

**Chelsea Academy Foundation  
Fundraising and Donation and Support Policy –  
Dated 8 October 2024**

The Chelsea Academy Foundation (the “Foundation”) is a charitable unincorporated organisation, registered with the UK Charity Commission (no. 1120784). Its purposes are to support such charitable purpose or purposes which promote the advancement of the education of the students at Chelsea Academy (the “Academy”), including the provision of scholarships, bursaries and the funding of capital projects connected to the Academy (“Charitable Purposes”).

The Foundation actively engages in fundraising and development activities and may seek a voluntary transfer of assets (financial or in-kind) by an individual or organisation made with philanthropic intent for the benefit of the Foundation (“Donations”), and other forms of financial and non-financial support, including the entering into of partnerships or other forms of organisational engagement on non-commercial terms (“Support”), which are aligned with its Charitable Purposes, and the strategic goals of the Foundation and the Academy.

This policy explains the Foundation’s approach to fundraising, its criteria for accepting Donations and Support, and its handling of Donations and Support received.

1. Who this policy applies to?

This policy applies to all members of the Foundation community, including Foundation trustees, volunteers and Academy staff and governors, who are either directly, or indirectly, involved in the Foundation’s fundraising activities or from time to time take part in any other charitable or development activities of the Foundation.

2. Policy Statement

The Foundation is committed to responsible fundraising practice. All fundraising by and on behalf of the Foundation must be in line with the Fundraising Regulator Code of Fundraising Practice and Charity Commission guidance. This makes sure that all fundraising is legal, open, honest and respectful.

Fundraising and development activities must support the achievement of the Foundation’s Charitable Purposes and such activities, or the source of funds raised from such activities, do not adversely impact the Foundation’s or the Academy’s reputation.

3. Procurement Principles

3.1 The activities undertaken to procure Donations or Support on behalf of the Foundation will be:

- a. **Legal:** Adhere to applicable requirements under charity law and the Fundraising Regulator Code of Fundraising Practice and Charity Commission guidance as well as anti-money

laundrying legislation, The Bribery Act and any other relevant Foundation policies, including but not limited to its Privacy Policy.

- b. **Open:** Be clear about what the Foundation is fundraising for, and make sure that individuals and organisations have all the information they may need to make an informed decision about offering Donations or Support.
- c. **Honest:** Volunteers and fundraising materials must not mislead anyone. Never take advantage of a prospective supporter error.
- d. **Respectful:** Volunteers must always be polite and respectful in line with the Foundation's Volunteer Policy.

3.2 Solicitations may be made via any communications vehicle (e.g., post, email, telephone, or social networking sites/channels), or they may be in person.

3.3 The Foundation will ensure that that all those who solicit Donations or offers of Support on its behalf understand the practice and behaviour expected and the guidelines of this policy.

3.4 The Foundation may use reasonable persuasion to encourage offers of Donations or Support, but it will not put individuals under pressure to give.

3.5 The Foundation reserves the right to review and reconsider any Donation or Support received in good faith if subsequent events or the subsequent availability of additional information require it.

3.6 Donations should not be directly received or sought by any Foundation volunteer or any Academy governor or member of staff.

3.7 Any Academy governor or member of staff who is approached by an individual or organisation with an offer of Donation or Support, should refer that individual or organisation to the Foundation or its delegate, including a designated member of Academy staff. For offers over £1,000, the Chairman of the Foundation should be informed directly of such offer.

#### 4. Due Diligence

4.1 The Foundation takes a risk-based approach to accepting, refusing, and returning Donation and Support. All offers of Donations and Support will be subject to a process of due diligence, including but not limited to an online search to highlight any potential areas of concern, in accordance with the provisions of Section 4 of this Policy.

4.2 The Foundation will make sure it:

- Knows who the donor is.
- Can assess any risks if the Donation or Support is accepted.
- Can check the appropriateness of accepting such a Donation or Support from a donor.
- Is confident the Donation or Support isn't from an illegal or inappropriate source.
- Can check that any conditions attached to the donation are appropriate and can be accepted.

4.3 Such due diligence will be carried out either by Foundation trustee or its delegate, including a designated member of Academy staff.

4.4 Small and regular Donations or Support are unlikely to be an issue. Some Donations or Support could be unusual, which could vary by size, amount, type and circumstances. See Appendix A for Review of Donations.

4.5 All Donations over £10,000 or any series of Donations or provision of Support with the same cumulative value in a given financial year will be subject to this process.

