



Sidcot
Live Adventurously

**Policy Name: Fundraising through the Alumni and Development
Office**

Policy Number: 3.15

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1 Introduction

1.1 Sidcot School is registered as an educational charity, which provides independent education in accordance with the principles of the Religious Society of Friends, for the education of the children of members of the Society of Friends and others.

1.2 As part of its activities, Sidcot School wishes to raise funds for bursaries, projects, equipment and capital expenditure that are not covered by school fees.

1.3 Quaker values as brought to life in the Quaker Testimonies and Advices & Queries discourage Friends' involvement in certain practices and activities. This policy seeks a) to clarify the kinds of funders that can legitimately be approached and b) to describe under which circumstances a donation can legally be refused by members of the SLT or the Board of Governors who are ultimately responsible for all fundraising operations.

1.4 This policy aims to ensure all the School's fundraising is legal, ethical, open, honest, respectful and consistent with Quaker Testimonies.

1.5 Responsibility for the acceptance and refusal of gifts rests ultimately with the SLT even where decision-making has been delegated. The SLT must be able to demonstrate it has acted in the best interests of the School in each case. It is clear from the guidance available that there is a presumption that, in general, the interests of a charity will be furthered by increasing the resources at its disposal. There is a strong emphasis on great care being taken over any decision to refuse a donation; section 5 details circumstances in which this could happen.

2 Scope

2.1 This policy applies to the whole School community including students who may volunteer in the A&D Office and can be found on the School's intranet.

2.2 Complaints in connection with fundraising by the School (including fundraising by any third parties on behalf of the School) should be lodged with the School in accordance with the procedures set out in paragraph 6.4.14 below.

2.3 The Quaker testimonies shape our principles, which in turn guide a) different methods of fundraising e.g. telephone, digital media, events etc and b) how we select and use assistance of third party fundraisers and/or volunteers.

In all cases, we will comply with fundraising industry regulations as prescribed by the Fundraising Regulator (FR) together with relevant law as per legislation enforced by the Charities Act 2016 and Data Protection legislation.

3 Aim

3.1 To increase the level of donations received by the school in support of its Strategic Plan.

3.2 To engage with all Sidcotians– both in the UK and international - to encourage contributions (both financial and gifts in kind e.g. of time, goods, expertise) to the School.

3.3 To fundraise in a way which is lawful, sympathetic to our Quaker ethos and values, and which is sustainable over time.

4 Mitigation of Risk

4.1 The Alumni & Development Manager in collaboration with the Finance Manager will report details of the solicitation and acceptance of gifts at each meeting as required by the SLT or the Board of Governors.

4.2 Gifts up to £10,000 will be accepted by the A&D Office without further investigation if they are given without conditions in support of an existing fundraising project or programme and are received from donors already known or on the donor's database. In other cases, SLT will judge whether to accept the gift, conduct a more extensive process of due diligence, or liaise with the Donor regarding any concerns. All gifts with a cumulative value of £10k or more will be subject to a Gift Agreement, which outlines details of the Donor, intended purpose and duration of the gift.

4.3 Efforts to secure gifts from private sources must in all cases be brought to the attention of the Alumni & Development Manager in advance. Everyone seeking to raise funds in the School's name must work in partnership with the Alumni & Development Manager to ensure compliance with this policy.

4.4 All gift solicitations should be made in support of school priorities as determined by SLT and the Board of Governors.

5 Solicitation, Acceptance and Refusal of Donations

5.1 The School will not solicit any prospective donor (individual or organisation) which is known from publically available sources to be materially involved in:

- Armaments
- Brewing/distilling, retailing of alcohol as a main activity;
- Gambling;
- Tobacco manufacture
- Retailing pornographic or violent material.

5.2 The School will refuse a donation where there is reason to believe the money results from illegal activities e.g. money laundering, where the activities of the Donor are harmful to the objectives of the school or where the donation may infringe the tainted charity donations rules pursuant to Schedule 3 of Finance Act 2011 or any statutory re-enactment or replacement of such provisions.

