



THE PERSE
SCHOOL
CAMBRIDGE

Fundraising and Donation Acceptance Code

The Perse School

April 2022

Contents

Executive Summary	1
A: Donors' Rights	1
B: Fundraising Practices	2
C: Transparency	2
D: Acceptance and Refusal of Donations	3
E: Naming Guidelines	4
F: Data Protection	5

Executive Summary

This code has been developed to guide anyone who raises funds for The Perse School, whether paid staff, consultants or volunteers. It is not a static document, and should be reviewed by the Governing Board annually to ensure it is up to date with changing legislation and relevant codes of practice, and that it reflects the current culturally accepted norms. It should be noted that each donation must be considered for its legal, moral, ethical and public relations implications, if fundraising is to succeed.

This code outlines:

- A Donors' Rights
- B Fundraising Practices
- C Financial Accountability
- D Acceptance and Refusal of Donations
- E Naming Guidelines
- F Data Protection

There are three guiding principles to the ethics of fundraising:

- The School will accept donations on the clear understanding that the donor will have no influence over the independence of the School.
- The School's selection criteria for admissions are set out in Admissions Policies and are fully independent of philanthropic support of the School.
- Donations will have no bearing or influence on the progression of current or future pupils of the School.

Everyone involved in any form of fundraising, whether paid staff in the Alumni & Development Office or other departments, consultants or volunteers must comply with this code and with the Code of Fundraising Practice (<https://www.fundraisingregulator.org.uk/code>) set out by the Fundraising Regulator.

Although the primary purpose of this code is to assist fundraisers in their work, it will also be available to donors and potential donors as an expression of our openness and integrity with regards to fundraising should they request to see it.

A: Donors' Rights

1. There will be complete transparency in all our dealings with donors. Specifically:
 - a. All fundraising solicitations by or on behalf of the School will disclose the School's name and the purpose for which funds are requested.
 - b. Printed solicitations will include full contact details.
 - c. All verbal requests should be supported by a printed statement incorporating such information, where possible.
 - d. All questions raised will be answered by the School promptly and honestly.
2. Donors are entitled to the following upon request:
 - a. The most recent annual report and financial statements;
 - b. Confirmation of the charitable status of the School;
 - c. A copy of this code.
3. Donors will be treated with respect. Specifically:
 - a. Donors will be given appropriate acknowledgement and recognition for all donations and sponsorships.
 - b. Unreasonably persistent approaches for the purpose of soliciting or otherwise procuring money or other property will not be made.

- c. Undue demands will not be placed on potential donors to give money or other property.
 - d. A donor is entitled to give the School written notice requiring it to stop direct marketing including fundraising.
4. Donors are entitled to know whether an individual soliciting funds on behalf of the School is a volunteer, employee or consultant, and whether or not they are being remunerated. Fundraising staff, officers and trustees who are fundraising as part of a paid role, will state that the solicitation is being made for the benefit of The Perse School, that they are an officer, or employee and that they are being remunerated.
5. Donors will always be encouraged to seek independent advice if the School has any reason to believe that a proposed donation might significantly affect the donor's financial position or taxable income.
6. Donors are normally entitled to confidentiality on the level of their donation or anonymity that they have made a donation, if they request it. The exception to this condition will be if the School is legally required to disclose information relating to the donation.
7. The privacy of donors will be respected. The School will comply with the General Data Protection Regulation and the Data Protection Act 2018 when processing personal information relating to donors.
8. The School will normally respond within a reasonable time to any enquiries by a donor about any matter addressed in this code. Donations will normally be acknowledged within 7 days of receipt.
9. Complaints relating to fundraising activities should be raised with the Business Development Director (tel, 01223 403865, email, knsawtell@perse.co.uk) or the Bursar (tel, 01223 403874, email, ashakespeare@perse.co.uk). The School aims to resolve any complaint within 15 working days of receipt.
10. If you are not satisfied with the School's response to your complaint, you may refer the matter to the Fundraising Regulator (<https://www.fundraisingregulator.org.uk/>).

B: Fundraising Practices

1. Volunteers, employees or consultants who solicit or receive donations on behalf of the School shall:
 - a. adhere to the provisions of this code;
 - b. act with fairness, integrity, and in accordance with all applicable laws;
 - c. adhere to the provisions of the Code of Fundraising Practice;
 - d. disclose immediately to the School any actual or apparent conflict of interest;
 - e. only accept donations that are aligned with the School's objectives and mission.
2. Fundraising solicitations on behalf of the School will be truthful and accurately describe the School's activities and the intended use of the donated funds.
3. 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 compensated with a retainer or fee.
4. The School does not and will not sell its donor or alumni list. Data will only be passed to third parties when necessary for administration (e.g. a mailing house) or when required by law (see section F: data protection).

C: Transparency

1. The School is a charitable company limited by guarantee registered in England and Wales with number 05977683. It is a charity registered with the Charity Commission for England and Wales with number 1120654. Its charitable activities are monitored by the Charity Commission. The Governors of the School are its charity trustees. The manner in which the School delivers its charitable purpose within the context

of the Charity Commission's guidance on public benefit is outlined in the annual report and the financial statement.

2. All donations will be used to support the vision and the strategy of the School.
3. All restricted donations will be used as agreed with the donor. If necessary due to programme or organisational changes, alternative uses will be discussed where possible with the donor or their legal designate(s). If the donor is deceased or not legally competent, and the School is unable to contact a legal designate, the donation will be used in a manner that is as consistent as possible with the donor's original intent.
4. Annual financial reports are factual and accurate, and publicly available. The annual donor report is publicly available in the magazine published by the Alumni & Development Office in the autumn of each year, which can be found on the School's website, or by contacting the Alumni and Development Office direct.
5. The School's fundraising programme is subject to regular reviews by the Governors' Finance & General Purposes Committee.
6. All financial affairs will be conducted in a responsible manner.