4.6 No donor of a Donation or grantor of Support has any influence over the admissions process of the Academy or the special treatment of any Foundation trustee, volunteer, Academy governor or member of staff or Academy students or their families or carers.

4.7 No Foundation trustee, volunteer, Academy governor, member of staff or parent or carer must derive personal benefit (individually or collectively) from any Donation or Support.

4.8 For all Donations of £25,000 or more, the Foundation will review and ensure that the guidelines of the Charity Commission are followed and the recommended “Know Your Donor Questions” in Appendix B are considered.

4.9 Any approach made directly to an Academy governor or member of staff or a Foundation trustee, will be passed on to the Foundation Chairman to ensure that distance is maintained between the individual or organisation and the Academy, and that the proper due diligence is carried out.

4.10 If due diligence raises any concerns, such information will be referred to the Foundation Chairman and the Board of Trustees of the Foundation and the Principal of the Academy. Trustees have the ultimate responsibility for decisions about accepting donations.

## 5. Types of Donations

The Foundation will accept the following types of donations:

- Cash up to £300 and cheque donations
- Credit/Debit Card and Bank transfers
- Gift pledges over a period, whether monthly, quarterly, annually
- Gifts of property, provided it is unencumbered, and the Foundation reserves the right to sell the property immediately. All legal expenses associated with such a gift will be the responsibility of the donor or executor
- Tangible personal property, e.g., gifts of jewellery, artwork, antiques or collections. Valuation is the responsibility of the donor and will be accepted only on the understanding that the Foundation has full authority to sell the property at any time
- Products and services/gifts in kind may be accepted subject to the Foundation’s Charitable Purposes and/or the Academy’s needs. Goods such as equipment, furniture and services such as use of a venue, advertising, catering, etc.

- Designated gifts/donations will be accepted, for a specific purpose, providing this meets the Foundation's Charitable Purposes. The Foundation will ensure, as far as it is able, that the donor's wishes are abided by and that the gift is used for the purposes intended. The Foundation reserves the right, in consultation with the donor, to amend the use of the gift should the circumstances change. If the donor is deceased, the next of kin will be consulted wherever possible.
- All undesignated gifts will be allocated to the Foundation's unrestricted funds.

All funds raised are either

- deposited directly, deposited into the Foundation's bank account (either current or liquidity account) or
- in the case of cash or cheques, given to the Academy's Director of Finance and Operations, or other designated member of Academy staff, to then be deposited into the Foundation's bank account (either current or liquidity account).

In-Kind gifts will be held on a case-by-case basis with clear records kept on Donorfy or other specialist software of the Foundation. The Foundation will work with the Academy's Director of Finance and Operations to determine the value of any in-kind gift in accordance with any applicable accounting rules and the Charity Commission guidelines.

## 6. Donation Acceptance

6.1 When accepting Donations and Support, the Foundation complies with all relevant legislation, including money laundering rules, the Bribery Act, Fundraising Regulator's Code of Fundraising Practice and Charity Commission guidance.

6.2 The Foundation will therefore not accept any of the following where the donation:

- Was known to be associated with criminal sources and/or illegal activity, e.g. fraud
- Would help further a donor's personal objectives which conflict with the ethos and values of the Foundation or the Academy
- Would lead to a possible decline in support for the Foundation, and so risk a fall in the resources given to fund its objects or damage its longer-term fundraising prospects
- Does not fit with the Foundation's Charitable Purposes or the Academy's strategic objectives
- Would otherwise adversely affect the reputation of the Foundation or the Academy
- Would be inconsistent with Government policy
- Depends on the fulfilment of unacceptable conditions applied by the donor

6.3 The Foundation will actively seek support from individuals and organisations whose practices align to the Foundation's Charitable Purposes and the Academy's strategic objectives.

6.4 The Foundation will respect the wishes of donors who wish to remain anonymous provided that this accords with the Foundation's legal and accounting obligations and other relevant policies and the name is recorded on Donorfy or other specialist software of the Foundation.

6.5 Where any concern about the source of funding is identified, potential gifts will be referred to the Chairman of the Foundation and such information will be referred to the Foundation Chairman and the Principal of the Academy. Trustees have the ultimate responsibility for decisions about accepting donations.

6.6 For offers of Donations or Support that exceeds £10,000, the Foundation or its delegate will inform the Chairman of the Foundation and the Academy Principal. For Donations or Support with a value exceeding £10,000, the terms of the donation will be set forth in writing (email is acceptable, but text messaging is not).

