



Glendower Preparatory School

Fundraising Policy

2023-24

Reviewed: NKM/ZB, June 2023

Next review: June 2024

Introduction

1. Glendower Preparatory School (the 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. The School welcomes offers of donations of all sizes which enable its continuing development over the long term. The 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 policy is to give prospective donors the greatest freedom possible in formulating their gifts, whilst safeguarding the best interests of the School; it seeks to outline:
 - a. the principles by which the 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; and
 - e. establish a clear complaints procedure should a complaint relating to a fundraising activity arise.

Legal requirements

4. This policy and related procedures take into account the following legal requirements and regulatory codes, standards and guidelines:
 - a. Charities Protection and Social Investment Act 2016;
 - b. Charities Act 2006;
 - c. Charities Act 1992;
 - d. Data Protection Act 2018;
 - e. Safeguarding and Vulnerable Groups Act 2006;
 - f. Bribery Act 2010;
 - g. Mental Capacity Act 2005;
 - h. Fundraising Regulator Code of Fundraising Practice;
 - i. Institute of Fundraising Treating People Fairly Guidance; and
 - j. Charity Commission Guidelines.

Ethical Fundraising Principles

5. Fundraising solicitations on behalf of the 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.
6. Volunteers and employees who solicit funds on behalf of the School shall:
 - a. adhere to the provisions of this policy;

- 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 potential conflict of interest; and
 - g. not accept donations for purposes that are inconsistent with the School's strategic and educational objectives.
7. 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.
8. Any donor records held by the School will be maintained in accordance with the School's data protection policies which can be found on the School website www.glendowerprep.org/about/policies. The School will not sell to a third party its donor or alumnae lists and contact details.
9. 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 this policy.

Dealing with vulnerable people

10. It is the School's policy not to exploit the credulity, lack of knowledge or inexperience of any supporter (or potential supporter). The School is committed to the highest standards in fundraising activity and to follow the Institute of Fundraising's (IoF) Code of Practice. When dealing with vulnerable people, the School 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." Which will include:
- a. providing alternative formats of fundraising materials (different language, print size or accessible forms);
 - b. consider alternative ways of communicating with supports if they have accessibility issues (such as video conference instead of telephone);
 - c. repeat information;
 - d. change the terminology used, to ensure the donor understands; and
 - e. ask if they wish to talk to anybody else before making a decision.
11. 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];
 - d. may not have the mental capacity to make a decision [to donate]; or
 - e. may need additional care and support due to personal circumstances at the time such as an individual who has recently suffered a bereavement.

12. 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.
13. If the school receives information that a supporter has become vulnerable and has either made a recent decision about their support to the School or wishes to review their support more generally, the Director of Development and Partnerships at the School in conjunction with the Head and Chair of Governors 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 who has the authority to act for the donor.

Donor thanks and recognition

14. Formal acknowledgement of all donations will be sent by the development office to each donor upon acceptance of the gift.
15. Unless the donor wishes to remain anonymous, the donor's name may 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 with the donor's prior written agreement. The amount given will not normally be stated and will only ever be specified with the donor's prior written consent.
16. 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.
17. 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.

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 the School.
21. Gifts that may expose the 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 the 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.

Processing Donations

Cash

23. The School will not accept cash gifts over the value of [£100.00].
24. Where a cash gift is provided, the cash will be counted in a secure location and a receipt will be provided to the donor, which will be signed by two representatives of the School.
25. Any cash gift will be placed in a safe or secure location if not paid into the bank immediately.
26. Any cash gift will be paid into the School's bank account within five working days of receipt.

Cheques

27. Any cheques will be placed in a safe or secure location if not paid into the bank immediately.
28. Any cheques will be paid into the School's bank account within five working days of receipt.
29. Where a refund is requested, the School will not process a refund until the cheque gift has cleared and the money appears in the School's bank account.

Card Transactions

30. The School will adhere to the Payment Card Industry Data Security Standards (PCI-DSS).
31. Where card details are provided over the phone, they will be keyed directly into the card terminal. For the avoidance of doubt, card details will not be written down.
32. If required by the donor a receipt will be emailed to the donor outlining the amount of the gift and its purpose.

Direct Debits

33. Direct Debits will be set up via the school's online giving system.
34. Alternatively, the School's pro forma direct debit form will be provided to the donor to complete.

Potential gifts which may have a controversial dimension

35. The School will consider the following issues when assessing all potential gifts and prospective donors:
 - 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 the 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)?
36. 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 further discussion should be pursued with the potential benefactor.

37. The Chair of Governors may at this stage decide to convene a Gift Acceptance Committee comprising of the Director of Development and Partnerships, the Head, the Bursar and at least two Governors, one of whom will be a member of the Finance Committee. 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

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

Restricted gifts

39. Restricted gifts are placed at the immediate disposal of the 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 which add unapproved budgetary or administrative burdens on the School will not be accepted.

Real estate

40. 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 of Development and Partnerships at an early stage.

Gifts of other tangible personal property

41. Donations of jewellery, artwork, collections, and equipment may be accepted by the School. 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

42. A legacy is a gift of any amount or form made to the 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 the School can change in unforeseen ways. The Governors must have the flexibility to make use of funds in the best interests of the School at the time they are received, 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

43. The School is committed to delivering a high standard of service to anyone who engages with our fundraising work. The School is therefore keen to hear from anyone who believes the School has fallen short of these high standards.
44. Individuals or organisations can provide feedback to our Bursar on the School's fundraising activities by email to office@glendowerprep.org or contact the School by telephone on 020 7370 1927. Alternatively, you can write to the following address:
- Bursar
Glendower Preparatory School
86/87 Queen's Gate,
London,
SW7 5JX
45. The School will acknowledge all complaints within 2 working days and provide an initial response within 10 working days of receiving a complaint. Whilst the School expects to be able to resolve most complaints within that timeframe, if the School needs to conduct a more in-depth investigation, the School will aim to provide you with a full response within 20 working days. If the School is unable to meet that deadline due to exceptional circumstances, it will of course let you know.
46. If you are not happy with the response you receive, you can escalate your concerns to the Head of the School, via the above address or phone number, who will consider the matter in more detail.
47. The School aims to resolve complaints about our fundraising activities within 20 working days but if the issue is not resolved to your satisfaction, contact can be made with the Fundraising Regulator to consider it by:
- submitting the 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
48. Further details about the Fundraising Regulator and their Complaints Procedure may be found at <https://www.fundraisingregulator.org.uk>.