St Swithun's
WINCHESTER

Bramston
Foundation

DONATIONS & SUPPORT ACCEPTANCE POLICY

Authorised by Headmistress

Date: March 2025

Review triennially date: March 2028

This Policy is available on the School Portal and the 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 to: development@stswithuns.com

1. Introduction

This document outlines St Swithun's School (the "School") and the Bramston Foundation's (the "Foundation") donations and support acceptance policy. It also outlines the principles and ethos under which they both operate when it comes to undertaking fundraising activities.

St Swithun's School is also a registered charity under charity no. 307335. The Bramston Foundation is a Charitable Incorporated Organisation (CIO) under registered charity no: 1209135. The Foundation focuses on fundraising for transformational bursaries for girls from seriously disadvantaged backgrounds and communities, and also capital project fundraising for improvements to the school site, buildings and facilities.

The School is also a registered member of the Institute of Development Professionals in Education (IDPE)

This Policy is intended for the St Swithun's School community and for prospective donors and their advisors, providing assurance that all donors are treated equitably, and that the School's reputation and achievements are not put at risk.

Donations must be freely given with no expectation of anything in return other than the School and the Foundation's sincerest thanks and appropriate recognition or acknowledgement for the gift. St Swithun's School, The Bramston Foundation and the school's Old Girls' Association (OGA) all solicit gifts from individuals, trusts, other foundations, commercial companies, and corporations to help further their combined vision, aims and objectives. They set out to achieve this ethically and with an intention to ensure donations are not coming from questionable or inappropriate sources.

Neither the Bramston Foundation, St Swithun's School or the OGA will accept donations where sources fall short of the standards outlined in this document. If there is concern that the gift has been illegally or unethically obtained, or if acceptance may damage the reputation of the School or does not reflect the School's principles and ethos, the gift will not be accepted and returned to the donor.

This Policy takes into account the Code of Fundraising Practice from the Fundraising Regulator and the best practice values of the IDPE.

We seek to treat all our donors and supporters fairly and equitably, with a reciprocal level of transparency, respect and openness.

2. Definition and scope

A **donation** is a contribution or asset that is voluntarily transferred by one person to another without compensation or benefit flowing from the giver to the receiver. General donations are irrevocable, and unrestricted in use, the donor does not impose contractual requirements or subsequent reports as a condition of the donation. The term 'donation' in this policy includes sponsorship and gifts.

Restricted donations in response to specific fundraising campaigns or where a donor restricts the use of the donation will only be used for the purpose outlined and any associated gift aid will also be applied to the same purpose.

This Policy applies to all philanthropic donations received with the intent of philanthropic benefit to either the Bramston Foundation, St Swithun's School or the OGA.

This Policy applies to all staff working for the School or the Foundation.

3. Donor's Rights

i. All gifts should be made without coercion and as an informed decision

ii. All fundraising solicitations by, or on behalf of the School or the Foundation, will disclose the School's name and the purpose for which the funds are requested. Where funds are sought for the Foundation, its name will be disclosed. Printed solicitations (however delivered) will also include the School's address and contact details.

iii. Donors and prospective donors are entitled to the following, promptly upon request:
- the most recent financial statements of the School or the Foundation
- confirmation of charitable status
- a copy of this policy

iv. Donors and prospective donors are entitled to know, upon request, whether an individual soliciting funds on behalf of the School or the Foundation is a volunteer, employee, a trustee or a consultant / freelance fundraiser working on behalf of the School or Foundation.

v. Donors will be encouraged, in writing, to seek independent advice if there is any reason to believe that a proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members. It will remain the donor's responsibility to consider such matters prior to making a gift.

vi. Donors will be acknowledged and recognised as they may reasonably wish. A donor's request to remain anonymous will be respected as far as is legally, practically and ethically possible.

vii. The privacy of donors will be respected. Any donor records that are maintained by the Development team will be kept confidential to the greatest extent possible. Donors have the right to see their own donor record and challenge its accuracy.

The School's Privacy Policy explains how data is collected, stored, managed and protected and how any complaints can be made in this regard.

viii. Donors and prospective donors will be treated with respect. Every effort will be made to honour requests to:

- Limit the frequency of solicitations
- Not be solicited by telephone or any other technology requested
- Limit the amount and frequency of printed or online material that is sent
- Any donor or prospective donor who asks to be excluded from fundraising approaches will be omitted

ix. Donors have the right to ask that their donations are allocated to a specific area of fundraising, campaign or School or Foundation activity, project or cause. These requests will be honoured wherever possible. If the request cannot be achieved, the donor will be advised so that they can consider other options. Where a donation is unrestricted, it will be used wherever it is needed most.

x. Either the School and or the Foundation will respond promptly to any complaint by a donor or prospective donor about any matter in this Policy. A designated member of the Development Team will attempt to satisfy the complainant's concerns in the first instance. A complainant who remains dissatisfied may request in writing a review of their complaint by the Headmistress, and will be advised of the outcome of this review.

