Steppe Sisters: The Future of Our Charitable Status

Membership briefing and proposed vote — Annual General Meeting, 14 November 2026

Background

In 2025, the Steppe Sisters membership agreed to pursue registration as a Charitable Incorporated Organisation (CIO) with the Charity Commission for England and Wales.

Our intention was to establish a formal legal structure that would enable Steppe Sisters to manage its own finances, receive donations and funding directly, and support the continued development of our activities and programmes.

Unfortunately, the application process took considerably longer than anticipated. When we began preparing for registration in autumn 2025, the expected processing time was approximately five to six weeks. During 2026, waiting times increased substantially, and Steppe Sisters ultimately waited approximately seven months for a decision.

On 30 July 2026, we received a formal letter from the Charity Commission refusing our application.

The Steering Committee has since reviewed the decision and discussed the implications for the future of Steppe Sisters. We now wish to ask members whether we should pursue a revised application or continue operating under our existing organisational arrangements.

Why was our application refused?

The Charity Commission did not conclude that Steppe Sisters could never qualify as a charity. Rather, it determined that our application had not sufficiently demonstrated that our organisation met the legal requirements for charitable purposes and public benefit.

The Commission raised four principal concerns:

1. Insufficient evidence of public benefit

Although our application described educational activities, lectures, workshops, mentoring and research dissemination, the Commission considered that we had not provided sufficient detail about their educational content, accessibility or wider public benefits.

2. Emphasis on professional networking and career development

The Commission questioned whether some of our activities primarily benefited individual researchers and members of an academic network rather than advancing education and equality for wider public benefit.

3. Differences between our application and website

The Commission noted that our application emphasised education, outreach and public benefit, whereas our website described Steppe Sisters primarily as a professional networking organisation supporting women researchers. It considered this apparent inconsistency significant.

4. Insufficient evidence relating to equality and diversity

The Commission requested more substantial evidence of the inequalities Steppe Sisters seeks to address, the activities designed to address them, and how these activities would benefit the wider community.

These concerns relate substantially to how our aims, existing activities and intended programmes were described and evidenced in the application and our publicly available materials. However, the Commission also requires us to demonstrate that our activities genuinely meet charitable public-benefit requirements, rather than simply revise their descriptions.

The Commission explicitly advised that Steppe Sisters could submit a fresh application addressing its concerns. Although formal routes existed to challenge the decision, including a decision review and appeal, these were not designed for substantially revising an application. A fresh application was therefore the more appropriate route if we wished to make changes.

What is our current legal status?

Because our application was unsuccessful, Steppe Sisters has not become a registered CIO.

Although the membership approved a proposed CIO constitution in 2025, this has not taken effect as the constitution of a registered CIO. We therefore continue to operate as an unincorporated community association under our previous constitution.

This means that we can continue organising activities, maintaining our membership, holding meetings and delivering programmes. However, we do not have the separate legal identity or protections that incorporation as a CIO would provide.

The practical problem of banking and financial administration

One of the principal reasons for pursuing registration was to establish an independent bank account for Steppe Sisters.

Although unincorporated community associations are legally permitted to hold bank accounts in the United Kingdom, accessing these services has become increasingly difficult in practice.

Steppe Sisters has made substantial efforts to establish its own organisational bank account. However, most banks we investigated required a UK charity registration number before we could apply. We submitted applications to two banks that accepted unregistered community organisations, but both were unsuccessful.

Consequently, we continue to rely on university partners and individual members to receive, hold and administer funds on our behalf.

These arrangements have enabled us to organise events, secure academic funding and deliver programmes, but they also create practical limitations:

- Funds must often be channelled through university accounts or personal accounts rather than held directly by Steppe Sisters.
- Financial administration places additional responsibilities on individuals.
- We have limited independence in receiving donations and administering funding.
- Our capacity to manage larger grants, donations or more ambitious programmes is constrained.
- Reliance on individual members creates challenges for continuity, accountability and financial responsibility.

Obtaining a UK charity registration number would significantly improve our practical access to banking services, although it would not guarantee that an application for an account would be accepted.

What kind of organisation do we want to be?

The question of charitable registration is closely connected to our ambitions for the future of Steppe Sisters.

Since our establishment in 2017, we have primarily operated as a volunteer-led academic network, organising events, supporting researchers, sharing resources and delivering educational and outreach activities.

Our activities have been funded through academic grants, institutional support and the voluntary contributions of our members.

Looking ahead, we might wish to expand our programmes, secure larger grants or donations, undertake more ambitious international activities, or eventually employ staff to support the organisation.

The Steering Committee has also discussed potential income-generating activities, such as:

- Membership subscriptions or contributions.
- Academic publications or other research outputs.
- Training, curriculum development and continuing professional development (CPD) resources.
- Educational programmes and partnerships with universities or other organisations.

Developing these activities would require additional organisational capacity, financial administration and volunteer commitment.

A formal incorporated structure would make it easier for Steppe Sisters to manage larger projects, hold funds independently, enter into contracts and potentially employ staff. However, it would also bring additional governance, financial reporting and regulatory responsibilities.

Alternatively, we may prefer to retain our existing volunteer-led model, concentrating on networking, research collaboration, educational events and outreach programmes funded through existing academic and institutional arrangements.

Neither approach would prevent Steppe Sisters from continuing its mission. The question is which structure would best support our activities and future ambitions at this time.



