



**RADLEY**  
FOUNDATION

**Donor Charter,  
Fundraising Code of Practice and  
Gift Acceptance Policy**

**September 2023**

## Introduction

We pride ourselves on seeking to ensure that giving to Radley is as enjoyable and fulfilling an experience as possible and are very grateful to all our donors for their generous support.

The Radley Foundation is a registered charity with its own Board of Trustees, distinct from the Radley College Council, and which seeks to raise funds to support particular and important initiatives at the College. Each gift plays a vital role in ensuring:

- Radley College can provide opportunities for a greater number of talented and deserving boys, from diverse backgrounds, to enjoy the benefits of a Radley education
- the creation of new buildings and facilities that support the educational needs of the College
- the establishment of a sufficient endowment to sustain the future needs of the College.

All donations should be made to the Radley Foundation (registered charity number 272671) which exists for the benefit of Radley College. Whilst the College is also a registered charity (registered charity number 309423) capable of receiving donations directly, all fund-raising is carried out through and by the Foundation, with the intention that the Foundation will ordinarily be the direct recipient of all donations intended for the benefit of Radley applicable either at the Trustees' discretion or for purposes specified by the donor, and that save in the case of bequests (which can be made either to the College or the Foundation), it is contemplated that donors will ordinarily deal directly with the Foundation through its Development Director and make donations to the Foundation. All fundraising solicitations are undertaken by the Foundation Office within the Development Office at Radley College.

We see the cultivation and sustenance of strong relationships between the College and members of its community as vital for successful fundraising activities. However we are very careful to ensure that 'friend-raising' and fundraising are separate disciplines and are clearly defined.

Radley College and the Radley Foundation are committed to the highest forms of best practice in its fundraising activities. To that end, this policy is regularly reviewed and updated to reflect any changes in best practice or policy.

Making a gift to Radley should be a positive experience and one that we hope will lead to similarly positive and long term relationships between the College and its donors.

The pages that follow set out the Foundation's Donor Charter, Fundraising Code of Practice and Gift Acceptance Policy.

## Donor Charter

The Radley Foundation 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 Foundation's name and purpose for which the funds are requested during all fundraising solicitations. Printed and digital solicitations will also include contact information and the registered charity number.
2. Take all reasonable steps to treat donors fairly, enabling them to make an informed decision about any donation. This must include taking into account the needs of any potential donor who may be in a vulnerable circumstance or require additional care and support to make an informed decision.
3. Respect the privacy of our donors. All gifts and data will be processed in accordance with the College's privacy notice and relevant legislation (e.g. GDPR). Donors have the right to see their own donor record and the Foundation will never sell data from its donor or alumni lists to third parties. All alumni and donor data is held securely on the Raiser's Edge NXT database, which is provided by the supplier Blackbaud.
4. Process and send thank you letters to acknowledge prompt and ongoing gratitude for your donation. Where appropriate we will provide a formal Gift Agreement with the purpose of the gift and the payment schedule for transparency and accurate record-keeping. A copy will be held by both the Foundation and the donor.
5. Reclaim Gift Aid on all gifts given by UK income tax payers where a Gift Aid declaration is signed or made digitally. Every acknowledgement letter, where a donor has gift aided their donation, serves as a receipt for tax purposes. The College also seeks to provide tax efficient methods of giving to the College from other countries and we are pleased to receive donations from the British Schools and Universities Foundation (USA), the Radleian Society (Hong Kong), Transnational Giving Europe (Europe) and the British Schools Foundation (Canada).
6. Ensure that all gifts we receive are in line with our Gift Acceptance Policy and we will undertake due diligence where necessary (see section below).
7. Ensure all donations given for a specific or restricted purpose will be used in a timely fashion, ring-fenced within Foundation and/or College funds and used solely for the purpose stipulated by the donor. If necessary, due to programme or organisational changes, alternative uses or extensions to timescales will be discussed with the donor. If a donor is deceased, and a legal designate is not available, 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 activities funded through philanthropy, rests solely with the Foundation.

