



The Abbey

The independent school for girls aged 3-18.

Ethical Fundraising Policy

The Abbey School, Reading



17 Kendrick Road, Reading, Berkshire RG1 5DZ
Company Limited by Guarantee. Registered in England No 133676.
Registered Charity No 309115. The Abbey School exists to educate academically able girls.



THE ABBEY SCHOOL

Development: Ethical Fundraising Policy

Scope

This policy relates to all fundraising activities undertaken directly by The Abbey School through its External Relations office, staff, volunteers and contractors for the benefit of the School.

Guiding Principle

Our fundraising approach is to act fairly, transparently and ethically in the best interests of serving the School's charitable objectives and those in our community. We will always aim to follow best practice, and in doing so abide by specific fundraising law (including the General Data Protection Regulation and any associated or implementing legislation) and relevant guidance from regulatory and other bodies including The Charity Commission (CC), The Fundraising Regulator, The Institute of Fundraising (IoF), The Information Commissioner's office (ICO) and more recently the findings of the Etherington Report (2015) – *Regulating Fundraising for the Future*. Above all, we value most highly the relationships we have with members of the The Abbey School community, including current pupils and parents, alumnae and former parents, friends of the school and more widely our community and business partners. We will seek at all times to protect our relationship with our supporters and in doing so to treat them with respect and integrity.

Overview

1. The Board of Governors has an overriding duty to act in the interests of The Abbey 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 Board of Governors 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); and
 - d. [The charity trustee welcome pack](#).
2. The Board of Governors has established the Abbey Community Committee to assist it in this.
3. All fundraising undertaken by the The Abbey School External Relations office shall be monitored and reviewed by the Abbey Community Committee on behalf of the Board of Governors. The Abbey Community Committee reports and is accountable to the Board of Governors.
4. The role of the Abbey School External Relations office is to develop proposals for and to carry out fundraising work and projects agreed by the Abbey Community Committee on behalf of the Board of Governors for all fundraising work and projects:
 - a. a cost-benefit and income v expenditure assessment has been undertaken;
 - b. an income and expenditure budget has been drawn up;
 - c. is approved by the School Executive Board as being strategically important in improving the provision of education at the School;
 - d. aims to promote and advance the School's charitable objectives;
 - e. includes an appropriate programme for supervision of those involved in fundraising;
 - f. the School's reputation and assets, including funds raised, will be protected;

- g. compliance with law, regulation and the [Code of Fundraising Practice](#) ("**Code**") is provided for;
- h. accountability is addressed including ensuring the transparency of fundraising literature/scripts and reporting.
- i. complies with new ethical and fair GDPR/ICO fundraising and data protection requirements (*the display of the ICO "kite mark" on our fundraising literature and on our website signifies annual compliance*).

Fundraising Practices

A. General standards

1. The School is registered with the Fundraising Regulator and adheres to the Code. All staff involved in fundraising should read and be familiar with those parts of the Code which are relevant to their work.
2. The School adopts the following general standards:
 - a. all funds raised for a particular cause must be used for that cause;
 - b. we will not denigrate other individuals or organisations;
 - c. we will not exaggerate facts;
 - d. we will not take advantage of mistakes made by donors;
 - e. we treat donors fairly.

B. Protection of donors - the public and vulnerable people.

1. We protect donors and potential donors by treating donors fairly:
 - a. we enable them to take informed decisions about donations. We take account of needs of donors who may be vulnerable or may need additional support to make an informed decision;
 - b. we do not take advantage of credulity, lack of knowledge or apparent need for support or vulnerable circumstance.
 - c. we do not seek or accept donations if we know or suspect that a potential donor lacks capacity and will return any donations made by someone who lacked capacity at the time;
 - d. we do not make unreasonable intrusions into privacy, are not unreasonably persistent and will not place undue pressure on anyone to donate;
 - e. we will not ask for support if a person has clearly indicated that they do not wish to continue to engage or we have 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.
2. In order to meet these standards, we adopt the [Institute of Fundraising Treating Donors Fairly](#) guidance.

