



Glendower Preparatory School

Fundraising Policy

2022-23

Reviewed: NKM/ZB, June 2022

Next review: June 2023

Introduction

1. Glendower Preparatory School is registered with the Fundraising Regulator and agrees to the commitment made to donors and the public as set out in the Fundraising Promise. More information can be found via www.fundraisingregulator.org.uk.
2. Glendower Preparatory School welcomes offers of donations of all sizes which enable its continuing development over the long term. Glendower Preparatory School is a registered charity, number 312717. Donations must be freely given with no expectation of anything in return other than due thanks and recognition. The school is pleased to accept lawful donations which are given in good faith, and which are compatible with the school's aims, values and strategic objectives. The school will not accept donations when a condition of acceptance would compromise its autonomy, integrity and reputation.
3. The purpose of this statement is to give prospective donors the greatest freedom possible in formulating their gifts, whilst safeguarding the best interests of Glendower Preparatory School; it seeks to outline:
 - a. the principles by which Glendower Preparatory School will or will not pursue potential donations,
 - b. how vulnerable donors will be treated fairly,
 - c. outline what a donor can expect in terms of thanks and recognition,
 - d. establish guidelines governing potentially controversial gifts or donors,
 - e. establish a clear complaints procedure should a complaint relating to a fundraising activity arise.

Ethical Fundraising Principles

4. Fundraising solicitations on behalf of Glendower Preparatory School will:
 - a. be truthful;
 - b. accurately describe the intended use of donated funds;
 - c. be made in accordance with the law; and
 - d. abide by the standards for good fundraising practice as set out in the Fundraising Code of Practice by the UK Fundraising Regulator and the Fundraising Regulator's Promise.
5. Volunteers and employees who solicit funds on behalf of the school shall:
 - a. adhere to the provisions of these guidelines;
 - b. act with fairness, integrity, and in accordance with all applicable laws;
 - c. adhere to the provisions of any applicable professional codes of ethical practice which apply to them as individuals including the Fundraising Regulator's Promise;
 - d. cease solicitation of a prospective donor who identifies solicitation as harassment or undue pressure;
 - e. not exploit the credulity, lack of knowledge, apparent need for care and support or vulnerable circumstances of any existing supporters or potential new supporter at any point in time;
 - f. disclose immediately to the Head and Governing Body any conflict of interest; and
 - g. not accept donations for purposes that are inconsistent with the school's strategic and educational objectives.
6. Paid fundraisers, whether employed staff, short-term contractors or consultants, will not be paid finders' fees, commissions or other payments based on either the number of gifts received, or the value of funds raised. They will be compensated by a salary, hourly wage or fee. Their compensation will be consistent with the school's policies and practices that apply to non-fundraising personnel.

7. Any donor records held by Glendower Preparatory School will be maintained in accordance with the school's data protection policies which can be found on the school website. The school will not sell its donor or alumnae lists and contact details.
8. If an individual wishes to make a complaint about the school's fundraising, the school's complaints procedure will be followed (see page 6). The Governing Body will be informed at least annually of the number and nature of any complaints received from donors or prospective donors about matters that are addressed in these guidelines.

Dealing with Vulnerable People

9. It is our policy not to exploit the credulity, lack of knowledge or inexperience of any supporter (or potential supporter). Glendower is committed to the highest standards in fundraising activity and follow the Institute of Fundraising's (IoF) Code of Practice. When dealing with vulnerable people, we will have specific regard to the IoF Guidance Note, "Treating Donors Fairly – Guidance for Fundraisers: responding to the needs of people in vulnerable circumstances and helping donors make informed decisions."
10. We have defined a vulnerable person to be someone who:
 - a. is under the age of 18;
 - b. is an individual who by reason of mental, physical or learning disability, age or illness is unable to protect themselves;
 - c. is in need of additional support to make an informed decision [to donate]; or,
 - d. may not have the mental capacity to make a decision [to donate].
11. Fundraisers need to be patient, clear in their language and transparent in why the communication is happening. If they have reasonable grounds for believing the person is vulnerable, then the communication should be curtailed, and no donation accepted.
12. If the school receives information that a supporter has become vulnerable and has either made a recent decision about their support to Glendower or wishes to review their support more generally, the Director of Development and Partnerships at Glendower will make best efforts to receive evidence of the vulnerability and reverse any decision, and return any donations from the date the vulnerability has been acquired, in line with the donor's request and/or the person that has the authority to act for the donor.

