Culford

Fundraising Policy

Culford School
September 2024

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Culford School is grateful to all donors for their generous support and is dedicated to treating donors with the highest level of care and respect. Culford School is administered by Methodist Independent Schools Trust, Company Reg 7649422 and a registered charity with the Charity Commission for England and Wales no 1142974.

We welcome support from individuals, foundations, and organisations and would be delighted to discuss ways in which relationships may be fostered with potential benefactors. If you would like to discuss any aspect of the Fundraising Policy or other matters concerning development activity at Culford School, please contact the Foundation Director foundation@culford.co.uk

A: Donor Charter

1. Making a gift to Culford School is an important way that our donors show support for the School, and we recognise this is a considered commitment on your part. We are committed to ensuring that donors are treated fairly, transparently and respectfully and are kept informed of the impact of their giving. We will always:

1.1. Commit to high standards and adhere to the Fundraising Regulator's Code of Fundraising Practice.

1.2. Treat you fairly, showing sensitivity and adapting our approach depending on your needs, to enable you to make an informed decision about any donation.

1.3. Give a clear explanation of how you can make, amend and cancel your donation.

1.4. Process and thank you for your donation promptly. Where appropriate, we will provide you with a formal Gift Agreement with the purpose of the gift and the payment schedule for transparency and accurate record-keeping.

1.5. Ensure your gift is used in the way in which you intended. All donations, when unrestricted, will be used where the School needs it most. Where donations are given for a specific purpose, we will take care to ensure that your wishes are carried out. From time to time, the philanthropic priorities of the School may change. Should this happen, alternative uses for restricted donations will be discussed with you or your representative. If we are unable to contact you or a legal representative, for example because you have passed away, we will use your gift in a manner that is as consistent as possible with your original intent.

1.6. Keep you updated (at least annually) about the impact of your philanthropy and the evolving needs and priorities of the School. The School's most recent financial accounts are publicly available via the Charity Commission.

1.7. Recognise your gift publicly where appropriate, such as in our annual publication, unless you ask to remain anonymous. We will respect any requests to remain anonymous, however we may disclose details of any donor where we are required to do so by law, by any governmental or other regulatory authority, or by order of a court.

1.8. Manage our resources responsibly and consider the impact of our fundraising on our donors, supporters and the wider public.

1.9. Respect your rights and privacy. All gifts and information will be processed in accordance with relevant legislation and our Privacy Notices, which can be found on the school website. We will not make unreasonable intrusions on your privacy, and will honour any requests to cease or

limit solicitations (including by post, email or telephone). We will not make unreasonably persistent solicitations, or place undue pressure on you to make a gift.

1.10. Respond promptly to a complaint by a donor or prospective donor about any matter that is addressed in this policy. Our Fundraising Complaints Procedure can be found at section F, below.

B: The Culford School Fundraising Code

1. The School's charitable activities are regulated by the Charity Commission for England and Wales, with MIST Trustees overseeing the School's Board of Governors, who delegate close scrutiny to the School's Foundation Committee, made up of Governors and Senior Staff. The School delivers its charitable purpose within the contxt of MIST Governance and the Charity Commission's guidance on public benefit and is outlined in MIST's annual report and the financial statement, which can be found on the Charity Commission website.

2. The Foundation Office may solicit donations from individuals, corporations and charitable trusts to provide financial support to help further the mission of the School. It commits to do so ethically and in line with best practice, having subscribed to the Fundraising Regulator and its Code of Fundraising Practice.

3. All fundraising activities undertaken by Culford School are to be agreed by the Board of Governors as part of the School's strategic development plan. These activities may include face-to-face solicitations, online fundraising campaigns, telephone campaigns and direct mail campaigns. The fundraising programme is subject to regular reviews, and the Foundation Director will report to the Foundation Committee on a termly basis.

