



Ethical Fundraising Policy

I. Introduction

Manchester High School for Girls (the “School”) is a registered charity (registered charity number 1164323) which seeks to, “...inspire girls to pursue the highest academic, personal and moral standards and empower them to become responsible global citizens who have a positive impact on the world.”

The Manchester High School for Girls General Charitable Trust (the “Trust”) is a registered charity (registered charity number 506823) which focuses on the provision of bursaries at the School.

While the School may, from time to time, look to raise funds to support annual expenditure and capital projects (by agreement with the Trust), the vast majority of fundraising efforts are focused on raising funds for the Trust to provide bursary places. This supports the School’s objectives to, “...enrol girls with true potential, regardless of their means to pay; striving to be academically, but not financially selective.”

Such fundraising efforts are led by the School’s Development Team (in agreement with the Trust) and are subject to the oversight and control of the Governors of the School and also, in respect of fundraising for the Trust, the trustees of the Trust.

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

This Ethical Fundraising Policy sets out the principles under which the School and the Trust, and in particular the Development Team, will seek to operate when undertaking fundraising activities. It takes into account the Code of Fundraising Practice from the Fundraising Regulator and the Institute of Fundraising.

This policy must be read in conjunction with the School and the Trust’s anti-bribery policies, their personal data policies, whistleblowing policies and the Development Team’s privacy statement.

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.

2. General Principles

The School and the Trust adopt the following general principles which apply to all fundraising:

- all funds raised for a particular cause must be used for that cause
- we will not denigrate other individuals or organisations
- we will not exaggerate facts
- we will not take advantage of mistakes made by donors

- we treat donors fairly, enabling them to make informed decisions about donations. We take account of the needs of donors who may be vulnerable or may need additional support to make informed decisions
- we do not take advantage of credulity, lack of knowledge, or apparent need for support or vulnerable circumstance. We adopt the Institute of Fundraising's 'Treating Donors Fairly' guidance
- we do not seek or accept donations if we know or suspect that a potential donor lacks capacity and will return any donations made by someone who lacked capacity at the time
- we do not make unreasonable intrusions into privacy, are not unreasonably persistent and will not place undue pressure on anyone to donate
- we will not ask for support if a person has clearly indicated that they do not wish to continue to engage or we have reasonable grounds for believing in the course of engaging with an individual that they are in vulnerable circumstances and unable to make an informed decision to donate
- we are transparent about fundraising and include a report about fundraising in the School's annual report and accounts as required by section 13 of the Charities (Protection and Social Investment) Act 2016
- The Governors of the School and the trustees of the Trust oversee our fundraising, having regard to: the *Charity Governance Code*, published by the Good Governance Steering Group, *Charity Fundraising: A Guide to Trustee Duties* and *The Essential Trustee*, both published by the Charity Commission

3. Donor's Rights

- 1) All gifts should be made without coercion and as an informed decision.
- 2) All fundraising solicitations by, or on behalf of the School or the Trust, will disclose the School's name and the purpose for which the funds are requested. Where funds are sought for the Trust, its name will be disclosed. Printed solicitations (however delivered) will also include the School's address and contact details.
- 3) Donors and prospective donors are entitled to the following, promptly upon request:
 - the most recent financial statements of the School or the Trust
 - confirmation of charitable status
 - a copy of this policy
- 4) Donors and prospective donors are entitled to know, upon request, whether an individual soliciting funds on behalf of the School or the Trust is a volunteer, an employee or a consultant/freelance fundraiser working on behalf of the School or the Trust.

Please note: currently all fundraising efforts are solely led by the School's Development Team. Consultants and freelance fundraisers are not employed.
- 5) Donors will be encouraged, in writing, to seek independent advice if there is any reason to believe that a proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members. It will remain the donor's responsibility to consider such matters prior to making a gift.
- 6) Donors will be acknowledged and recognised as they may reasonably wish. A donor's request to remain anonymous will be respected as far as is legally, practically and ethically possible.

- 7) The privacy of donors 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 (see Section 10).