C. Rights of Donors and Prospective Donors

1. All fundraising solicitations by or on behalf of The Abbey School will disclose the School's registered name, address of its registered office, confirmation that it is a charity registered in England and Wales, its charity number and purpose/s for which the funds are requested. 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.
2. Donors and prospective donors are entitled to the following, promptly on request:

- a. the most recent Annual Report and financial statements;
 - b. confirmation of the charitable status of The Abbey School;
 - c. the names of those serving on the governing body, those in positions of fundraising leadership on the Abbey Community Committee and those on the Executive Board of the School;
 - d. a copy of this policy.
3. 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.
 4. When employees, officers or governors solicit funds on behalf of the School, and it is part of their paid work, they must explain that they are an employee, officer or governor as the case may be and that they are receiving remuneration for fundraising.
 5. 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.
 6. Donors' requests to remain anonymous will be respected.
 7. Donors and prospective donors will be treated with respect. Every effort will be made to honour their requests as to:
 - a. the frequency of solicitations;
 - b. solicitation by telephone or other technology;
 - c. printed material concerning the School.

In particular, the School will not solicit funds:

1. from individuals who have elected not to receive fundraising contact through the Fundraising Preference Service;
2. using electronic means without consent to do so;
3. contact potential donors by telephone where they have registered with the telephone preference service.

D. Content

The School is committed to legal and ethical standards in the content of fundraising materials and scripts and in particular:

1. will not use materials which are indecent, offensive or intended to cause distress or anxiety;
2. will not use materials which contain other people's copyright material, marks or other intellectual property without their permission;
3. will not imply funds are raised for a specific, restricted purpose if this is not the case;
4. will be clear whether funds are being raised for the School, any other purpose and in what proportions;
5. will be legal, decent, honest and truthful and in compliance with Committee of Advertising Practice rules or the Broadcasting Committee of Advertising Practice rules as appropriate;
6. will not be misleading because of inaccuracy, ambiguity, exaggeration, omission or any other reason;
7. will be backed by objective evidence for all direct or implied claims;
8. will not cause offence on grounds of race, age, religion, sex, sexual orientation or disability;
9. will not include shocking images.

E. Solicitation of donations



1. Fundraising solicitations on behalf of The Abbey School will:
 - a. be truthful;
 - b. accurately describe the The Abbey School External Relations office activities and intended use of donated funds;
 - c. respect the dignity and privacy of those who benefit from the The Abbey School External Relations office activities.
2. The Abbey School External Relations office must obtain the written permission of all persons mentioned in case studies and other promotional material (including photographs) prior to publication.
3. Volunteers, staff and contractors who solicit or receive 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 applicable professional codes of ethics and standards of practice including those of the ICO and the Code;
 - d. cease solicitation of a prospective donor who identifies solicitation as a harassment or undue pressure;
 - e. cease all forms of solicitation and/or request contact form any vulnerable people, such as the old, the infirm and the disabled;
 - f. disclose immediately to the Head of The Abbey School and the Governor representative (Chair of the Abbey Community Committee) any actual or apparent conflict of interest;
 - g. not accept donations for purposes that are inconsistent with the School's objects or mission.
4. 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 personnel.
5. Fundraising, no matter how small, that is undertaken by staff and/or pupils in the name of the School throughout the year need to have gained permission from the Teacher-in-Charge of Charity work (in the Senior School it is the Deputy Head – Pastoral and in the Junior School it is the Teacher-in-charge of charity outreach activities) for said activity. A termly report must be submitted to the Head of External Relations on the activities undertaken, the total amount of funds raised, from whom, and who the nominated beneficiaries of said funds have been.

F. Professional fundraisers and commercial participators

1. Professional fundraisers carry on fundraising businesses or are paid to solicit funds from charities. *The School does not use professional fundraisers.*
2. Commercial participators are businesses which run a promotion saying that contributions will be made to charity. The School does not use commercial participators.
3. The School will take appropriate steps to prevent its name being used in connection with unauthorised fundraising or commercial promotions in order to protect its name and reputation.

G. Sponsorships



17 Kendrick Road, Reading, Berkshire RG1 5DZ
 Company Limited by Guarantee. Registered in England No 133676.
 Registered Charity No 309115. The Abbey School exists to educate academically able girls.



