1. **Policy context and purpose**

1.1 The primary object of the Sevenoaks School Foundation ("the Foundation") is the advancement of Sevenoaks School ("the School"). In order to support delivery of the School’s mission and strategic priorities, the Foundation solicits philanthropic donations in the United Kingdom and across the world.

1.2 As a registered charity in the United Kingdom, the Foundation has a responsibility to ensure that it acts legally and ethically, that the processes of securing and receiving funds to support the objects of the Foundation do not compromise its integrity nor pose a risk to the reputation of the Foundation or the School.

1.3 The Foundation has a duty to maintain the trust of its supporters and their commitment to the advancement of the School.

1.4 The Foundation must ensure it does not bring itself or the School into disrepute by knowingly accepting philanthropic donations from questionable or inappropriate sources and must comply with the Charity Commission and UK Fundraising Regulators guidelines.

1.5 This document sets out standard procedures for the solicitation and acceptance of philanthropic donations to support the Foundation’s object i.e. advancement of the School. It is intended to support Foundation Trustees and for Prospective Donors and their advisers, providing assurance that Donors are treated equitably and risks associated with fundraising are appropriately mitigated.

1.6 The Foundation expects all of its members and associates to follow the ethical behaviors set out in the Nolan Principles. Those are: selflessness, integrity, objectivity, accountability, openness, honesty, and leadership. These Principles define the Foundation’s ethical framework and policies.

2. **Scope and definitions**

2.1 This policy applies to all philanthropic donations received by the Foundation.

2.2 This policy uses the following key definitions:

- **Assignment:** The process whereby a Fundraiser is made the designated canvasser for a prospective Donor.
- **The Foundation:** Sevenoaks School Foundation being a registered charity in the United Kingdom registered charity number 307923.
- **Donor:** A person, organisation or legator who gives a philanthropic donation to the Foundation without receiving any material benefit in exchange.
- **Donation:** a voluntary transfer of funds made with the philanthropic intent of supporting the mission of the Foundation i.e. the advancement of Sevenoaks School.
- **Due Diligence:** The range of practical steps that need to be taken by the Foundation, so it is reasonably assured of the identity of a Donor and the origin of a Donation, and can identify and manage associated risks.
• **Fundraiser:** Foundation Trustees and staff, and any other individuals who have been vetted and approved as Fundraisers by the Foundation Chairman and/or the Clerk to the Foundation Trustees (“the Clerk”).

• **Fund:** An account for donations to support the Foundation’s objects and the School’s mission.

• **Donation Agreement:** a binding agreement between the Donor and the Foundation to clarify the purpose and any expected outcomes from a Donation. Donation Agreements should follow the agreed template in Appendix B.

• **Donation Acceptance Committee (DAC):** comprises the Chair of Trustees, a second nominated Trustee and the Clerk. The DAC acts on behalf of the Foundation Trustees in accordance with approved Terms of Reference in Appendix A.

• **Legator:** A person who has died leaving a legacy to the Foundation.

• **Letter of Intent:** a non-binding letter outlining the amount, timing and purpose of a Donation made to the Foundation. Letters of Intent should follow the agree template in Appendix B.

• **Prospective Donors:** A person, organisation or legator who has potential to give a donation to the Foundation without receiving any material benefit in exchange.

• **Solicited:** Donation is offered to the Foundation following engagement and involvement with a Fundraiser.

• **Unsolicited:** Donation is offered to the Foundation without any prior engagement with a Fundraiser.

3. **Acceptance principles**

3.1 The Foundation will not accept a Donation that is inconsistent with the Foundation objects.

3.2 The Foundation will not accept a Donation if the proposed donation arises in whole or in part from any illegal activity.

3.3 The Foundation will not accept a Donation if the terms of accepting the proposed donation will:

• require any illegal action on the part of the School or the Foundation;

• create an unacceptable conflict of interest or compromise the independence of either the Foundation or the School, and in particular the Foundation will not accept a Donation from a parent, family member or other known close associate of a current applicant;

• damage the reputation of the Foundation or School;

• harm the Foundation’s or School’s relationship with the wider School community and external stakeholders;

• cause unacceptable difficulty, cost or future liability to administer a restricted Donation;

• benefit the Prospective Donor or Donor personally;

• affect the independence and integrity of the School’s admissions and appointments processes.

3.4 In terms of Corporate Philanthropy, Donations from companies in the United Kingdom and overseas are acceptable sources of philanthropic funding if the giving has philanthropic intent AND the Donation does not fall under one of the seven exclusion criteria:

• Contractual relationship

• Exclusive information

• Exclusive publication

• Consultancy included

• IP rights

• Other forms of financial benefit

• Donor control.

