



MALVERN ST JAMES
Girls' School

Ethical Fundraising Policy

This Policy is the responsibility of the Director of Development and will be reviewed biennially and upon the issue of relevant new regulations or guidance.

This policy should be read in conjunction with the School's Privacy Notice, Fundraising Complaints Policy, Anti-Corruption and Bribery Policy, Anti-Fraud Policy and the Financial Procedures. The Fundraising Regulator's Code of Fundraising Practice applies.

Scope

This policy relates to all fundraising activity undertaken by or on behalf of Malvern St James Girls' School ('the School') and must be adhered to by those carrying out such activities.

Guiding Principles

The School is a member of the Institute of Fundraising and has signed an undertaking to abide by the Fundraising Regulator's Code of Fundraising Practice ('the Code'). As such the School adheres to the four values of the Code:

- All fundraising must meet the requirements of the law;
- Fundraisers must be open with the public about their processes and must be willing to explain (where appropriate) if asked for more information;
- Fundraisers must act with integrity and must not mislead about the cause they are fundraising for or the way a donation will be used; and
- Fundraisers must demonstrate respect whenever they have contact with any member of the public.

Each person carrying out fundraising activities for or on behalf of the School should be familiar with the sections of the Code relevant to their activities.

Complaints

Please see the Fundraising Complaints Policy for further information on how to complain to the School.

If a member of Staff (which for the purposes of this policy includes anyone officially acting on behalf of the School to raise funds) believes that a complaint has, without satisfactory explanation, been closed without concluding action, they may use the Whistleblowing Policy to bring the unexplained inaction to appropriate attention.

Fundraising Practices

Overview

Council, the School's governing body, may only authorise the School to undertake fundraising activities that support or further the School's charitable aims and objectives, thus donations that are inconsistent with those aims and objectives cannot be accepted.

Data Protection and the Rights of Individuals

The School's handling of personal data is in accordance with the Data Protection Act 2018 (that incorporates the General Data Protection Regulations (*GDPR*)) and is summarised in its Privacy Notice (available on the School's website). The Privacy Notice also summarises an individual's rights regarding their data.

Authorisation of Fundraising Campaigns

Any detailed fundraising* activity declared to and authorised by Council, when Council approves the School's annual budget, is thereby pre-authorised by Council and only requires approval by the Headmistress for it to be initiated (unless stated otherwise at the time of Council authorisation).

The following is not pre-approved and will require additional authorisation to the level defined by the total value of the work in the flowchart of Financial Authority of Council and the Director of Finance:

- any change to the scope pre-authorised; or
- any fundraising activity that is included in the Council approved School's annual budget but for which insufficient details were available at the time of Council's approval; or
- any scope not included in the approved School's annual budget.

**Any detailed fundraising means - a business case for the fundraising campaign (in detail consistent with the value and risk) that includes Cost, Timescale, Expected Returns, the approach to be adopted & by whom, Data Protection and Risk.*

Before any contract is placed;

- to receive confirmation that it has been reviewed;
- that the Governance & Legal Committee has had a reasonable opportunity to review it; and
- that any concerns raised by the reviews had been resolved to the School's satisfaction.

A flowchart of how financial authority is delegated by Council is given in the Governance Manual; Section 6 Annex 1 : Financial Authority of Council and the Director of Finance.

Solicitation of Donations

Solicitation of donations will comply with the Code as appropriate to each fundraising campaign.

The Development Committee will, on behalf of Council, have oversight of all fundraising activities.

Acceptance or Rejection of Donations

The School abides by the law which requires us, in deciding whether to accept or reject a donation, to consider which action is in the charity's best overall interest and we will not accept donations made by donors whose activities appear to be in conflict with the best interests of our charitable aims and objectives.

The School will not undertake business with organisations or individuals whose activities could cause detriment to the School's reputation and thus could cause disproportionate reduction in donations to further the charitable aims and objectives.

The responsibility for judgement as to whether the School should accept or reject a donation initially resides with the Director of Development and proceeds through the Development Committee and ultimately resides with Council. Flowcharts of how that authority is delegated is given in the Governance Manual; Section 7 Annex 7 : Development Committee Terms of Reference.


Use of Donations

The cost of all the School's fundraising activities shall be paid for out of the School's annual budget. Therefore each donation shall be received in its entirety, and shall be used for the purpose for which it was donated. However, if a donor wishes to make a donation to a specific area of the School's work that is not already defined by a specific fundraising campaign or project, they may make a restricted donation by providing written instructions to this effect with their donation. It is strongly recommended that such a specific donation is discussed first with the Director of Development to ensure that the School will be able to make use of such restricted funds. If the School receives restricted funds without first having had discussions as to the appropriateness of the restrictions, the School will seek to clarify the restrictions and will have to seek authority from the Charity Commission for any change of purpose even if the donor agrees with the proposed change of purpose.

Financial Accountability

The School's fundraising activities shall be accounted for in accordance with its Financial Procedures that comply with the relevant legal and accounting requirements.

Any gifts offered to any person involved in any fundraising activity shall be bound by the School's Anti-Corruption and Bribery Policy.

Authorised by	Resolution of the School Council
Signature	
Date	16 March 2022

Effective date of the Policy	16 March 2022
Review date	March 2024
Circulation	Members of School Council / teaching staff / all staff / parents / pupils [on request]