1. Sponsorships are the provision of funds/services/products for which the provider expects a return on investment in the form of advertising/publicity/public relations. This can take the form of a once off/sporadic/recurring donation of said funds/ services/products in the form of a donation to the School.
2. Sponsorship arrangements present particular risks to the School's reputation as a result of its association with the sponsoring party. As a result:
 - a. 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;
 - b. The School will keep such arrangements under review;
 - c. Clear and detailed contracts need to be in place to manage the expectations of all parties, particularly in the positioning of logos and brands on School apparel/kit and the School's rights to terminate; and agreed by The Head with oversight by the Abbey Community Committee Chair on behalf of the Board of Governors.
3. Certain restrictions will apply on certain types of sponsorship, in order that The Abbey School remains a non-commercialised campus. Advertising coverage on School programmes/materials may be offered in return for sponsorships. The Abbey School will not accept any sponsorship or advertising branding on formal School uniforms, but leeway may be given for their use on sports kit.
4. Scholarships and means-tested bursaries are a form of sponsorship that enables pupils to attend the School who possess particular talents and skills in academia, sport or cultural activities.
5. Sponsorships made to the School of products given in-kind is permitted but must be discussed and agreed upon by The Head. Sponsorships from certain industries will need a wider discussion with the Executive Board and in some cases the Chair of the Abbey Community Committee and a decision made on merit at any given time.
6. Cash donations from businesses and industries are allowed but must be notified to The Head and the Executive Board and in some cases the Chair of the Abbey Community Committee upon offer and before acceptance.
7. The External Relations office must respond to all sponsors in the same professional manner expected with fundraising campaigns and other income generating activities. Adherence to the Code is critical in all dealings with potential and actual donors, sponsors and partnerships.

H. Openness and transparency

1. The School is committed to openness and accountability in its fundraising. In particular:
 - a. care is taken to ensure all fundraising literature and scripts are clear and meet legal and regulatory requirements and the Code;
 - b. the School operates the complaints procedure under this policy; and
 - c. it includes fundraising in its reports and accounts.
2. The External Relations office will collate the information in Appendix 1 for the Governors for inclusion in the School's reports and accounts.

I. Data Protection

1. Data will be processed, stored and accessed in accordance with the requirements General Data Protection Regulation and all associated and implementing legislation as outlined in the School's Data Protection policy and in accordance with the School's privacy notice.
2. The privacy of donors and prospective donors will be respected. Any donor records that are maintained by the The Abbey School External Relations office will be kept secure and confidential. Records will only be accessed by members of the The Abbey School External Relations office and the Executive Board. Donors 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 to opt out of fundraising and other communications.
4. The School will not sell or share any of its contact lists.

J. Ensuring compliance

1. The role and authority of all staff and volunteers involved in fundraising is set out in their job description and their key measurable objectives set as part of the appraisal process.
2. Performance of individual roles and objectives, compliance with the law, this policy and the Code will be regularly reviewed through line management.
3. The School will monitor fundraising campaigns including:
 - a. actively seeking feedback
 - b. reviewing a sample of call recordings and notes
 - c. attendance at some meetings and during telephone campaigns
 - d. mystery shopping and
 - e. operating a complaints process.
4. Staff and volunteers with concerns about our fundraising practice should raise them in accordance with the School's whistleblowing policy.

K. Acceptance, Refusal and Repayment of Donations

1. The ultimate responsibility to accept or decline a donation resides with the Board of Governors.
2. Appropriate due diligence steps will be taken to confirm the identity of a donor and the source of any funds. Many donors will be known to the School as part of continuous contact with alumni since they left the School. Current identification evidence be requested from:
 - a. any donor whose identity is not already known to the School as a member of the alumnae;
 - b. for any donor (including known alumnae) of a sum or series of sums exceeding £10,000.
3. For any donor proposing to donate a sum or series of sums exceeding £25,000 the School will take steps in advance of any donation being made or accepted to:
 - a. establish whether the donor has any known links which present a risk to the reputation of the School
 - b. find-out what payment arrangements are proposed and whether they raise concerns about the source of funds
 - c. record the terms of the donation in a formal agreement.

