



Cheltenham College and Cheltenham Prep Donor Charter, Fundraising Code & Gift Acceptance Policy

We are very grateful to all our donors for their generous support. Your gift plays a vital role in ensuring the Cheltenham College and Cheltenham Prep can provide bursaries to enable more talented young people to study here and to enhance our facilities for the benefit of our pupils and the local community.

All donations should be made to the Cheltenham College Charitable Trust (CCCT / registered charity number 1006429) which exists for the benefit of Cheltenham College and Cheltenham Prep. All fundraising solicitations for the CCCT are undertaken by the Development Office at Cheltenham College and Cheltenham Prep.

A. Donor Charter

CCCT 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 Cheltenham College and Cheltenham Prep'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. We will honour any requests to cease or limit solicitations (including by telephone or mail).
3. Respect the privacy of our donors. All gifts and data will be processed in accordance with Cheltenham College and Cheltenham Prep's privacy notice (see <https://www.cheltenhamcollege.org/privacy-terms/>), Legitimate Interest Assessment and relevant legislation (e.g. GDPR). Donors have the right to see their own donor record, and Cheltenham College and Cheltenham Prep will not sell either its donor or alumnae lists. For more information, please see our 'Cheltenham College and Cheltenham Prep Legitimate Interest Assessment', which is available upon request.
4. Process and thank you for your donation promptly. 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 Cheltenham College and Cheltenham Prep and the donor.
5. Ensure that all gifts we receive are in line with our Gift Acceptance Policy and we will undertake due diligence where necessary (see Section C for more details).

6. Ensure all donations given for a specific purpose will be used for that purpose and in a timely fashion. If necessary, due to programme or organisational changes, alternative uses or extensions to timescales will be discussed where possible with the donor(s). If a donor is deceased, and the CCCT is unable to contact a legal designate, 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/or activities funded through philanthropy rest solely with Cheltenham College and Cheltenham Prep.

7. Update you regularly (at least annually) on the impact of your gift, invite you to join any relevant giving clubs, and invite you to any relevant events linked to your donation.

8. Recognise your gift publicly where appropriate for the level and use of the gift (e.g. on donor walls), unless you ask to remain anonymous. We will respect any requests to remain anonymous. However, Cheltenham College and Cheltenham Prep 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. Senior and select administrative staff may be made aware of the real identity of the donor, if necessary.

9. Respond promptly (within 15 working days, Monday to Friday) to a complaint by a donor or prospective donor about any matter that is addressed in this policy, through the Development Office. 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 Head, who will respond to this appeal within a further 15 working days, Monday to Friday. If the issue remains unresolved, the complainant may pursue the matter with the Cheltenham College Charitable Trust Trustees. For more information, please see our 'Cheltenham College and Cheltenham Prep Fundraising Complaints Procedure', which is available upon request.

B. Fundraising Code

The CCCT is a registered charity (registered charity number 1159259) established to provide long-term financial support for Cheltenham College and Cheltenham Prep's continuing development. On behalf of the Cheltenham College Charitable Trust, the Development Office may solicit gifts from individuals, corporations, and charitable trusts and foundations to help further the mission of Cheltenham College and Cheltenham Prep. It commits to do so ethically and in line with best practice:

1. All solicitations and appeals for funds on behalf of the Cheltenham College Charitable Trust or Cheltenham College and Cheltenham Prep will:

- adhere to the provisions of this policy;
- be truthful;
- accurately describe Cheltenham College and Cheltenham Prep's activities and the intended use of donated funds;
- respect the dignity of the donor and of those who benefit from Cheltenham College and Cheltenham Prep's activities;

2. Volunteers and employees who solicit or receive funds on behalf of the CCCT or Cheltenham College and Cheltenham Prep 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 Acceptance of Gifts Policy (see Section C below).

3. Paid fundraisers are compensated by 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 CCCT's fundraising programme, undertaken by the Development Office, is wholly funded by Cheltenham College and Cheltenham Prep.

5. Donors will be encouraged to seek independent advice if the CCCT has any reason to believe that a proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members.

C. Gift Acceptance Policy

CCCT seeks and accepts philanthropic gifts in accordance with the guidelines of the Fundraising Regulator and CASE (Council for Advancement and Support of Education).