The options for members

Option 1: Continue pursuing charitable registration

Under this option, the Steering Committee would prepare a revised application for registration as a CIO, addressing the concerns raised by the Charity Commission.

This would include reviewing our stated charitable purposes, strengthening evidence of public benefit, updating relevant website information, and correcting miscellaneous administrative issues identified in the refusal letter.

Advantages

- Establishes an independent legal identity for Steppe Sisters if registration is successful.
- Provides a UK charity registration number, removing a major barrier we have encountered when applying for organisational bank accounts.
- Improves access to charitable grants, donations and funding opportunities restricted to registered charities.
- Enables Steppe Sisters to manage funds, enter into contracts and administer programmes in its own name.
- Reduces reliance on individual members and university partners to hold and administer funds.
- Creates a formal structure capable of supporting larger programmes and potential future employment.
- Provides limited liability protections and a more formal framework for financial governance.

Disadvantages

- Requires substantial further steering committee time to revise the application, constitution and supporting documentation, which will reduce time to develop and deliver our programs
- Involves another potentially lengthy assessment process, with no guarantee of approval.
- Requires us to demonstrate that our activities meet charitable public-benefit requirements, potentially including changes to how some activities are structured or delivered.
- Creates ongoing governance, accounting and regulatory reporting obligations.
- Requires enough volunteers willing to undertake formal trustee and administrative responsibilities.

Option 2: Continue as an unincorporated community association

Under this option, Steppe Sisters would not pursue charitable registration at the present time.

We would continue operating under our existing constitution, with activities and programmes organised by the Steering Committee and volunteers. Funding would continue to be administered through existing university arrangements and other agreed mechanisms, including funds held on behalf of Steppe Sisters by individual members where necessary.

Advantages

- Allows us to concentrate our limited volunteer capacity on delivering existing programmes rather than pursuing registration.
- Preserves our existing organisational structure and flexibility.



- Avoids the additional regulatory obligations associated specifically with operating as a registered CIO.
- Allows our existing networking, mentoring, educational events and outreach activities to continue.
- Avoids a further potentially lengthy and uncertain application process.

Disadvantages

- We would continue without a separate incorporated legal identity or the liability protections that incorporation provides.
- Access to independent banking would remain a significant challenge. We have already made two unsuccessful applications, and most other banks we investigated require a registered charity number.
- We would remain dependent on university partners and individual members to receive and administer some of our funds.
- Some grants, donations and other funding opportunities would remain inaccessible or more difficult to pursue.
- Financial administration would continue to place additional burdens and potential personal liability on individual volunteers.
- Larger projects, commercial activities and future employment would be more difficult to administer without a formal organisational structure.

What about other organisational structures?

The Steering Committee has also discussed alternative forms of incorporation, including a Community Interest Company (CIC), a social-enterprise structure or potentially registering an organisation outside the United Kingdom.

These may offer different opportunities for fundraising, trading and organisational governance. However, each involves its own legal requirements, administrative responsibilities and restrictions.

As these alternatives have not yet been investigated in sufficient detail, they are not being presented as a separate option for the current membership vote.

This does not prevent Steppe Sisters from considering alternative organisational structures in the future.

How to vote

Members are asked to indicate their preferred direction for Steppe Sisters by either participating in the vote which will be held during the AGM on 14 November, 9am UK time in Durham, UK. Participation is also available online via Zoom. Register here to receive the link: https://umich.zoom.us/meeting/register/V5Ml_ibtQN-FwZ9Q9Y0C8A#/registration

Members are also able to vote by email. All votes must be emailed to the hello@steppesisters.org address by 5pm UK time 12 November 2026. You must fulfil the criteria for membership to vote which are 1) You must identify as a woman who works in or on Central Asia and 2) You must belong to the Facebook group and/or receive the newsletter and/or follow our Instagram and/or Telegram channels

For ease, we have provided a voting example on our website (https://www.steppesisters.org/2026-annual-general-meeting/) that members are welcome to download and email into the address above.

The Voting Options

(This text is reproduced in the standalone document available on our website).

The outcome of this vote will guide the Steering Committee's future priorities, governance arrangements and approach to funding.

Both options allow Steppe Sisters to continue pursuing its mission of supporting women researchers, fostering collaboration across academic and cultural boundaries, and promoting research, education and equality in the study of Central Asia and neighbouring regions.

Please delete the option that you do not support, and be sure to date your email and include your full name and title (and institutional affiliation, if relevant). Only one vote per eligible member will be counted.

Voting Instructions

Members may submit their vote by email to hello@steppesisters.org, no later than 5:00 pm UK time on Thursday, 12 November 2026.

To cast your vote:

1. Confirm your eligibility using the statement below.
2. Delete the voting option you do not support, leaving only your preferred option.
3. Include your full name, title and institutional affiliation (if applicable), and date your email.
4. Send your completed vote to hello@steppesisters.org before the deadline.

Voter eligibility

I confirm that I am a woman working in, on, or from Central Asia and neighbouring regions, and that I am a member of Steppe Sisters through our Facebook group or newsletter.

Please select one of the following options

Option 1 — Continue pursuing charitable registration

I support Steppe Sisters preparing and submitting a revised application for registration in the UK as a Charitable Incorporated Organisation, addressing the concerns raised by the Charity Commission.

Option 2 — Retain our existing organisational structure

I support Steppe Sisters continuing to operate as an unincorporated community association based in the UK under its existing constitution, without pursuing charitable registration at the present time.