4. All solicitations and appeals for funds on behalf of the School will:

4.1. adhere to the provisions of this policy and the Code of Fundraising Practice;

4.2. disclose the School's name and purpose for which the funds are requested (including contact information and the registered charity number in case of printed and digital solicitations);

4.3. be truthful and accurately describe the School's activities;

4.4. respect the contact preferences of the donor

4.5. respect the dignity of the donor and of those who benefit from the School's activities.

5. Volunteers and employees who solicit or receive funds on behalf of the School will:

5.1. adhere to the provisions of this policy and the Code of Fundraising Practice;

5.2. adhere to MIST's provisions of the School's Anti-Bribery and Corruption Policy and Culford's Anti-Money Laundering Policy;

5.3. act with fairness, integrity, and in accordance with all applicable laws (including UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018);

5.4. adhere to the provisions of applicable professional standards (including the Charity Commission and the Fundraising Regulator);

5.5. complete appropriate fundraising training;

5.6. inform donors that they are a volunteer or employee of the School, and whether they are being paid;

5.7. answer all questions from current or potential donors promptly and honestly;

5.8. disclose immediately to the Bursar any actual or apparent conflict of interest;

5.9. treat all individuals with respect and care, responding to the needs of each individual donor and being alert to people who may be in vulnerable circumstances;

5.10. cease solicitation of a prospective donor where the fundraiser has reasonable grounds for believing that the prospective donor lacks the capacity to make an informed decision to donate;

5.11. cease solicitation of a prospective donor who requests no further contact, or otherwise indicates they do not want to make a donation or continue with the contact;

5.12. not accept donations for purposes that are inconsistent with the Gift Acceptance Policy (see section C below).

6. The School's fundraising programme, undertaken by the Foundation Office, is funded by the School. Fundraising employees will be remunerated by a salary and will not be paid finders' fees or commission. When necessary to employ services of fundraising consultants, those will be on written contractual terms and compensated with a retainer or fee.

7. Donors will be encouraged to seek independent advice if the School has any reason to believe that a proposed gift might significantly affect their financial position, taxable income, or relationship with other family members.

8. In accordance with B 5.9 above, fundraisers should be aware that donors may be vulnerable for a variety of reasons, including medical conditions, financial vulnerability, personal circumstances, bereavement, or being under the influence of alcohol or drugs. Their vulnerability may vary from day-to-day and may affect the person's behaviour or decision making.

   8.1. If a fundraiser suspects that a potential donor may be vulnerable, they should bring the contact to a close immediately. This should be done politely, without making a request for a donation or asking questions about the potential donor's circumstances. If a fundraiser is unsure whether or not a donor is vulnerable, they should err on the side of caution and end the contact.

   8.2. If a fundraiser believes that a donor is vulnerable, measures will be put in place to ensure that any further contact is appropriate. This may include recording communication preferences in the database, delaying contact until a more appropriate time, or providing additional care and support to enable them to make an informed decision. Fundraisers should be aware that vulnerable donors may be affected differently and for different periods of time, and so the actions taken will depend on the individual circumstances.

   8.3. If a donor's vulnerability means they lack the capacity to make an informed decision, solicitations should not be made, nor donations accepted (see B.9 below).

9. In accordance with B 5.10 above, solicitations should not be made, nor donations accepted, should a fundraiser have reasonable grounds to believe that a potential supporter lacks the capacity to make an informed decision.

9.1. If a fundraiser believes that a donor lacks the capacity to make an informed decision about a gift, measures will be put in place to ensure that donations are not solicited from them in future. This may include recording communication preferences in the database and being aware of responsibilities under data protection law. Fundraisers should not record any judgement about what they perceive an individual's physical or mental condition might be.

9.2. If, after receiving a donation, Culford School receives evidence that the donor lacked the capacity to make an informed decision to donate, the donation will be returned. In these circumstances, the School will follow guidance from the Charity Commission, and take such legal advice as may be appropriate.

10. Donors are entitled to give the School notice requiring it to stop direct marketing, including fundraising. Should a donor use the Fundraising Preference Service (FPS) to request that solicitations be stopped, the School will act to stop direct marketing communications within 21 days of receiving the request from the FPS.

