



**AMABHUNGANE CENTRE FOR INVESTIGATIVE JOURNALISM NPC
FUNDING POLICY – ADOPTED BY BOARD JULY 31 2019**

Purpose

1. This policy is intended to:
 - a. protect our editorial independence from compromise at the hand of our funding;
 - b. shield us and our funders from public perceptions of the same;
 - c. promote transparency; and
 - d. stimulate the development of funding policies applicable to the non-profit journalism sector in general.

Definitions

2. “Corporate funding” means funding from any juristic person with a profit motive or its proxy, the latter including a natural person, but does not include funding from bona fide charities/non-profits or simple holding structures for the assets of natural persons. A “corporate” has the corresponding meaning.
3. A “donation” means funding with the characteristics below. “Crowd funding” means the same, while “donor” and “crowd funder” have corresponding meanings.
 - a. The funding, or invitation to apply for funding, is at the instance of the funder (although it may be in response to a general appeal by us initially or in response to a specific request by us for repeat funding);
 - b. The purpose of the funding is not restricted (other than as to our stated objectives overall or statutory limitations that apply generally between similar funders and funded organisations);
 - c. The period within which we may use the funding is not restricted;
 - d. We are not obliged to report to the funder (other than information that we do or would readily report to the public); and
 - e. The aggregate from the funder within our financial year does not exceed the amounts in paragraph 20.
4. “Government funding” means funding from any government department, agency, entity, enterprise or proxy, the latter including a natural person, locally and abroad. A “government” has the corresponding meaning.
5. A “grant” means funding that tends to have the characteristics below, while “grant funder” has the corresponding meaning. We deem any funding that is not “government funding”, “corporate funding”, a “donation” or a “legacy” to be a grant.
 - a. We apply for the funding;
 - b. The funding may be restricted to specific purposes;
 - c. The period within which we may use the funding is restricted, after which any surplus may be repayable to the funder; and
 - d. We are obliged to report to the funder on predetermined indicators regarding the use of the funding, our work and/or our organisational status.
6. A “legacy” is a bequest specifically to amaBhungane in a will.



Application

7. This policy applies to donations, grants and legacies to amaBhungane itself. It does not apply to:
 - a. commercial discounts, tax breaks or similar benefits provided they are also available to non-profits, companies or the public generally;
 - b. benefits such as sponsorships, hospitality and gifts to individual staff, provided that their acceptance is regulated by policy or practice broadly consistent with this policy; and
 - c. direct contributions by media organisations to shared costs of joint stories or by partner organisations to shared costs of joint non-story projects.
8. This policy prevails in case of a conflict between it and any earlier amaBhungane policy or code.

General conditions

9. We shall not accept funding for specific stories or story areas, or that has conditions regarding our editorial decisions such as which stories we do and what they say.
10. We shall not accept funding where there is a material risk that its provenance will conflict us, or reasonably be seen by the public to conflict us, with regard to a story or stories that we might want to do in the foreseeable future. Unless aggravating circumstances apply, we shall consider risk to be immaterial where the aggregate from a funder within our financial year is R10 000 or less.¹
11. We shall not accept funding unless we may and do publicly disclose the identity of the funder and the amount where the aggregate within our financial year is material, i.e. exceeds the amount in paragraph 10 above.
12. Where funding reaches us before we are able to determine if it is acceptable under this policy, we shall return any amount that is not acceptable. Where we are unable to return funding despite our reasonable efforts, we shall transfer it to a charitable cause of our choosing.
13. We consider the provenance of funding/the identity of a funder to be the juristic or natural person who made the decision to fund us, and not any funder they had in turn who did not contribute to that decision.
14. Where ostensibly distinct funders are within our knowledge materially connected, we shall count them as one for the purpose of all limits in this policy.

Government and corporate funding

15. The risk that government or corporate funding will compromise us is high given our enduring journalistic interest in government and corporate malfeasance; and the serious consequences should a perception arise that our editorial decisions are influenced by state or corporate actors.
16. To this end:
 - a. We shall not solicit government or corporate funding.
 - b. We shall not accept government or corporate funding.²

¹ The executive directors will amend this amount from time to time to be a rounded figure roughly equivalent to 0.1% of our budget.

² This is subject to us being or becoming aware that the funding is from such a source.

Grant funding

17. Grant funding risks include the real or perceived links that may exist between grant funders and governments or corporates; the conditions that may attach to grant funding; the possibility that grant funders may want to influence editorial decisions; and the materiality of some grants when measured against the size of grantee budgets.
18. To this end:
- a. We may accept grant funding only from reputable grant-making organisations with a credible track record of funding media or social justice causes and that are clearly not government or corporate funders or their proxies;
 - b. We shall perform a due diligence on any new grant funder to satisfy ourselves that accepting grants from it will not contravene this policy; in particular its provisions in the subparagraph immediately above and on conflicts with regard to a story or stories that we might want to do in the foreseeable future;
 - c. We shall consider any new grant agreement diligently to satisfy ourselves that it does not contravene this policy and in particular does not contain conditions regarding our editorial decisions; and
 - d. We shall limit our exposure to any particular grant funder to 20% of our budget, although our board may waive this limit in exceptional circumstances subject to conditions regarding the extent and duration of the breach.

Donations/crowd funding

19. Donations come without material conditions and tend to be in smaller amounts, which mitigates their risk. However, there may be real risks relating to who donors are and what other interests they have, which may give rise to real or perceived conflicts regarding our stories.
20. To this end:
- a. We may accept donations from a natural person, or a juristic person that is a simple holding structure for the assets of a natural person, to a maximum aggregate within our financial year of R100 000;³
 - b. We may accept donations from a juristic person that is a bona fide charity/non-profit to a maximum aggregate within our financial year of R250 000,⁴ except that where the funder is little more than an extension of a natural person, the limit in respect of natural persons applies;
 - c. We shall perform a due diligence on any donor when their aggregate within our financial year becomes material, i.e. exceeds the amount in paragraph 10 above, to satisfy ourselves that accepting donations from them will not contravene this policy; in particular its provisions in the two paragraphs immediately above and on conflicts with regard to a story or stories that we might want to do in the foreseeable future; and

³ The executive directors will amend this amount from time to time to be a rounded figure roughly equivalent to 1% of our budget.

⁴ The executive directors will amend this amount from time to time to be a rounded figure roughly equivalent to 2.5% of our budget.



- d. Should the donor want to enter an agreement, we shall consider it diligently to satisfy ourselves that it does not contravene this policy.

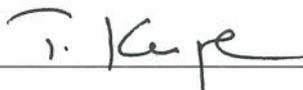
Legacies

21. The risk in accepting a legacy is moderated by the fact that our stories cannot conflict with a funder's interests, although a legacy may conceivably have conditions regarding editorial decisions.
22. To this end, we may accept legacies provided they do not contravene this policy and in particular does not contain conditions regarding our editorial decisions.

Ongoing relationship with funders

23. We will not enter negotiations with existing funders about our editorial decisions.
24. In applications and reports to funders, we may describe stories or story areas we have worked on or intend to work on, provided that we do not bind ourselves.

SIGNED



PROF TAWANA KUPE (CHAIRPERSON OF THE BOARD)