



GIFT ACCEPTANCE POLICY (FUNDRAISING)

Introduction

The College relies on philanthropic support in order to fulfil its academic mission and charitable objectives. It is very grateful to all of its benefactors, whatever the size and nature of their gifts. For the benefit of both the College and its supporters, the College has put in place guidelines for the acceptance, recording and recognition of gifts. This document sets out these practices. It should be noted that these guidelines are to be interpreted and applied with a reasonable degree of flexibility so as to accommodate the needs and circumstances of each donor in individual cases and the College.

Rights of Donors and Prospective Donors

Dulwich College is committed to its donors and dedicated to treating all its supporters with the highest level of care and respect. The Development Office are committed to upholding the highest professional and ethical standards of conduct.

General Principles

1. The College seeks and encourages charitable gifts from a range of potential donors including alumni, parents, staff, companies, charitable trusts and foundations and friends of the College. These gifts may be in many forms, including cash, property, bequests, shares or in-kind services. In the case of gifts of stock or property the College reserves the right to immediately sell such assets in order to invest the proceeds in accordance with the College's investment policy.
2. All gifts accepted by the College will be used in direct support of its charitable objectives. The College reserves the right to refuse any gift that is not consistent with its mission and so there may be occasions when the College chooses not to solicit or accept a gift from an individual or organisation.
3. In addition to these guidelines, the acceptance of a proposed gift will also be subject to other College policies, including (but not limited to) its anti-money laundering and anti-bribery policies.
4. When reviewing a proposed gift, the following factors will be taken into account from the information received from the prospective donor and due diligence conducted by the College. Proposed gifts and related arrangements should not:
 - a) damage the College's reputation,
 - b) compromise the College's independence,
 - c) create material conflicts of interest,

- d) require the College to provide special consideration for pupil admission or exclusion,
 - e) arise, in whole or in part, from illegal activity,
 - f) require the College to be involved in action that is illegal; or
 - g) require the College to deviate from its normal hiring, promotion, and contracting procedures.
5. Where the College is unable to determine or verify the source of a proposed gift and/or the identity of its donor, the gift will not be accepted.
6. The College will also take into consideration the following points before approving a proposed gift and any related terms:
- a) Any additional costs associated with the acceptance of the gift for which the College might be liable.
 - b) Where copyright or intellectual property issues are involved in connection with any proposed gift, they must be clearly understood, and it must be checked that the College can comply with any associated requirements.
 - c) The proposed terms of the gift must be clearly understood and appropriately documented.
 - d) Any proposals regarding any naming benefits and use of the College brand must be in accordance with the College's naming and branding policies. Naming is always at the discretion of the Master and the Chair of Governors. The Development Office will ensure that the Gift Agreement states that the naming rights may be terminated if the College considers that association with the name to be damaging to its reputation or in case of a breach of the Gift Agreement (e.g. non-payment).
 - e) In the case of gifts worth over £15,000, when considering whether the College can accept a particular gift and assessing the source of the gift, the College shall take into account any ethical investment guidelines adopted by the Governors' Finance Committee for the College's investment portfolio.
7. The College and the donor will together agree on any appropriate publicity by either party that may surround specific donations. The College will respect requests from prospective donors for their support to remain anonymous from the world at large but full details will be recorded in the fundraising database. In addition, the College may be required to disclose donor information by law, governmental or regulatory authority, or by order of a court.

Responsibility for Review of Potential Gifts

8. Responsibility for the review of proposed gifts rests, in the first instance, with the Development Office (lead by the Director of Development), in consultation with the Master and the Chair of Governors, as required.

All Staff Responsibilities

Gifts to the College

9. All College staff must notify the Development Office if they become aware of a possible gift to the College (irrespective of the amount/value).
10. Unless the Master agrees otherwise, no action should be taken in relation to a proposed gift to the College (nor agreement of any terms of a gift to the College) until the Development Office has confirmed that the matter has been considered at the appropriate level and a decision has been made that the gift may be accepted.

Gifts to Staff

11. From time to time supporters of the College may make gifts to staff as tokens of their appreciation. Retaining a gift which has a value of more than £100 requires approval from the Master or the Clerk to Governors (the College's Anti-Bribery Officer), in accordance with the College's Receipt of Gifts and Hospitality Policy. If a member of the Development Office receives a gift from a donor, they must also report the gift to the Director of Development.