5.3 The School will not accept gifts where to do so would, in its considered opinion, infringe the provisions of the Bribery Act 2010 (as amended from time to time) and/or more specifically:

- Compromise its status as an independent institution
- Create unacceptable conflicts of interest
- Cause adverse damage to the School's reputation (including deterring significant numbers of prospective / current parents, beneficiaries or other donors)
- Cause financial loss or any other damage to the School
- Be directly harmful to the school's vision, values and objects as approved by the Board of Governors.

5.4 Great care will be taken by the school in deciding whether to accept or refuse a donation where:

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- an offer of support is itself dependent upon the School first spending its own money or resources in order to facilitate the execution of the original offer of support, as this might be placing the School's assets under undue and inappropriate risk
 - the support, whilst reflecting the School's Strategic Plan, is impractical because the School does not have the resources to maintain the running costs associated with it
 - the support consists of goods, services or property which the School cannot lawfully use, convert, exchange or sell in direct support of its charitable objectives
 - the offer is dependent upon the satisfaction of conditions by the School which are contrary to the school's values and objectives, or unreasonable in relation to the nature of the donation
 - conditions tie the donation to a specific activity and the activity itself is not within the Strategic Plan of the School.

5.5 The Alumni & Development Office will accept unrestricted gifts for specific programmes and purposes if such gifts are aligned with the School's vision, values and strategic plan. Unrestricted gifts will be allocated to projects at the discretion of the School. To this effect, the Alumni & Development Office will ensure that donors of unrestricted gifts are informed of the allocation of their gift through an initial letter and, thereafter, by on-going communications from this office, as appropriate.

5.6 In cases where a gift with agreed restrictions has been received by the School in good faith but where circumstances have changed so that the original purposes of the gift cannot be fulfilled in whole or in part, then the School will normally seek to use the funds in a way that closely corresponds to the original objectives of the donor, consulting the donor or the donor's representative wherever possible.

5.7 Gift solicitations may be made via any communications vehicle (such as standard mail, email, telephone, social networking site or they may be in person). Solicitations made on a person-to-person basis (such as face-to-face or by telephone) will only be undertaken by staff, or staff specifically hired for that purpose, and supervised by the Alumni & Development Office and/or its accredited agents e.g. such as the use of current students for telephone campaigns. All solicitations will be made in accordance with the guidance given by the FR in response to the 'Regulating Fundraising for the Future' review undertaken by Sir Stuart Etherington in 2015, and in accordance with the 'Donor's Charter' section (6.4) of this policy below.

5.8 Donors will be thanked, acknowledged and reported upon. In addition to being a moral imperative, it is a primary method of beginning the solicitation process for further gifts.

5.9 Unless otherwise agreed with the Donor, the School reserves the right to dispose of shares or property at a time to be decided by the School. Unless otherwise agreed with the Donor, articles of value or collections are accepted on the understanding that the School would have full authority to use, lend, exhibit, donate or sell such property.

5.10 If a gift is offered anonymously, so that the donor is unknown to anyone, the Alumni & Development Office will be charged with seeking such information from

the Donor's representatives so as to ensure that it would be appropriate for the School to accept the funds.

6 Due Diligence

6.1 The School will undertake all reasonable research on donation pledges to ensure it is aware of the ultimate source of funding for each gift and to satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal or which runs counter to the provisions of this policy. This research will also include checks to determine whether the individual offering the donation in fact has the funds to do so. This research will involve appropriate searches of web and other resources and databases, and the results will be recorded on the School's own information systems. It is recognised that this will be easier to fulfil in the UK than the international market.

6.2 The test of compliance with this policy must be undertaken prior to solicitation wherever possible rather than at the point of acceptance. An unsolicited bequest would be an example of an exception to this approach.

6.3 The School will be transparent about gifts accepted in terms of their sources and purposes. In cases where a donor wishes to remain anonymous, such anonymity will be respected so far as is legally and practically possible, but full details will be recorded in the School's electronic database.

