

READING BLUE COAT

Fundraising Policy

1 Introduction:

Reading Blue Coat School (RBC) is a registered charity (charity number 1087839) which seeks to raise funds to further its charitable objectives.

The fundraising efforts are led by the School's Foundation Office and are subject to the oversight and control of the Governors of the School who have overall responsibility for RBC's fundraising and who set and monitor RBC's fundraising strategy in accordance with the principles set out in Charity Commission guidance CC20 and Part 2 of the Fundraising Code of Practice. As part of the Governors' commitment to ensuring that fundraising is carried out properly and exclusively in the interests of RBC as a charity, they have adopted this policy.

The School requires all fundraising to be carried out ethically. At the heart of fundraising ethics lies the need to ensure the School's objectives, sense of personal integrity and the trust of the donors are not violated. This requires openness, transparency and respect. There is also the need for the School to ensure they do not expose themselves by accepting donations from questionable or inappropriate sources.

The School is registered with the Fundraising Regulator and all staff and volunteers must be familiar with the fundraising Regulator's Code of Fundraising Practice as it applies to their work and must follow its rules.

This document is not legally binding, but sets out the principles under which the School will seek to operate when undertaking its fundraising activities. It reflects RBC's commitment to implement, as far as possible, best practice in its fundraising activities, and is in line with the current guidance provided by the Institute of Fundraising (IOF).

2 Summary:

RBC is committed to the principle that it solicits gifts from those individuals who have an active relationship with the School – Old Blues, supporters, staff, parents and former parents – or those individuals or organisations that have been carefully identified as having a potential interest in supporting a specific activity or initiative.

3 General Principles:

The School adopts the following general principles which apply to all fundraising:

- Our fundraising is legal, open, honest and respectful. It is truthful and decent.
- We are polite to people at all times.
- We do not unfairly criticise or insult other people or organisations.
- We do not encourage donors to cancel or change donations to other organisations.
- We do not fundraise in a way which is an unreasonable intrusion on a person's privacy, is unreasonably persistent or places undue pressure on a person to donate.

- Our fundraising is accurate, with evidence to support any claims, it is not misleading, does not leave things out and is not ambiguous.
- We do not take advantage of mistakes made by a donor.
- We observe equality in our fundraising and in particular we comply with the requirements of the Equality Act and the law on equality wherever we fundraise.

4 Donor's Rights:

- We take all reasonable steps to treat a donor fairly, so that they can make an informed decision about any donation.
- We always take into account the needs of any possible donor who may be in vulnerable circumstances or need extra care and support to make an informed decision.
- We never exploit the trust, lack of knowledge, apparent need for care and support or vulnerable circumstance of any donor at any time. . All fundraising solicitations by, or on behalf of the School, will disclose the School's name and the purpose for which the funds are requested. Printed solicitations (however delivered) will also include the School's address (registered office), contact details, registered company number and registered charity number.
- We never accept donations where we know, or have good reason to believe, that a person lacks capacity to make a decision to donate, or is in vulnerable circumstances which mean they may not be able to make an informed decision. Among other things, we consider:
 - any physical or mental-health condition the person may have;
 - any disability the person may have;
 - any learning difficulties the person may have;
 - whether the person is facing times of stress or anxiety (for example, following the death of a loved one or redundancy);
 - whether a donation is likely to affect the person's ability to sufficiently care for themselves or leave them in financial hardship;
 - how well the person can speak and understand English;
 - whether the person is under the influence of alcohol or drugs; and
 - the person's age.

If we discover that a donor made a donation while they did not have the capacity to make an informed decision, we will return the money to them.

- Donors and prospective donors are entitled to the following, promptly upon request:
 - The most recent financial statement of the School
 - Confirmation of charitable status
 - A copy of this policy
- 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 consultant / freelance fundraiser working on behalf of the School
- Donors will be encouraged to seek independent advice if there is any reason to believe a proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members. We will be clear that we are not in a position to offer financial advice. It will remain the donor's responsibility to consider such matters prior to making the gift.
- Donors will be acknowledge and recognised as they may reasonably wish. A donor's request and privacy will be respected. Any donor records that are maintained by the School will be kept

confidential to the greatest extent possible. Donors have the right to see their own donor record and to challenge its accuracy.

