

INTRODUCTION

- 1. The Tiffin Girls' School (the School) is an 11-18 selective state academy funded by the ESFA (Education and Skills Funding Agency). Extra funds are necessary for building refurbishment and maintenance, additional teaching and learning resources and facilities and for a range of projects that benefit both our students and members of the local community. The ESFA does not provide capital budget for single academy trusts. They must compete annually against other schools for funds from the Capital Investment Fund and are not permitted to take out loans (except in certain tightly defined circumstances) or deficit finance capital investment.
- 2. The School raises funds principally through the following channels:
 - Support Tiffin Girls' School Company (STGSC): This body, registered charity no. 1069996, collects donations made by parents, alumnae and individuals. The STGSC Directors make grants to The Tiffin Girls' School in line with the charity object to advance the education of the pupils at Tiffin Girls' School by supplementing the educational provision and facilities at the school.
 - **Parent Staff Association (PSA):** This body, *registered charity no. 285731,* raises valuable funds through a range of school community activities and events. The PSA liaise with the School and make donations to fund extra resources and equipment, the improvement of facilities and supporting refurbishment projects.
 - **Tiffin Girls' Music Society (TGMS):** This body, *registered charity no. 1090557*, is a charity that was set up by parents to support music at The Tiffin Girls' School. They work closely with the Music department, supporting it to provide a top-class musical education and an outstanding range of free co-curricular activities open to all.
 - **Grant applications:** The School seeks to raise funds by making applications to charitable trusts and foundations and grant-making bodies that support education.
 - **Sponsorship:** The School may seek to raise funds through corporate sponsorship whereby the provider expects a return on investment in the form of advertising, publicity or public relations.
 - **Legacies:** The School may seek to raise money through a campaign for legacy pledges to support the future of the School.
- **3.** This policy relates to the fundraising activities undertaken directly by the School, through its Development Office, staff and volunteers for the benefit of the School.
- **4.** This policy should be read in conjunction with the following documents:
 - Complaints Policy
 - Data Protection Policy
 - Whistleblowing Policy
 - Gifts and Hospitality Policy
 - Fraud and Anti-Corruption Policy

GUIDING PRINCIPLES

- 5. The School is committed to act fairly, transparently and ethically in the best interest of serving the School's charitable objectives:
 - to advance for the public benefit education in the United Kingdom, in particular but without prejudice to the generality of the foregoing by establishing, maintaining, carrying on, managing and developing a selective school offering a broad and balanced curriculum
 - to promote for the benefit of the inhabitants of Kingston Upon Thames and the surrounding area the provision of facilities for recreation or other leisure time occupation of individuals who have need of such facilities by reason of their youth, age, infirmity or disablement, financial hardship or social and economic circumstances or for the public at large in the interests of social welfare and with the object of improving the condition of life of the said inhabitants
- 6. The School will always aim to follow best practice, and in doing so abide by specific fundraising law (including the Data Protection Act) and relevant guidance from regulatory and other bodies including The Charity Commission (CC), The Fundraising Regulator, The Institute of Fundraising (IoF) and The Information Commissioner's Office (ICO).
- 7. The School is registered with the Fundraising Regulator and adheres to the Code of Fundraising Practice. All staff involved in fundraising should read and be familiar with those parts of the Code which are relevant to their work.
- 8. Above all, the School values most highly the relationships it has with members of the School community, including current students and parents, alumnae and former parents, current and former governors, current and former staff, friends of the School, the wider community and business partners. The School will seek at all times to protect the relationship with its supporters and in doing so to treat them with respect and integrity.

OVERVIEW

- **9.** The Governing Board has an overriding duty to act in the interests of The Tiffin Girls' School. The ultimate responsibility for ensuring the School conducts its fundraising activities ethically, and in adherence with this new set of policies, rests with it. In fulfilling its responsibilities under this policy, the Governing Board has regard to:
 - a. The Charity Governance Code
 - b. Charity fundraising: a guide to trustee duties (known as CC20)
 - c. The essential trustee (known as CC3)
 - **d.** <u>The charity trustee welcome pack</u>
- **10.** The Governing Board has established a Fundraising Group of governors with delegated responsibility to:
 - Monitor the fundraising activities of the school
 - Monitor how the school engages and communicates with donors
 - Monitor the alumnae development strategy of the school
 - To oversee risk management for fundraising
- **11.** The School has appointed a Development Manager who reports and is accountable to the Headteacher. The Development Manager is salaried and will not be paid finders' fees, commissions or other payments based on either the number of gifts received or the value of funds raised.