6.4 The Donor Charter

6.4.1 The following donor charter has been produced to assure donors and prospective donors of the integrity and accountability of the Alumni & Development Office, and of their commitment to the highest professional standards at all times. Donors and prospective donors may expect:

6.4.2 To be assured that the School will not sell or give its donor list to any third party

6.4.3 To be assured that all fundraising communications to a named individual clearly display how the recipient can, in a single step, opt out of receiving such communications.

6.4.4 To be assured that care will be taken to ensure that all donors can make an informed decision about any donation.

6.4.5 To be assured that a donor's rights to privacy and confidentiality will be respected, with all donor records being kept securely and in full compliance with the Data Protection Act 1998.

6.4.6 To have their details removed from the fundraising database once such request has been communicated in writing

6.4.7 Having indicated a desire for anonymity, a donor may request a change to allow recognition of a donation. This request must be made in writing to the Alumni & Development Office.

6.4.8 Donors will have the right to see their own donor record and to challenge its accuracy.

6.4.9 To be asked for permission to be cited in case studies and other promotional material (including photographs) prior to publication.

6.4.10 To have access to the School's most recent published financial accounts and be assured that the School's financial affairs are conducted in a responsible manner, consistent with the obligations of stewardship and legal requirements of Charity Commission.

6.4.11 To receive fundraising solicitations and stewardship reports that are truthful, accurately describing the activities and the intended / actual uses of donated funds.

6.4.12 To be kept informed of the impact of their philanthropy and the School's evolving needs and priorities. This may include receiving progress reports on supported activities, offer of small gifts of appreciation (e.g. branded merchandises or flowers) and invitations to attend relevant events to see at first-hand the benefits their support brings.

6.4.13 The Alumni & Development Office will maintain appropriate records to enable tax to be reclaimed under the UK Gift Aid scheme. This will be an auditable record for every gift and donor and held in an electronic database. Records will be subject to annual scrutiny by the appointed auditors of the School Accounts.

6.4.14 The Alumni & Development Office will seek the opportunity to put right anything a donor feels has been done incorrectly and will do its utmost to discuss and resolve such issues. In the first instance, any complaints should be raised with the Alumni & Development Manager for investigation. If a donor remains dissatisfied with the initial response, then the complaint will be addressed in accordance with the School's relevant complaints procedure (policy 6.7). Alternatively, donors can report their complaints directly to the FR via www.fundraisingregulator.org.uk/make-a-complaint/complain-about-a-fundraising-approach/

7 Recording of Donations

7.1 The Alumni and Development Office is responsible for issuing the official gift receipt and donor acknowledgement, and for the proper recording of gift funds. Adequate records of all gifts shall be maintained by the Alumni and Development Office in accordance with accepted accounting procedures to allow a proper audit trail.

8 Returning a Gift

8.1 The School will not normally return a gift, which has been accepted in good faith in compliance with this policy. The circumstances in which it may do so are extremely limited by law. Exceptionally, subsequent events or the subsequent availability of additional information may give rise to the need to review a previous decision to accept a gift. A decision to return or decline a gift shall always be a matter for SLT or the Board of Governors, having taken appropriate legal advice.

8.2 Gifts that are paid in error by the donor's bank, and bank overpayments, will be refunded to the donor.

9 Review

This Policy was initially adopted by the Board of Governors on 25 March 2017. It will be reviewed in June 2018 and at three-year intervals thereafter, or sooner if changes to legislation, regulations or circumstances dictate. The Director of

Marketing will approve any revisions before it is presented to the SLT and Chair of Governors.

10 Relevant Policies

Care is taken to follow the School's Anti-Bribery Policy, Receipt of Gifts Policy, Complaints Policy and Social Media Policy.

11 Document Change History

Date of Change	Detail significant changes and any new legislation/guidance taken into account
25.03.2017	Policy adopted by Board
25.05.2017	Deletion of reference to the GDPR as regs not yet in force, and Data Protection Act being complied with (DPA will be superseded by GDPR in May 2018).