explicitly relates to enabling meaningful accelerations away from carbon usage and speeding the transition to net zero carbon (for example research into the process of transforming an oil major into a global renewable energy company, or carbon capture and storage).

The research funder or donor should have clearly stated, evidenced and credible plans to achieve net zero carbon by 2050 or sooner, consistent with the [Oxford Martin principles](#), involving:

- (i) A commitment to net-zero emissions
- (ii) A profitable net-zero business model
- (iii) Quantitative medium-term targets

Further detail on how this guidance will be implemented is available at the of this document.

6. Legacy gifts (donations only):

For cases where the legacy has not yet been received out of the estate the University should consider the following:

- (a) would it be morally wrong to accept the legacy and, if so, do the limited circumstances apply where the University has the requisite power to refuse it?
- (b) are there any other grounds on which the legacy could be refused?

7. Use of intermediaries (including donor-advised funds)²:

Where an intermediary negotiates a donation or funding on behalf of a funder, the identity of the funder must at least be known to, and acceptable to, the Chair of CRDRF and the Pro-Vice-

¹ Added following the meeting on 19 July 2022

² Updated following the meeting on 22 May 2018.

Chancellor (Development and External Relations) if it is otherwise anonymous. For the avoidance of doubt, this includes donor-advised funds.

8. Use of intermediaries (including donor-advised funds)³:

Where an intermediary negotiates a donation or funding on behalf of a funder, the identity of the funder must at least be known to, and acceptable to, the Chair of CRDRF and the Pro-Vice-Chancellor (Development and External Relations) if it is otherwise anonymous. For the avoidance of doubt, this includes donor-advised funds.

9. Subsequent gifts

Although every potential donation will be assessed under these guidelines, irrespective of any previous consideration of the donor, there will be an assumption that, where a gift from a donor has previously been approved, any subsequent gift will also be approved unless in the interim there has been a change in circumstance that might affect the University's decision as to whether to accept the subsequent gift.

B. Reconsidering funding that has already been accepted

Where funding has been accepted, acceptance will be reconsidered by the University if information comes to light about the funder or the funding:

- (a) which might have made the funding unacceptable under these guidelines; and
- (b) the University could not reasonably have known at the time.

³ Updated following the meeting on 22 May 2018.

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Further information on the guidelines: tobacco

Both the current guidelines for the acceptance of donations and research funding, and the previous guidelines for the acceptance of donations⁴ state that funding will not generally be accepted if the potential funder is actively involved in the tobacco industry⁵.

The University's position is informed by Cancer Research UK and the Wellcome Trust:

A. Cancer Research UK

Code of Practice on Tobacco Industry Funding to Universities

Circumstances in which Cancer Research UK may make public comment on tobacco industry funding to universities

While recognising that certain decisions rest with individual universities, Cancer Research UK feels it has a right and duty to comment in certain situations.

All universities are asked to consider the great harm to public health caused by tobacco, and the damage to their reputation if they accept tobacco industry funds. If a university accepts donations from the tobacco industry, Cancer Research UK considers it has a duty to publicly criticise such funding.

Furthermore, Cancer Research UK applauds those universities which already have a policy not to accept such funds and encourages other universities to follow their lead.

Cancer Research UK believes that no form of association with the tobacco industry is acceptable. Therefore, nothing in this Code shall be taken to imply that Cancer Research UK supports or approves the use of tobacco industry funding for research or any other activities.

Conditions under which Cancer Research UK funding may be withheld (revised 2014)

Cancer Research UK has a legitimate right to protect its own research funding where there is likely to be close proximity of its funding to tobacco industry funds.

Cancer Research UK will not provide financial support to those supported by tobacco industry funding. Cancer Research UK will also not provide financial support where those who are, or would be, supported by Cancer Research UK funds are working in such proximity to others supported by tobacco industry funding that there is any possibility or likelihood that facilities, equipment or other resources will be shared. The conditions of this Code, at a minimum, apply at research team level.

The application of this rule would apply to e-cigarette companies which are fully or partially owned by tobacco companies.