C: Gift Acceptance Policy

1. The ultimate responsibility to accept or decline a donation resides with the Board of Governors.

2. Donations up to but not including a value of £15,000 (as a single donation or series or pattern of donations in any rolling year) may be accepted by the Foundation Director after consultation with the Head, who is accountable to the Board of Governors.

3. The School is committed to undertaking due diligence when soliciting and accepting donations. Due diligence is completed to:

   3.1. ensure that it is appropriate for the School to accept the donation;

   3.2. give reasonable assurance that the donation is not from an illegal or inappropriate source;

   3.3. protect the School's reputation both internally and externally;

   3.4. prevent threats to the School's independence;

4. Proportionate due diligence will be conducted when establishing a donor relationship, and for all donations in accordance with the Charity Commission's *Know Your Donor* guidance, contained in Chapter 2 of their Compliance Toolkit. This will include:

   4.1. the identification of the donor;

   4.2. verification of their identity;

   4.3. identification of their business with the charity.

   Findings may be recorded using template forms provided by the Charity Commission or on the donor's database record, and will be referred to the Charity Commission where necessary under their serious incident reporting guidance.

5. Due diligence will be referred to the Head and Bursar for further scrutiny for any donation:

   5.1. Of £15,000 or more (as a single donation or series or pattern of donations in any rolling year);

   5.2. likely to draw significant public attention;

   5.3. associated with a naming opportunity (see section D); or

5.4. where the donor's link to the School or motivations for giving are unclear.

Should further consideration be required, or in circumstances where there could be any perceived conflict of interest in their making a decision, the Head and the Bursar shall pass the matter to the Chair of Governors whose decision will be regarded as final.

6. A donation is liable to be refused if it:

6.1. appears to be connected with a child currently applying for admission to Culford School, except with the explicit written consent of the Chair of Governors, taking such legal advice as appropriate to establish the lawfulness of accepting the donation;

6.2. appears to be connected to a pupil whose academic progression, grades or matters of discipline are currently under review by the Head, except with the explicit written consent of the Chair of Governors, taking such legal advice as appropriate to establish the lawfulness of accepting the donation;

6.3. is at risk of being (or perceived to be) connected with or otherwise able to influence decisions surrounding the admission, academic progression, or treatment of any prospective or current pupil;

6.4. is being made by an individual or entity notorious in some way, or closely associated with another individual, organisation or activities known to be in conflict with strongly held views or values of the School;

6.5. is being made by an individual or organisation involved in, or strongly suspected to be involved in, criminal or fraudulent activity;

6.6. is at odds with the objectives of the School, its agreed policies or beneficiaries;

6.7. is in contravention of the 2010 Bribery Act or any other legislation.

7. An anonymous donation, where the School may only deal with an intermediary who will not identify the donor, even to the Head/Chair of Governors, on a strictly confidential basis, will not be accepted.

8. Where concerns are raised under these ethical guidelines about a donation that has already been accepted by the School, a similar process of consideration and scrutiny will be followed to that set out above to determine whether it is appropriate to retain the donation, to return it to the donor or to take any other action in relation to the donation.

D: Naming Guidelines

1. It is not the Board of Governors general policy to associate the names of donors or others with buildings, facilities, equipment or bursaries, but that they may consider doing so at their discretion on a project by project or case by case basis. No name will be associated with any building, facility or equipment except with the consent of the named person (or their personal representatives); and only for so long as the Board of Governors continue to consider it is in the interests of the School.

2. Prizes/Awards

2.1. An endowed prize or award may be named if the proposed prize/award is deemed accurately to reflect the School's academic priorities and complement existing prizes/awards, and if the donation will generate income to cover the full cost of the prize/award for the duration that the prize/award will be made. The named prize or award will be reviewed and agreed on a case-by-case basis.

Should a new prize/award satisfy 2.1 above, the Deputy Head will make a recommendation to the Head, whose decision will be final.

Any endowed or named fund/prize must be accompanied by a document setting out terms. If a donor is considering making a gift for a specific purpose, or on restricted terms, they are encouraged to discuss their plans with the School.