Donor Thanks and Recognition

13. Formal acknowledgement of all donations will be sent by the finance department to each donor upon acceptance of the gift.
14. Unless the donor wishes to remain anonymous, the donor's name will normally be listed in the annual donor report, on the school website and may also appear in other print and online materials prepared by the school. The amount given will not normally be stated and will only ever be specified with the donor's written consent.
15. In cases where a donor wishes to remain anonymous, such anonymity will be respected for all public purposes. The school will, however, 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. The identity of anonymous donors will be known only to the Head, the Director of Development and Partnerships, and the Chair of Governors, and to those school staff who process the gift.

16. Most donors wish to hear about the progress of the activity they have supported. The annual donor report will provide feedback about the use of donations received over the previous year. This may include case studies.
17. The school are developing separate Donor Management and Recognition Guidelines which will set out these arrangements more fully for internal management purposes.

Gift Acceptance

18. The Governing Body encourages the solicitation and acceptance of gifts and grants that enable it to fulfil its strategic objectives. Gifts may be sought from individuals, corporations, and foundations. They will be sought only for purposes that have been approved by the School's Governing Body.
19. The school is legally obliged to adhere to the terms and conditions of every gift. For this reason, the terms of each gift must be considered with the utmost care to be sure they are feasible, do not unduly hamper the usefulness and desirability of the gift, and are in accordance with the school's policies.
20. The school is unable to accept gifts which are too restrictive in purpose or inconsistent with the stated academic purpose, priorities and strategic objectives of Glendower Preparatory School.
21. Gifts that may expose Glendower Preparatory School to adverse publicity, require expenditure beyond the school's resources, or involve the school in unexpected responsibilities because of their source, condition, or purposes, will not be accepted.
22. Gifts received by Glendower Preparatory School must not inhibit it from accepting gifts from other donors. The school also cannot accept gifts which involve unlawful discrimination on any basis. Gifts that may result in current or future financial obligations for the school or that will have an impact on school facilities and grounds, will require prior approval of the Governors. Gifts that involve naming a school facility will also require approval of the Governors.

Potential Gifts Which May Have a Controversial Dimension

23. The following issues should be considered for all potential gifts and prospective donors which may have a controversial dimension:
 - a. Would acceptance of the potential gift be inconsistent with the school's strategic and educational objectives?
 - b. Is there published or other credible evidence that the proposed gift will be made from a source that arises from an activity that:
 - i. Evaded taxation or involved fraud?
 - ii. Violated international conventions that bear on human rights?
 - iii. Was illegal in whole or part?
 - iv. Is inconsistent with the values and reputation of Glendower Preparatory School?
 - c. Is there evidence that the proposed gift or any of its terms will:
 - i. Require action that is illegal?
 - ii. Damage the reputation of the school?
 - iii. Create unacceptable conflicts of interest?

- iv. Harm the School's relationship with its stakeholders (e.g. donors, parents, pupils, staff, and alumnae)?
24. If the Director of Development and Partnerships considers that the answer to any of the above questions might be yes, it is the Director's responsibility, at the earliest possible stage, to alert the Head. In consultation with the Chair of Governors, the Head will then decide whether or not further discussion should be pursued with the potential benefactor.
25. The Chair of Governors may at this stage decide to convene an ad hoc Gift Acceptance Committee comprising of the Director of Development and Partnerships, the Head, the Bursar and at least two Governors. Prior to any meeting of the Gift Acceptance Committee, the Director of Development and Partnerships will provide members with a briefing, including reasonable due diligence on the donor. Appropriate professional research will be undertaken on potential donors to address issues of reputational risk if there are any concerns about the identity of the donor. Gifts are not accepted where the sources are unknown to the Director of Development and Partnerships or cannot be verified.

