

# FUNDRAISING POLICY

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Author: Alison Vernon, Director of Marketing & Admissions

## **Scope**

This Fundraising Policy applies to all fundraising activities undertaken directly by Box Hill School through its Development Office, staff, contractors and the wider school community for the benefit of the school.

It applies also to the work of the school's Campaign Board and other structures created to assist with the delivery of specific fundraising campaigns and initiatives.

## **Guiding Principles**

Our fundraising approach is to act fairly, transparently and ethically in the best interests of serving the school's charitable objectives. We will always aim to follow best practice, and in doing so abide by specific fundraising law and relevant guidance from regulatory and other bodies including but not limited to, the Charity Commission, the Institute of Fundraising, the Information Commissioner's Office and The Fundraising Regulator.

Above all, we value most highly the relationships we have with members of the Box Hill School community, including current pupils and parents, alumni and former parents, friends of the school and the wider community. We will seek at all times to protect and develop our relationship with our supporters and in doing so treat them with respect and integrity.

## **Overview**

The Board of Governors has an overriding duty to act in the interests of Box Hill School and the ultimate responsibility for ensuring the school conducts its fundraising activities appropriately and in furtherance of the school's charitable objectives, and in adherence to this Policy, rests with the Governors.

1. The Board of Governors is responsible for determining and overseeing the school's fundraising strategy which shall be undertaken by the Development Office.
2. The Box Hill School Executive and Board of Governors will permit the Development Office to actively seek funding for a mutually agreed project provided that it:
  - is fully costed (including all additional staff and running costs);
  - is approved by the school Executive and Board of Governors as being strategically important in improving the provision of education at the school; and
  - aims to further the school's charitable objectives.

## **Fundraising Practices**

### **Rights of Existing and Prospective Donors**

1. All fundraising solicitations by or on behalf of Box Hill School will disclose the school's name, registered address, status as a registered charity (charity number 312082) and purpose for which the funds are requested. Printed solicitations (however transmitted) will also include full contact information.
2. We seek to be as transparent as possible in respect of our governance and fundraising and will provide to existing and prospective donors the following, on request:
  - the most recent Annual Report and financial statements;
  - details of Box Hill School's charitable status;
  - the names of those serving on the Board of Governors, those in positions of fundraising leadership and those in the top administration of the school; and
  - a copy of this Policy.

All of the above information, except for a copy of this Policy, is also publicly available on the Charity Commission website. This Policy is available on the school's website.

3. Existing and prospective donors will be informed, whether an individual soliciting funds on behalf of the school is a volunteer, an employee or a contractor working for a paid third party organisation.
4. Donors will be encouraged to seek independent advice if the school 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.
5. Donors' requests to remain anonymous will be respected.
6. Donors and prospective donors will be treated with respect. Every effort will be made to honour their requests as to:
  - the receipt and/or frequency of solicitations;
  - solicitation by telephone or other technology; and
  - receipt of printed material concerning the school.

### **Solicitation of donations**

1. Fundraising solicitations on behalf of Box Hill School will:
  - be truthful;

- accurately describe the intended use of donated funds;
  - include a statement that Box Hill School is a registered charity.
  - provide an opportunity for recipients to opt out of receiving communications;
  - respect the dignity and privacy of those who benefit from the Development Office activities.
3. The Development Office will obtain the written permission of all persons mentioned in fundraising case studies and other promotional material (including photographs) prior to publication.
  4. Volunteers, staff and contractors who solicit or receive funds on behalf of the school shall:
    - adhere to the provisions of this Policy;
    - act with fairness, integrity and in accordance with all applicable laws;
    - adhere to the provisions of applicable professional codes of ethics and standards of practice;
    - cease solicitation of an existing or prospective donor who requests not to receive any further communications;
    - report promptly any complaints about the school's fundraising to the Development Office or Governor representative, as appropriate;
    - disclose immediately to the senior member of staff responsible for Development or Governor representative, as appropriate, any actual or apparent conflict of interest;
    - not accept donations for purposes that are inconsistent with the school's objectives or mission.
  5. Paid fundraisers, whether staff or consultants, will be compensated by a salary, retainer or fee, and will not be paid finders' fees, commissions or other payments based on either the number of gifts received or the value of the funds raised. Compensation policies for fundraisers, including performance-based compensation practices (such as salary increases or bonuses) will be consistent with the school's policies and practices that apply to non-fundraising staff.

### **Data Protection**

1. Data will be processed, stored and accessed in line with the requirements of the Data Protection Act 2018 and GDPR as outlined in the school's Data Protection Policy.
2. Any donor records that are maintained by the Development Office will be kept secure and confidential. Access to these records will be managed by members of the Development Office, permitting the sharing of data only as appropriate and necessary with other members of school staff. Existing and prospective donors have the right to see their own records and to challenge their accuracy.
3. Appropriate wording and notification will be made clearly on all fundraising materials, however presented, and there will always be the option available not to

receive fundraising communications in line with the provisions of the Data Protection Act 2018 and GDPR.

4. The school will not sell to third parties, without consent any personal data pertaining to existing and prospective donors including alumni, parents, friends and the wider Box Hill School community.