The School's Development Team Privacy Statement explains how the Development Team collects, stores, manages and protects personal information:

http://www.manchesterhigh.co.uk/_site/data/files/documents/54F99D361CA5972F765A12A93319020D.pdf

- 8) Donors and prospective donors will be treated with respect. Every effort will be made to honour requests to:
- limit the frequency of solicitations
 - not be solicited by telephone or other technology
 - limit the amount of frequency of printed or online material concerning the School that they are sent

If any donors or prospective donors ask to be excluded from fundraising approaches (including by using the Fundraising Preference Service), this is recorded on the Development Team'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 included. Under such circumstances, the Development Team 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.

- 9) Donors have the right to ask that their donations be allocated to a specific area of School activity. The School and the Trust 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 11.
- 10) The School will respond promptly to a complaint by a donor or prospective donor about any matter that is addressed in this policy. A designated member of the Development Team will attempt to satisfy the complainant's concerns in the first instance. A complainant who remains dissatisfied may request in writing a review of their complaint by the Head Mistress, and will be advised of the outcome of this review.

4. Constituency

The School is committed to the principle that it solicits gifts from individuals who have a clear relationship with the School - alumnae, 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 Development Team has thousands of contactable alumnae on its database. It is from this group, primarily, that the School will focus the majority of solicitations.

5. Overview of Fundraising Practices

- 1) Fundraising solicitations on behalf of the School or the Trust will:
- be truthful
 - accurately describe the School's activities and the intended use of donated funds
 - respect the dignity and privacy of those who benefit from the School's activities

- 2) Employees, volunteers and hired fundraisers who solicit funds or receive funds on behalf of the School or the Trust 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 on request
 - 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
 - ensure that no inappropriate benefit is secured by a donor in return for a gift
- 3) Paid fundraisers, whether staff or consultants, will be compensated by a salary, retainer or fee and will not be paid finders' fees, commissions or other payments based on either the number of gifts received or the value of funds raised.

Please note: currently all fundraising efforts are solely led by the Manchester High School for Girls Development Team. Consultants and freelance fundraisers are not used.

- 4) The School or the Trust will not sell or exchange personal details of donors. The Manchester High School for Girls' Development Team Privacy Statement explains how the Development Team collects, stores, manages and protects personal information.
- 5) The School and the Trust will abide by all applicable laws and regulations relating to the acceptance, solicitation and use of donations.
- 6) The School and the Trust will meet the provisions of the Bribery Act and other relevant legislation intended to protect against bribery in respect of donations.
- 7) The number, type and disposition of complaints received from donors or prospective donors about matters that are addressed to this policy will be included in the Development section of the Head Mistress' termly report to Governors of the School and trustees of the Trust.

6. Content of Fundraising Materials

The School and the Trust are committed to legal and ethical standards in the content of fundraising materials, scripts and in particular:

- printed materials will include the School's registered charity number, its registered name with Companies House (together with the fact it is a limited company registered in England and Wales), its registered number and registered charity number
- will not use materials which are indecent, offensive or intended to cause distress or anxiety
- will not use materials which contain other people's copyright material, marks or other intellectual property without their permission
- will not imply funds are raised for a specific, restricted purpose if not the case
- will be clear whether funds are being raised for the School or the Trust, or, if both, in what proportions
- will be legal, decent, honest and truthful in compliance with the Committee of Advertising Practice rules or the Broadcasting Committee of Advertising Practice rules as appropriate
- will not be misleading because of inaccuracy, ambiguity, exaggeration, omission or any other reason
- will be backed by objective evidence for all direct or implied claims
- will not cause offence on grounds of race, age, religion, sex, sexual orientation or disability
- will not include shocking images

7. Specific Fundraising Practices

The School uses a range of indirect methods of solicitation, primarily through the inclusion of a donation form when booking for an event or with another mailing, and through links provided by e-newsletters and other communications. Leaflets and donations forms may also be placed round the room at events for alumnae, parents and supporters.

