ETHICAL FUNDRAISING, GIFT ACCEPTANCE & RECOGNITION POLICY

Policy Owner:	Chief Finance Officer (CFO)
ISSR Reference:	Part 8 – Quality of Leadership in and Management of Schools
Date of review:	Summer 2026
Approved by:	Group Board
Date of next review	Summer 2027

Version Control Information

Reason for Amendment	Role	Date	Main Changes
New consolidated Tier 1 Policy	Chief Finance Officer (CFO) and Director of Philanthropy & Alumni Relations	Group board – Summer 2026	Consolidates ethical fundraising, gift acceptance, donor due diligence, recognition, naming, delegated authorities and assurance within one Group policy.

1. Aims

The Policy is deliberately principle-led. The main body sets charitable purpose, ethical standards, governance, decision rights and assurance. The appendices preserve the practical detail required for consistent gift acceptance and recognition without creating a separate policy or standard.

The governing proposition
Philanthropy should widen opportunity, strengthen education and connect generations of the SDEG community. Income is never pursued at the expense of charitable purpose, institutional independence, safeguarding, legality or public trust.

SDEG welcomes philanthropic support that advances its charitable objects and enables Excellence. Differently. Fundraising may support bursaries, endowment, educational programmes, outreach, facilities, equipment and other strategic priorities. This Policy ensures that fundraising is legal, open, honest and respectful, that gifts are accepted in the charity's best interests and that recognition is appropriate, proportionate and capable of review.

The Policy applies to monetary and non-monetary donations, grants that are gifts rather than contracts, legacies, gifts in kind, property, shares, services and offers of support on non-commercial terms. It excludes pupil fundraising for charities other than SDEG and genuine commercial contracts, although naming linked to commercial support remains subject to the recognition principles in this Policy.

2. Legislation and Regulatory Framework

- Charities Acts 2011 and 2022;
- Trustee duties and Charity Commission guidance on accepting, refusing and returning donations;
- Charity Commission due-diligence and "know your donor" guidance;
- Fundraising Regulator Code of Fundraising Practice effective from 1 November 2025;
- Bribery Act 2010;
- Proceeds of Crime Act 2002, Terrorism Act 2000 and UK sanctions requirements;
- Money Laundering Regulations 2017 where applicable;
- Data Protection Act 2018, UK GDPR and Privacy and Electronic Communications Regulations;
- Finance Act and HMRC requirements, including Gift Aid; and
- relevant accounting, tax, safeguarding and consumer-protection requirements.

3. Roles and responsibilities

3.1 Group Board of Governors

- approves this Policy and retain responsibility for the charity's fundraising;
- approves gifts and naming decisions reserved to it under Appendix B;

- receives annual assurance on fundraising, due diligence, accepted and refused gifts, restricted funds, naming, complaints and material risk; and
- ensures decisions are informed, evidenced, independent and in SDEG's best interests.

3.2 Chief Finance Officer

- acts as Executive Lead and holds the Director Owner to account for implementation;
- oversees financial control, restricted funds, tax, Gift Aid, fraud, sanctions and suspicious activity;
- approves or refers gifts within delegated authority;
- ensures high-risk and contentious matters receive appropriate legal or professional advice; and
- provides executive assurance to the Group Board.

3.3 Director of Philanthropy & Alumni Relations (Director Owner)

- owns and operates this Policy;
- leads fundraising, donor engagement and stewardship;
- ensures proportionate due diligence and complete decision records;
- maintains the donor, gift, recognition and naming registers;
- recommends acceptance, refusal, return, restriction and naming decisions;
- ensures fundraising partners, volunteers and suppliers are appropriately briefed and monitored; and
- reports performance, risk, complaints and assurance to the CFO.

3.4 Heads, Directors and staff

- refer all prospective gifts and naming proposals to the Philanthropy Office before commitments are made;
- avoid promising acceptance, recognition, naming, admissions advantage or other benefit;
- support due diligence and delivery of restricted purposes;
- identify conflicts of interest and withdraw from decisions where appropriate; and
- protect donor information and report concerns.

3.5 Gift Review Panel

The CFO may convene an ad hoc Gift Review Panel for a high-value, unusual, contentious or reputationally sensitive matter. It is an advisory executive mechanism, not a Board committee. Membership is determined by the CFO according to the matter and may include the Director Owner, Chair of the Group Board, Group Director of Governance & Compliance and relevant professional advisers. The accountable decision-maker remains the person or body identified in Appendix B.

