



THE  
KING'S SCHOOL  
CANTERBURY

# Donation Policy

Responsible Person: Bursar

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## INTRODUCTION

The King's School Canterbury is a UK registered charity (charity number 307942).

The School comprises three institutions:

The King's School, 25 The Precincts, Canterbury

The Junior King's School, Sturry

The International College, The Malthouse, Canterbury

Its mission is:

- to promote education in the broadest sense of the word, intellectual, spiritual and personal of persons of both sexes.
- to carry out and maintain the King's School, Canterbury, the Junior King's School and the International College together with all the lands, securities, money and property of every description real or personal vested in or belonging to any governors on behalf of the charity.

This policy governs the acceptance of gifts from individuals, corporations and charitable trusts and foundations, to help further the missions of the School.

This policy details:

1. The Regulatory Framework
2. Fundraising Code
3. Gift Acceptance
4. Donor Charter

## 1. THE REGULATORY FRAMEWORK

The King's School Canterbury is registered with the Fundraising Regulator and adheres to its Code of Fundraising Practice. The School seeks and accepts philanthropic gifts in accordance with the guidelines set by IDPE (Institute of Development Professionals in Education) and CASE (Council for Advancement and Support of Education), and ISBA (Independent Schools Bursars Association).

All gifts and data will be processed in accordance with the School's privacy notice (see [Privacy Policy.pdf \(kings-school.co.uk\)](#)) and relevant legislation (e.g. GDPR).

Further information can be found on the following websites:

[www.fundraisingregulator.org.uk](http://www.fundraisingregulator.org.uk)

[www.idpe.org.uk](http://www.idpe.org.uk)

[www.theisba.org.uk](http://www.theisba.org.uk)

## 2. FUNDRAISING CODE

On behalf of King's, the Development Office may solicit gifts from individuals, corporations, and charitable trusts and foundations, to help further the mission of the School. It commits to do so ethically and in line with best practice:

1. All solicitations and appeals for funds on behalf of the School will:
  - adhere to the provisions of this policy
  - be truthful
  - accurately describe the School's activities and intended use of donated funds
  - respect the dignity of the donor and of those who benefit from the gift.

2. Volunteers and employees who solicit or receive funds on behalf of the School will:
  - adhere to the provisions of this policy and those of the Fundraising Complaints policy
  - act with fairness, integrity, and in accordance with all applicable laws (including GDPR and the Data Protection Act 2018)
  - adhere to the provisions of applicable professional standards (including the Charity Commission and the Fundraising Regulator)
  - cease solicitation of a prospect or donor who requests no further contact
  - not accept donations for purposes that are inconsistent with the Acceptance of Gifts policy.
3. Paid fundraisers are compensated by a salary, and are not paid finders' fees, commissions, or percentages of gifts raised based on either the number of gifts received or the value of funds raised.
4. Should an employee or volunteer involved in donor engagement and legacy fundraising activities be offered a personal legacy from a potential testator, they will follow the clear procedure set out in the relevant internal policy ('Personal Legacy Offers to Fundraisers Procedure'). This policy ensures ethical conduct, transparency, and protection for all parties involved.
5. Donors will be encouraged to seek independent advice if the School has any reason to believe that a proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members

### **3. GIFT ACCEPTANCE**

1) The following principles will be considered for all gifts:

- Does the potential gift fit with the School's strategic mission?
- Is there published or other credible evidence that the proposed gift will be made from a source that arises in whole or in part from an activity that:
  - Evaded taxation or involved fraud?
  - Violated international conventions that bear on human rights?
  - Limited freedom of enquiry, or encroached on academic freedom?
  - Was illegal and/or involved money laundering?
  - Is linked to the proceeds of crime?
  - Has the donor been placed under any international sanctions?
- Does the gift comply with UK law, Charity Commission rules and Fundraising Regulator guidance?
- Is there evidence that the proposed benefaction, or any of its terms will:
  - Require action that is illegal?
  - Seriously damage the reputation of the School?
  - Create unacceptable conflicts of interest?

- Come with unacceptable expectations?
- Harm the School's relationship with other benefactors, parents, pupils, partners or the local community?

2) The School will follow a formal 'Due diligence' process for any gift which, in the opinion of the Development Office, could represent a risk to the School and / or where the total value of the donation is equal to or greater than £50,000. There will be a review that assesses the acceptability of a proposed gift against the criteria as defined above. It will also include consideration of any financial or reputational risks for the School. Gifts where a concern is identified will be referred to the Head and, if necessary, to the Governing Body for acceptance. The Development Office and Head will be kept updated on all gifts following the due diligence process.

The School reserves the right to refuse any gifts:

- which are considered to have arisen through illegal activity
- whose acceptance may damage the reputation of the School
- where conditions imposed conflict with the educational policy, the admissions procedures, or the overall objectives or the independence of the School.

