



ST PAUL'S SCHOOL
Est. 1509

Donation and Support Acceptance Policy

Author: Director of Development & Engagement	Date of authorisation: 20 September 2018
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Authorised by the resolution of: ADC of the GB	

This policy is available on the Handbook page of the School Intranet and Policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made by email to the Director of External Relations.

This policy gives the following guidance for Governors and staff to ensure that the School is able to maximise opportunities for fundraising and development while safeguarding its reputation and fulfilling its legal obligations:

1. Principles for ethical fundraising and development activity;
2. Background principles for decision making;
3. Guidance for Governors and school staff in the procurement of Donations and Support;
4. Procedures for acceptance or refusal of offers of Donations and/or Support.

1. **PRINCIPLES FOR ETHICAL FUNDRAISING AND DEVELOPMENT ACTIVITY**

- 1.1 The School actively engages in fundraising and development activities and may seek donations (**Donations**), other forms of financial and non-financial support including the entering into of partnerships or other forms of organisational engagement on non-commercial terms (**Support**) which are aligned with its charitable objectives, strategic goals and financial needs.
- 1.2 The School is committed to the implementation of professional systems of donor stewardship and to ensuring that the highest standards of ethical and financial governance and management will be applied to all funds raised.
- 1.3 The School is aware that all charities, including schools, are at risk of exploitation by criminals and terrorists. In order to protect its reputation and integrity, the School will accept or refuse to accept Donations or Support in accordance with this Donations and Support Acceptance Policy.

2. BACKGROUND PRINCIPLES FOR DECISION MAKING

- 2.1. Any offer of a Donation or Support will be considered by Governing Body or, where relevant, their delegates in accordance with the procedures set out in this document.
- 2.2. The Governing Body and their delegates must make all decisions relating to the acceptance or refusal of Donations or Support in the best interests of the School.
- 2.3. The Governing Body must derive no personal benefit (individually or collectively) from any Donation or Support offered to the School.
- 2.4. The School's selection criteria for admissions are based exclusively on academic achievement and an objective assessment of a candidate's potential, and the School's implementation of the selection criteria will at all times be fully independent of the provision of any (or the express or implied promise of any) Donation or Support in line with the School's current admissions policy.
- 2.5. The provision of any (or the express or implied promise of any) Donation or Support will not affect in any way the treatment of any current or future pupil by the school or any recruitment or commercial decision making.
- 2.6. Any approach by a donor or potential donor if made directly to a member of the academic staff will be passed on to the development department in order to ensure that distance is maintained between the donor or potential donor and the School's operations.

3. GUIDANCE FOR THE PROCUREMENT OF DONATIONS OR SUPPORT

Responsible Fundraising, Stewardship & Governance

- 3.1 The School will ensure that all those who solicit Donations or offers of Support on its behalf understand the practice and behaviour that the School expects.
- 3.2 Schemes and practices for recognition of those who provide Donations or Support will be proportionate, agreed in advance with the provider and will comply with both prevailing charity and tax law.
- 3.3 The School may use reasonable persuasion to encourage offers of Donations or Support, but it will not put individuals under pressure to give.
- 3.4 Fundraising for legacies will be carried out with due regard to the potential legator's freedom to provide for his / her family and others, and will take into account the needs and situation of vulnerable individuals where appropriate. The Development Team will make it clear that they cannot give financial or legal advice on drawing up wills.

- 3.5 The School will adhere to professional standards in the management of fundraising and development activities and in the stewardship of funds raised.
- 3.6 The School will act with sensitivity and in accordance with the law, regulation and best practice.
- 3.7 Information about possible providers of Donations and/or Support will be kept secure and in compliance with applicable data protection law.
- 3.8 The School reserves the right to review and reconsider any Donation or Support received in good faith if subsequent events or the subsequent availability of additional information require it.

Purpose

- 3.9 Those who offer Donations or Support will be provided with accurate information about the School and the purpose for which their Donation or Support is being solicited.
- 3.10 Donations and Support will be used for the purpose for which they were solicited, and the School will inform those providing them in a timely manner should any activity they are funding or otherwise supporting be changed in a significant manner or experience problems that could prevent the agreed outcomes being achieved.
- 3.11 Where a written agreement between the School and the provider of a Donation or Support exists, funds can only be repurposed with the explicit prior permission of the provider, or as charity law allows.

Documentation and reporting

- 3.12 The outcome of the assessment or any offer of a Donation and/or Support will be recorded on the School's database.
- 3.13 Every donation or offer of Support that is accepted will be documented in a signed Donation Report or exchange of correspondence.
- 3.14 The School will give providers of Donations or Support appropriate general reports on their contribution to the School's objectives, and will comply with any reasonable reporting requirements that providers may require as a condition of the provision of a Donation or Support and as set out in their relevant Donation Report.
- 3.15 The School reserves the right not to provide reasons for the refusal of a donation.