Due Diligence Practices

12. In order to assist the College to make informed decisions as to whether a proposed gift should be approved, due diligence shall be carried out in relation to potential gifts notified to the Development Office exceeding £15,000 in value. Due diligence will also be carried out in respect of gifts below that threshold if there seems cause to do so.
13. Due diligence will be conducted by the Development Office and the level of due diligence to be carried out will depend on the size and other circumstances of each proposed gift. Where appropriate, external research will be commissioned.
14. Due diligence may include:
 - a) **Identity checking:** A review using sources which confirm a potential donor's identity e.g. the Development Office's database, Charity Commission, and Companies House.
 - b) **Biographical information search:** Research looking at standard biographical information such as family and career history using resources including the College's own records.
 - c) **Checking for high risk indicators:** An internet search using the potential donor's name and a series of key terms including: tax evasion, fraud, human rights, falsification, bribery, controversy, crime.
 - d) **Charity Commission review:** A check of the charitable organisations linked to the prospective donor.

- e) **Bankruptcy, court judgement and public records check:** A search of online databases and court papers to identify any bankruptcy, court judgements and outcomes of any legal proceedings involving the prospective donor and/or related individuals and organisations.
15. Where proposed gifts are to be received by the College over a specified period, the thresholds above should be considered by reference to the aggregated value of the anticipated gift. Where gifts are to be provided over an unspecified period the projected value of the gift over the first five years should be used when assessing whether the thresholds have been reached.
16. It must be recognised that the position as regards a donor may change over time. Accordingly, where funding continues, the College will review all gifts within five years of receipt and at appropriate intervals thereafter. In the event that the College has reason to believe that a review is required at an earlier point in time, a review shall be carried out accordingly.
17. The Development Office will also consider the risk of money laundering, and the potential circumstances considered to be “red flags” in the context of development/fundraising (as set out in the Anti-Money Laundering Policy) and will undertake additional due diligence as required to satisfy itself as to the legitimacy of the funds.

Escalation

18. If the Development Office identifies a potential area of concern during the identification of prospective donors, due diligence will be carried out (see “Due Diligence Practices” above) and the report referred to the Clerk to Governors (and the Chief Financial Officer as applicable) for further consideration. If the Clerk determines that an approach for funding would not be appropriate, the prospective donor will be marked as such in the database.
19. If an unsolicited gift or approach is received from a prospective donor and due diligence gives rise to a potential area of concern, the Development Office will refer to the Clerk to Governors or the Master for guidance as to whether the gift should be returned.
20. If the Development Office identifies an area of concern during the solicitation, negotiation or review of a proposed gift, the matter should be referred to the Master, who shall consider the matter and provide guidance. Where the proposed gift exceeds £50,000 in value, the Chair of Governors will also be consulted.

Return of Gifts

21. In cases where a gift with agreed restrictions has been received by the College in good faith but where circumstances have changed so that the original purposes of the gift cannot be fulfilled in whole or in part, then the College will normally seek to use the funds in a way that closely corresponds to the original objectives of the donor, after consulting the donor or the donor’s representative wherever possible.
22. Gifts that are paid in error by the donor’s bank, and bank overpayments, will be refunded to the donor.

Anti Bribery

23. The College is very grateful for the philanthropic support of its community. However, in order to preserve its integrity and independence, it is important to stress that the provision of financial support does not in any way entitle donors or their families to greater consideration than any other member of the community, nor permit them to exert undue influence on College operations. Specifically, such considerations will have no impact upon the education of pupils at Dulwich College, nor upon the Admissions process.
24. If a member of College staff has concerns about potentially inappropriate interactions with donors or their families, they should in the first instance notify the Director of Development who can provide guidance. Any matters of concern would then be escalated to the Clerk to Governors.

Gift Recording & Documentation

25. Secure electronic and paper records of donors and donations shall be created and maintained by the Development Office, working in conjunction with the Finance Office. All gifts will be appropriately recorded and documented by the Development Office, including:
 - a) A record of the gift acknowledgement sent by the College, which confirms the amount and purpose of the gift.
 - b) Copies of any Gift Agreement agreed with the donor. The Development Office is responsible for putting in place Gift Agreements for any donor commitment that spans multiple years, involves a sum of £15,000 or more, or places an active obligation upon the College.
 - c) There may be occasions where a Gift Agreement is not suitable. In this situation the Development Office will record clear written evidence of the donor's intentions.
 - d) Where a matter of due diligence is carried out or an issue escalated, a record of the report provided and the decision reached by the College.
 - e) Any relevant Gift Aid declaration details.

Data Protection

26. The personal data of donors and prospective donors is handled in accordance with the Data Protection Act 2018. For more information, please see the Development Office's Privacy Notice (in the policies section of the College's website).

Complaints

27. The College will seek the opportunity to set right anything a donor feels has been done wrongly and will do its utmost to resolve such issues. In the first instance any complaints should be raised with the Director of Development. If a donor remains dissatisfied with the initial response, then the complaint

will be referred to the Master and if it remains unresolved at that stage it will be referred to the Board of Governors.

Policy Owner:	Director of Development/Clerk to Governors
Last Reviewed:	November 2024
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