Gifts that are received without any express purpose or as unrestricted gifts are added to our 'Trustees Discretion Fund' and will be allocated by Trustees. Whilst the Foundation is empowered to apply funds for general charitable educational purposes as well as purposes for the benefit of Radley, the Trustees' practice and policy has been, and it continues to be their intention, to apply donations received for purposes connected with the College. That is the basis on which fundraising has been and will continue to be carried out.

8. Send you an annual Impact Report, update you periodically on the impact of your gift and invite you to any relevant events linked to your donation.
9. Recognise your gift publicly with donor names being listed in the annual Impact Report (subject to your prior approval – see 10). The College does not explicitly advertise the particular value of gifts given by any individual, save in exceptional circumstances and only with the consent of the donor.
10. Respect all requests from a donor to remain anonymous and will not recognise your gift publicly. However, the Foundation may 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.
11. Honour all requests to cease or limit solicitations from an individual or organisation requesting that they are no longer approached about supporting the Foundation. The Foundation actively ascertains exactly what forms of communication are preferred recognising that some still wish to be solicited but only by certain methods (see below) and that others wish to receive no requests for gifts but still receive other communications from the Radleian Society and the College.
12. Respond promptly (where practicable within 10 working days) to a complaint by a donor or prospective donor about any matter that is addressed in this policy, through the Foundation. The Development Director will attempt to satisfy the complainant's concerns in the first instance. A complainant who remains dissatisfied will be informed that they may appeal in writing to the Warden, who will respond to this appeal normally within a further 10 working days. If the complainant considers there are reasonable grounds for persisting in the complaint, the complainant may pursue the matter with the Chairman of the Foundation. The Chairman shall either reply in writing, where practicable, within a further 10 days or at their discretion refer the matter to the Trustees for their consideration and reply in writing as soon as possible thereafter, notifying the complainant of the likely timescale.

## Fundraising Code of Practice

This policy exists to clarify the Radley Foundation's commitment to implementing best practice in all of its fundraising activities that underpin these objectives. It sets out the principles by which the Foundation will seek to operate when undertaking all such fundraising activities.

The Radley Foundation is committed to ensuring that (as far as practicable) it only seeks support from those individuals, corporations, and charitable trusts and foundations who have or have had an active relationship with Radley College (i.e. Old Radleians, Parents and Former Parents, 'Past and Present' members of the Common Room, Operational Staff and other Friends of the College) or those who have been carefully identified (individuals or organisations) and who may have potential interest in supporting a specific activity or initiative.

It is this pre-existing relationship with Radley College that establishes a legitimate interest in our sharing with you news of developments at Radley, our fundraising programme generally, and in the social and networking opportunities that we offer to our community. There is a balanced and legitimate interest in the Foundation Office contacting its community to establish whether or not they would like to commence or renew giving to the College.

1. It is on this basis we hold the information that you have supplied to the College, and use it in the manner set out in this policy. All solicitations and appeals for funds on behalf of the Radley Foundation will:
  - Adhere to the provisions of this policy
  - Be truthful
  - Accurately describe the College's activities and the intended use of donated funds and in confidence that the donor will be acknowledged and recognised as they have indicated
  - Respect the dignity of the donor and of those who benefit from the College's activities
  - Be made without any form of coercion and entirely as an informed decision.
  
2. Volunteers and employees who solicit or receive funds on behalf of the Foundation or College will:
  - Adhere to the provisions of this 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 prospective donor who requests no further contact
  - Not accept donations for purposes that are inconsistent with the Foundation's Gift Acceptance Policy (see below).
  
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. The Foundation's fundraising programme, undertaken within the Development Office, is wholly funded by the College and no amount of your donation is used to fund administrative or fundraising costs.
5. Donors will be encouraged to seek independent advice if a proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members.
6. Research is undertaken to ensure communications are relevant and timely, and to provide an improved experience for our community. Research allows us to target our resources effectively, by understanding the background and interests of the people who support us or may wish to support us, so we can make appropriate requests. Our research may use information from third party sources which is in the public domain. Importantly, our research enables us to raise more funds, sooner, and more cost-effectively than we otherwise could, and to service the interests of our donors and prospective donors appropriately.
7. If fundraising is undertaken for a particular project with a specific stated target of funds, donors will be informed:
  - a. If the total amount raised is not enough to complete the project, to either redirect the donation according to the donors wishes or return this specific donation.
  - b. If the total amount raised exceeds the target, to apply the donation to the same project if funds are still needed, redirect the donation according to the donors wishes or return this specific donation.