3) Gifts are accepted in the following forms and with the following restrictions:

- **Cash (or equivalent):** to comply with money laundering regulations, cash donations of over £50 cannot be accepted. Cheques and card donations are accepted.
- **Shares:** The School can accept publicly traded securities. Securities may be accepted subject to completion of the necessary transfer formalities and the payment of any Stamp Duty. As a general rule, all marketable securities will be sold upon receipt unless otherwise directed.
- **Tangible personal property:** Tangible personal property includes art, furniture, books, School memorabilia, coin and stamp collections, jewellery, vehicles and any other personal property item owned by a donor. It excludes property and land. The School will examine a potential gift of tangible personal property for the item's financial value, its potential use by and significance to the School, any associated ongoing risks or costs to the School (e.g. insurance) and, if it is agreed with the donor that the item will not be used or kept, whether the item could be sold and converted into cash. The School reserves the right to refuse such gifts.
- **Property and land:** Gifts of property and land may include gifts of developed property or undeveloped land. Prior to acceptance of gifts of real estate, the School shall require a structural survey or other similar review of the real estate to ensure it offers no significant ongoing financial or environmental risks or costs to School. The cost of such survey or review will generally be an expense of the donor.
- **Bequests:** The School will gratefully accept bequests for the benefit of the School. The Development office asks donors wishing to leave a bequest to execute an appropriate codicil or include it in their will. The School is also keen that such donors notify the School if they would like to do so, in order for the School to keep accurate records of those who have made a provision in their will or codicil. In this way, the School can

ensure that legacy pledge-makers can be appropriately thanked via the School's *Robert Rose Society*. Such notification is in no way binding and those notifying the School of an intention to leave a gift in their will retain absolute rights over whether or not to fulfil this commitment.

- **Restricted Gifts:** The School may accept a gift from a person or organisation for a specific purpose within the school, providing it is within the mission and vision of the School. The School will ensure, as far as it is able, that the donor's wishes are upheld and that the gift is used for the purposes intended. The Governors reserve the right to amend the purpose of the gift where the donor has passed on and there are no next of kin to consult. Undesignated gifts will be used to fund the work of the School where the need is greatest.

4) The Development Office is not responsible for the financial, tax or legal position of donors or of prospective donors in relation to their gifts. Donors or prospective donors must take such advice as they deem necessary and in no circumstances are they entitled to rely on guidance offered by the School and/or the Development Office, whether written or verbal, which can only ever be generic in nature.

5) To comply with money laundering and related legislation, the School might require donors and potential donors to provide reasonable proof of identity and, if necessary, furnish information as to the origins of the gift.

6) Donations must be freely given with no expectation of anything in return other than due thanks and recognition. Gifts from prospective parents without a confirmed place will not be accepted. Gifts from parents cannot be made to offset School fees or the cost of a trip or activity for an individual pupil who is related or known to a donor. The decision of a parent to make or not make a gift to the School will have no bearing on the academic, sporting or extracurricular opportunities open to an individual pupil.

7) Any naming rights (e.g. a building, a plaque or the naming of a bursary or award) related to a donation will be agreed between the donor and the School. The School will reserve the right to remove a name should the individual, trust or corporation fall into disrepute and compromise the reputation of the School. The Governing Body will take and/or ratify this decision on a timely basis.

#### **4. DONOR CHARTER**

The King's School takes a 'donor-centric' approach to all its fundraising activities, ensuring that donors are treated fairly, transparently, and respectfully and are kept informed of the impact of their giving. We will always:

1. Disclose the School's name and purpose for which the funds are requested during all fundraising solicitations. Printed and digital solicitations will also include contact information, the registered charity number and the logo of the Fundraising Regulator.
2. Take all reasonable steps to treat donors fairly, enabling them to make an informed decision about any donation. This must include consideration of the needs of any potential donor who may be in a vulnerable circumstance or require additional care and support to make an

informed decision. We will honour any requests to cease or limit solicitations (including by telephone or mail).

3. Respect the privacy of our donors. All gifts and data will be processed in accordance with the School's privacy notice (see [Privacy-Policy.pdf \(kings-school.co.uk\)](https://www.kings-school.co.uk/Privacy-Policy.pdf)) and relevant legislation (e.g. GDPR).

4. Process donations and thank donors promptly. Where appropriate a formal Gift Agreement will be provided, with the purpose of the gift and the payment schedule. A copy will be held by both the School and the donor.

5. Ensure that all gifts we receive are in line with our Gift Acceptance Policy and we will undertake due diligence where necessary.

6. Ensure all donations given for a specific purpose will be used for that purpose and in a timely fashion. If necessary, due to programme or organisational changes, alternative uses or extensions to timescales will be discussed where possible with the donor(s). If a donor is deceased, and the School is unable to contact a legal designate, the donation will be used in a manner that is as consistent as possible with the donor's original intent. Donors accept that the management and governance of programmes and/or activities funded through philanthropy, rests solely with the School.

7. Update donors regularly (at least annually) on the impact of their gift, steward them through relevant giving clubs and invite them to any events linked to their donation.

8. Recognise gifts publicly where appropriate for the level and use of the gift (e.g. on donor walls), unless the donor asks to remain anonymous, in which case that request will be honoured. The School may however disclose details of any donor where it is required to do so by law, by any governmental or other regulatory authority, or by order of a court. In addition, and where necessary, senior and select School administrative staff may be made aware of the real identity of the donor.

9. Adhere to the provisions set out in the School's Fundraising Complaints policy. This details how the Development Office will respond promptly (within 15 working days) to a complaint by a donor or prospective donor about any matter that is addressed in this policy, made through the Office. The Director of Development will attempt to satisfy the complainant's concerns in the first instance and if an investigation needs to be carried out, this will aim to be completed within 20 working days. A complainant who remains dissatisfied will be informed that he/she may appeal in writing to the Head, who will respond to this appeal within a further 15 working days. If the issue remains unresolved the complainant may pursue the matter with the Governing Body.