4. Philanthropy, fundraising, gift acceptance and recognition framework

4.1 Strategic principles

Principle	Application
Charitable purpose	Every gift and fundraising activity supports SDEG's objects, strategy and public benefit.
Independence	Donors do not influence admissions, appointments, curriculum, assessment, safeguarding or governance decisions.
Legal, open, honest and respectful	Fundraising meets the Fundraising Regulator's core standards.
Best interests	Acceptance, refusal, return and use of gifts serve SDEG's charitable interests.
Proportionate due diligence	Checks reflect value, source, nature, conditions, geography and risk.
Donor dignity	No undue pressure, unreasonable persistence or exploitation of vulnerability.
Transparency	Purpose, restrictions, recognition, costs, risks and decisions are documented clearly.
Stewardship	Donors receive appropriate acknowledgement and proportionate information on impact.
Equity and inclusion	Recognition and engagement seek breadth without tokenism or unlawful discrimination.
Long-term value	SDEG considers sustainability, ongoing cost, flexibility and reputational implications.

4.2 Ethical fundraising and donor stewardship

- fundraising communications must be accurate, clear and not misleading;
- donors must understand the purpose of an appeal and what may happen if more, less or unusable funds are raised;
- requests must not be unreasonably persistent or intrusive;
- people in vulnerable circumstances must be treated fairly and must not be exploited;
- legacy conversations must protect freedom of choice and staff must not give legal or financial advice;
- fundraising by staff, volunteers, professional fundraisers and commercial participators must be appropriately governed and documented;
- preferences and direct-marketing objections must be honoured;
- anonymous recognition may be respected only after SDEG has established donor identity and completed necessary checks; and
- complaints and concerns must be recorded, addressed and learned from.

4.3 Gift acceptance, refusal and return

4.3.1 Starting position

SDEG's starting position is to accept and retain gifts that further its charitable purposes. A gift must be refused or returned where legally required. A gift may be refused or returned where, after balancing relevant factors, the authorised decision-maker reasonably concludes that doing so is in SDEG's best interests and within its powers.

4.3.2 Acceptance criteria

- the gift provides a real benefit to SDEG and supports its charitable purposes;
- any restriction is clear, achievable, affordable and consistent with strategy;
- the donor has capacity and authority and the asset is theirs to give;
- the source, method and conditions are lawful;
- the gift does not compromise independent decision-making;
- ongoing obligations and costs are proportionate; and
- due diligence and approval requirements are complete.

4.3.3 Mandatory refusal or return

- the source or condition is illegal;
- the donor lacks capacity or authority, or the property is not theirs to give;
- acceptance would amount to bribery, money laundering, sanctions breach, terrorist financing or other criminal conduct; or
- another binding legal requirement requires refusal or return.

4.3.4 Discretionary refusal or referral

- conditions are incompatible with charitable objects, values or independent governance;
- cost associated with donation, liability or diversion of resource outweighs the likely benefit;
- the gift creates an unmanageable conflict of interest or unacceptable influence or reputational risk;
- credible evidence indicates a serious and continuing reputational, ethical or safeguarding risk;
- the identity or provenance cannot be established to the level required by risk;
- the gift is cryptocurrency, complex asset, overseas property, unusual financial arrangement or cash above the threshold in Appendix B;
- the gift is materially inconsistent with the expectations of beneficiaries, supporters or the wider community and mitigation is not sufficient; or
- the decision-maker cannot conclude confidently on the available information.

4.3.5 Ethical decision making

Decisions must distinguish relevant evidence from personal preference or external pressure unrelated to SDEG's purposes. The record will identify available information, due diligence, conflicts, risks of accepting and refusing, possible mitigation, advice obtained, decision, authority and rationale. Returning an accepted gift requires legal, tax and regulatory consideration and must not occur outside delegated authority.

4.4 Due diligence

Due diligence is risk-based and proportionate. Routine small gifts may require limited checks; larger, unusual, restricted, anonymous, overseas, non-cash or reputationally sensitive gifts require enhanced checks. Appendix E provides the minimum framework.

- verify donor identity, authority and, where proportionate, beneficial ownership;
- understand source of funds or assets and payment route;
- screen applicable sanctions, restrictions and credible adverse information;
- assess conditions, conflicts, associations and reputational implications;
- consider donor capacity, vulnerability and signs of pressure or fraud;
- assess fundraising partners and third parties;
- record searches, evidence, advice, judgements and review dates; and
- escalate suspicious activity through the CFO and relevant legal or regulatory route.

4.5 Restricted gifts, agreements and financial accountability

- restricted purposes must be clear, achievable and accepted in writing;
- gifts above the threshold in Appendix B require a gift or pledge agreement;
- agreements should address payment, purpose, reporting, recognition, variation, termination and return where relevant;
- no third party may substitute as donor without approval;
- all gifts and gifts in kind are recorded in the fundraising and finance systems;
- restricted funds are separately identifiable and applied to the accepted purpose within a reasonable timeframe;
- where circumstances change, SDEG will consult the donor where appropriate and take legal advice before varying restrictions;
- accepted gifts are not normally returned unless legally required or lawfully determined to be in SDEG's best interests; and
- donor wishes that are not legally binding may be respected where compatible with SDEG's objects and current needs.

