



The Brilliant Club Donations Policy

Objects and Activities

The Brilliant Club is a charity registered with The Charity Commission in England and Wales under registration number 1147771 and with The Scottish Charity Regulator (OSCR) under registration number SC048774 at 17th Floor, Millbank Tower, 21-24 Millbank, SW1P 4QP.

The objects of the charity are, for the benefit of the public: to promote the advancement of education, in particular by seeking to widen university access amongst high performing pupils from low participation communities; and to pursue any other purpose that is charitable under English law.

The Brilliant Club's mission is to increase the number of pupils from underrepresented backgrounds that progress to highly-selective universities. We do this by mobilising the PhD community to share its expertise with state schools.

Rationale for Fundraising

Fundraising is an important income stream for The Brilliant Club, alongside income from schools, universities, special projects, and the contract with the Department for Education to deliver Researchers in Schools (RIS).

In 2018/19, 12% of the charity's £6m income was from fundraising and 88% was earned through our charitable activities.

Fundraising income supports the charity's financial sustainability by enabling us to deliver high quality programmes and robust impact evaluation, whilst keeping costs reasonable for education partners, including state schools.

Funding also makes a significant difference to the charity's ability to expand provision across the UK and to innovate.

Fundraising Strategy

The Brilliant Club is registered with the Fundraising Regulator and adheres to the Code of Fundraising Practice to deliver fundraising activity that is legal, open, honest and respectful.

The charity's fundraising income is primarily from trusts, foundations and corporates.

We also welcome support from individuals and have recently introduced proactive approaches to individuals, as we would like to engage with people who would like to support our mission in this way.

All fundraising should support The Brilliant Club's strategy and be in line with its mission, values and integrity.

Policy Transparency

The Brilliant Club makes this Donations Policy available to all staff and publicly available on its website. We will share this policy with existing and prospective donors as relevant.



Registered with
**FUNDRAISING
REGULATOR**

The Brilliant Club is a registered charity in England and Wales (no. 1147771) and in Scotland (no. SC048774).
The Brilliant Club is a registered company limited by guarantee in England and Wales (no. 7986971).
The Brilliant Club, 17th Floor, Millbank Tower, 21-24 Millbank, SW1P 4QP



Introduction to Donations Policy

The Brilliant Club welcomes donations from individuals, companies, public bodies and other charitable organisations. In exceptional circumstances, the charity may decide to refuse a donation.

This policy is aligned with the Fundraising Regulator's [Code of Fundraising Practice](#) and is intended to:

- Ensure compliance with the law and Charity Commission guidance
- Ensure that all fundraising activity is legal, ethical and practical
- Protect the integrity of the work of the charity and minimise any risk of detriment to the charity's reputation or a conflict with the charity's values which would be detrimental to the achievement of its purposes
- Ensure that decisions are consistent and based on the needs of the organisation
- Ensure clarity and transparency for all of our stakeholders.

All Trustees, staff and volunteers involved in fundraising or the acceptance of donations must:

- Adhere to this Donations Policy
- Adhere to The Brilliant Club's financial procedures and any other relevant policies and procedures
- Act in accordance with all applicable laws and the provisions of applicable professional codes of ethics and standards of practice.

Any donation must be evaluated by the charity, taking into account this policy to establish whether it would be in the best interests of The Brilliant Club to accept it.

Guiding Principles

Any donation will be evaluated by the charity, taking into account the following principles:

- The donation must support the objects of the charity, its mission and strategy.
- The charity must be able to apply the donation in a way that is consistent with the donor's wishes.
- The charity must not accept donations from individuals or companies whose funds are known or suspected, with credible evidence, to derive from illegal activities, or where there are indications of corruption and related crime.
- The donor's objectives or activities must not be incompatible with the charity's mission and values. In particular, acceptance must not risk causing significant damage to The Brilliant Club's integrity or reputation that would be detrimental to the achievement of its purposes.
- The charity must not reasonably believe that the donor is unable to make a decision about the donation.
- Obligations to the donor and any possible pressures arising from applying the donation must not outweigh the benefits of accepting.

The Brilliant Club accepts donations on the absolute understanding that any funder, regardless of the amount given, can have no influence over the charity's objectives, mission, or independence.



