The Brilliant Club Donations Policy

Last updated: October 2026

Our vision is a society where every child has a fair chance to unlock their brilliance, regardless of where or how they grow up, and where positions of influence are open to everyone, not just the most advantaged. To achieve this, we support young people to access and thrive at leading universities by working with schools, parents and the broader education sector.

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 schools, universities, and other stakeholders across the education sector who invest in our programmes. We also generate income through consultancy.

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 over 800 state schools across the UK that we partner with annually.

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 UK 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 current data protection legislation.

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.

The Brilliant Club's approach to accepting, refusing and returning donations is guided by the Charity Commission guidance on accepting, refusing and returning donations and donations will only be refused in exceptional circumstances. The charity will undertake proportionate due diligence and risk assessment when considering donations. Trustees retain overall responsibility for ensuring that decisions are made in the best interests of the charity.
The Brilliant Club may refuse a donation where:

- 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 significant 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 donation is subject to conditions that would compromise, or appear to compromise, the independence of The Brilliant Club, its Trustees, or its decision-making processes.

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 Chief Engagement Officer 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 Director of Philanthropy 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 Engagement Officer in the first instance. The Chief Engagement 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 Chief Engagement Officer, who will consider whether the enquiry should be directed to the CEO.

Approval Limits for Fundraising

The responsibility to accept or refuse gifts is delegated by the Trustees to the Director of Philanthropy and the Executive Leadership Team, depending on gift size. Gifts of value £1,000,001 and over require approval by a representative of the 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.

We are grateful to those who choose to support the charity and give young people a fair chance to unlock their brilliance. If you have any questions about this policy, or our fundraising approach, please contact fundraising@thebrilliantclub.org.