

Fundraising policy

Action	Policy to be reviewed annually		
	Owner	Date	Completed
Review	Director of Development	February 2022	✓
Reported	Finance & Estates Committee	22 November 2022	✓
Approved	Governors	6 December 2022	✓

To be published on the following:

Staff Portal	✓
Student Portal	✓
School website	✓



1. Who this policy applies to

This policy applies to all members of the St Paul's Girls' School ('the school') community, who are either directly, or indirectly, responsible for the school's fundraising activities.

2. What this policy is for

2.1 This policy aims to:

- Help ensure that the school's fundraising activities directly support the achievement of the school's charitable objectives and that such activities, or the source of funds raised from such activities, do not adversely impact St Paul's reputation.
- Provide guidance on the types of companies, funders and fund-raising events that the school will not be associated with in pursuing fundraising to support the school's charitable objectives
- Set out the process of due diligence before the acceptance of donations and the criteria for declining donations

3. The legal framework

- Anti-money laundering legislation
- The Bribery Act 2010
- Fundraising regulator - Code of Fundraising Practice

4. Other relevant school policies

- Anti-fraud, bribery and corruption

5. Donation principles

5.1 All prospective donations will be subject to a process of due diligence, including the use of Raiser's Edge (or similar) and technology such as Worldcheck, alongside an online search to highlight any potential areas of concern.

5.2 Donations over £50,000 or any series of donations with the same cumulative value will be subject to this process.

5.3 All donations will be acknowledged officially and promptly (by email at least) and recorded on the Development Office database

5.4 No philanthropic gift or donation offered to the school has an influence over the Admissions process or the treatment of any member of staff or pupils.

5.5 In line with Charity Commission guidance, if a donation of £25,000 or more is received from an unknown or unverifiable source, it should be reported to the Charity Commission as a serious incident.

5.6 Donors will be issued with regular updates on how their donations have been used (where appropriate).

6. Types of donations

6.1 The school will accept the following types of donations

- Card and cheque donations
- Gift pledges over a period of time, whether monthly, quarterly, annually)
- Gifts of shares and securities
- Gifts of property, provided it is unencumbered, and the school reserves the right to sell the property immediately. All legal expenses associated with such a gift will be the responsibility of the donor or executor

- Tangible personal property, e.g., gifts of jewellery, artwork, antiques or collections. Valuation is the responsibility of the donor and will be accepted only on the understanding that St Paul's has full authority to sell the property at any time
- The school will accept legacies and bequests made by individuals in their wills, where either all or part of the estate. All assets will be sold as soon as possible. These gifts can be held in perpetuity, the income from which will support the school's object, or applied over a specific period of time for an agreed purpose.
- Products and services/gifts in kind may be accepted subject to the school's needs. Goods such as equipment, furniture and services such as use of a venue, catering, etc.
- Designated gifts/donations will be accepted, for a specific purpose, providing this meets the school's objects. The school will ensure, as far as it is able, that the donor's wishes are abided by and that the gift is used for the purposes intended. The school reserves the right, in consultation with the donor, to amend the use of the gift should the circumstances change. If the donor is deceased, the next of kin will be consulted wherever possible.
- All undesigned gifts will be allocated to the school's unrestricted funds

7. Acceptance of Donations

7.1 The school complies with all relevant legislation, including money laundering rules, the Bribery Act, Fundraising regulator's Code of Fundraising Practice and Charity Commission guidance.

7.2 The school will therefore not accept any of the following where the donation:

- Was known to be associated with criminal sources and/or illegal activity, e.g. fraud
- Would help further a donor's personal objectives which conflict with the ethos and values of the school
- Would lead to a possible decline in support for St Paul's, and so risk a fall in the resources given to fund its objects or damage its longer-term fundraising prospects
- Does not fit with the school's strategic objectives
- Would otherwise adversely affect the school's reputation of the school
- Source would be inconsistent with Government policy
- Depends on the fulfilment of unacceptable conditions applied by the donor

7.3 The school will actively seek support from donors whose practices align to the school's objects.

7.4 The school will respect the wishes of donors who wish to remain anonymous (provided that this accords with the school's legal and accounting obligations and other relevant policies).