E: Legacies

1. Culford School has benefitted from legacy pledges. All fundraising activities regarding legacies will comply with section 15 of the Code of Fundraising Practice.
2. When seeking legacy pledges, fundraisers will be clear that communications are not intended to be legal advice, and that potential testators should seek their own professional advice.
3. Potential testators intending to leave a gift for a specific or restricted purpose are encouraged to discuss their plans with the School.

    3.1. Where a legacy has been left for a particular purpose that the School cannot fulfil, the School will contact the testator's personal representatives before accepting the legacy, and will consult the Charity Commission where appropriate.

4. The School will adhere to the wishes of the testator with regard to publicity of the gift. Should these wishes be unknown, the School will contact the estate to ascertain their wishes.

F: Data Protection

1. The Foundation Office will ensure it complies with all relevant legislation, including the UK GDPR, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003, so that it does not obtain, process, store, sell or pass on data unlawfully.
2. All records created in accordance with this policy can be found in the School's Policy Central under Culford Data Retention Policy.
3. The information created in accordance with this policy may contain personal data. The School's use of personal data will be in accordance with data protection law. The School has published privacy notices on its website, including a Foundation Privacy Notice which explain how the School will use personal data.
4. When sharing personal data with a third party processor, for example mailing houses, the Foundation Office will ensure that all issues, such as data ownership, fitness for use and confidentiality, are governed by a legally binding contract.

G: Fundraising Complaints Procedure

We believe that philanthropy should be an enjoyable experience. We are registered with the Fundraising Regulator and are committed to best practice in fundraising. Despite our best efforts, we recognise that there may be occasions when you wish to register a complaint. We take complaints seriously and seek to address them appropriately.

If you believe that we have not complied with this policy or may be in breach of the Fundraising Regulator's Code of Fundraising Practice, please raise your concerns using the steps below. Complaints may be made by anyone who has a concern about the School's fundraising activity, which may include current or potential donors, staff and volunteers.

How to complain

In the first instance, complaints should be raised with the Foundation, using the details below:

Email: foundation@culford.co.uk

Post: Foundation Director, Culford School, Bury St Edmunds, Suffolk, IP28 6TX

Telephone: +44(0)1284 385310

Complaints about the Foundation Director should be sent to the Head (CBentley@culford.co.uk). Please include your name and contact details in your email or letter so that we can get back in touch with you easily.

It is much easier to investigate and resolve any complaint that is raised in a timely manner. The Fundraising Regulator recommends you should raise a complaint within 12 weeks. Complaints received will be dealt with sensitively and confidentially with details shared only with those who need to know for the complaint to be investigated.

Throughout the complaint process, we will treat you fairly and with respect, keep you informed of progress, respond promptly, and let you know how to escalate a complaint if you wish to pursue it further. We will also consider whether the issue needs to be reported externally by the School.

Responding to a complaint

We aim to acknowledge all complaints within three working days, and to resolve them within 28 working days.

Your complaint will be fully investigated, and the outcome of our investigation will be communicated to you within 28 working days of the receipt of your complaint. If it is not possible to give a response within that timescale, we will contact you to explain why and to provide an indication of when a full response can be expected.

If you are not satisfied

If you are not satisfied with our response, please contact the Foundation Director within one month of the date of that response using the details above, and your complaint will be investigated by the Head/Bursar. Your request will be acknowledged within five working days of receipt.

The Head will aim to complete their investigation within 28 working days and will write to you setting out the outcome of their review and the rationale for their decision.

What to do next

If you are still not satisfied, you are entitled to make a complaint to the Fundraising Regulator regarding Culford School. The Fundraising Regulator is the independent regulator of charitable

fundraising in the UK. It sets and promotes the standards for fundraising practice and adjudicates complaints from the public about fundraising where these cannot be resolved by the charities themselves. Please contact them via the details at:
https://www.fundraisingregulator.org.uk/complaints/make-complaint

H: Version Control

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