

Introduction

Twyford St Mary's School sees fundraising and donations as a legitimate means of improving the school's ability to purchase goods, equipment or services beyond those funded by Hampshire County Council under its statutory duties. Fundraising enhances Twyford St Mary's ability to achieve its aims and further meet the needs of its students.

Donating money, services, time or equipment or actively raising funds is a positive way for the wider community to support the school. This policy should be adhered to by all those involved in accepting and actively raising funds on behalf of Twyford St Mary's School.

Principles

Twyford St Mary's will ensure that the best interests of the school are served when accepting or refusing a donation and that the origins of the funds are legitimate. In order to do this the school will apply the following principles before accepting a donation:

- Donations must be freely given with no expectation of anything other than thanks and appreciation from the school to the donor.
- Twyford St Mary's will ensure that any fundraising undertaken, and donations received, comply with all other school policies (e.g., Data Protection Policy, Finance Policy) and all legal requirements are met (such as relevant bribery and charity laws).
- That the donation must be given in good faith to support the school's aims, values and strategic objectives.
- Donations will not be accepted if the gift is subject to conditions that would compromise the autonomy, integrity and reputation of the school, or the principles of equality of opportunity for all children as outlined in our <u>Equality Policy</u>

Donations

Donations may include financial contributions as well as products, services, time, and other benefits provided by or to the school. Fundraising is managed day-to-day by the Senior Administrative Assistant and overseen by the Headteacher and Resources Committee.



Twyford St Mary's School most frequently accepts donations in the form of:

- financial donations through:
 - PTA donations
 - voluntary parental contributions direct to the school, via the PTA, or through standing order to the school.
- donation of goods through:
 - requests to the local community directly or via social media,
 - one off donations of equipment or materials.

Significant and Overseas Donations

In addition to the support listed above, Twyford St Mary's School may be fortunate to, from time to time, enjoy the support of grant making organisations and philanthropic individuals. A significant donation is any donation that:

- is above £20,000, or
- is material to the day-to-day operations of the school, or
- may result in reputational risk or,
- in the view of the Headteacher, should be treated as such.

Where a significant donation is a possibility, Twyford St Mary's School will consider a range of information and undertake due diligence to ensure that:

- the donation is in the best interest of the school
- the proposed purpose and source of the donation are consistent with its strategic and charitable objectives, in particular its vision, mission and values
- either the donation has no conditions or if there are any conditions linked to the support - they are explicit and regarded as reasonable and in no way breach any of the school's policies, procedures or processes, in particular its vision, mission and values,
- any relevant legislation or guidance,
- all reasonable steps have been taken to ensure that the school is aware of the source of funding for
- each donation and is satisfied that the funds do not derive from activity that was, or is, illegal.



The school will have regard to the Charity Commission's "Know your Donor" principles and will consider the "Know your Donor" questions found in Annex A which assist in:

- identifying the donor,
- verifying the donor (where it is reasonable and necessary to do so),
- knowing the organisation's/individual's business with the charity,
- having confidence that they will deliver what the charity wants them to do,
- watching out for unusual or suspicious activities, conduct or requests
- ensuring that due regard has been taken of any reputational risk to the school which may arise from its acceptance of such a donation

Advice will be taken from the Chair of Governors, Hampshire County Council or legal advisors as necessary.

The Senior Administrative Assistant will ensure that any necessary registrations are completed and maintained, such as Equivalency Determination Certificate, to enable international donations and funding to be accepted.

Approval of Donations

On a day-to-day basis the following approval system should be followed:

Senior Administrative Assistant

Up to £500

Headteacher approval for:

- Donations over £500
- Donations from charities, grant making organisations or philanthropic individuals up to £50,000

Headteacher, Chair of Governors and Chair of Resources for:

 Donations from charities, grant making organisations or philanthropic individuals over £50,000

The Headteacher will have final decision as to whether a donation, including a significant donation, is accepted, declined or returned.



Exceptions and management

If any member of staff is in any doubt about the procedure to follow, or whether a charitable donation should be accepted, then advice should be sought from the Senior Administrative Assistant in the first instance.

If a staff member is asked to receive a bribe, or they believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, they must notify the Headteacher **or** report it in accordance with the Twyford St Mary's School Whistleblowing Policy as soon as possible.

Donations will be accounted for so that their receipt and subsequent expenditure (or transfer to other funds) can be readily identified and reported. Monetary gifts will be recorded at value in the school's finance management system in the period in which they were received.

Physical Gifts

Physical gifts in kind (over £50) will be recorded on the school's asset register and also, where appropriate, reported to Hampshire County Council by the end of the financial year in which they were received.

The value placed on physical gifts in kind will either be a reasonable estimate of their gross value to the school or, if donated for resale, the value actually realised.

Complaints and Returns of Donations

Twyford St Mary's School will not normally return a donation which has been accepted in good faith and in accordance with this policy (in particular as the law prohibits the return in most circumstances). However, exceptional circumstances may give rise to the need to review the acceptance of a donation.

Any decision to return donations should be a matter for the Governors Resources Committee on the recommendation of the Headteacher. The school or the governors may take legal advice before making any such decision.

Twyford St Mary's School will endeavour to respond promptly to a complaint by a donor or prospective donor about any matter addressed in this policy. The Headteacher will attempt to resolve the complainant's concern in the first instance.



If a complainant feels their concern remains unresolved, they may invoke the school's Complaints Policy.

Data Protection

Twyford St Mary's School will ensure that it complies with all relevant legislation including UK GDPR and the Data Protection Act 2018.

All records created in accordance with the policy are managed within the school's Data Protection, Information Security and Data Retention Policies.

Relevant Legislation

Bribery Act 2010 Gift Aid Regulations UK GDPR Data Protection Act Charities Act Charity Governance Code

First approved July 2024 Due for annual review July 2025