7.5 Where any concern about the source of funding is identified, potential gifts will be referred to the High Mistress and the Board of Governors for consideration.

8. Refusal of Donations

8.1. The school reserves the right to refuse any donation that does not meet the donation acceptance criteria. A donation will not be accepted if, were the school to do so, it would be detrimental to the school

8.1 The school may decline a donation where due diligence research highlights an unacceptable level of ethical or reputational risk

9. Donations management procedure

9.1 Gift solicitations may be made via any communications vehicle (e.g., post, email, telephone, or social networking sites/channels), or they may be in person.

9.2 Donations should not be directly received or sought by any member of the teaching staff. Any member of teaching staff who is approached by a potential donor should refer that donor to the Development Office.

9.3 The Development Office will seek to reclaim tax under the UK Gift Aid scheme, where possible.

9.4 The Development Office will maintain electronic records of all donations received, using if necessary, specialist software for that purpose.

10. Rights of donors and prospective donors

10.1 All donor records will be held securely and in full compliance with UK GDPR Regulation 2018

10.2 In compliance with the Privacy and Electronic Communications Regulations (PECR), no donor will be contacted by electronic means (e-mail, text, etc.) unless they have given specific consent.

10.3 St Paul's will not share any donor data with any third party.

10.4 St Paul's will consult, where possible, with any donor about alternative use of their gift if it cannot be used for its originally intended purpose.

11. Complaints

11.1 As a charity registered with the Fundraising Regulator we are committed to best practice. St Paul's Girls' School could not maintain its bursary programme without its wonderful supporters, so it is important to us that we get it right.

11.2 Your complaints will always be taken seriously, and you will be treated fairly and with consideration during any review process. Complaints will be treated sensitively and in confidence where possible.

11.3 If you have a complaint about our fundraising, you can contact the Director of Development at:

- 020 7605 4814
- Development@SPGS.org
- The Development Office, St Paul's Girls' School, Brook Green, London W6 7BS

Complaints Handling Policy

11.4 **First Stage** If you make a complaint by telephone, it may be possible to resolve it during the call. If this is not possible, we will let you know how long it will take us to resolve it.

11.5 If you complain by email or by post, we will acknowledge receipt as soon as possible. In all cases we will try to resolve first stage complaints within 10 working days.

11.6 If you consider that it would not be appropriate to make a complaint to the Development Office in the first instance you can make your complaint directly to the Senior Management Team (Second stage).

11.7 Second Stage – Senior Management Team

If you still feel that your complaint has not been dealt with you should write to the PA to the Bursar at St Paul's Girls' School, London W6 7BS. The matter will then be escalated to a member of the Senior Management team. He or she will lead an investigation and contact you with a resolution within 10 working days.

11.8 Third Stage – Governors' Appeal

If you remain unhappy with the outcome, you can contact a governor of St Paul's Girls' School who will set up an appeal panel to review the complaint. You can do this by writing to the Secretary to the Governors at St Paul's Girls' School, Brook Green, London W6 7BS. The governor appointed to lead the panel will contact you with the panel's conclusions within 15 working days.

11.9 Fourth Stage – taking your complaint outside St Paul's Girls' School

In the event that you remain dissatisfied with the response you have received, you are entitled to take your complaint to the Fundraising Regulator, www.fundraisingregulator.org.uk/make-a-complaint/complaints/

11.10 This is an independent body that works to ensure that charities raising money from the public do so honestly and properly.

11.11 St Paul's Girls' School is a member of the Fundraising Regulator, and we are committed to abide by any decision they reach on complaints which are escalated to them. Their contact details are:
The Fundraising Regulator 2nd Floor CAN Mezzanine Building 49-51 East Road London N1 6AH Tel: 0300 999 3407 **Email:** enquiries@fundraiseregulator.org.uk

Availability of this policy

A copy of this policy may be downloaded from our website <http://www.spgs.org/what-we-offer/policies> or is available on request from the school office, St Paul's Girls' School, Brook Green, London, W6 7BS (tel: 0207 603 2288). This policy can be made available in large print or other accessible format if required.