The Foundation may still accept income under these exclusion criteria, but not as a Donation.
3.5 The Foundation will only accept a Donation if it is clearly understood and accepted by all parties that impartial, independent research, scholarship and teaching are the basis for the furtherance of knowledge.

4. **Approach and negotiation practices**

4.1 All fundraising in support of the Foundation and the advancement of Sevenoaks School will be undertaken by approved Fundraisers who have confirmed in writing acceptance and compliance with this Donation Acceptance Policy. A record of all approved Fundraisers will be maintained and updated annually by the Clerk.

4.2 All fundraising solicitations by or on behalf of the Foundation will be truthful, accurately describe the School’s activities and intended use of donated funds, and respect the dignity and privacy of those who benefit from donations.

4.3 Fundraisers who solicit or receive funds on behalf of the Foundation shall:

- adhere to the provisions of this Donation Acceptance Policy;
- adhere to the provisions of applicable professional codes of ethics and standards of practice to include but not limited to the UK Code of Fundraising Practice as outlined by the UK Fundraising Regulator;
- act with fairness, integrity and in accordance with UK law;
- provide truthful information about fundraising activity, without exaggeration or underestimation;
- not express or suggest in public information that fundraising activity is without cost;
- cease solicitation of a prospective Donor on request;
- cease engaging with a Prospective Donor or existing Donor where a Donation is offered in relation to a student application;
- report immediately to the Donation Acceptance Committee any Donation which they consider to be a cause for concern and any actual or apparent conflict of interest as a result of the Foundation accepting a Donation.

4.4 The Foundation will seek, as a first preference, unrestricted Donations from Prospective Donors and Donors. Where a Prospective Donor or Donor expresses a preference for their Donation to be restricted to funding specific activities, these should be discussed at an early stage with the Clerk and Foundation Chairman, before being agreed with a Donor.

5. **Donor Rights**

5.1 All fundraising solicitations by or on behalf of the Foundation will disclose the Foundation’s name and purpose for which the funds are requested. Written solicitations (however transmitted) will also include the Foundation’s address or other contact information.

5.2 Prospective Donors and Donors are entitled to the following, promptly upon request:

- The report and financial statements from the Foundation’s most recent Annual Report to The Charity Commission;
- Confirmation of the exempt charitable status of the Foundation;
- A copy of this Donation Acceptance Policy and the UK Code of Fundraising Practice.

5.3 Prospective Donors and Donors are entitled to know, upon request, whether an individual soliciting funds on behalf of the Foundation is an employee, volunteer, or other stakeholder.

5.4 The Foundation does not provide legal advice or financial planning services for Prospective Donors or Donors.

5.5 Fundraisers will encourage Donors to seek independent advice if the Foundation has any reason to
believe that a proposed Donation might significantly affect the Donor’s financial position, taxable income, or relationship with other family members.

5.6 The Foundation will not pay legal or other fees for the preparation of a Prospective Donor’s or Donor’s Will or other documents which name the Foundation as a beneficiary.

5.7 Personal details of Prospective Donors and Donors and their Donations will only be shared as necessary for the solicitation, approval, processing, stewardship and auditing of donations, in accordance with data protection regulations. However, the Foundation may publish the names of Donors as part of Donor acknowledgement and wider stewardship activities, unless there is a prior agreement with a Donor to remain publicly anonymous. If a Donor does request to remain publicly anonymous, this will be respected as far as is legally, practically, and ethically possible.

5.8 Prospective Donors and Donors will be treated with respect. The Foundation will make every effort to honour Donor requests in relation to the frequency and type of solicitations, or the receipt of printed material concerning the School.

5.9 The Foundation will respond promptly to a complaint by a Prospective Donor or Donor, in accordance with the Foundation’s Fundraising Complaints Procedure in Appendix C, which adheres to the UK Fundraising Code of Practice.

6. Acceptance practices

6.1 A written Donation Agreement or Letter of Intent following a prescribed template is required for all Donations over £10,000, all restricted Donations, and all Donations where agreed expenditure will extend beyond the current financial year. The Donation Agreement template must include the Donation amount, purpose including any restrictions, payment schedule and relevant stewardship arrangements (as a minimum) and must be signed (electronically or otherwise) by the Donor and an appropriate member of staff according to the value of the Donation, as set out below.

6.2 Appropriate Due Diligence is required and should be commissioned by the Clerk or nominee prior to accepting:
   - any proposed Donation, including cumulative Donations, of over £10,000;
   - any proposed Donation where there are known ethical concerns;
   - any proposed Donation that includes naming rights;
   - a proposed volunteer to act as a Fundraiser on behalf of the Foundation.