### **The ways we seek support for the Foundation**

Through the Foundation and its fundraising team, we will seek to raise funds through a number of ways:

**Face to Face fundraising** – the fundraising members of the Foundation Office are professional fundraisers who have experience and have been trained in fundraising. An important aspect of their role is to meet personally and privately with those who may be potential donors, either individually or in small groups.

Every meeting request (by telephone, letter, or email) where a solicitation (or conversation leading to a solicitation) is envisaged, will explicitly indicate that this is the purpose of, or at least part of the reason for, the meeting.

These meetings provide an opportunity to outline the vision and ambitions of the College and Foundation, to establish the particular areas of interest that a potential donor may have, and to provide the basis for further discussion, as appropriate.

**Direct Mail** – at least once a year we will send out hard copy fundraising materials which usually include a brochure on why to give to Radley along with a donation form.

**Telephone Campaigns** – although it is commonly used by other educational establishments, it is not the current practice or intention of the Foundation to engage in telephone fundraising.

**Email Campaigns and Social Media** – occasionally we will contact you by email to solicit or follow up direct mail requests for our fundraising programmes.

**Indirect Solicitation** (website and donation forms) – donation forms or information about ‘how to support us’ will frequently be included with publications sent out from the Foundation and Radleian Society. Furthermore, the Radley College website contains a wide range of material regarding how and why to give to the College.

## Gift Acceptance Policy

The Radley Foundation seeks and accepts philanthropic gifts in accordance with the guidelines of the Fundraising Regulator and the UK Charity Commission.

The following approach is adopted with respect to acceptance of gifts:

1. The basis on which the Foundation will actively seek funding is:
  - That the full cost of the project or proposed undertaking is identified (including staff costs, planning and works costs where applicable)
  - That the project is approved by the Council of Radley College
  - That in the case of capital projects, any required applications for planning will have already passed – or if not, that this is made clear to prospective donors.
  
2. Prior to acceptance, the following questions will be considered for all gifts:
  - Does the potential gift fit with the College's strategic mission?
  - Does the gift comply with UK law, Charity Commission rules and Fundraising Regulator guidance?
  - Does the gift comply with the Sanctions and Anti-Money Laundering Act 2018 (the Sanctions Act)?
  - 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?
  - Is there evidence that the proposed benefaction, or any of its terms will:
    - Require action that is illegal?
    - Seriously damage the reputation of the College and / or Foundation?
    - Create unacceptable conflicts of interest?
    - Come with unacceptable expectations?
    - Harm the College's and / or Foundation's relationship with other benefactors, parents, pupils, partners or the local community?
  
3. The Foundation and, where appropriate, the College will follow a formal 'Due diligence' process for any gift which, in the opinion of the Foundation, could represent a serious risk to the College and/or Foundation either by reference to one or more of the matters listed in paragraph 2 or on any other ground, and / or where the total value of the donation is equal to or greater than £100,000. There will be a review that assesses the acceptability of a proposed gift against the criteria as defined within this policy. It will also include consideration of any financial or reputational risks for the College and / or Foundation. Gifts where there is an initial concern and, where such concern is not



resolved to the satisfaction of the Warden and Chairman of the Foundation, will be referred for specific consideration to the Trustees of the Foundation or its Fundraising Committee (as may be considered appropriate). The Foundation Fundraising Committee will be kept updated on all gifts following the due diligence process.

