THE PERSE SCHOOL
CAMBRIDGE

Fundraising Policy

The Perse School

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The Perse School is deeply grateful to all donors for their generous support and is dedicated to treating donors with the highest level of care and respect. The School has relied on philanthropic support since its foundation, to ensure that the vision of our Founder is upheld today.

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.

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 The Perse, please contact the Head of Alumni and Development.

Related Policies

The School has the following policies which can be found on the school website:

- Anti-Bribery and Corruption Policy
- Anti-Money Laundering Policy
- Whistleblowing Policy
- Economic Crime and Fraud Policy

Donor Charter

1. Making a gift to The Perse 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 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 undesignated, will be used for such purposes as the School judges will best advance its philanthropic priorities. 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 charitable 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 published financial accounts are publicly available via the Charity Commission, and our annual donor report is published on the School website, and available by contacting the Alumni and Development Office directly.

1.7 Recognise your gift publicly where appropriate, such as in our annual Donor Report or Benefactors' Board, 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.

The Perse Fundraising Code

2. The School's charitable activities are regulated by the Charity Commission, and the Governors of the School are its charity trustees. The way 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, which can be found on the Charity Commission website.

3. The Alumni and Development Office may solicit donations from individuals, corporations and charitable trusts and foundations 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.

4. All fundraising activities undertaken by The Perse School are to be agreed by the Governing Board 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 Head of Alumni and Development will report to the Finance & General Purposes Committee of the Governing Board on an annual basis.

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

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

5.2 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);

5.3 be truthful and accurately describe the School's activities;

5.4 respect the contact preferences of the donor, including whether or not they are registered with the Telephone Preference Service, Mailing Preference Service and Fundraising Preference Service;

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

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

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

6.2 adhere to the provisions of the School's Anti-Bribery and Corruption Policy, Anti-Money Laundering Policy and Economic Crime And Fraud Policy;

6.3 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);

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

6.5 complete appropriate fundraising training;

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

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

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

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

6.10 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;

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

7. The School's fundraising programme is undertaken by the Alumni and Development Office. 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.

8. 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.

9. In accordance with paragraph 6.9 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.

9.1 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.

9.2 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.

9.3 If a donor's vulnerability means they lack the capacity to make an informed decision, solicitations should not be made, nor donations accepted (see 10. below).

10. In accordance with 9.3 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.

10.1 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, 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.

10.2 If, after receiving a donation, The Perse 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.

11. 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.

Gift Acceptance Policy

12. The ultimate responsibility to accept or decline a donation resides with the Governing Board.

13. Donations up to but not including a value of £30,000 (as a single donation or series or pattern of donations in any rolling year) may be accepted by the Head of Alumni and Development, who shall be in discussion with the Director of External Relations, be accountable to the Governors through the School's management structure.

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

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

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

14.3 protect the School's reputation both internally and externally;

14.4 prevent threats to the School's independence;

15. 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:

15.1 the identification of the donor;

15.2 verification of their identity;

15.3 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.

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

16.1 Of £30,000 or more (as a single donation or series or pattern of donations in any rolling year);

16.2 likely to draw significant public attention;

16.3 associated with a naming opportunity (see paragraphs 22-24); or

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

17. 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.

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

18.1 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, taking such legal advice as appropriate to establish the lawfulness of accepting the donation;

18.2 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;

18.3 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;

18.4 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;

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

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

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

19. 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.

20. 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 what action, if any should be taken.

21. Gifts in kind (gifts otherwise than in money, including of real and personal property or investments) will only be accepted where they are consistent with the mission and purpose of The Perse School. It will be relevant to consider any potential costs to the School, such as storage, maintenance and repair, before accepting the donation. Donors should be aware that gifts in kind accepted by the School become the property of The Perse School, who reserve the right to determine matters related to the retention, use, preservation, and possible disposition of the material. For the items it accepts, the School will make every effort to put them to good use; items that cannot be used will be sold to benefit the School's charitable purposes, offered to another charitable organisation or recycled where possible.

Naming Guidelines

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

23. Prizes/Awards

23.1 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.

23.2 Should a new prize/award satisfy 23.1 above, the Deputy Head (Teaching and Learning) (for academic prizes/awards) or Deputy Head (Pupil Development and Welfare) (for prizes/awards recognising exemplary conduct) will make a recommendation to the Head, whose decision will be final.

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

Legacies

25. The Perse has a long history of benefaction through legacy pledges. All fundraising activities regarding legacies will comply with section 9 of the Code of Fundraising Practice.

26. 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.

27. Potential testators intending to leave a gift (including gifts in kind) for a specific or restricted purpose are encouraged to discuss their plans with the School.

28. 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.

29. 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.

Data Protection

30. The Alumni & Development 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.

31. All records created in accordance with this policy are managed in accordance with the School's *Records Management Policy* and *Records Retention Schedule*.

32. 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 Privacy Notice for Alumni, Friends and Supporters which explain how the School will use personal data. The School's approach to data protection compliance is set out in the School's *Data Protection Policy*. 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* and *Information Security and Sharing Data Guidance*.

33. When sharing personal data with a third-party processor, 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.

Fundraising Complaints Procedure

34. 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.

35. If you believe that we have not complied with this policy or may be in breach of the Code of Fundraising Practice as outlined by the Fundraising Regulator, 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

36. In the first instance, complaints should be raised with the Head of Alumni and Development, using the details below:

Email: perseado@perse.co.uk

Post: Head of Alumni and Development, The Perse School, Hills Road, Cambridge, CB2 8QF

Telephone: +44(0)1223 403838

37. Complaints about the Head of Alumni and Development should be sent to the Bursar, Alison Shakespeare (ashakespeare@perse.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.

38. 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.

39. 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

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

41. Your complaint will be fully investigated, and the outcome of our investigation and any proposed remedies 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.

42. Where a complaint is upheld, remedies may include acknowledging that things have gone wrong, apologising, taking proportionate action to put things right, and telling you about lessons learned and changes made as a result of your complaint. Requests for financial awards, such as claims for compensation, damages or fee refunds, are beyond the scope of the Fundraising Complaints Procedure.

If you are not satisfied

43. If you are not satisfied with our response, please contact the clerk to the governors (clerk@perse.co.uk) marking correspondence as "private and confidential" within one month of the date of that response using the details above. The clerk will arrange for your complaint to be investigated by someone who has not already been involved in the complaint. Your request will be acknowledged within five working days of receipt.

44. The School will aim to complete the investigation within 28 working days and we will write to you setting out the outcome of the review, the rationale for their decision and any remedies proposed.

What to do next

45. If you are still not satisfied, you are entitled to make a complaint to the Fundraising Regulator regarding The Perse 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

Version Control

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