- **12.** All fundraising undertaken by the School's Development Manager is monitored and reviewed by the Headteacher and Fundraising Group. The Fundraising Group reports and is accountable to the Governing Board.
- **13.** The role of the Development Manager is to develop proposals for and to carry out fundraising work and projects agreed by the Headteacher and Governing Board that are strategically important in improving the provision of education at the School.

FUNDRAISING PRACTICES

General Standards

- **14.** The purpose of this policy is to ensure that all fundraising conducted by the School is lawful, ethical and in line with the School's vision and values. This means that the School will not:
 - Knowingly accept money from an unethical source.
 - Allow students, parents/carers, staff, alumnae and members of the local community to be exposed to an excessive volume of corporate messages and logos.
 - Accept corporate sponsorship:
 - without fully considering if the conditions imposed by the sponsor are in line with the School's vision, values and ethical standard
 - if the corporate activities are not in line with the School's vision and values. See paragraph 19 below.
 - Disadvantage parents/carers and the local community through repeated requests for money
- **15.** The School adopts the following general standards of:
 - ensuring all funds raised will be used to support the vision of the School
 - not denigrating other individuals or organisations
 - not exaggerating facts
 - not taking advantage of mistakes made by donors
 - treating donors fairly and with respect and not discriminating against any group or individual
- **16.** A record will be kept of any funding that is received and how it is spent. These records will be used to produce an annual report of the school's fundraising activities.
- **17.** While the school thanks donors publicly for their generosity, being a donor will not influence the governors and staff of the School in their decisions when dealing with donors, including matters related to admissions to the School, provision of education or any endorsement of their products or services.
- **18.** The decision of a parent/carer to make or not to make a donation to the School will have no bearing on the academic, sporting, co-curricular or extra-curricular opportunities open to an individual student.
- **19.** The School will not apply for or accept funding from sources which are not in line with the School's ethics, values and educational policies. These include:
 - Sources which are considered to be involved in criminal or illegal activities
 - Sources which are considered to run counter to government policy
 - Individuals whose personal objectives are considered to conflict with the school's values and policies
 - Junk and unhealthy food and drink companies
 - Companies that exploit child labour

- Companies involved in the production of tobacco, alcohol, pornography, sale of arms and armaments or gambling
- Companies adversely linked to concerns over climate change, eg oil, gas, coal industries
- Any source whose donation might damage the school's reputation or adversely affect its potential for raising funds in the future
- **20.** The Headteacher must approve any application for funding before it is submitted.

Protection of donors - the public and vulnerable people.

- **21.** The School protects donors and potential donors fairly by:
 - enabling donors to take informed decisions about donations and by taking account of needs of donors who may be vulnerable or may need additional support to make an informed decision
 - not taking advantage of credulity, lack of knowledge or apparent need for support or vulnerable circumstance
 - not seeking or accepting donations if it is known or suspected that a potential donor lacks capacity and returning any donations made by someone who lacked capacity at the time
 - not making unreasonable intrusions into privacy, not being unreasonably persistent and not placing undue pressure on anyone to donate
 - not asking for support if a person has clearly indicated that they do not wish to continue to
 engage or there are reasonable grounds for believing in the course of engaging with an
 individual that they are in vulnerable circumstances and unable to make an informed
 decision to donate.
- **22.** In order to meet these standards, the School follows the Institute of Fundraising 'Treating Donors Fairly' guidance.

Rights of Donors and Prospective Donors

- **23.** All fundraising solicitations by or on behalf of The Tiffin Girls' School will disclose the School's registered name, address of its registered office, confirmation that it is a registered company with charitable status and purpose/s for which the funds are requested.
- **24.** Printed solicitations (however transmitted) will also include the registered company number, confirmation that it is a company limited by guarantee, full contact information for the School and/or the department involved.
- **25.** Donors and prospective donors are entitled to know, upon request, 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.
- **26.** When employees solicit funds on behalf of the School, and it is part of their paid work, they must explain that they are an employee and that they are receiving fixed remuneration for fundraising.
- **27.** 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. It will remain the donor's responsibility to consider such matters prior to making a gift.
- **28.** Donors' requests to remain publicly anonymous will be respected as far as is legally, practically and ethically possible.