4. Donations up to and including a value of £25,000 may be accepted by the Head of External Relations, who shall be accountable through the School's Executive Board, to The Head and Board of Governors via the Abbey Community Committee Chair. Any donation over this value shall be referred to the Governor representative (Chair of the Abbey Community Committee), who in consultation with The Head and the Head of External Relations, will accept or decline the donation on behalf of the Board of Governors.
5. All donations should be made electronically, by cheque, by credit card or debit card.
6. 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.
7. Consideration will be given to whether any donation involves or is linked to any suspicious transaction, for example:
 - a. a fee is requested to release the donation;
 - b. the School is asked to cash a cheque or return part of the donation;
 - c. the School is asked to convert foreign currency;
 - d. the proposed donation involves other additional steps with no clear purpose in the making of the donation;
 - e. the donor has no link to the school or explanation for their interest in its work.
8. Key criteria for accepting gifts are that:
 - a. all gifts adhere to the School's aims in ways which meet their objectives and are productive and reasonable;
 - b. the gift is applied for the purpose for which it was donated and meets the donor's wishes;
 - c. the source of the donation is morally acceptable to the School;
 - d. the completion of the project for which donations are accepted should be achieved. (Where the School raises funds in contemplation of a particular project, the appeal literature, scripts and other materials will clearly and transparently explain that funds are being raised for the general purposes of the School and may be used for those general purposes if the project is not completed or if more funds are raised than are needed for the project);
 - e. all gifts are accepted as voluntary contributions and not in lieu of tuition or other fees;
 - f. the decision of a parent/guardian to make or not to make a gift to the School will have no bearing on the academic, sporting or extra-curricular opportunities open to an individual pupil.
9. The School may decline a donation if it is felt by the The Abbey School External Relations office and the Executive Board, and endorsed by the Abbey Community Committee, that the gift:
 - a. compromises its status as an independent organisation
 - b. creates unacceptable conflicts of interest
 - c. exposes the School to undue adverse publicity or reputational risk
 - d. causes any other damage, including financial damage, for example, deterring other donors
 - e. involves concerns about the legality of the source of funds or the ability to identify the donor
 - f. involves the acceptance of funds from proscribed organisations, designated individuals or sanctions targets
 - g. involves a suspicious transaction

- h. would impair the External Relations office in fulfilling its objectives, particularly with respect to supporting the School;
 - i. is damaging to the objectives of the School, its agreed policies or its beneficiaries;
 - j. would lead to a demonstrable decline in the assets of the School;
 - k. consists of goods, property or services which the School cannot lawfully use, convert, sell or exchange in direct support for its charitable aims;
 - l. is dependent on the fulfilment of unacceptable conditions applied by the donor, for example if The Head, Executive Board or Board of Governors believed such conditions would place the assets of the School in undue or inappropriate risk;
 - m. may require action that is potentially illegal;
 - n. harms the School's relationships with other stakeholders (e.g. donors, alumnae, parents, staff, pupils, etc.).
10. 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 Board of Governors.
11. Once the School has accepted a donation it can only be returned if:
- a. the terms and conditions of the gift made provision for it to be returned under particular circumstances;
 - b. 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;
 - c. the Charities Commission grants authorisation for an ex-gratia payment to be made by the School to discharge a "compelling moral obligation". Such a payment is subject to receiving authorisation under section 106 of the Charities Act 2011.

L. Complaints

1. We will respond within 30 days to a complaint by a donor or prospective donor about any matter that is addressed in this policy. The Head of External Relations 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 Head 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 ICO.
2. The Board of Governors will be informed at least annually of the number, type and disposition of complaints received from donors or prospective donors about matters that are addressed in this policy.

