

# SEVENOAKS SCHOOL FOUNDATION

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| Policy Category                                     | BD3<br>Operations, resources and compliance related policies                                                                                                                                                                                                                                                                                                                                                          |
| Name of policy                                      | <b>Donation Acceptance Policy</b> (Financial Integrity)                                                                                                                                                                                                                                                                                                                                                               |
| Purpose of policy                                   | This Policy sets out the procedures for the solicitation and acceptance of philanthropic donations to support the Foundation's charitable objects. It is intended to provide guidance to staff, support Foundation Trustees, School Governors and for Prospective Donors and their advisers, providing assurance that Donors are treated equitably and risks associated with fundraising are appropriately mitigated. |
| Scope                                               | Sevenoaks School (senior school)<br>Sevenoaks School Foundation                                                                                                                                                                                                                                                                                                                                                       |
| Regulatory or legal requirement addressed by policy | Proceeds of Crime Act 2002<br>Terrorism Act 2002                                                                                                                                                                                                                                                                                                                                                                      |
| Other policies referred to                          | <b>Financial Integrity suite of policies:</b><br>Anti-Bribery and Corruption Policy<br>Anti-Money Laundering Policy                                                                                                                                                                                                                                                                                                   |
| Policy owned by                                     | Chief Development Officer, Sevenoaks School Foundation                                                                                                                                                                                                                                                                                                                                                                |
| Date effective from                                 | V6.0<br>16 June 2026                                                                                                                                                                                                                                                                                                                                                                                                  |

# SEVENOAKS SCHOOL FOUNDATION

## 1. Policy context and purpose

- 1.1 This Policy applies to Sevenoaks School Foundation Sevenoaks School (or the Foundation) (being a registered charity in the United Kingdom registered charity number 307923). In this policy, Sevenoaks School Foundation and Sevenoaks School (charity number 1101358) will jointly be referred to as “the Charities”). For the purposes of this Policy, reference to Sevenoaks School or the School is reference to the senior school only and not the broader Family of Schools.
- 1.2 As registered charities in the United Kingdom, the Foundation and School have a responsibility to ensure that they act legally and ethically, that the processes of securing and receiving funds to support their charitable objects do not compromise its integrity nor pose a risk to the reputation of the Foundation or the School.
- 1.3 The Charities have a duty to maintain the trust of their supporters and their commitment to the advancement of Sevenoaks School.
- 1.4 The Charities must ensure they do not bring themselves 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 Charities objects. It is intended to support Foundation Trustees, School Governors 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 Charities expect all of their members and associates to follow the ethical behaviors set out in the [Nolan Principles](#). Those are: selflessness, integrity, objectivity, accountability, openness, honesty, and leadership.

## 2. Scope and definitions

- 2.1 This policy applies to all philanthropic donations received by the Charities.
- 2.2 This policy uses the following key definitions:
  - **Assignment:** The process whereby a Fundraiser is made the designated canvasser for a Prospective Donor.
  - **Donor:** A person, organisation or Legator who gives a philanthropic Donation to the Charities 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.
  - **Donation Acceptance Committee (DAC):** comprises the Chair of Trustees or Trustee nominee of the Foundation, a Foundation Trustee, and the CFO (Sevenoaks School). Executive Attendees may include the Chief Development Officer, the Head of Advancement Services, the Chief Operating Officer and the Director of Marketing and Communications (where there may be reputational concerns).
  - **Donation Agreement:** a binding agreement outlining the amount, timing and purpose of a Donation made to the Foundation.
  - **Donation Form:** a form outlining the amount, timing and purpose of a Donation made to the Foundation.
  - **Due Diligence:** The range of practical steps that need to be taken by the Charities, so they are reasonably assured of the identity of a Donor and the origin of a Donation

- **Fundraiser:** Foundation Trustees and staff, and any other individuals who have been vetted and approved as Fundraisers by the Charities.
- **Fund:** An account for donations to support the Charities objects
- **Legator:** A person who has died leaving a legacy to the Charities.
- **Gift Agreement or Letter of Intent:** a non-binding letter outlining the amount, timing and purpose of a Donation made to the Foundation.
- **Prospective Donors:** A person, organisation or Legator who has potential to give a Donation without receiving any material benefit in exchange.
- **Solicited:** Donation is offered to the Charities following engagement and involvement with a Fundraiser.
- **Unsolicited:** Donation is offered without any prior engagement with a Fundraiser.