Use of Different Types of Gift

Unrestricted gifts

26. Unrestricted gifts are those placed at the immediate disposal of Glendower Preparatory School. They may be expended at the Head's discretion on any purposes that are in line with the school's aims, values and strategic objectives.

Restricted gifts

27. Restricted gifts are placed at the immediate disposal of Glendower Preparatory School and must be expended on purposes defined by the donor, such as means-tested bursaries or to support a capital project. They are accepted according to the terms outlined in this policy. Donor restrictions are accepted only when they do not add unapproved budgetary or administrative burdens on Glendower Preparatory School.

Real estate

28. The school may accept a donation or legacy of unencumbered property. The Governing Body has a legal responsibility to act always in the best interest of the school. Donors should be aware that this may involve selling any donated land or property and using the proceeds to advance the school's strategic and educational objectives. For this reason, donors considering donations or legacies of real estate are encouraged to consult the Head or the Director Development and Partnerships at an early stage.

Gifts of other tangible personal property

29. Donations of jewellery, artwork, collections, and equipment may be accepted. Donors should be aware that the school has limited space and is not able to expend funds on additional storage facilities of a specialist nature or offsite without Governors' approval. For these reasons the school reserves the right to sell any donated tangible personal property. Such items will not be sold for as long as the Governors deem the donation to have an educational purpose related to the mission of the school. The school will follow all HMRC guidelines in connection with disposing of donations of tangible personal property and filing of appropriate tax reporting forms.

Legacies

30. A legacy is a gift of any amount or form made to Glendower Preparatory School in a donor's will. Legacies may be residuary, pecuniary, specific legacy bequest, or reversionary.

Note on legacies: Donors should be aware that over the (sometimes many) years following the establishment of a legacy gift, the needs, policies, and circumstances of Glendower Preparatory School can change in unforeseen ways. The Governors must have the flexibility to make use of funds in the best interests of the school, while doing so in accordance with donor interests and specifications. For this reason, donors are advised to describe the specific purposes of their gifts as broadly as possible and to avoid detailed limitations and restrictions. Donors considering legacies for a specific purpose are encouraged to consult the Director of Development and Partnerships at an early stage.

Complaints Procedure

31. Glendower Preparatory School is committed to delivering a high standard of service to anyone who engages with our fundraising work. We are therefore keen to hear from anyone who believes the school has fallen short of these high standards.

32. Individuals or organisations can provide feedback to our Director of Development and Partnerships on our fundraising activities by email to office@glendowerprep.org or contact us by telephone on 020 7370 1927. Alternatively, you can write to the following address:

Director of Development and Partnerships
Glendower Preparatory School
86/87 Queen's Gate,
London,
SW7 5JX

33. Our Director of Development and Partnerships will acknowledge and provide an initial response to your feedback within 10 working days of receiving it. Whilst we expect to be able to resolve most complaints within that timeframe, if we need to conduct a more in-depth investigation, we will aim to provide you with a full response within 20 working days. If we are unable to meet that deadline due to exceptional circumstances, we will of course let you know.

34. If you are not happy with the response you receive, you can escalate your concerns to the Head at Glendower Preparatory School, via the above address or phone number, who will consider the matter in more detail.

35. We aim to resolve complaints about our fundraising activities within 4 weeks but if the issue is not resolved to your satisfaction, you can ask the Fundraising Regulator to consider it by:

- submitting your complaint through the Fundraising Regulator website <https://www.fundraisingregulator.org.uk/make-a-complaint/complain-about-a-fundraising-approach>
- Contacting the Fundraising Regulator on 0300 999 3407

36. Further details about the Fundraising Regulator and their Complaints Procedure may be found at <https://www.fundraisingregulator.org.uk>