However, Cancer Research UK will consider funding research teams in close proximity of those funded by an *independent* e-cigarette company, those in receipt of funding from *independent* e-cigarette companies and those working alongside *independent* e-cigarette companies, where independence for e-cigarette companies is understood as the absence of ownership, funding, or comparable engagement with a tobacco company. Cancer Research UK reserves the right to place additional conditions on applicants to avoid its brand being directly associated with an individual e-cigarette company or individual e-cigarette brands. Cancer Research UK will continue to examine the questions raised by e-cigarettes and by the rapidly changing structure of the e-cigarette industry. Cancer Research UK will therefore regularly review this approach.

⁴ As agreed by the Committee to Review Donations on 1 February 2016 and 23 June 2009 respectively.

⁵ Following the definition used in the Cancer Research UK Code of Practice on Tobacco Industry Funding to Universities, a tobacco company "means a company, entity or organisation (or groups or combinations of the same) whose business other than for an insignificant part (i.e. less than 10% of its revenue), is the development, production, promotion, marketing, or sale of tobacco in any country of the world, or is a subsidiary or a holding company or affiliate of the same. E-cigarette companies, fully or partially owned by the tobacco industry, are also considered tobacco companies under this definition."

Where Cancer Research UK is considering major new funding, association of the university with the tobacco industry will be a key criterion.

Definition of Tobacco Industry Funding (revised 2018)

"Tobacco Company" means a company, entity or organisation (or groups or combinations of the same) whose business other than for an insignificant part (i.e. less than 10% of its revenue), is the development, production, promotion, marketing, or sale of tobacco in any country of the world, or is a subsidiary or a holding company or affiliate of the same.

E-cigarette companies, fully or partially owned by the tobacco industry, are also considered tobacco companies under this definition.

The Foundation for a Smoke-Free World was launched in September 2017, with an announcement of US\$800 million funding from Philip Morris International (PMI). Although its own communications identify it as an independent organisation, the Foundation's sole source of funding to date comes from PMI. We therefore consider funding from the Foundation for a Smoke-free World to be Tobacco Industry Funding within the scope of this Code.

Cancer Research UK will have the final decision in any dispute. Policy endorsed by CRUK Scientific Executive Board 2015

<http://www.cancerresearchuk.org/funding-for-researchers/applying-for-funding/policies-that-affect-your-grant/code-of-practice-on-tobacco-industry-funding-to-universities>

B. Wellcome Trust

Policy on researchers funded by the tobacco industry

The Wellcome Trust is dedicated to improving health by supporting bright minds in science, the humanities and social sciences, and public engagement.

In view of the overwhelming evidence that both active and passive smoking of tobacco are injurious to health, we are unwilling to fund applications from individuals applying for, holding, or employed under a research grant from the tobacco industry.

<https://wellcome.ac.uk/funding/managing-grant/policy-researchers-funded-tobacco-industry>

COMMITTEE TO REVIEW DONATIONS AND RESEARCH FUNDING

Further information on the guidelines: research funding and donations related to fossil fuels

Introduction

The University receives research funding and donations from companies and organisations from the fossil fuel sector. In the five years since 2016, the total value is £15m in research grants (~£3m pa; < 1% of research turnover) and £10m (~£2m pa)⁶ in philanthropic donations. These funds are used principally to support researchers and activities aimed at speeding the transition to a net zero carbon future, or to support activities disconnected from fossil fuels, such as research on anti-microbial resistance.

We expect that research and donated funds linked to fossil fuels will reduce in the medium term because fossil fuel companies as we see them today will largely no longer exist. In the near term, fossil fuel linked funding opportunities might increase as companies invest significantly to develop new low or no carbon products and services. This document outlines how the University, through its Committee to Review Donations and Research Funding, might approach research funding or donation opportunities from companies or individuals linked to the fossil fuel industry.

Funding our leading role in addressing global challenges

Through its teaching, research and innovation, the University can play a leading role in meeting global challenges, not least in decarbonizing our planet, but also in global health, new therapies, mental health, artificial intelligence and understanding ourselves and our universe. Our research staff and students are motivated and determined to create new knowledge and develop capabilities to make significant contributions to these challenges. Although our Strategic Research Fund is investing in many of these areas it is only with much more significant external resources that we can hope to mobilise and undertake research on a scale and with impact consistent with the magnitude of the challenges, not least the climate crisis.