## 7. Refusal of Donations

7.1. The Foundation reserves the right to refuse any Donation or Support that does not meet the donation acceptance criteria set forth in Section 6 or where due diligence highlights an unacceptable level of ethical or reputational risk.

7.2 The Foundation will refuse a Donations that is a cash payment that is more than £300.

7.3 The Foundation reserves the right not to provide reasons for the refusal of a Donation or Support.

7.4 The Foundation can refuse Donations or Support if:

- Trustees have reason to believe it could be from an illegal or inappropriate source.
- Accepting the donation would harm the Foundation's or Academy's ability to operate, and the risks of accepting the Donations or Support outweigh the benefits.
- Trustees know or have good reason to believe that the prospective donor is unable to make an informed decision about donating.
- Trustees know or have good reason to know that prospective donor's practices do not align to the Foundation's Charitable Purposes, the Academy's strategic objectives or the ethos of the Academy.

## 8. Donor Recording, Management and Stewardship

8.1 All Donations and Support, including pledges, will be acknowledged officially and promptly in writing (email is acceptable, but text messaging is not) by either a Foundation volunteer or a designated member of Academy staff.

8.2 The Foundation will maintain electronic records of all Donations and Support, including pledges, using Donorfy or other specialist software for that purpose and administered with assistance of designated member of Academy staff.

8.3 Individuals and organisations will be issued with regular updates on how their Donations or Support have been used (where appropriate) by either a Foundation volunteer or a designated member of Academy staff.

8.4 Such reports and other practices for recognition of those who provide Donations or Support will be proportionate to the value of the Donation or Support received by the Foundation.

8.5 The Foundation will seek to reclaim tax under the UK Gift Aid scheme, where possible. This may be processed through Donorfy or other specialist software and administered with assistance of a designated member of Academy staff.

## 9. Rights of donors and prospective donors

9.1 All donor and prospective donor records and communications will be subject to the Foundation's Privacy Policy.

9.2 The Foundation will consult, where possible, with any donor about alternative use of their gift if it cannot be used for its originally intended purpose.

## 10. Miscellaneous

10.1 Donations or Support may only be made by the person or entity which has been approved by the Foundation.

10.2 The Foundation may not be permitted to return funds which have been transferred to it from an unapproved source or where there has been an overpayment.

## 11. Complaints

The Foundation takes seriously any complaints from donors or prospective donors and will ensure that any complaints received will be treated as such and handled with respect. If you have a concern or complaint about our fundraising, please contact us:  
Chelsea Academy Foundation at **CAF@chelsea-academy.org**.

## **Appendix A**

### **Know who they are**

The donor might be someone you know personally, like an Academy parent or carer, a neighbour or a friend, or they might be someone you don't have any connection with. You might also get donations from businesses, like free or discounted use of their services, or from other charities. You can accept donations from anonymous donors, but look out for anything which makes you suspicious or uncomfortable.

### **Check they're who they say they are**

If the prospective donor is a registered charity, you may be able to find them in the [charity register](#). If the prospective donor is a business, you can search for them on [Companies House](#). Not all charities or businesses need to be registered with the Charity Register or Companies House, respectively so if you can't find your donor that's not necessarily something to be concerned about.

### **Know their business, and that it's appropriate for the Foundation and the Academy to be linked to them**

You can do this by researching the prospective donor online to check they haven't been involved in anything illegal or had any serious allegations made against them. If they're a business or charity, you could have a look on their website to see whether their values are similar to the Foundation's and the Academy's values/ethos/mission. Consider how volunteers, Academy staff, Academy students and parents or carers might react if they knew you had accepted a donation from them.

### **Know why they're donating to you**

Some donors will be interested in donating for a specific cause. If this is the case, it's important to be open and transparent about how their Donation or Support will be used.

### **Watch out for anything unusual or suspicious**

We don't expect volunteers to know if a Donation or Support is from an illegal or inappropriate source. If anything makes you uncomfortable or seems unusual, please inform the Foundation Chairman for advice.

Some key considerations:

- Unusually large donations, especially if you don't know enough about the donor.
- Conditions which aren't reasonable or compatible with the Foundation or the Academy, or that undermine the Foundation's or the Academy's independence from the donor.
- Complicated banking arrangements. Having to transfer money between multiple accounts may be a sign that the donor's funds are from an inappropriate or illegal source.
- Unusual behaviour, like saying the donation needs to be made urgently but without giving you a reason why.



## 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