



UNITY SCHOOLS PARTNERSHIP

DONATIONS & GIFTS ACCEPTANCE POLICY

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1	Summer 2020	Summer 2021

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Donations & Gifts Acceptance Policy

Unity Schools Partnership and its associated academies are sometimes offered charitable donations to support the school in some way. UnitySP has a duty to maximise the resources available for that purpose. If we choose to accept donation, we must be able to demonstrate to the Charity Commission that we have acted in line with our objects.

The Trust's position towards a contentious donor or donation is not the sum total of the personal beliefs of our Trustees, Governors, staff or other stakeholders, it is determined by whether our charitable objects are adversely affected by association with that donor or gift.

Three core principles and a set of key questions will guide decision-making about whether (or not) a donation or gift should be accepted.

Core principles

- ▲ The Trust (or any of its academies) will only accept charitable support that helps us to fulfil, and which can be utilised effectively in pursuit of, its vision and values.
- ▲ The Trust only accept gifts that support and do not compromise the Trust's core activities.
- ▲ The Trust will be transparent about the sources and purposes of gifts received.

Key questions

When considering acceptance of a donation, particularly but not limited to gifts which may have a controversial dimension, the Trust will consider and be guided by the following questions.

Does the gift:

- ▲ Arise in from an activity that involved criminality, fraud or the evasion of taxation?
- ▲ Require action that is illegal?
- ▲ Seriously damage the Trust's reputation?
- ▲ Create unacceptable conflicts of interest?
- ▲ Involve unlawful discrimination based upon race, religion, sex, age, national origin, colour, disability or upon any other basis prohibited by law?
- ▲ Require the Trust to deviate from its normal hiring, promotion, and contracting procedures?
- ▲ Require unacceptable expenditure of additional Trust resources?
- ▲ Limit the effectiveness of other work being undertaken by the Trust?
- ▲ Harm the Trust's relationship with its members, other donors and sponsors, partners, families or potential supporters?
- ▲ Contravene the Trust's policies that relate to anti-bribery and corruption?

When asking for or confirming receipt of donations, all Trust staff and volunteer representatives must make the Director of Finance & HR aware if they are aware, or in any doubt, as to whether there are features of the gift which may conflict with the above core principles, or to which a key question answer is 'yes'.

In such cases, it is the Director of Finance & HR's responsibility to alert the CEO as soon as possible after he/she has been made aware, certainly before any planned 'ask' is made, and to provide a due diligence report for the CEO and the Chair of Trustees. The CEO and Chair may then commission further investigations before giving approval or – if doubt remains – referring the matter to the Risk and Audit Committee for final judgement.

In cases where a donor wishes to remain anonymous, anonymity will be respected provided the name of the donor is known to the Director of Finance & HR, CEO and Chair of Trustees, and the Trust is satisfied, through the procedure set out, that any conflicts of interest are resolved before accepting the donation.

All due diligence and decision-making undertaken in assessing the acceptability or otherwise of a proposed donation will recognise the legal and reputational rights of potential donors. A clear distinction will be drawn between rumour or speculation and matters of confirmed fact or legal finding.

An annual report will be made to the Risk and Audit Committee as to any changes to this policy or its implementation, and a list of accepted and rejected gifts.

Draft Process for the Acceptance of Gifts

Taking into account the principles above, all donations will be subject to basic gift acceptance procedures.

Written records must be kept for all donations. At a minimum, this must include the donor's name, their contact details, the amount and date of the gift, and the specific allocation of the gift if there is one. All gifts above £100,000 must have a written Gift Agreement including the above.

Gift Agreements must be signed by someone other than the member of staff who has secured the gift.

Approvals for Gift Agreements are determined by gift size, and approval should be based on due diligence checks conducted at the appropriate level. Appropriate details of the checks will be recorded and retained by the Director of Finance & HR.

- Gifts under £100,000 – signed by the Head Teacher and Director of Education
- Gifts £100,000-£1m – signed by the Director of Finance & HR or the CEO
- Gifts £1m+ – counter-signed by the Chair of Trustees

If any concerns are raised about a potential gift, each approver may seek additional validation, both from the next level of approver as well as from the Risk and Audit Committee. The Risk and Audit Committee will act as the de facto Ethics Committee should the need arise and will make recommendations as to whether to accept a gift or not. Appropriate details of decisions will be recorded in the minutes of the meetings.