



Gift Acceptance Policy

New Policy to support the new fundraising programme

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1. Introduction

1.1 This document outlines Tormead's policy for the acceptance of donations and sets out the principles under which the School will seek to operate when undertaking its fundraising activities. It reflects our commitment to implementing, as far as possible, best practice in our fundraising activities and is in line with the current guidance provided by the Institute of Fundraising (IoF).

1.2 The policy is intended for the School community and for prospective donors and their advisers, providing assurance that all donors are treated equitably and that the School's reputation and achievements are not put at risk.

1.3 This document is not legally binding but sets out the principles under which the School will seek to operate when undertaking its fundraising activities.

1.4 On behalf of the Governing Body of Tormead, the Tormead Development Office solicits gifts from individuals, corporations and charitable trusts and foundations, to help further the mission of Tormead School.

1.5 Tormead will not accept donations where the source, or naming of a gift falls short of the standards determined through the guiding principles detailed below or if a gift has been illegally or unethically obtained or its acceptance may damage the reputation of the School.

2. Definition and Scope

2.1 This policy applies to all philanthropic donations received by Tormead School. A donation, or gift, is a voluntary transfer of money by an individual or organisation, made with philanthropic intent for the benefit of the School and its mission.

This includes:

- i) Donations received from individuals in the UK and overseas
- ii) Grants from charitable trusts and foundations in the UK and overseas
- iii) Donations from companies in the UK and overseas
- iv) Donations from legacy bequests
- v) Grants from overseas governments and their agencies and foundations

3. Guiding Principles

3.1 The UK Bribery Act 2010 requires Tormead to ensure that the receipt of a donation is not related to some inappropriate advantage that be afforded to the donor, such as the offer of a School place for their child or a close relative or the award of a contract. Other relevant legislation includes the Proceeds of Crime Act 2002, the Terrorism Act 2000 & 2006, and the Money Laundering Regulations 2007 under which it is an offence to receive, retain or convert money or property known, or reasonably suspected, to be the product of criminal activity.

3.2 The School also provides codes of conduct by which the whole community is expected to act and to consider when making decisions at all levels of the School's operation. All fundraising activities should be conducted in line with the School's published values of treating everyone with respect and

dignity, celebrating effort and achievement, bringing out the best in our girls and preparing our girls for life beyond School.

4. Gift Acceptance Principles

4.1 Donations are accepted and held by Tormead School and allocated to the charitable purposes of the School in accordance with its financial regulations, which are monitored by the Finance and General Purposes Committee of the Governing Body.

4.2 Governors

4.2.1 In considering the acceptance of any donation, Tormead will consider if the donation is compatible with the purposes and goals outlines in all relevant policies and regulations (including the School's Anti-Bribery Policy and Corruption Policy, included in the Employment Manual).

4.2.2 Tormead School will not accept donations which are counter to Tormead's interests. Examples include, but are not limited to, gifts that:

- i) Do not further or are in conflict with Tormead's values and mission
- ii) Are too difficult or expensive to administer or could create unacceptable liability or future expense
- iii) Fail to meet the requirements of the Equalities Act 2010
- iv) Violate the terms of this policy or other policies of Tormead School

5. Process for Review

5.1 All donations with which there are ethical concerns, or which have a value above £10,000, can only be accepted by the Head and will be subject to due diligence review in relation to the acceptance principles detailed above. The due diligence review will be conducted by the Head of Development and Alumnae and presented to the Head who will seek further advice from the School's Governing Body as appropriate. Approval must be obtained by the Head prior to a proposal or a donation being submitted to the potential donor, or when a donor approaches the School before negotiations with the donor can continue.

5.2 In all other cases, such approval must be obtained to continue negotiations as soon as it becomes clear that the donation will be made, or to continue negotiations if issues arise, during the course of negotiations, which give rise to ethical concerns.

5.3 Approval must always be obtained from the Head prior to acceptance of a donation and of the terms of that donation.

6. Naming Recognition

6.1 Donations which involve naming will be subject to levels of approval as follows and before the funding announcement becomes public:

- i) Naming of any building or grounds as part of a donor agreement will be subject to review and approval from the Governing Body upon the advice of the Head

- ii) Naming of portions of a building or a classroom, seminar room, or facility, as part of a donor agreement will be subject to review and approval from the Governing Body upon advice from the Head
- iii) Naming of any other academic or support staff position as part of a donor agreement will be subject to review and approval from the Governing Body upon the advice of the Head in consultation with the relevant department or division
- iv) Naming of a scholarship, bursary, award or prize as part of a donor agreement will be subject to review and approval from the Governing Body upon advice from the Head
- v) Naming plaques requires approval from the Governing Body upon advice from the Head

6.2 Naming may be withdrawn on the recommendation of the Head where subsequent concerns arise regarding the source of the funding or the individual or organisation named.

7. Gift Agreements

7.1 For restricted gifts of over £5,000, gift agreements must include the details of the gift, the project to be supported, fulfilment schedule (if applicable), naming rights (if applicable), relevant stewardship and recognition information.

7.2 Gift agreements for endowment must include a standard clause reserving the authority of the School's Governing Body to propose changing the use or purpose of the donation when its object is no longer viable at Tormead. For example, where the School no longer offers a subject for which the restriction has been accepted for a scholarship.

7.3 In general, restrictions related to the use or purpose of a donation should be written as preferences to allow Tormead the greatest latitude in ensuring future use. When that is not possible, the agreement should reserve the authority of the School's Governing Body to change the use or purpose of the donations should circumstances change.

8. Gift Processing, Acknowledgement and Stewardship

8.1 All donations to Tormead School must be processed by the School's Bursary Office and recorded confidentially by the School's Development Office to ensure compliance with this policy, in addition to the School's Privacy Notices and Data Protection policies.

8.2 Tormead School may accept the following types of assets as donation:

- i) Cash
- ii) Securities – stocks and bonds
- iii) Property and other real estate
- iv) Property which is to be sold

8.3 A donor's right to remain anonymous externally will be maintained, but full details will be recorded confidentially by the Development Office within the School's donations database and this policy will apply.

8.4 A gift will only be accepted where the identity of the donor is provided.

8.5 Tormead School is committed to the public and private recognition of its donors where it is desired. Each donor can expect to receive a formal and personalised letter from the Head or the

Development and Alumnae Office. All donors and bequest intentions will receive appropriate acknowledgement and recognition for their pledges and gifts, as well as assurance that their gift is used for the purposes designated in line with the gift agreement.

8.6 Tormead aligns its fundraising practices to that of the Fundraising Regulator as a model of best practice. Complaints or concerns regarding the gift acceptance policy and/or procedures, should be addressed, in the first instance, to the Deputy Head (External Relations). Escalation of an issue can then be raised to the Bursar or Head.

9. Other policies

9.1 This policy should be read in conjunction with Tormead's:

- Fundraising Policy
- Anti-Bribery and Corruption Policy (please see the Employment Manual)
- Privacy Notice (Development and Alumnae)

Date of last review: 27th June 2023

By resolution of the Governing Body

Mr Matthew Howse
Chair of Governors

Mr David Boyd
Head