- i) The School's Privacy Notice explains how the Foundation Office collects, stores, manages and protects personal information.
- j) Donors and prospective donors will be treated with respect. We will comply with any request:
 - To cease or limit the frequency of solicitations (including any communicated by the Fundraising Preference Service).
 - Not be solicited by telephone or any other communication channel.

If any donor or prospective donor asks to be excluded from fundraising approaches (including by using the Fundraising Preference Service) this is recorded on the Foundation Office's database and acted upon immediately so they are excluded from all forms of solicitation, or those forms from which they have asked to be excluded. Under such circumstances the Foundation Office will seek to find out the forms and amount of communication preferred, recognising that some still wish to be solicited by certain methods, while others wish to receive no requests for gifts, but to receive other communications and remain actively involved with the School.

- k) Donors have the right to ask that their donations be allocated to a specific area of school activity. The School will meet these requests wherever possible and appropriate in order to deliver their objectives. For further details on gift acceptance and restricted gifts, see Section 8.
- l) The School will respond promptly to a complaint by a donor or prospective donor about any matter that is addressed in this policy in accordance with our *Complaints Policy* which is available on our website.

5 Constituency:

The School is committed to the principle that it solicits gifts from individuals who have a clear relationship with the School – Old Blues, parents, former parents and supporters – or individuals and organisations that have been carefully identified as having a potential interest in supporting a specific activity or initiative.

The School's Foundation Office has many thousands of contactable alumni on the database. It is from this group, primarily, that the School will focus the majority of solicitations provided in any case that it is satisfied that it has a legal basis under data protection law for making a solicitation. The School also fundraises from current and former parents as well as staff.

We take all reasonable steps to make sure our materials are suitable for our constituents. Our materials will not shock, cause fear, distress or offence.

6 Overview of Fundraising Practices:

- a) Fundraising solicitations on behalf of the School will:
 - Be truthful, legal open and respectful. It will be truthful and decent and comply with the Committee of Advertising Practice Code.
 - Accurately describe the School's activities and the intended use of the donated funds
 - Respect the dignity and privacy of those who benefit from the School's activities
- b) Employees and volunteers who solicit funds or receive funds on behalf of the School will:
 - Adhere to the provisions of this policy
 - Act with fairness, integrity and in accordance with all applicable laws
 - Cease solicitation of a prospective donor if they indicate this by word or gesture.
 - Disclose immediately to the School any actual or apparent conflict of interest

- Not accept donations for purposes that are inconsistent with the School's objectives
- c) Ensure that no inappropriate benefit is secured by a donor in return for a gift. The School will not sell or exchange personal details of donors. The School's Privacy Notice explains how the School Foundation Office collects, stores, manages and protects personal information.
 - d) The School will abide by all applicable laws and regulations relating to the acceptance, solicitation and use of donations.
 - e) The School will meet the provisions of the Bribery Act, the Proceeds of Crime Act, the Criminal Finances Act and other relevant legislation intended to protect the integrity of donations. All staff are required to be familiar with the School's Anti-bribery and prevention of tax evasion policy.

7 Specific Fundraising Practices:

The School uses a range of direct solicitation methods, which letters, face-to-face approaches and in the future, telethons.

a) Direct Mail:

Hard-copy fundraising materials, which usually include a leaflet about supporting RBC and a donation form will be sent out during the year. The School checks that those who have requested they are not mailed, or are not solicited, will not receive these solicitations including those registered on the Mail Preference Service. Such requests are recorded on the database.

Every attempt will be made to ensure deceased constituents are excluded from such mailing.

b) Face-to-face solicitations

Fundraising members of the Foundation Office but most particularly the Director of Foundation, meet potential and current donors where appropriate to solicit gifts. The solicitations of a major gift is likely to entail a series of meetings.