1. The basis on which the CCCT will actively seek funding is:

- that the full cost of the project is identified (including start-up costs; planning and works costs where applicable);
- that the project is approved by the Governors of Cheltenham College and Cheltenham Prep;
- 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. The following principles will be considered for all gifts:

- Does the potential gift fit with Cheltenham College and Cheltenham Prep's strategic mission?
- 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?
- Has the donor been placed under any international sanctions?
- Does the gift comply with UK law, Charity Commission rules and Fundraising Regulator guidance?

- Is there evidence that the proposed benefaction, or any of its terms, will:
 - Require action that is illegal?
 - Damage the reputation of Cheltenham College and Cheltenham Prep?
 - Create unacceptable conflicts of interest?
 - Come with unacceptable expectations (see point 7 below)?
 - Harm Cheltenham College and Cheltenham Prep's relationship with other benefactors, parents, pupils, partners or the local community?

3. Cheltenham College and Cheltenham Prep will follow a formal due diligence process for any gift which, in the opinion of the Development Office, could represent a risk to Cheltenham College and Cheltenham Prep and/or where the total value of the donation is equal to or greater than £50,000. This limit also applies for cumulative gifts from the same donor over time. There will be a review that assesses the acceptability of a proposed gift against the criteria as defined above (see Section C2). It will also include consideration of any financial or reputational risks for Cheltenham College and Cheltenham Prep. Gifts where a concern is identified will be referred to the Headmistress and, if necessary, to CCCT Trustees for acceptance. The CCCT Trustees 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): to comply with money laundering regulations, cash donations of over £50 cannot be accepted. Cheques and card donations are accepted.
- Shares: The CCCT can accept publicly traded securities. Securities may be accepted subject to completion of the necessary transfer formalities and the payment of any Stamp Duty. As a general rule, all marketable securities will be sold upon receipt unless otherwise directed.
- Tangible personal property: includes art, furniture, books, Cheltenham College and Cheltenham Prep memorabilia, coin and stamp collections, jewellery, vehicles and any other personal property item owned by a donor. It excludes property and land. Cheltenham College and Cheltenham Prep will examine a potential gift of tangible personal property for its financial value, its potential use by and significance to Cheltenham College and Cheltenham Prep any associated ongoing risks or costs to Cheltenham College and Cheltenham Prep (e.g. insurance), and whether the item could be sold and converted into cash.
- Property and land: may include gifts of developed property or undeveloped land. Prior to acceptance of gifts of real estate, Cheltenham College and Cheltenham Prep shall require a structural survey or other similar review to ensure it bears no significant ongoing financial or environmental risks or costs. The cost of such survey or review will generally be an expense of the donor. Prior to acceptance, the gift will have to be approved by CCCT Trustees.
- Bequests: The CCCT will gratefully accept bequests for the benefit of Cheltenham College and Cheltenham Prep. The Development Office asks donors wishing to leave a bequest to execute an appropriate codicil or include it in their will. Cheltenham College and Cheltenham Prep encourages such donors to notify Cheltenham College and Cheltenham Prep if they wish, in order to keep

accurate records of those who have made a provision in their will or codicil. This allows Cheltenham College and Cheltenham Prep to thank legacy pledge-makers appropriately through the Cheltenham College and Cheltenham Prep Legacy Society. Such notification is in no way binding and those notifying Cheltenham College and Cheltenham Prep of an intention to leave a gift in their will retain absolute rights over whether or not to fulfil this commitment.

5. The CCCT Trustees and the Development Office are not responsible for the financial, tax or legal position of donors or 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 Cheltenham College and Cheltenham Prep and/or Development Office, 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, Cheltenham College and Cheltenham Prep 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, in compliance with the UK Bribery Act. Gifts from prospective parents without a confirmed place will not be accepted. Gifts from parents cannot be made to offset School 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 Cheltenham College and Cheltenham Prep will have no bearing on any aspect of a pupil's education at Cheltenham College and Cheltenham Prep.

8. All donations made in accordance with this policy are final and non-refundable, as they are therefore fully eligible as a charitable gift to the extent permitted by law. Once received, contributions are irrevocably applied toward the charitable purposes of Cheltenham College and Cheltenham Prep and cannot be returned to the donor under any circumstances. If a donor feels a donation has been processed contrary to this policy, please see our 'Cheltenham College and Cheltenham Prep Fundraising Complaints Procedure', which is available upon request.

9. Any naming rights (e.g. a building, a plaque, or the naming of a bursary or award) related to a donation will be agreed between the donor and Cheltenham College and Cheltenham Prep.

Completed by: Hannah Redman, Development Director, Cheltenham College

Date: March 2026