### 3. Acceptance principles

- 3.1 All Donations made by Donors for the benefit of Sevenoaks School should be granted to the Foundation. The Foundation will work with the School and Donors to facilitate this.
- 3.2 The Charities will not accept a Donation that is inconsistent with their charitable objects.
- 3.3 The Charities will not accept a Donation if the proposed Donation arises in whole or in part from any illegal activity.
- 3.4 The Charities will not accept a Donation if the terms of accepting the proposed Donation will:
  - require any illegal action on the part of the Charities;
  - damage the reputation of the Charities;
  - harm the Charities 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;
  - create an unacceptable conflict of interest or compromise the independence of the Charities,
  - affect the independence and integrity of the School's admissions and appointments processes. In particular, there should be no solicitation of, and the Foundation will not accept a Donation from, donors who are a parent, family member or other known close associate of a current applicant. The Foundation will be able to solicit and accept donations from a donor once an offer of a place at the School has been accepted by the family. To ensure there is no perception of undue influence, the Foundation will observe the period between the point interest in the School is secured by the family (e.g. via the registration process) and when an offer is accepted.
- 3.5 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 six exclusion criteria:
  - Contractual relationship
  - Exclusive information
  - Consultancy
  - IP rights
  - Other forms of financial benefit
  - Donor control.

### 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 Foundation Office.

- 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 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 restricted to priority areas of the school, at the time of the gift.

## 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.
- 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 Charities do 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 Charities have 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 Charities 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 Charities 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 Charities 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 Charities will respond promptly to a complaint by a Prospective Donor or Donor, in accordance with the Fundraising Complaints Procedure, which adheres to the UK Fundraising Code of Practice.

## **6. Due Diligence Process**

- 6.1 All Donors and Prospective Donors are subject to Due Diligence appropriate for the size and nature of the Donation before accepting their donations. Due Diligence is carried out in order to verify whether a proposed Donation or engagement with a Prospective Donor or volunteer is appropriate for the Foundation to accept.

### **Donations of Any Value**

- 6.2 The Anti-Money Laundering Policy sets out due diligence requirements which should be followed prior to accepting any donations of any value.
- 6.3 In addition to this, the Foundation Office will undertake specific, additional Due Diligence, where appropriate, for:
- any Donation where there may be money laundering concerns;
  - any Donation where there may be ethical concerns;
  - any Donation where there may be reputational concerns;
  - any Donation that includes naming rights.
- 6.4 For the purposes of oversight, the Foundation's Donation Acceptance Committee (DAC) shall periodically receive a schedule of all donations received within a specified period.
- 6.5 In addition to clauses 6.2 and 6.3 above, the following process will apply based on the value of the donation:

### **Donations between £10k and £99,999 in value**

Individual donations within this value will be subject to a Due Diligence review by the Foundation Office and approved by two members of the Executive Attendees, one of whom cannot be a Foundation Office employee.

### **Donations of GBP £100,000 or more**

Individual donations of GBP £100,000 or more must be subject to enhanced Due Diligence and be reviewed and approved by the Foundation's Donation Acceptance Committee (DAC).

- 6.6 **Cumulative giving:** When a Donor's cumulative lifetime giving exceeds the threshold of £100,000, £250,000, £500,000 or £1,000,000 and multiples of £1,000,000, any further proposed Donation will prompt a review by the DAC. Cumulative giving will include donations made by any related individuals, companies or entities connected to the donor.
- 6.7 **Multi-year donations:** Existing due diligence relating to multi-year donations will be reassessed at least every three years, or sooner where changes in circumstances may present an increased risk..

6.8 The Foundation Board of Trustees reserve the right to refuse any Donation.

## **7. Acceptance practices**

- 7.1 A written Donation Agreement, Letter of Intent or Donation Form is required for all Donations over £10,000. Details recorded must include the amount, purpose (including any restrictions) of the Donation and any specific arrangements.
- 7.2 A Donation receipt will be provided to all Donors for all Donations received directly by the Foundation.
- 7.3 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.
- 7.4 The Foundation welcomes Donations made via appropriate third parties including but not limited to the Charities Aid Foundation, the British Schools and Universities Foundation, the Friends of Sevenoaks School Hong Kong Ltd and other registered charitable trusts and foundations, subject to the principles and guidelines set out in this DAC policy.
- 7.5 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.
- 7.6 The affairs of the Charities 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 to Trustees will refer the matter to the Donation Acceptance Committee, and ultimately to Foundation Trustees.

## **8. Data Protection**

- 8.1 The Charities will ensure compliance with the Data Protection Act (U.K.) and the General Data Protection Regulations (U.K.) and all subsequent Data Protection legislation.
- 8.2 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 Charities 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.
- 8.3 When using external agencies or when data may be shared with a third party, for instance mailing houses, the Charities 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.

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## Appendix 1: Donation Acceptance Process workflow

