



Donations Policy

This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment

Governor's Committee Responsibility:	Resources
Date Approved:	Spring 24
Review Period:	3 yearly
Next Review Date:	Autumn 2027

The Limpsfield Grange Values:

At Limpsfield Grange we believe in working together to make a difference.

We are a tolerant community; we accept, value and understand others.

We care for all members of our community without judgement.

We are responsible for our own learning, behaviour and actions.

We accept that sometimes things go wrong. We work together to take responsibility for our mistakes and for putting things right.

We are a respectful community and we treat others as we would like to be treated, even if they have different views and opinions to our own.

We understand that good behaviour helps us to prepare for life beyond Limpsfield Grange.

We are positive and resilient. We celebrate difference in everything that we do.

We are all proud to be part of the Limpsfield Grange community.

July 2023

Limpsfield Grange School

Donations Policy

Introduction

Limpsfield Grange 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 Surrey County Council under its statutory duties. Fundraising enhances Limpsfield Grange'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 Limpsfield Grange School.

Principles

Limpsfield Grange must 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/or recognition on the school website/social media or similar to be mutually agreed between the school and the donor.
- Limpsfield Grange 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.

Donations

Donations may include financial contributions as well as products, services, time and other benefits provided by the school. Fundraising is managed on a day-to-day basis by the School Fundraising Lead and overseen by the School Business Manager and Headteacher.

Limpsfield Grange operates the Limpsfield Grange School Fund which is a registered charity (charity number 1163700). The School Fund will adhere to the requirements of charity law and its constitution in relation to the acceptance of donations.

Limpsfield Grange School most frequently accepts donations in the form of:

- financial donations through:
 - its school website via a Just Giving page;
 - voluntary parental contributions usually through ParentPay but also by standing order to the School Fund;
 - receiving 50% of the ticket purchases of the Tandridge Lottery
- donation of goods through;
 - a wish list maintained at Amazon <https://amzn.eu/6Lvn1k3>

- requests to the local community via social media

As a registered charity, the School Fund is registered for Gift Aid. This is an HMRC scheme which allows the School Fund to claim additional money from HMRC for donations of money made by individual UK Income Tax and/or Capital Gains Tax payers who complete the relevant form. The School Business Manager is responsible for maintaining the registration and ensuring day to day compliance with the scheme.

Significant and Overseas Donations

In addition to the support listed above, Limpsfield Grange School is fortunate to, from time to time, enjoy the support of grant making organisations and philanthropic individuals. A significant donation is any donation above £20,000/is material to the day-to-day operations of the school/may result in reputational risk/or, in the view of the Headteacher, should be treated as such.

Where a significant donation is a possibility, Limpsfield Grange School will:

- consider a range of information and undertake due diligence to ensure that:
 - the donation is in the best interests of the school. In particular the source and the proposed purpose 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 and having confidence they will deliver what the charity wants them to do, and
 - watching out for unusual or suspicious activities, conduct or requests
 - 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, Surrey County Council or legal advisors as necessary.

The School Business Manager 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:

Charitable donation value	Pre-approved by
Up to £2000	Fundraising Lead and School Business Manager
Donations from charities, grant making organisations or philanthropic individuals up to £50,000	Headteacher

Donations from charities, grant making organisations or philanthropic individuals over £50,000	Headteacher, Chair of Governors and Chair of Resources Committee
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The Headteacher will have final decision as to whether a donation, including a significant donation, is accepted, declined or returned.

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 School Business Manager 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 Limpsfield Grange 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 FMS system in the period in which they were received. Physical gifts in kind (over £50) will be recorded on the school’s asset register and also, where appropriate, reported to Surrey 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

Limpsfield Grange 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.

Limpsfield Grange School will endeavour to respond promptly to a complaint by a donor or prospective donor about any matter addressed in this policy. The Fundraising Lead 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

Limpsfield Grange 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

Related School Policies

Charging and Remissions Policy
Complaints Policy
Data Protection Policy
Data Retention Policy
Equality & Diversity Policy

Finance Policy
Information Security Policy
School Fund Policy
School Purchasing Card Policy
Whistleblowing Policy

The Governing Body of Limpsfield
Grange School adopted this policy on:

It will be reviewed on:

Signed

Dated



Tool 6: Know your donor

Know your donor - key questions

These questions are not intended to be asked in respect of each donor. However, trustees may need to consider them depending on the risk, including the size and nature of the donation, and whether it appears to have any suspicious characteristics.

General information

- Who are the donors?
- What is known about them?
- Does the charity have a well established relationship with them?
- Do any additional identity checks need to be made? Full use should be made of internet websites, particularly to check whether a donor organisation is registered with another regulator. Registration may provide access to the organisation's accounts and governing document
- Are the donors UK taxpayers, and can Gift Aid be claimed?
- If Gift Aided, does the donation fail all the 3 tests, in which case it is a tainted charity donation? The tests establish whether the person or linked person or entity gains a financial advantage from the donation; whether 1 of the main or sole purposes is to obtain a financial advantage directly or indirectly from the charity for the donor or linked person; and the donor is not a wholly owned subsidiary of the charity or a 'relevant housing provider'.
- In what form is the money being received? Cash, cheque, bank transfer?
- Have any public concerns been raised about the donors or their activities? If so, what was the nature of the concerns and how long ago were they raised? Did the police or a regulator investigate the concerns? What was the outcome?
- Would any adverse publicity about the donor have a damaging effect on the charity?

Comments

The nature of the donation and any conditions

- How big is the donation?
- Is it a single donation, or one of a number of regular donations, or the first of multiple future donations?
- Is the donation one of a series of interest-free loans from sources that cannot be identified or checked by the charity?
- Are there unusual or substantial one-off donations?
- Does the donation come with any conditions attached? What are they? Are they reasonable?
- Is there a condition that funds are only to be retained by the charity for a period and then returned to the donor, with the charity retaining the interest?
- Is the donation conditional on particular organisations or individuals being used to apply the funds?
- Is the donation conditional on being applied to benefit particular individuals either directly or indirectly?
- Is there a suggestion that the charity is being used as a conduit for funds to a third party?
- Is the donation in sterling or another currency, perhaps with a requirement that the donation be returned in a different currency?
- Are any of the donors based, or does the money originate, outside the UK? If so, from which country? Does this country/ area pose any specific risks?
- Are donations received from unknown bodies or international sources where financial regulation or the legal framework is not rigorous?
- Is the donation received from a known donor but through an unknown party or an unusual payment mechanism where this would not be a typical method of payment?
- Is anything else unusual or strange about the donation?

Comments

What trustees should do if they are suspicious

- If due diligence checks reveal evidence of crime, trustees must report the matter to the police and/or other appropriate authorities.
- If the trustees have reasonable cause to suspect that a donation is related to terrorist financing, they are under specific legal duties under the Counter-Terrorism Act to report the matter to the police. In the case of money laundering, reports can be made to the police, a customs officer (HMRC), or an officer of the National Crime Agency.
- Such issues should be reported to the Charity Commission under the reporting serious incidents regime, especially if significant sums of money or other property are donated to the charity from an unknown or unverified source. This could include an unusually large one-off donation or a series of smaller donations from a source you cannot identify or check. The commission would expect trustees to report any such payment (or payments) totalling £25,000 or more.
- Check the donor against the consolidated lists of financial sanctions targets and proscribed organisations.
- Consider whether to refuse the donation.

Comments