Every request for a meeting, whether made by letter, email or telephone, where a solicitation, or a conversation leading to a solicitation is envisaged will explicitly indicate this is the purpose, or part of the purpose, in the request. The fundraiser would not typically accept a gift as 'cash in hand' on the day of the meeting. If during the course of a meeting, the fundraisers believes a potential donor is not capable of making an informed decision, a donation will not be solicited. In such circumstances, a note would be made on the database.

c) Email

From time to time, alumni and other potential donors are contacted by email and this includes information about donations such as links to the giving pages of the website. The School can always be identified as the originator of the message. It is always possible to opt out of receiving email communications. Emails including materials soliciting donations will not be sent unless RBC has consent from the recipient to do so.

The School's website also contains material about how and why people might support RBC by making a donation.

d) Telethons

Please note: to date the School has not held a telethon. Should one occur in the future the following guiding principles will be adhered to:

- The School would contact, by phone, from an identifiable number, those members of the Old Blues, parent and supporters community who have an up to date telephone number and who have not indicated an unwillingness to receive calls.
- Anyone over the age of 80 would not be called unless they have specifically indicated they wish to receive such communication. The Foundation Office would also exclude those individuals they know to not have the capacity to make a decision on the telephone.
- All those called for the purpose of a donation would receive a pre-call letter (either by post or email) giving the opportunity to opt out of that particular telethon, or telethons in general. Anyone who wishes to be excluded from telethons would be removed from the calling list and if the request applies to telethons in general they would be given a solicitation code to reflect this.
- If during a telephone campaign anyone asks not to be called, or to be solicited at all, they would be removed from the calling list.
- Calls will not be placed after 9pm unless requested by the call's recipient.
- If the person requests, we provide our business address and a Freephone contact number.
- We will not use automated dialling systems and we will work to avoid silent and dropped calls.
- Anyone who has signed up to the Telephone Preference Service would not be called unless they have stated otherwise to the Foundation Office.
- Callers would more than likely be members of the RBC Sixth Form or recent leavers. They would be professionally trained at the start of the telethon and required to speak to each other and those they call with courtesy and respect. One of the purposes of the call is to solicit a donation and callers will be clear that is the case on the call. But the call is also to check contact details, convey school news and learn news from the individual. Callers may also ask for feedback on events and seek consent to contact in the future. Training would cover relevant requirements of the Fundraising Regulator's Code of Fundraising Practice, including specific rules relating to telephone fundraising.
- Callers would follow the legal requirements when asking for Direct Debits and Gift Aid. The School would employ a telethon consultant to oversee the telethon and to provide supervision during calls. The School would enter into a formal, written agreement with the consultants. Training is provided by members of the Office and the caller supervisor from the consultants. Training is provided by members of the office and the caller supervisor from the consultants.
- Under no circumstance will a caller be aggressive – requests for donations are made carefully to ensure that no-one feels pressured into making a gift and are made no more than three times.
- Callers are employed by the School and paid an hourly rate for the time that they work. Their salary is not calculated on the amount they raise, so they do not feel under undue pressure to focus on the fundraising element of the call, but can pay equal attention to building or strengthening the relationship alumni and friends have with the School.

8 Acceptance of donations:

The School will accept gifts that:

Aim to support the School's objectives, as set out in the School's vision

Fit within our organisational values

Support our financial needs as a legitimate component of our income

All gifts given for a restricted purpose will be received and used solely for the purpose agreed between the donor and the School. Some gifts are unrestricted and are therefore spent at the School's discretion following discussions with governors and the School's senior leaders. Gifts for restricted purposes will be accepted, providing the restriction is within the objectives of the School, is not inconsistent with their

priorities and is not subject to terms that will cost more to implement or administer than the value of the gift.

The full value of every gift (including gift aid, if applicable) is used for the charitable purposes of the School. There is no administrative or overhead charge.