D: Acceptance and Refusal of Donations

1. The ultimate responsibility to accept or decline a donation resides with the Governors.
2. Donations up to and including a value of £50,000 may be accepted by the Business Development Director, who shall be accountable to the Governors through the School's management structure.
3. The School is committed to undertaking due diligence when approaching potential major donors or accepting major donations. It does so in order to ensure it is appropriate for the School to accept the donation; to give reasonable assurance that the donation is not from an illegal or inappropriate source; to protect the School's reputation both internally and externally; to prevent threats to the School's independence; and to ensure funds are not diverted to low-priority activities. For this purpose, a major donation is a single donation or a series or pattern of donations whose total in any rolling year exceeds £50,000.
4. Due diligence will be carried in accordance with the Charity Commission's "Know Your Donor" guidance contained in Chapter 2 of their Compliance Toolkit in particular, the identification of the donor, verification of their identity and their business with the charity. Proportionate due diligence will be undertaken for (see D:7):
 - a. any donation exceeding £50,000, £25,000, £15,000 and £1,000;
 - b. any donation likely to draw significant public attention (of any value);
 - c. any donation associated with a naming opportunity.
5. A donation is liable to be refused if it:
 - a. appears to be connected with a child currently applying for admission to The Perse, except with the explicit written consent of the Chair of Governors;
 - b. 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;
 - c. is at risk of being perceived to be connected or otherwise able to influence decisions surrounding the admission, academic progression, or treatment of any prospective or current pupil;
 - d. 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 of the School;

- e. being made by an individual or organisation involved in, or strongly suspected to be involved in, criminal or fraudulent activity;
 - f. at odds with the objectives of the School, its agreed policies or beneficiaries;
 - g. in contravention of the 2010 Bribery Act.
6. Donations acceptance review process
- Donations will be referred for further scrutiny by the Head and the Bursar in case of:
- a. any donation that exceeds £50,000 (as set out in D:3);
 - b. any donation that is likely to draw significant public attention (even if less than £50,000 and straightforward in its terms and purpose);
 - c. any donation that is associated with a naming opportunity.
- 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.
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 in order 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.

E: Naming Guidelines

1. Bursaries
Endowed bursaries may be named in perpetuity if the gift is at least at a level that can generate an annual income equivalent to a minimum of 50% of the full annual fee.
2. Prizes/Awards
 - a. 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 a period of at least 25 years.
 - b. Should a new prize/award satisfy criteria 2.a above, the Deputy Head (Teaching and Learning); for academic prizes/awards) or Deputy Head (Pupil Development and Welfare); for prizes/award recognising exemplary conduct) will make a recommendation to the Head, whose decision will be final.
3. Endowed and named funds must be accompanied by a document setting out terms of reference.
4. The Governing Board reserves the right from time to time to review and amend minimum amounts required to endow or name a fund so as to ensure that the monies are sufficient to fund the intended purpose(s). If and when the minimum amount is increased, such action shall not be retroactively applied on funds already established.
5. Capital Projects
 - a. A donation amount required to name a building will be agreed by the Governing Board and does not need to match the full cost of the proposed project.

- b. The contribution of a major proportion of a building or a large area within a building is necessary and sufficient to confer naming rights.
 - c. The donation of a gift sufficient for the naming of the building does not preclude the naming of separate components of the building unless otherwise agreed by the Governing Board.
 - d. Naming rights for smaller items such as seats or bricks will be allocated as appropriate and defined within the scope of the entire project.
 - e. The development of new options for naming to a building interior or exterior can be introduced at any time.
 - f. The name will not necessarily be on the item funded. Naming can be accomplished by placement of the donor's name on the item paid for (subject to aesthetic constraints) or on a plaque on display or in a permanent book at the entrance to a building, or in an annual report.
 - g. The name chosen by the donor for a building or for a major part of a building will have to be approved by the Governing Board.
 - h. Naming rights for a building or any part of it is permanent as long as the current structure exists. If the structure is remodelled or reconfigured substantially, or if the purpose of the building changes significantly, the Governing Board will review the naming of the structure. Names will normally not be transferred to successor structures except on explicit decision by the Governing Board and the Head.
6. The Governing Board reserves the right to remove a donor/honouree's name to protect the School's reputation should the standards of integrity or character associated with the name be brought into disrepute.

F: Data Protection

1. The Alumni & Development Office will ensure it complies with the UK General Data Protection Regulation, 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 are managed in accordance with the School's *Records Management Policy* and *Records Retention Schedule*.
3. Records created in accordance with this policy may contain personal data. The School has a privacy notice which explains how the School will use the personal data of alumni, friends and supporters. The privacy notice is published on the School's website. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the School's *Data Protection Policy for Staff, Governors and Volunteers* and *Information Security and Sharing Data Guidance* which are both contained in the *Data Protection and Information Security Handbook*.
4. When using external agencies or when data may be shared with a third party, for example mailing houses, the Alumni & Development Office will ensure that all issues, such as data ownership, fitness for use and confidentiality, are governed by a legally binding contract.

Authorised by	Jonathan Scott On behalf of the Board of Governors
Effective Date	19 th April 2022
Date of next review	March 2023 (or earlier if required)