4.6 Recognition and naming

Recognition may acknowledge philanthropic, commercial or exceptional non-financial contribution. Naming is entirely at SDEG's discretion, creates no ownership or governance right and does not establish precedent. The principles and detailed framework in Appendix A apply to all physical and non-physical naming, including buildings, rooms, facilities, programmes, outreach, scholarships, bursaries, prizes, awards and endowed funds.

Naming must be approved before it is offered or announced and must be documented in a written agreement. Naming is normally time-limited on a case by case basis, capable of review and subject to withdrawal where the term ends, the agreement is breached, funding is not completed or continued association poses unacceptable legal, ethical or reputational risk.

4.7 Data protection and confidentiality

Donor and prospect information will be processed under the Data Protection & Privacy Policy and applicable privacy notices. Fundraising communications will comply with UK GDPR and PECR. Information is accessed only by authorised people, retained according to the Data Retention Schedule and not sold. Confidentiality and donor anonymity are respected so far as law, regulation, safeguarding and proper governance permit.

4.8 Complaints, concerns and speaking up

A fundraising complaint may be made to the Director Owner through the published route. SDEG will acknowledge, investigate and respond within the timeframe in its Complaints Policy and the Fundraising Regulator's requirements. A complainant may escalate under the published process and may contact the Fundraising Regulator where applicable. Serious wrongdoing may be raised under the Speaking Up Policy. Safeguarding, fraud, money laundering and data incidents must be referred immediately through the relevant route.

4.9 Assurance and review

Assurance area	Minimum evidence
Strategy and performance	Funds raised, purposes, pipeline and alignment with strategic priorities.
Due diligence	Checks completed, enhanced cases, advice and unresolved matters.
Gift decisions	Accepted, refused, returned and referred gifts with rationale.
Restricted funds	Balances, application, delays, variations and donor reporting.
Recognition and naming	Approvals, terms, registers, reviews and withdrawals.
Compliance	Fundraising Code, privacy, complaints, conflicts, partners and training.
Risk and learning	Incidents, concerns, trends, actions and verified closure.

The Director Owner reviews implementation annually and reports to the CFO. The CFO provides annual assurance to the Group Board and escalates material matters promptly. The Group Board approves this Policy. Appendices may be updated only through the same approval route where the change alters authority, risk tolerance or substantive policy; purely administrative form changes may be approved by the CFO and recorded in version control.

5. Monitoring

This policy will be reviewed annually by the Director of Philanthropy & Alumni Relations and Chief Finance Officer or sooner where required due to:

- legislative change;
- regulatory change;
- material strategic or reputational change;
- a significant gift, complaint or compliance incident;
- changes to delegated authority or risk tolerance.

Monitoring and assurance activity will include fundraising performance, due diligence, gift decisions, restricted funds, recognition and naming, complaints, risks and verified action closure.

At every review, the policy will be approved by the Group Board of Governors.

6. Links with other policies

- Financial Regulations and Scheme of Delegation;
- Fraud, Bribery and Anti-Corruption Policy;
- Data Protection & Privacy Policy and privacy notices;
- Speaking Up (Whistleblowing) Policy;
- Risk, Assurance & Compliance Policy;
- Complaints Policy;
- Admissions policies; and
- Data Retention Schedule.

Appendix A: Naming & Recognition Framework

A1. Categories

Category	Examples
Physical	Buildings, rooms, wings, gardens, pitches, laboratories and facilities.
Programmatic	Outreach, lecture series, educational or community programmes.
Student support	Scholarships, bursaries and other endowed or expendable funds.
Achievement	Prizes, awards, cups and medals.
Honorific	Recognition of exceptional service, leadership or contribution without a financial gift.

A2. Common requirements

- a completed proposal under Appendix D;
- appropriate due diligence;
- clear rationale, benefit and alignment with SDEG values;
- consideration of existing names, living relatives and conflicts;
- defined term, review and withdrawal rights;
- cost, design, maintenance, records and signage arrangements;
- written signed agreement for financially linked naming; and
- approval under Appendix B before commitment or announcement.

A3. Recognition periods and review

Naming linked to a financial contribution should normally be granted for a fixed term stated in the agreement and should not normally exceed 40 years. Longer recognition may be appropriate for a fully endowed bursary, scholarship, prize or award while funding remains sufficient, subject to periodic due diligence and SDEG's continuing right to review or withdraw the name. Buildings and facilities will not normally receive perpetual naming rights.

A4. Termination or withdrawal

SDEG may terminate or withdraw recognition where the agreed term expires; the agreement or pledge is breached; funding is not completed; the name creates a material legal, ethical, safeguarding or reputational risk; the entity is demolished, repurposed or substantially changed; or continued naming is no longer in SDEG's best interests. The CFO will determine the process, including legal advice, communication and any opportunity to respond. A decision originally reserved to the Group Board may be withdrawn only by the Group Board.