4. Responsibility

The **headmistress** has overall responsibility for the Policy ensuring that it is effectively implemented, monitored and applied within the school and that the Policy is regularly reviewed.

The **bursar** has overall responsibility for all the associated Accounting Procedures and the administrative processes of donations received by the Foundation and the school including audit.

The **director of development and alumnae** has responsibility for due diligence and background checks in line with sector best practice, as well as the administrative processes of the Bramston Foundation for audit.

The **Chair of the School Council** has responsibility for approving the Policy and the acceptance, refusal and return of any donations in line with the principles, reputation, and ethos of the school.

The **Chair of the Trustees of the Bramston Foundation** has responsibility for approving the Policy and the acceptance, refusal and return of any donations in line with the principles, reputation, and ethos of the foundation.

5. Solicitation and acceptance of donations

The Bramston Foundation and St Swithun's School seek and welcome offers of charitable donations (gifts) from a range of sources including individuals, companies, charitable trusts and foundations.

These gifts may be in the form of cash, shares, property, in-kind services or pro-bono voluntary work. They may be given with (restricted) or without (unrestricted) conditions.

Donations, gifts and sponsorship must be given freely with no expectation of anything in return other than due thanks and recognition. The Governing Body must derive no personal benefit (individually or collectively) from any Donation or Support offered to the School.

Gifts are accepted at the discretion of the Foundation and or the School. Appropriate risk-based due diligence will be carried out to explore whether there are any concerns associated with the provider of the gift or the gift itself which raise issues of legal, ethical or reputational risk.

In considering the acceptance of a gift the following guidelines apply:

Gifts should:

i. Support the Bramston Foundation and or St Swithun's School's mission, vision and strategic aims.

ii. Be consistent with the overall objectives of both the School and the Foundation.

Gifts should not:

i. Compromise either entity.
ii. Arise, in whole or in part, from illegal activity.
iii. Require either entity to be involved in action that is illegal.
iv. Cause reputational damage.
v. Cause any other damage, including financial.
vi. Expose either entity to potentially significant liability.
vii. Deter other donors.
viii. Inhibit the Foundation or the School from seeking gifts from other donors.
ix. Require special consideration of the donor or designate.
x. Require either entity to deviate from its normal admissions, hiring, promotion, and contracting procedures.
xi. In any other way conflict with the values and aims of the Bramston Foundation or St Swithun's School.

Donations cannot be accepted where the sources are unknown or cannot be verified. Any additional costs associated with the acceptance of a gift need to be clearly identified and agreed with the Bursar.

Both the Bramston Foundation and St Swithun's School will be transparent about gifts received, their sources and purposes. In cases where a donor wishes to remain anonymous, such anonymity will be respected for all public purposes. Both entities may disclose details of any donor where required to do so by law, by any governmental or

other regulatory authority, or by order of a court. For example, anonymous donations with a value of over £25,000 will be reported to the Charity Commission.

Where a donor offers to make a donation with conditions attached, the Foundation and the School both reserve the right to make the final decision on acceptance or refusal of the gift. They also reserve the right to refuse or return any gift that is thought not to meet our robust Donations Policy requirements.

Cash or shares donations

All donations, both monetary or via shares, will be accounted for on the School's financial system so that their receipt and subsequent expenditure or transfer to other funds or investments can be readily identified and reported.

Donations in the form of gifts in kind

Assets donated by third parties are recorded on the School's financial system at their fair (open market) value where the benefit to the school can be reliably measured (i.e. what the School would be prepared to pay to purchase the asset). An equivalent amount should be recognised in the appropriate fixed asset category and depreciated over its expected useful economic life on a basis consistent with the depreciation accounting policy for that category. Where a gift is donated (in the form of goods or services) of estimated value £500 or less (eg. an ad hoc donation for an auction or raffle prize) it is regarded as trivial and not recorded on financial systems.

Gift Aid

Gift Aid is a way to increase the value of charitable monetary gifts from UK taxpaying individuals by claiming back the basic rate tax paid by the donor. It can increase the value of donations by a quarter at no extra cost to the donor. Gift Aid declarations are kept on record, in accordance with our data protection policy, so that gift aid can be claimed wherever the donor has indicated they are happy for it to be.

The responsibility for whether gift aid can be claimed always lies with the donor rather the Foundation or the School, because the donor must be paying an amount of UK income tax in excess of the amount being claimed by the charity.

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