M. Serious incident reports in connection with fundraising

1. The School is committed to reporting serious incidents to the Charity Commission
2. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:
 - a. loss of a charity's money or assets
 - b. damage to a charity's property
 - c. harm to a charity's work, beneficiaries or reputation
3. Examples of serious incidents which could arise in connection with fundraising include:
 - a. suspicions or allegations of criminal activity including theft, fraud, bribery and money laundering

- b. suspicious financial transactions, suspicious or unverified donors particularly if the donation or series of donations totals £25,000 or more
- c. circumstances in which a report has to be made to the Information Commissioner's Office
- d. links to terrorism through donors
- e. investigation by the police or another regulator, significant adverse findings by a regulator, significant penalty from a regulator
- f. harm to beneficiaries or donors/the public
- g. circumstances attracting negative media attention or adversely affecting the School's reputation.

If staff or volunteers believe there may have been a serious incident, they must immediately inform their line manager and . The Head of External Relations shall apply the procedures of the School for the consideration, management and reporting of serious incidents. Staff or volunteers may in addition report serious incidents using the whistleblowing policies of the School.

Financial Accountability

1. The financial affairs of the The Abbey School External Relations office will be conducted in a responsible manner, consistent with the ethical obligations and the legal requirements of the Charity Commission, the ICO, the GDPR and other regulatory bodies that are inherent to ethical fundraising.
2. All donations will be used to support the objectives of The Abbey School.
3. The School will seek to respect any non-binding wishes expressed by the donor as to the use of the donation, provided they are compatible with the objects, work and values of the School.
4. All donations which have been legally restricted to specific purposes will be used for the purposes for which they are given. If necessary due to programme or organisational changes, subject to such legal consents or processes as are necessary, the School will seek to use the donation for in a manner as consistent as possible with the donor's original intent, seeking the views of the donor where possible. Where necessary, the School will seek legal advice on the available options for amending the terms of the donation.
5. Annual reports will be:
 - a. factual and accurate in all material respects;
 - b. disclose the total amount of fundraising expenses;
 - c. identify government grants and contributions separately from other donations;
 - d. address the matters in the appendix;
 - e. be prepared in accordance with generally accepted accounting principles and standards including SORP.
6. The cost effectiveness of the External Relations office fundraising activities will be reviewed regularly by the Head and reported on at the Board of Governors AGM.
7. 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 External Relations office. Acceptance is allowed, with the proviso that:
 - a. all such gifts should be registered by the Head of External Relations with the Head of Finance and Resources at the earliest opportunity. Gifts will recorded in the School Gift Register.

- b. a copy of the School's Gift Register will be presented annually to the Head.
- c. gifts to individuals (not the School) worth less than £50 may be kept by the recipient and need not be registered.
- d. if an individual receives a substantial gift, worth over £50, this gift must then 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).
 - i. such gifts should be lodged with the Head of Finance and Resources until the Head decides how to dispose of the gift to the best advantage of the School. The Head's decision will be recorded in the Register.
 - ii. If the substantial gift is perishable then the Head of Finance and Resources will decide how to dispose of the item, and record this decision in the Register.

Review

The fundraising policy should be reviewed annually or exceptionally, following new regulation or guidance from relevant bodies like the ICO and GDPR. Any amendments will be notified to, and approved by the Abbey Community Committee and The Head.

Approved by The Abbey Community Committee – July 2018

**Information for inclusion in the Governors' annual report and accounts
Development & Fundraising Report**

This annual report must include information on the following points, as relevant:

- The approach taken by the School to fundraising activities and in particular whether a professional fundraiser or commercial participator carried out any of those activities;
- Whether the School (or those acting on its behalf) is subject to an undertaking to be bound by a voluntary scheme for regulating fund-raising, or any voluntary standard of fund raisings and if so what scheme or standard;
- Any failure to comply with the Fundraising Regulator standards;
- Whether the School monitored activities carried on by any person on behalf of the School for the purposes of fundraising and if so, how;
- The number of complaints received by the School or a person acting on its behalf about activities by the School for the purpose of fundraising;
- What the School has done to protect vulnerable people and other members of the public from unreasonable intrusion into privacy, unreasonably persistent approaches and placing undue pressure on a person to give money or property.
- The annual Public Benefit report of all development & fundraising activities
- The list of all stakeholders who have specifically stated a non-contact/ right to be forgotten preference for all communications and contact by the School in future in any annual period