



## The Brilliant Club Donations Policy

**We mobilise the PhD community to support students from less advantaged backgrounds to access the most competitive universities and succeed when they get there.**

This policy was created in line 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.

### Why Do We Fundraise?

Fundraising is an important income stream for The Brilliant Club, alongside income from school and university partners, Academic Development projects, Research and Impact consultancy and government funding for our Brilliant Tutoring Programme and Researchers in Schools (RIS) programme.

Fundraising income supports the charity's financial sustainability by enabling us to deliver high quality programmes and robust impact evaluation, whilst keeping contributions accessible for education partners, including the 900 state schools across the UK we partner with.

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

### How Do We Fundraise?

All fundraising should support The Brilliant Club's strategy and be in line with its mission, values and integrity. The charity's fundraising income is primarily from trusts, foundations, corporates, and individuals who want to support our mission.

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

### Our Promise to Donors

We will always respect the privacy of our donors and prospective donors. Any information we do hold about our donors is kept confidential and in compliance with GDPR. We will never share confidential donor information externally without permission. Please see our [Privacy Policy](#) for more details.

Our donors and prospective donors will be treated with respect, and after initial contact, we will honour any requests to stop receiving communications from the charity, to limit the frequency of communications or to have personal information deleted in line with GDPR.



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, 17<sup>th</sup> Floor, Millbank Tower, 21-24 Millbank, SW1P 4QP



We promise to always be open and honest with our donors about how we have used their donation to support our mission and are happy to share written reports or verbal updates as appropriate.

Where money is donated for a defined specific purpose, we will record this purpose on our financial accounting system and include the donation as restricted funds in our annual financial statements.

To find out more about our fundraising, you can see our most recent audited financial statements, which are available on our website.

### **When Might We Refuse a Donation?**

The Brilliant Club welcomes donations from individuals, companies, public bodies and other charitable organisations.

All donations will be evaluated by the charity to establish whether it is in our best interest to accept or refuse them. 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 donation or the activities of the donor do not support, or are directly contrary to, the charity's mission, values and strategy.
- The charity is unable to apply the donation in a way that is consistent with the donor's wishes.
- The charity has reasonable belief that the donor is unable to make a decision about the donation.
- Acceptance of the donation would lead to reputational damage to the charity or be detrimental to stakeholder relationships, affecting our ability to work towards our mission.
- The donation is from a donor whose funds are known or suspected, with credible evidence, to derive from illegal activities, or where there are indications of corruption and related crime.
- Acceptance of the donation, and the terms associated with the donation, would place the charity's assets under unacceptable risk.
- 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. Truly 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.

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

All Trustees, staff and volunteers involved in fundraising must comply with this Donations Policy, the charity's financial policies and procedures and all applicable laws.





## 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 the Fundraising team 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 Fundraising Team 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 Executive Leadership Team 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.

Any media enquiries related to donations will 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

Donation Amount	Approval
Up to £50,000	Head of Philanthropy or External Affairs Director
£50,001 - £100,000	External Affairs Director and Chief Operating Officer
£100,001 - £500,000	COO and CEO
£500,001 and over	A representative of Finance Audit and Risk Committee of the Board of Trustees.

We will continue to review this policy in line with legal requirements and best practice.