9 Refusal of Gifts:

- a) 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 a continuous contract with them as a member of the alumni community, parent or long-term supporter. Current identification evidence will be requested from any donor whose identity is not already known to the School
- b) 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:
 - 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
- c) Consideration will be given whether any donation involved or is linked to any suspicious transaction, for example:
 - A fee is requested to release the donation
 - The School is asked to cash a cheque and return part of the donation
 - The School is asked to convert foreign currency
 - The proposed donation involves other additional steps with no clear purpose in the making of the donation
 - The donor has no link to the School and no explanation for interest in their work
 - The gift is made in cash
- d) The School will not accept gifts in cases where to do so would not be in the best interests of the School i.e. might:
 - Compromise its status as an independent organisation
 - Involve or risk conduct contrary to the School's anti-bribery and prevention of facilitation of tax evasion policy
 - Create unacceptable conflicts of interest
 - Expose the School to undue adverse publicity or reputational risk
 - Cause any other damage, including financial damage, for example, deterring other donors
 - Involve concerns about the legality of the source of funds or the ability to identify the donor
 - Involve the acceptance of funds from proscribed organisations, designated individuals or sanctions targets
 - In any other way be in conflict with the values and objectives of the School
- e) The Governors of the School may decide to refuse the offer of a donation because the purpose of the donation does not match its fundraising objectives or if there is doubt about the appropriateness or legality of the source. Should a donation be refused for any reason, records will be kept to indicate why it was refused and any such refusal will be couched in appropriate language so that it does not cause offence.

10 Gift Aid and Tax Efficient Giving:

The School does not attempt to claim gift aid on any donation which do not meet HMRC guidance, but it is committed to reclaiming gift aid on all gifts made by UK taxpayers where a gift aid declaration has been made. To that end, every acknowledgement letter to a donor who has gift-aided his/her gift serves as a receipt for tax purposes. Donors may be provided with a schedule of their donations during the course of a tax year to assist with their income tax returns, if they request this information.

11 Handling of donations:

In line with IoF best practice, cash and cheques are banked at the earliest possible opportunity. Cash and cheques that have not yet been banked are stored securely. Charity vouchers such as those made through the Charities Aid Foundation are sent to CAF to be processed and the money is passed to Reading Blue Coat by bank transfer. Card transactions are made through the Foundation Office's Merchant Service account and all handling is PCI-DSS compliant.

Donations of shares are co-ordinated between the donor and the Bursar.

All receipts are recorded and cash is counted in the presence of two unrelated individuals and bank statements are regularly reconciled against these records by a person who was not involved in their receipt or banking.

12 Database and Security:

All alumni and donor data is held securely on the Foundation Office database. This database is password protected and only those who need to see financial data have the relevant permissions to do so. Those who are working with the Foundation Office on a temporary basis, such as the telethon callers, are required to maintain confidentiality.

13 Data Protection:

The School's Privacy Notice explains how the Foundation Office collects, stores, manages and protects personal information and is found on our website.

It outlines the types of personal information that we hold and how this is used to provide services to our Old Blues, supporters and friends of the School. The Foundation Office is part of the School which means the School is ultimately responsible for how the Foundation Office uses people's information. The Bursar is the School's nominated Data Protection Co-ordinator.

14 Acknowledgement, Recognition and Stewardship:

Donors will be acknowledged and recognised as they wish. A donor's request to remain anonymous will be respected as far as is legally, practically and ethically possible.

Where desired, the School is committed to the public and private recognition of its donors. Each donor can expect to receive a formal and personalised letter from the Foundation Office and/or the Head.


From time to time, other forms of recognition are offered in line with the value of gifts, such as invitations to special events.

In no circumstances will a gift be accepted where the donor expects a place or position at the School to be offered, or preferential treatment for a particular student. All places and positions at the School are gained through academic or professional merit alone.

Questions

If you have any questions about this policy, please contact us:

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