

Donations Policy

Introduction

Channing School gratefully receives donations, which advance the objects of the school. Donations and sponsorships can be important sources of funding and the School welcomes cooperation with individuals and businesses in the pursuit of shared values. However, the integrity of the School must not be compromised as a result of such donations. The Board of Governors has adopted the following policy to clarify the conditions under which the School accepts donations, to provide the underlying principles for soliciting donations, and to identify situations for which Board approval is required prior to acceptance of a donation. This policy is in line with established best practice in the United Kingdom (as agreed by the Ross Group of UK University Development Secretaries and the Council for the Advancement and Support of Education – Europe).

Implementation

This donations policy will be used to guide and inform the fundraising activities of the School. Channing School staff and volunteers are expected to comply with this policy. Volunteers will be made aware of who is responsible for any fundraising they are asked to participate in and will be clearly briefed on their roles and responsibilities.

Staff will work with the Headmistress in advance of soliciting donations, when appropriate, to ensure that the principles contained in this policy are adhered to. The Headmistress supported by the Bursar and Development Secretary should evaluate all offers of donations to ensure consistency with this policy. For donations that are not consistent with the policy, the Headmistress must either decline the donation or seek approval from the Board of Governors for an exception to the policy.

POLICY

Donations - General

1. Acceptance of donations

The School will accept monetary or in-kind donations if:

- a) The donation is wholly consistent, in fact and appearance, with the School's Charitable Objects and its Articles of Association and the School's acceptance of it is in compliance with the School's other legal obligations and with this and its other relevant policies.
- b) The donation is not linked to a requirement that the School endorse any products or services.
- c) The donor is not involved in activities that may be construed to be contrary to the Articles of Association of the School and provided that there is no concern that the acceptance of a donation from the donor would adversely affect the reputation of the School.

If there is considered to be any such risk in accepting a donation, the Headmistress shall

seek prior approval from the Board of Governors.

- d) The School will take all reasonable steps to ensure that it is aware of the source of funding for every gift, and has processes in place to satisfy itself that the funds do not derive from activity that was or is illegal, or runs counter to its ethos or core values.

2. Acknowledgement

The School will be pleased to provide recognition to donors in a mutually agreeable format.

If a donor asks to make an 'anonymous donation' the school would need to be aware of the details of such a donation in order to comply with its own legal obligations and policies with regard to fraud, bribery or money-laundering. Such details would also be required if the school were to seek to reclaim any gift aid if appropriate. In accepting an anonymous donation the School would agree that it would not seek to publicise the source of any donation but would provide information if the School were legally obliged to do so. The Chairman of Governors and the Headmistress will be informed as a matter of course about all anonymous donations.

3. Gift Aid

In seeking to reclaim any gift aid made on donations made either from individuals in the UK or overseas the school will ensure that proper taxation advice is received. The format of any gift aid declaration used by the school will be in accordance with HMRC guidelines. Where there is any doubt as to the legitimacy of any claim for the recovery of gift aid the school will seek advice from its accountants.

4. Disclosure

- a) The School will provide a copy of the Donations Policy to any corporation, business, organisation or individual that requests it.
- b) The School will post its Donations Policy on the School's website.

5. Board Approval

- a) Subject to 5b) and 5d) below, the authority for the acceptance of proposed donations is delegated to the Development Secretary with the expectation that their responsibility to ensure compliance with the School's Charitable Objects, its Articles of Association, its other legal obligations and this and its other relevant policies is clearly understood and will be consistently applied.
- b) Where there is any risk that a proposed donation could be outside the School's Charitable Objects and/or involve a breach by it of its Articles of Association or any other legal obligation or this or any other relevant policy, the Development Secretary will take related advice from the Clerk to the Governors. If there remain concerns, the proposed donation shall be referred promptly to the Board of Governors. In that event it shall be for the Board of Governors to decide whether the proposed donation shall be accepted and if so on what terms.
- c) If the Development Secretary suspects that there may be a risk as described in 5b) above, it is

their responsibility, straightaway and if at all possible before an 'ask' has been made to seek relevant advice from the Clerk to the Governors. In the event that there remain concerns, The Development Secretary is to alert the Headmistress, and the Chair of the Governors, and to provide them with a written briefing as to the nature of the approach and the source of concern. The Headmistress and Chair of the Governors will then decide whether or not further discussion with the potential donor is required.

d) The Chairman of Governors must be informed of any donation that exceeds £50,000 in cash or in-kind.

e) Where a donor wishes to make a donation, which is outside the School's Charitable Objects or would otherwise involve a breach of any legal obligation on the part of the School, it is confirmed for the avoidance of doubt that the Board of Governors must decline to accept the donation.

6. Conflict of Interest

To avoid any actual or potential conflicts of interest, board members that have a financial or other interest relevant to a proposed donation or the donor shall excuse themselves from the vote to accept that donation.

7. Acknowledgement

a) Corporate and business donors will be acknowledged in an appropriate manner that is considered acceptable to the School. The Headmistress must decline any form of acknowledgement, which it is considered might adversely impact on the School or its reputation. It is recognised that such action might impact upon any related donation. The Headmistress should inform the Governors of any such action which she takes.

b) Recognition of a corporate donation on School publicity material/sports kit etc. is allowed but the size and style of the recognition must not dominate the item.

8. Money Laundering

The School is subject to money laundering regulations in respect of donations whether received overseas or in the UK and has its own money laundering policy. The School cannot be party to laundering money by receiving a donation from any source and then giving some or all of it back to the donor or his / her designated representative. In this context all donations that are given to the School for a general or specific purpose agreed by the School are "non refundable", and the School's statutory accounts will treat all donations as non-refundable income.

For all material donations or for donations made from overseas, the School will always seek to establish and verify the identity and address of an individual in an appropriate manner.

9. Complaints

The complaints procedures relevant to this policy are contained within the schools Fundraising complaints policy which is published on the School's Website. Copies are also available on request.

This policy is reviewed annually by the Bursar.

Last review August 2018