- **29.** The School will not sell or exchange personal details of donors.
- **30.** Donors and prospective donors will be treated with respect. Every effort will be made to honour their requests as to:
 - the frequency of solicitations
 - solicitation by telephone or other technology
 - printed material concerning the School
- **31.** Donors or prospective donors who request no further contact will not be contacted for fundraising purposes.
- **32.** In particular, the School will not solicit funds:
 - from individuals who have elected not to receive fundraising contact through the Fundraising Preference Service
 - using electronic means without consent to do so

Appeals for funds

- **33.** Whatever type of appeal is chosen to raise funds, the School will adopt the following principles:
 - The purpose of the appeal will be clearly expressed. Where the appeal is for general funds, any specific project mentioned in the appeal document will be clearly identified as an example. Donors will not be misled into thinking that their money will only be used for a particular project identified in the appeal literature, where this is not the case.
 - If the appeal is for a specific project, the appeal literature will clearly and transparently explain that funds are being raised for that project and if that project raises insufficient or excess funds, those donations will be used for the general purposes of the School.
 - All gifts are accepted as voluntary contributions.
 - Funds raised for a special appeal will be accounted for separately.
 - Wherever possible, the appeal document will show an end date for the appeal.

Acceptance of donations

- **34.** The School will take steps to confirm the identity of a donor and the source of the funds donated.
- **35.** Evidence of identification will be requested for any donor contributing a sum or series of sums exceeding £5,000.
- **36.** For any donation of a sum or series of sums exceeding £10,000 the School will:
 - establish whether the donor has any known links which present a risk to the reputation of the School
 - find-out what payment arrangements are proposed and whether they raise concerns about the source of funds
 - record the terms of the donation in a formal agreement
- **37.** The final decision to accept a donation over £10,000 shall rest with the Fundraising Group.

Refusal of donations

- **38.** The School may decline a donation if it can demonstrate, for example, that accepting the donation:
 - compromises its status as an independent organisation
 - creates unacceptable conflicts of interest

- exposes the School to undue adverse publicity or reputational risk
- causes any other financial damage, for example, deterring other donors
- involves concerns about the legality of the source of funds or the donor's identification
- involves a suspicious transaction
- may require action that is potentially illegal
- is dependent on the fulfilment of unacceptable conditions applied by the donor
- consists of goods, property or services which the School cannot lawfully use, convert, sell or exchange in direct support for its charitable aims.
- **39.** If the School has reasonable grounds for believing that an individual lacks the capacity to make a decision to donate, a donation will not be accepted. The final decision to refuse a donation shall rest with the Fundraising Group.

Return of donations

- **40.** Once the School has accepted a donation it can only return it:
 - if the terms and conditions of the donation made provision for it to be returned under particular circumstances
 - where the law specifically provides for the donation to be returned (for example under section 61 of the Charities Act 1992 donations over £100 made by credit or debit card are subject to a seven-day cooling off period)
 - by way of an "ex-gratia payment" (a payment made as a result of a compelling moral, but not legal, obligation). This type of donation return will only be permitted where the school has received an order from the Charity Commission for England and Wales
- **41.** Where a change in circumstances prompts a donor to request the repayment of part or all of a donation, the final decision to repay a donation shall rest with the Headteacher.

Sponsorships

- **42.** Sponsorships are the provision of funds, services or products for which the provider expects a return in the form of advertising, publicity or public relations. Sponsorship arrangements present risks to the School's reputation as a result of its association with the sponsoring party (see paragraph 19 above) and therefore:
 - The School will carry out due diligence into any potential sponsors to ensure their business, products and services, interests, reputation, associations and values are compatible with the School's objects, work and reputation
 - The School will keep such arrangements under review
 - Clear and detailed contracts and the School's rights to terminate the contract, need to be in place and agreed upon by the Headteacher, in order to manage the expectations of all parties
 - Certain restrictions will apply on certain types of sponsorship, in order that the School's site remains non-commercialised. Advertising coverage on School programmes/materials may be offered in return for sponsorships. The School will not accept any sponsorship or advertising branding on formal School uniforms, but leeway may be given for their use on sports kit if agreed by the Headteacher.
 - Sponsorships made to the School of products given in-kind is permitted but must be discussed and agreed by the Headteacher.
 - Sponsorships from certain industries will need a wider discussion with the Governing Board and a decision will be made on merit at any given time.
- **43.** An annual fundraising report will be made available to the Governing Board and parents. This report will outline funding that has been secured and what it has been used for. It will also contain details of the School's sponsors and funds raised by other means.