4. Gifts are accepted in the following forms and with the following restrictions:
  - **Cash** (or equivalent): in order to comply with money laundering regulations, cash donations of over £50 cannot be accepted. Electronic bank transfers, cheques and card donations are accepted for all amounts.
  - **Shares**: The Foundation can accept publicly traded securities. Securities may be accepted subject to completion of the necessary transfer formalities and the payment of any Stamp Duty. All marketable securities will be sold upon receipt unless otherwise directed.
  - **Tangible personal property**: Tangible personal property includes art, furniture, books, College memorabilia, coin and stamp collections, jewellery, vehicles and any other personal property item owned by a donor. The Foundation will examine a potential gift of tangible personal property for the item's financial value, its potential use by and significance to the Foundation, any associated ongoing risks or costs to the Foundation (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.
  - **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 College shall require a structural survey or other similar review of the real estate to ensure that it offers no significant on-going financial liability, or environmental risks or costs to College. The cost of such survey or review will generally be an expense of the donor. Prior to acceptance of the real estate, the gift must have approval by Council.
  - **Bequests**: Bequests intended to be for the benefit of Radley will be gratefully accepted. Such bequests may be made to the Foundation either (a) for particular purposes specified in the bequest or (b) for the general purposes of the College or (c) for such purposes for the benefit of Radley as the Trustees in their discretion may determine. Alternatively bequests may be made direct to the College either for specified or general purposes. In either case it must be clear from the bequest that it is for exclusively charitable purposes. Donors wishing to leave a bequest are asked to execute an appropriate codicil or include the bequest in their Will. The Foundation is also keen that such donors notify the Foundation, if they would like to do so, in order to keep accurate records of those who have made a provision in their Will or codicil. In this way, the College and / or Foundation can ensure that legacy pledge-makers can be appropriately thanked via the Vyvyan Hope Society. Such notification is in no way binding and those notifying an intention to leave a gift in their Will retain absolute rights over whether or not to fulfil their commitment.
5. The College and the Foundation Trustees and Office are 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 College and/or Foundation, whether written or verbal, which can only ever be generic in nature.

6. To comply with money laundering and related legislation as this might apply from time to time, the College and / or Foundation might require donors and potential donors to provide reasonable proof of identity and, if necessary, furnish information as to the origin of the gift to be donated.
7. Donations must be freely given with no expectation of anything in return other than due thanks and recognition. Gifts from parents cannot be made to offset College 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 College and / or Foundation will have no bearing on the academic, sporting or extracurricular opportunities open to an individual pupil.
8. Where a change in circumstances prompts a donor to request the repayment of part or all of a donation, the final decision to repay a donation shall rest with the Trustees of the Foundation (or in the case of a donation to the College direct, with the Council). (NB The law provides for only limited instances when a charity may return a donation it has already accepted.)
9. Gifts will not be accepted from those who are 'prospective parents' (i.e. those whose son(s) have not yet been offered a place at the College). These include the following:
  - No donation will be accepted from a prospective parent until their son has started at the school, unless they have an existing relationship with the school, either as a parent of another boy, as an Old Radleian, or as an individual with a clear and legitimate connection with the project associated with such a donation.
  - No link will be made between entry and a future donation; all boys entering the school will do so entirely on their own merit, within the constraints of the normal admissions processes of the College.
  - It is legitimate for conversations to take place between the school and prospective parents regarding the plans for the school, including fundraising projects, particularly once a place has been offered and accepted. However, it must always be clear that no advantage is attached to any donation, there is no expectation of any donation, and that no donation will be accepted prior to a boy's arrival at the College.

In the case of a donation to the Foundation, by law, ultimate responsibility for deciding whether to accept or refuse any donation lies with the Trustees of the Radley Foundation. The law requires trustees, in making this decision, to consider which course of action will, taking an overall view, be "in the best interest of the charity". In so doing, "Trustees must act reasonably and prudently in all matters relating to the charity and need always to bear in mind that their prime concern is its interests. They must not let any personal views or prejudices affect their conduct as trustees."

In reality, Trustees delegate responsibility for accepting or refusing donations on a day-to-day basis to the Foundation Office and Warden. As in 3, above, any potential gifts where a concern is identified will be referred to the Warden and, if necessary, to the Chairman of the Foundation for acceptance. For avoidance of doubt, in the case of any bequest or other donation made direct

to the College, ultimate responsibility for deciding whether to accept or refuse it rests with the Council.