A5. Honorific naming

Honorific naming must recognise exceptional and well-evidenced contribution directly connected to SDEG. Naming for a living person requires particular care. National or international prominence alone is not sufficient. The same due-diligence, term, review, conflict and withdrawal principles apply.

Appendix B: Gift Acceptance & Naming Authority Matrix

Gift / decision	Authority	Minimum control
Routine gifts below £20,000	Director Owner, in consultation with CFO where risk warrants	Proportionate checks; no naming commitment unless separately approved.
£20,000 to £250,000	CFO	Enhanced checks where risk-based; written gift agreement for gifts above £20,000.
£250,001 to £999,999	CFO after advice from an ad hoc Gift Review Panel	Enhanced risk assessment and report to the next Group Board meeting.
£1 million and above	Group Board	Enhanced due diligence, professional advice and formal Board decision.
Any value: unusual, contentious, high-risk or potential refusal/return	Next higher authority, with CFO determining referral	Risk determines authority; value is not the sole criterion.
Any Board-reserved naming or withdrawal	Group Board	Formal proposal, rationale and record.

No delegated authority permits acceptance of an unlawful gift. The CFO may require any matter to be referred to the Group Board. Conflicted persons do not participate in the decision.

Appendix C: Naming Threshold Matrix

Opportunity	Reference threshold	Condition
Whole building or major facility	Normally 30-40% of construction cost, existing value or campaign target	Project-specific assessment and exclusivity priced separately.
Room or defined internal space	Minimum £10,000 baseline	Adjusted for size, equipment, refurbishment, prominence and heritage.
Outreach activity or programme	Minimum £15,000 or 50% of full economic cost, whichever is greater	Term linked to funding and programme life.
Named annual bursary or scholarship	Normally at least 50% of full economic annual cost and at least three years	SDEG agreement required for any matched contribution.
Fully endowed bursary	£750,000 2025/26 reference level	Reference value must be recalculated before offer.
Partially endowed bursary	£100,000 2025/26 reference minimum	Scope and level of support stated clearly.
Prize or award	£5,000-£10,000 2025/26 reference range	Reflects administration, award value, direct costs and minimum three-year term.

Threshold control
Figures are reference levels derived from the preceding policies, not automatic entitlements. The Director Owner reviews them annually with the CFO. No threshold creates a right to naming, and the approved figure must be confirmed before discussion with a donor.

Appendix D: Naming Proposal Form

Field	Required information
Proposal owner and department	
Physical or non-physical entity to be named	
Proposed name and rationale	
Financial, philanthropic, commercial or honorific basis	
Donor / contributor identity and relationship to SDEG	
Gift value, proportion of project cost and payment status	
Extent to which support depends on naming	
Proposed recognition term	
Existing name, rights or living relatives affected	
Due diligence completed and key findings	
Reputational, equality, safeguarding or conflict considerations	
Signage, installation, maintenance and removal cost	
Gift / commercial agreement attached	
Recommended decision and authority	
Approvals, dates and conditions	

Appendix E: Donor, Gift & Partner Due-Diligence Checklist

- ☐ Identity, legal status, authority and beneficial ownership confirmed where relevant.
- ☐ Source of wealth/funds or asset provenance understood proportionately.
- ☐ Sanctions, restrictions, proscription and suspicious-activity checks completed where relevant.
- ☐ Credible adverse media, litigation, convictions and regulatory findings considered.
- ☐ Donor capacity, vulnerability, pressure, third-party influence and conflicts considered.
- ☐ Terms, restrictions, side agreements, return expectations and ownership implications reviewed.
- ☐ Gift type, payment route, overseas connection, tax and fraud indicators assessed.
- ☐ Alignment with charitable objects, values, beneficiaries and independent decision-making considered.
- ☐ Fundraising partner, professional fundraiser or commercial participator appropriately checked and contracted.
- ☐ Legal, financial, safeguarding, data-protection or specialist advice obtained where needed.
- ☐ Risks of accepting, refusing or returning and available mitigations documented.
- ☐ Decision, authority, rationale, review date and ongoing monitoring recorded.

Appendix F: Gift Decision Record

Field	Record
Gift, donor and proposed purpose	
Value and form of gift	
Due diligence and risk rating	
Restrictions, costs and recognition	
Conflicts declared and managed	
Risks of accepting / refusing / returning	
Mitigations and advice obtained	
Decision and rationale	
Authority, date and conditions	
Review, monitoring and reporting requirements	

The SDEG philanthropy test **Does this gift advance charitable purpose, preserve independence, withstand scrutiny and create sustainable benefit?**