



Thames View Infants

Donations Policy

Introduction

Thames View Infants/TVI Learning sees fundraising and donations as a legitimate means of improving the School's ability to purchase goods, equipment or services beyond those funded by other funding streams. Fundraising enhances the Trust's ability to achieve its aims and further meet the needs of its children.

Donating money, services, time or equipment or actively raising funds is a positive way for the wider community to support the School. This policy should be adhered to by all those involved in accepting and actively raising funds on behalf of the Trust.

Principles

The Trust must ensure that the best interests of the School are served when accepting or refusing a donation and that the origins of the funds are legitimate. To do this, the Trust will apply the following principles before accepting a donation:

- Donations must be freely given with no expectation of anything other than thanks and/or recognition on the School Website/Social Media, to be mutually agreed between the School and the donor.
- The Trust will ensure that any fundraising undertaken, and donations received comply with all other School Policies (e.g., Data Protection Policy, Finance Policy, Gifts Policy) and all legal requirements are met (such as relevant bribery and charity laws).
- That the donation must be given in good faith to support the Trust's aims, values and strategic objectives.
- Donations will not be accepted if the gift is subject to conditions that would compromise the autonomy, integrity and reputation of the Trust.

Donations

Donations may include financial contributions as well as products, services, time and other benefits provided by the Trust. Fundraising is managed on a day-to-day basis by the School Business Manager and Headteacher.

Thames View Infants/TVI Learning most frequently accepts donations in the form of voluntary parental contributions usually through ParentMail.

As a registered charity, the School Fund is registered for Gift Aid. This is an HMRC scheme which allows the School Fund to claim additional money from HMRC for donations of money made by individual UK Income Tax and/or Capital Gains Taxpayers who complete the relevant form. The School Business Manager is responsible for maintaining the registration and ensuring day to day compliance with the scheme.

Significant and Overseas Donations

In addition to the support listed above, Thames View Infants/TVI Learning may, from time to time, receive the support of grant making organisations and philanthropic individuals. A significant donation is any donation above £20,000/is material to the day-to-day operations of the Trust/may result in reputational risk/or, in the view of the Headteacher, should be treated as such.

Where a significant donation is a possibility, the Trust will consider a range of information and undertake due diligence to ensure that:

- the donation is in the best interests of the Trust. That the source and the proposed purpose of the donation are consistent with its strategic and charitable objectives, in particular its vision, mission and values
- either the donation has no conditions or if there are any conditions linked to the support, they are explicit and regarded as reasonable and in no way breach any;
 - of the school's policies, procedures or processes, in particular its vision, mission and values
 - any relevant legislation or guidance
- all reasonable steps have been taken to ensure that the school is aware of the source of funding for each donation and is satisfied that the funds do not derive from activity that was, or is, illegal. The school will have regard to the Charity Commission's "Know your Donor" principles and will consider the "Know your Donor" questions found in Annex A which assist in:
 - identifying the donor
 - verifying the donor (where it is reasonable and necessary to do so)
 - knowing the organisation's/individual's business with the charity and having confidence they will deliver what the charity wants them to do, and
 - watching out for unusual or suspicious activities, conduct or requests
 - due regard has been taken of any reputational risk to the school which may arise from its acceptance of such a donation.
- Advice will be taken from the Chair of Director's or legal advisors where necessary.

The School Business Manager will ensure that any necessary registrations are completed and maintained, such as Equivalency Determination Certificate, to enable international donations and funding to be accepted.

Approval of Donations

On a day-to-day basis the following approval system should be followed:

Charitable donation value	Pre-approved by
Up to £2000	School Business Manager
Donations from charities, grant making organisations or philanthropic individuals up to £50,000	Headteacher
Donations from charities, grant making organisations or philanthropic individuals over £50,000	Headteacher, Chair of Directors, FPPC

The Headteacher will have final decision as to whether a donation, including a significant donation, is accepted, declined or returned.



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If any member of staff is in any doubt about the procedure to follow, or whether a charitable donation should be accepted, then advice should be sought from the School Business Manager in the first instance.

If a staff member is asked to receive a bribe, or they believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, they must notify the Headteacher **or** report it in accordance with the Whistleblowing Policy as soon as possible.

Donations will be accounted for so that their receipt and subsequent expenditure (or transfer to other funds) can be readily identified and reported.

Complaints and Returns of Donations

Thames View Infants/TVI Learning will not normally return a donation which has been accepted in good faith and in accordance with this policy (as the law prohibits the return in most circumstances). However, exceptional circumstances may give rise to the need to review the acceptance of a donation. Any decision to return donations should be a matter for the FPPC to make, on the recommendation of the Headteacher. The School or the Directors may take legal advice before making any such decision.

Thames View Infants/TVI Learning will endeavour to respond promptly to a complaint by a donor or prospective donor about any matter addressed in this policy. The School Business Manager will attempt to resolve the complainant's concern in the first instance. If a complainant feels their concern remains unresolved, they may invoke the Trust's Complaints Policy.

Data Protection

Thames View Infants/TVI Learning will ensure that it complies with all relevant legislation including UK GDPR and the Data Protection Act 2018.

All records created in accordance with the policy are managed within the School's Data Protection, Information Security and Data Retention Policies.

This Policy was adopted on: 16th June 2025

It will be reviewed on: June 2028



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



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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?

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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