### **Acceptance, Refusal and Return of Donations**

1. The ultimate responsibility to accept, decline or return a donation resides with the Governors.
2. Donations up to and including a value of £5,000 may be accepted by the senior member of staff responsible for Development, who shall be accountable through the school's management structure, to the Governors. Any donation over this value shall be referred to the Governor representative, who in consultation with the Headmistress and the senior staff member will accept or decline the donation on behalf of the Governors.
3. The school will undertake appropriate and proportionate due diligence in respect of potential donations. In order to comply with financial regulations, the Development Office is unable to accept gifts of cash in excess of £500. Donations larger than this value are very welcome but should be made electronically, by cheque, by credit card or debit card.
4. On occasion the school may wish to delay the acceptance of a donation with a view to providing the donor with advice enabling them to donate in a more tax efficient manner, if it is felt this will not jeopardise the donation itself.
5. The school maintains the discretion to decline donations if acceptance would not be in the best interests of the school, including but not limited to circumstances in which the Development Office and Executive, endorsed by the Governors determine that the gift, or its acceptance:
  - is from an unknown source and/or would not be morally acceptable to the school;
  - would damage the objectives of the school, its agreed policies or its beneficiaries;
  - would lead to a demonstrable decline in the assets of the school;
  - consist of goods, property or services which the school cannot lawfully use, convert, sell or exchange in direct support for its charitable aims;
  - is dependent on the acceptance of conditions attached to the gift that are inappropriate, for example where the conditions are incompatible with the school's charitable objectives, where the Governors believe such conditions would place the assets of the school at undue or inappropriate risk, where conditions would be impracticable to fulfil, or where conditions are so stringent as to prohibit Governors from being able to exercise their independent discretion;

- may require action that is potentially illegal;
  - would seriously damage the reputation of the school;
  - would create a serious conflict of interest; or
  - would harm the school's relationships with its community (e.g. donors, alumni, parents, staff, pupils etc.).
6. Any decision to return a donation shall be made by the Governors and once the school has accepted a donation it can only be returned if:
- the donation was for a restricted purpose, which is no longer possible to achieve or for which surplus funds have been raised, and the school has not spent the donation or has sufficient unrestricted funds to repay the donor;
  - the law specifically provides for the donation to be returned, for example under section 63 of the Charities Act 2022 or
  - the donation is subject to sections 15 and 16 of the Act and an ex-gratia payment is to be made by the school to discharge a "compelling moral obligation" and the thresholds for ex gratia payments that can be made without Charity Commission consent are adhered to.

### **Complaints**

1. We will respond within 30 days to a complaint by an existing or prospective donor about any fundraising matter, including those addressed in this Policy. The senior staff member will attempt to satisfy the complainant's concerns, in the first instance. A complainant who remains dissatisfied will be informed that he/she may appeal in writing to the Governor representative and will be advised of the outcome of the appeal within a further 30 days. If the issue remains unresolved the complainant may pursue the issue with the Fundraising Regulator.
2. The Governors will be informed at least annually of the number, type and disposition of complaints received from existing or prospective donors about any fundraising matter, including those addressed in this Policy.

### **Treatment of Donations**

The treatment and accounting of all funds raised by the school will be conducted in a responsible manner, in accordance with relevant statutory obligations and Charity Commission guidance as regards accounts, audit or examination of accounts, annual reports and annual returns applicable to the school.

1. All donations will be used to support the objectives of Box Hill School.
2. All restricted donations will be used for the purposes for which they are given. If necessary due to programme or organisational changes, alternative uses will be discussed where possible with the donor or the donor's legal representative. If the donor is deceased or legally incompetent, and the Development Office 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.

3. All gifts are accepted as voluntary contributions and not in lieu of tuition or other fees.
4. The decision of a parent/guardian to make or not make a gift to the school will have no bearing on the academic, sporting or extracurricular opportunities open to an individual pupil.

### **Financial Accountability**

1. Annual financial reports in relation to fundraising will be:
  - factual and accurate in all material respects;
  - disclose the total amount of fundraising expenses;
  - identify government grants and contributions separately from other donations;
  - be prepared in accordance with generally accepted accounting principles and standards.
2. The cost effectiveness of the Development Office's fundraising programme will be reviewed regularly by the Governors.
3. From time to time, supporters of the school may wish to offer tokens of thanks to staff, Campaign Board members, Governors or volunteers whom they have worked with. It is recognised that to refuse such items may cause misunderstanding or offence and hence be contrary to the work of the Development Office. Acceptance is allowed, with the proviso that:
  - all such gifts should be registered with the COO at the earliest opportunity who will record such gifts in the school's Gift Register;
  - a copy of the school's Gift Register will be presented annually to the Governors;
  - gifts to individuals (not the school) worth less than £100 may be kept by the recipient and need not be registered;
  - if an individual receives a substantial gift, worth over £100, this gift must be accepted on behalf of the school. (Gifts made by individuals or groups of supporters to leaving members of staff, however, are exempt from this code).
    - such gifts should be lodged with the COO until the Governors decide how to dispose of the gift to the best advantage of the school. Their decision will be recorded in the Register.
    - If the substantial gift is perishable then the COO will decide how to dispose of the item and record this decision in the Register.