Due Diligence is carried out in order to uphold this policy and to verify whether a proposed Donation or engagement with a prospective Donor or volunteer is appropriate for the Foundation to accept.

6.3 Donations below £10,000 should follow the electronic donation process set out on the Foundation’s online giving page at: https://giving.sevenoaksschool.org/donate/single-or-recurring-gift/

6.4 Individual Donations of £10,000 or above must be formally approved according to their value as follows:
   - GBP £10,000 to £100,000 by the School Bursar or nominee, usually the Director of Finance;
   - GBP £100,000 or more by the School Bursar and the Foundation Chairman on behalf of the Donation Acceptance Committee.

6.5 When a Donor’s cumulative lifetime giving exceeds the threshold of £100,000, £250,000, £500,000 or £1,000,000, any further proposed Donation will prompt a review by the Committee.

6.6 The approver(s) should ensure the prospective donation adheres to this Donations Acceptance Policy and the guidelines set out in the Donation Acceptance Committee Terms of Reference in Appendix A, including consideration of any associated strategic, financial, legal, ethical and
reputational issues and risks, before reaching a decision to accept a Donation. Approval may be escalated in the event of significant concerns, including to the full Board of Trustees for guidance if appropriate.

6.7 A donation receipt will be provided to all Donors for all Donations received directly by the Foundation.

6.8 The Foundation welcomes notifications by Prospective Donors and Donors that they have included the Foundation in their Will or Estate Planning. The Foundation will record this information confidentially.

6.9 The Foundation welcomes Donations made via the Charities Aid Foundation or other registered charitable foundations, subject to the principles and practices set out in this policy.

6.10 Non-monetary Prospective Donations will be considered individually by the Foundation Trustees, and the Foundation reserves the right to sell or trade any non-monetary Donation for its cash value to be used in line with the wishes of the Donor.

6.11 The financial affairs of the Foundation and the School will be conducted in accordance with the ethical obligations of stewardship and the legal requirements of national and international regulators. All Donations will be used as set out in the Donation Agreement, unless the Donation Agreement is subsequently varied with the express agreement of the Donor, for example to accommodate strategic, organisational, legal or regulatory changes. If the Donor is deceased or legally incompetent and the Foundation is unable to contact a legal designate, the donation will be used in a manner that is as consistent as possible with the Donor’s original intent. If necessary, the Foundation Office or the Clerk will refer the matter to the Donation Acceptance Committee, and ultimately to Foundation Trustees.

7. Data Protection

7.1 The Foundation will ensure compliance with the Data Protection Act (U.K.) and the General Data Protection Regulations (U.K.) and all subsequent Data Protection legislation.

7.2 Donor privacy will be respected and information will only be used in accordance with our privacy statement available at https://giving.sevenoaksschool.org/privacy-statement/ and data protection legislation as set out below. The Foundation will at all times be aware of the sensitivity of information gathered and held on Donors, other individuals and organisations. This will aid our compliance with data protection legislation and ensure that information obtained via all channels, particularly information not in the public domain, is treated with utmost respect and confidentiality.

7.3 When using external agencies or when data may be shared with a third party, for instance mailing houses, the Foundation will ensure that all issues such as data ownership, fitness for use and confidentiality are understood and formally agreed with the third party in advance, prior to sharing any data.
DOCUMENT MANAGEMENT - to be completed and maintained by the Clerk

Review schedule

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Version history

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<td>1.0</td>
<td>May 2015</td>
<td>Gift Acceptance Policy established</td>
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<tr>
<td>2.0</td>
<td>May 2021</td>
<td>Minor updates</td>
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<tr>
<td>3.0</td>
<td>January 2022</td>
<td>Major revisions and renamed Donation Acceptance Policy</td>
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<td>4.0</td>
<td>April 2022</td>
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Links to other policies

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<td>Privacy Statement</td>
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Key contacts

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<tr>
<td>Policy owner</td>
<td>Bursar, Clerk to the Governors and Clerk to the Trustees</td>
<td>B McClure</td>
<td><a href="mailto:bxm@sevenoaksschool.org">bxm@sevenoaksschool.org</a></td>
</tr>
<tr>
<td>Business lead</td>
<td>Executive Director of Advancement</td>
<td>Michael Joyce</td>
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</tr>
<tr>
<td>Financial accountability</td>
<td>Director of Finance</td>
<td>Philip Watkins</td>
<td><a href="mailto:pjw@sevenoaksschool.org">pjw@sevenoaksschool.org</a></td>
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