Complaints

- 3.16 The School takes seriously any complaints from donors or prospective donors and will ensure that any complaints received will be treated as such and handled with respect. Such complaints will be passed

to the Director of External Relations who will respond within 5 working days. Complaints will be escalated in accordance with the School's Complaints Policy.

Miscellaneous

- 3.17 Donations may only be made by the person or entity which has been approved by the school.
- 3.18 The school may not be permitted to return funds which have been transferred to it from an unapproved source or where there has been an overpayment.

4 PROCEDURES FOR THE ACCEPTANCE OR REFUSAL OF OFFERS OF DONATIONS OR SUPPORT

4.1 Every offer of a Donation or Support will be assessed against the acceptance criteria by reference to appropriate due diligence before a decision whether to accept or refuse it is made:

4.1.1 The procedure for assessing what due diligence is appropriate is set out at 4.2;

4.1.2 The acceptance criteria are set out at 4.3;

4.1.3 The refusal criteria are set out at 4.4; and

4.1.4 The process for decision making is set out at 4.5.

4.2 Due Diligence

4.2.1 Appropriate risk based due diligence will be carried out to explore whether there are any concerns associated with the provider of the offer or the offer itself which raise issues of legal, ethical or reputational risk.

(a) Stage 1 Screening. Stage 1 Screening will be carried out for all offers of Donations or Support. Stage 1 Screening means that reasonable efforts will be made to establish whether any of the Refusal Criteria are applicable through standardised searches using Google or a similar web search engine and the advice and opinion of individuals who have knowledge of the proposed provider.

(b) Stage 2 Screening. Stage 2 Screening will be carried out for all offers of Donations or Support with a value of £50,000 or more or where Stage 1 Screening raises a concern of legal, ethical or reputational risk associated with the offer or the provider of the offer.

Where a proposed donation is in the amount of £50,000 or more, the High Master and Director of External Relations will determine what type of Stage 2 search should take place. This may mean the commissioning of a due diligence Report prepared by a third party risk management/business intelligence provider.

Where a proposed Donation is below £50,000 and the Stage 1 Screening raises a concern, the High Master and Director of External Relations will determine whether this should be further investigated through a commissioned report or other due diligence.

For the purposes of this clause 4.2, references to the amount of the proposed Donation include the aggregate amount where there is, or is proposed to be, a series of Donations.

4.3 Acceptance Criteria

St Paul's School can accept Donations and/or Support on the following conditions:

- 4.3.1. The Donation or Support will result in benefit to the School; and
- 4.3.2. If the Donation or Support is offered for a specific purpose, this is a charitable purpose that is within the School's objectives; and
- 4.3.3. None of the refusal Criteria apply.

4.4 Refusal Criteria

St Paul's School will not accept any Donation or Support where any of the following apply:

- 4.4.1 The receipt of the funds for the Donation or Support (or agreeing to receive such funds) would constitute an offence pursuant to prevailing laws, including but not limited to the Proceeds of Crime Act 2002, the Bribery Act 2010 or anti-terror financing legislation.
- 4.4.2 The proposed source of the Donation or Support:
 - (a) has had a reputation materially compromised in some way, and the behaviour which led to that individual or organisation's reputation being compromised has not clearly ceased or the reputation remains compromised; or
 - (b) Carries on activities which are in conflict with the objectives and agreed policies of the School.
- 4.4.3 Any conditions imposed upon the provision of any Donation or Support are onerous, seek to unduly influence independent decision making or are otherwise in conflict with the School's objectives or practice or would impose on the School objectives contrary to those already agreed by the School (for example Support is offered in an attempt to procure a successful admission to the School or to affect the treatment by the School of any current or future pupil).
- 4.4.4 The Donation is to be made as a cash payment and it is in excess of £250.
- 4.4.5 Where for any reason whatsoever, it is the view of the High Master and Director of External Relations and Governing Body that the acceptance of any Donation or Support would involve an unacceptable risk of damage to the School.

4.5 Process for Decision Making

- 4.5.1 The decision whether to accept or refuse a potential Donation or offer of Support shall be made by the High Master and Director of External Relations (acting under the delegated authority of the Governing Body) where Stage One Screening raises no legal, ethical or reputational concerns and the donation is of less than £50,000.
- 4.5.2 Where a donation exceeds £50,000 or where issues are flagged at Stage 1 but the High Master and Director of External Relations recommend that the proposed Donation should be accepted after the Stage 2 Screening, a decision will be taken by the Access and Development Committee with sight of the relevant due diligence findings as applicable.
- 4.5.3 Every decision will be supported by a recommendation from the Executive supported by a written Donation Report, prepared by the Development Office which details the assessment of the Donation or Support against the Acceptance Criteria and the outcome of all screening carried out.