Refusal of Donations

The Brilliant Club's Trustees have a responsibility to act in the best interests of the charity and donations will only be refused in exceptional circumstances. The Brilliant Club reserves the right to refuse donations in the following circumstances:

- The charity cannot lawfully use the donation offered in direct support of its charitable objectives.
- The funds are known or suspected, with credible evidence, to derive from illegal activities, or where there are indications of corruption and related crime.
- The activities of the donor are directly contrary to the charity's mission, values and strategy and acceptance of the donation, including in terms of reputational damage or stakeholder relationships, would be detrimental to the purposes of the organisation.
- The costs to the charity of accepting the donation, including in terms of associated project and running costs, would place the charity's assets under unacceptable risk.
- The charity believes that the donor is unable to make a decision about the donation.
- Acceptance of the donation is not in the best interests of the charity, for example, it might: lead to a loss of staff or inability to recruit staff; lead to unacceptable conflicts of interest; lead to unacceptable third-party influence, or impression of such influences, on the decisions or independence of the charity; involve onerous obligations, the cost of which would outweigh the benefits.
- The donation is from a truly anonymous donor (where the donor's identity has not been provided to the charity or an approved intermediary) and is over £24,999. Where a donor who wishes to remain anonymous donates funds, the External Affairs Director will take responsibility for the decision to accept donated monies on a case by case basis. Anonymous donations of £25,000 or more will be reported to the Charity Commission as a serious incident, in accordance with due diligence regarding money laundering and tax evasion.

Responsibility to Donors

The Brilliant Club respects the rights of donors to clear, truthful information about the work of the charity and to accurate reporting on any donation and relevant project.

Where money is donated for a defined specific purpose, the expenditure will be recorded separately with The Brilliant Club's financial accounting system clearly showing the corresponding activity as restricted funds in the annual financial statements.

The privacy of donors will be respected. Any donor records that are maintained by The Brilliant Club will be kept confidential and data will be held in compliance with GDPR. The Brilliant Club will not sell donor information.

Please see our [Privacy Policy](#) for further details.



Donors and prospective donors are entitled to the following, which we will provide in a timely manner upon request and which are available on our website:

- Most recent audited financial statements
- Most recent Annual Impact Report
- A copy of this Donations Policy.

Donors and prospective donors will be treated with respect, and after initial contact The Brilliant Club will honour any requests to:

- Limit the frequency of solicitations
- Not be solicited by telephone or other technology
- Limit the amount or frequency of printed or online material that they are sent.

Policy Administration

Under general principles of charity law, The Brilliant Club's Trustees have a legal duty to act in the best interests of the charity, including the acceptance and refusal of donations. On a day-to-day basis, the Board of Trustees delegates the administration of fundraising to charity staff.

The External Affairs Director and Partnerships and Fundraising Manager will administer the Policy, reporting to the Chief Operating Officer and CEO. All points of internal conflict must be taken to the Finance Audit and Risk Committee of the Board of Trustees. The External Affairs Director and Partnerships and Fundraising Manager will communicate decisions to donors.

In the event that a donation or fundraising action is refused or prevented, the information will be relayed by the Chief Operating Officer or CEO to the Finance Audit and Risk Committee of the Board of Trustees. In each individual circumstance, relevant staff members will be briefed on a refusal, in preparation for any possible external query. All points of conflict or complaint in the event of a donation being refused must be directed to the Chief Operating Officer in the first instance. The Chief Operating Officer will then consider whether the conflict or complaint should be directed to the CEO and Finance Audit and Risk Committee of the Board of Trustees. A media strategy for dealing with queries relating to refusals of donations will be administered by the External Affairs Director. In the event of a media enquiry, all calls and emails must be directed to the External Affairs Director, who will consider whether the enquiry should be directed to the Chief Operating Officer.

Approval Limits for Fundraising

- Decisions on accepting amounts up to £50,000 may be taken by the Partnerships and Fundraising Manager and External Affairs Director.
- Decisions on accepting amounts between £50,001 and £100,000 may be taken by the External Affairs Director and Chief Operating Officer.
- Decisions on accepting amounts between £100,001 and £500,000 require approval by the Chief Operating Officer and CEO.
- Decisions on accepting amounts in excess of £500,001 require approval by the Finance Audit and Risk Committee of the Board of Trustees.