



Hills Road
Sixth Form
College



Hills
Education
Trust

Gift Acceptance and Fundraising Policy

Hills Road Sixth Form College welcomes offers of donations to assist its development. Ultimate responsibility for acceptance or refusal of all donations lies with the Trustees by law, irrespective of internal delegation. Their duty is to ensure the best interests of the College are served in accepting or refusing a donation, regardless of personal views or outside interests.

The Trustees are pleased to accept lawful donations made in good faith, compatible with the College's aims, values and objectives.

Ethical Fundraising Principles

Fundraising undertaken on behalf of Hills Road Sixth Form College will:

- Be open, honest and respectful;
- Accurately describe the intended use of funds donated; and
- Adhere to applicable requirements under charity law and the Fundraising Regulator's Code of Fundraising Practice.

Employees (or volunteers) who solicit funds on behalf of the College shall:

- Adhere to these guidelines;
- Immediately cease solicitation of an individual who identifies solicitation as harassment or undue pressure;
- Immediately cease solicitation of an individual in vulnerable circumstances who is unable to make an informed choice about a donation;
- Disclose immediately to the Principal any conflict of interest;
- Ensure all funds collected are properly received and recorded by the College; and
- Not solicit or accept donations for purposes inconsistent with the College's objectives.

Paid fundraisers will not be paid with finders' fees, commissions or compensation based on number of gifts received or funds raised. They will be paid by a salary, hourly wage or fee, and their compensation consistent with the policies and practices that apply to non-fundraising staff.

Gift Acceptance and Due Diligence

The vast majority of gifts can be accepted by the Development Director without further referral. However, under Money Laundering Regulations we have a responsibility to carry out due diligence checks on any amount over £10,000. This will primarily apply to gifts coming from countries listed as high risk, requiring Enhanced Due Diligence, along with those received from individuals and organisations previously unknown to Hills Road Sixth Form College and with no obvious connection to us.

In addition, the College will not accept gifts from companies primarily involved in tobacco, alcohol, gambling, weapons and pornography.

Other circumstances where the source or purpose of the donation may require further consideration include, but are not limited to:

- Significant naming rights are attached;
- The donation is not in monetary form (e.g. a gift of shares or property);
- The cost to the school to administer the gift will be greater than the value of the gift itself;
- The donor is not someone with whom the College wishes to be associated;
- The donation is from a country which places restrictions on its residents making overseas donations;
- The donor, donor's family or donor's friends and associates will derive undue benefit from the donation;
- Conditions attached to the gift are impractical, may contradict the College's objectives, or are judged unreasonable by the Development Office, Trustees and the College Strategy Team.

For the avoidance of doubt, donations to Hills Road do not affect admissions decisions. You can view our admissions policy on the [Hills Road website](#).

The Governors must take reasonable steps to know who the College's donors are, and whence donations arise, especially when considering large donations or the circumstances of a donation give rise to particular risk. In these circumstances, the Development Office may seek further assurance on provenance of funds. Acceptance of a donation does not imply any endorsement of a donor's opinions or policies.

In the first instance, matters for consideration will be referred to the Principal before the gift is accepted. If required, the Chair of Trustees, Principal and Chief Financial Officer will discuss whether a donation can be accepted and document their decision-making process.

In rare circumstances, a gift may be refused unless an agreement can be reached between the College and the donor, for example, a re-direction of the proposed gift to a current appeal.

In rare circumstances, a gift may be returned. This may occur if it was clear the donor was not able to make an informed decision to make a donation, or if it becomes clear that the gift will cause harm to the College's reputation, an unacceptable conflict of interest, harm relationships with stakeholders, or contradict the school's objectives. In England and Wales, the law provides for the return of donations of more than £50 made by credit/debit card within a seven-day cooling off period.

In line with Charity Commission Guidance, any anonymous donations received in excess of £25,000 will be declared to the Charity Commission as a serious incident.

Fundraising from Persons in Vulnerable Circumstances

Giving to a charity should be a positive experience for everyone involved. We recognise that some people we engage with through our fundraising activity may, at the time of interaction, not fully understand the nature or consequences of the donation they are considering. We also understand that an individual may have the capacity to make a decision, but may be vulnerable at that moment in time and will require further support or information before coming to an informed decision about whether to make a donation.

If we suspect an individual we engage with is lacking capacity, we will immediately end any fundraising discussions, in a way that seeks to protect that person while respecting their dignity and any desire they have expressed to support Hills Road Sixth Form College. While we recognise that everyone has the right to support their favourite causes and charities, we know that we have an obligation to protect those who lack the capacity to make an informed decision.

Anyone may be considered vulnerable or requiring additional care and support at some stage in their life, depending on personal circumstances, bereavements, health, and so on. If a Hills Road Sixth Form College fundraiser suspects someone may be vulnerable at that period in time, we will pause fundraising discussions and provide any additional support needed. This may include delaying acceptance of a gift to give further time for considering; a 'cooling-off period' in case a donor changes their mind; or suggesting a donor consult friends, family, or a legal representative for advice.

If, despite our best efforts, we inadvertently receive an unsolicited donation from a donor we believe lacked capacity to make an informed decision we may return the donation to the donor or, in certain circumstances, to a family member or designated representative.

Data Protection

Donor records held by the Development Office will be held in accordance with the College's [Privacy Policies](#).

The College will not sell its donor and alumni lists and contact details.

In all cases where a donor wishes to remain anonymous, such anonymity will be respected for all public purposes, as well as in meetings of College committees and affiliated committees. If required to do so by law, by order of a court, or by any governmental or regulatory authority, the College will disclose donor details. The identity of anonymous donors will be known to the Principal, the Chair of Governors, and to college staff who process the gift.

Donor Recognition

Acknowledgement of donations will be sent to the donor on acceptance or notification of the gift. Unless a donor wishes to remain anonymous, their name may be included on the College website, and in other publications issued by the Development Office. The donation amount will not usually be stated unless formal consent has been requested and received in writing.

Code of conduct

The code of conduct aims to foster a culture of safety, respect and integrity. Fundraisers, volunteers and donors are expected to treat everyone with dignity, fairness and courtesy, ensuring an environment free from bullying, harassment and discrimination.

We have zero tolerance for bullying or intimidation; harassment or sexual harassment; sexist, racist or discriminatory jokes or comments; excessive criticism or undermining behaviour; physical abuse or threats; or behaviour that could be seen as coercive, offensive or inappropriate.

Staff, volunteers and donors can raise any concerns with Stuart Tinsley, Chief Financial Officer (stinsley@hillsroad.ac.uk, 01223 247251 Ext 263). All concerns will be taken seriously and investigated confidentially.

The Fundraising Regulator and Hills Road Sixth Form College

Hills Road Sixth Form College is registered with the Fundraising Regulator and we are committed to following the Code of Fundraising Practice and the [Fundraising Promise](#).

Fundraising Complaints Procedure

We are committed to best practice and take all complaints very seriously. If you have a concern or complaint about our fundraising, you can:

- Call the Development Office on 01223 278009
- Email us at development@hillsroad.ac.uk
- Write to us at Hills Road Sixth Form College, Hills Road, Cambridge CB2 8PE

We will acknowledge your complaint within 24 hours of receipt and respond to your complaint in writing within 28 days of receipt.

If you are not satisfied with how we respond to your complaint, you can contact the Fundraising Regulator who will independently investigate your complaint. You can contact them via their website: [Make a complaint | Fundraising Regulator](#)

The Trustees will be informed at least annually of the number and nature of any complaints received from donors or prospective donors about issues addressed in these guidelines.

Date of policy: September 2026

Review date: September 2027