Research funding from industry and donations are an increasingly important part of our research funding portfolio. Industrial research funding also provides relationships that can facilitate fast and efficient pathways for insights and technologies to be implemented in practice. The speed of development and implementation of the Oxford-Astra Zeneca COVID 19 vaccine is a good example.

Fossil fuel companies have large financial and intellectual resources that can be used to speed the transition to a net zero carbon future. Some fossil fuel companies have committed to use these assets at scale to transform themselves to net zero carbon on a quantified timescale, and to create new net zero or negative carbon products and services; others have yet to do so, or only tentatively or unconvincingly. Given the scale of the net zero carbon challenge⁷, working selectively with those companies who are committing an increasing and meaningful fraction of their resources to decarbonizing their products and services could enable the University to contribute positive and impactful ideas and innovations to the climate crisis on a meaningful scale. Appropriate collaborations can help also meet the ambitions of individual researchers and provide them with opportunities for career development, such as research funding, studentship funding, etc. Nonetheless, any collaboration with fossil fuel companies, even in areas of low or zero carbon research exposes the University to accusations of propagation rather than mitigation of the climate crisis, greenwashing, unconscious positive bias towards such funders, and that funding is being used to exert influence on research and researchers.

Guidance

⁶ Plus an exceptional £100m from Ineos in 2020, which does not reflect the typical picture.

⁷ To achieve global net zero carbon by 2050 and assuming all new demand for energy is provided through renewable sources, the energy sector needs to remove 11,000 megatons oil equivalent and replace with net zero carbon sources i.e. a large offshore wind farm or equivalent every day for 11,000 days up to 2050, expending ~4% of global GDP. (Ref: CCFE).

1. To help mobilise and strengthen the University's research capabilities, we will consider industrial research funding or donations from fossil fuel companies or linked entities and individuals⁸ for which:

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- or (ii) the use of the funding within the University may have some use connected to the fossil fuel industry but only where the purpose explicitly relates to enabling meaningful accelerations away from carbon usage and speeding the transition to net zero carbon (for example research into the process of transforming an oil major into a global renewable energy company, or carbon capture and storage).

2. The research funder or donor should have clearly stated, evidenced and credible plans to achieve net zero carbon by 2050 or sooner, consistent with the [Oxford Martin principles](#), involving:

- (i) A commitment to net-zero emissions
- (ii) A profitable net-zero business model
- (iii) Quantitative medium-term targets

To assess sufficient alignment with the principles, CRDRF will require some expert guidance, beyond the current expertise of the CRDRF due diligence team. To gather this input, [Oxford Net Zero](#) or other University researchers can be asked to provide advice on a case-by-case basis (care will be needed to avoid any conflict of interests). While not fully independent from the University, this approach promotes consistency with [Oxford University Endowment Management \(OUEM\)](#), who encourage the same principles. Assessment of funder plans can also be informed by public information sources such as the [Carbon Data Project](#), [UN Race to Zero](#), and others that may be developed. A credible plan to achieve net zero for a fossil fuel company should include a plan to balance carbon dioxide emissions arising from their activities and the fossil fuel assets they sell, whether or not they extract them, for example using carbon dioxide capture and geological-timescale storage by 2050. In assessing these aspects, it is likely engagement with the donor or funder will be required in some cases.

CRDRF will consider the extent to which the funding or donation meets the criteria in guideline 1 and 2, and whether there is, or is not, an acceptable degree of alignment.

All new funders and donors in fossil fuel industries whose proposed contributions meet the financial threshold for CRDRF, or sub-threshold cases where the view of CRDRF is requested, will be assessed. Fossil fuel funders will be re-reviewed every three years (or earlier if significant adverse information comes to light). Metrics that can be published to show all instances that fall within the policy and the overall decision outcomes, while maintaining appropriate confidentiality, will be developed and published annually.

⁸ Suggested definition of a fossil fuel company: engaged in exploration or extraction of oil, coal, tar sands, natural gas, or in fracking; if in doubt, the guidance should be applied.