Direct Mail

Hard-copy fundraising materials, which usually takes the form of a leaflet requesting financial support for the Bursary Fund and/or the School, along with a donation form, are sent out approximately twice a year.

The School's *High Flyer* newsletter, which is sent out three times a year, sometimes includes articles relating to fundraising efforts and requests for support.

The Development Team checks that those who have requested not to be mailed, or solicited, do not receive these communications. Such requests are recorded on the Development Team's database.

Every attempt is made to ensure deceased constituents are excluded from such mailings.

Face-To-Face Solicitations

Members of the Development Team, particularly the Director of Development and the Alumnae and Development Manager, meet with prospective and current donors, where appropriate, to solicit gifts. The solicitation of a major gift is likely to entail a series of meetings.

Members of the Development Team do not typically accept a gift as 'cash in hand' on the day of a meeting. If, during the course of a meeting, the fundraiser believes that a potential donor is not capable of making an informed decision about a donation, such a donation will not be solicited. In such circumstances, a note would be made on the database and were any further solicitations to be made, they would be made by mail only.

Email

Alumnae, parents, supporters and other potential donors are contacted, from time to time, via email. Such emails may include information about making a gift, such as a link to the donation page on the School's website.

The recipient of the email will always be able to identify the School as the originator of the message.

The School's website also contains a range of material about how and why people may choose to support the School and/or the Trust by making a donation.

It is always possible to opt-out of email communications by contacting the Development Team or simply updating communication preferences online:

<http://www.manchesterhigh.co.uk/page/?title=Old+Girls&pid=93>

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:

- 1) The School would contact, by phone, from an identifiable number, those members of the alumnae, 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 that they wish to receive such communication. The Development Team would also exclude those individuals they know to not have the capacity to make a decision on the telephone.

- 2) 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.

- 3) Anyone who has signed up to the Telephone Preference Service would not be called.
- 4) Callers would more than likely be members of the Manchester High School for Girls 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 but it 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.
- 5) 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 consultant. A member of the Development Team would always be present in the call room every day during calling hours. A member of the Development Team would review the call notes and send a letter to everyone who receives a call.
- 6) Under no circumstances would a caller be aggressive. Requests for donations would be made carefully, following training, to ensure that nobody feels pressured into making a gift.
- 7) Callers would be employed by the School and paid an hourly rate. Their salary would never be calculated on the amount they raise to ensure they do not feel undue pressure to focus on the fundraising element of the call, but to pay equal attention to building or strengthening the relationship with the alumna, parent or supporter.

8. Ensuring Compliance

- 1) The role and authority of all staff and volunteers involved in fundraising is set out in their job description and their objectives as part of the appraisal process.
- 2) Performance of individual roles and objectives, compliance with the law, this policy and the Fundraising Regulator's Code of Fundraising Practice will be regularly reviewed through line management.

- 3) All fundraising materials and call scripts must be approved by the Head Mistress who will only approve the material if it is in keeping with the School and the Trust's fundraising strategy and is in compliance with the law, this policy and the Fundraising Regulator's Code of Fundraising Practice.
- 4) The School and the Trust will monitor fundraising campaigns by:
 - actively seeking feedback
 - attendance at meetings and during telephone campaigns
 - operating a complaints process
- 5) Staff and volunteers with concerns about our fundraising practice should raise them in accordance with the School's whistleblowing policy.

9. Openness and Accountability

- 1) The School and the Trust are committed to openness and accountability in their fundraising. In particular:
 - care is taken to ensure all fundraising literature and scripts are clear and meet legal and regulatory requirements and the Code of Fundraising Practice
 - they operate a complaints procedure
 - they include fundraising in their reports and accounts as required
- 2) The Development Team will collate the information in Appendix I for the Governors for inclusion in the School's reports and accounts and for the trustees of the Trust for their consideration.
- 3) Paid staff who make solicitations to members of the public must make a statement that:
 - gives the name of the School or the Trust as the organisation for which funds are being raised (or, if both, the proportion)
 - explains they are an employee
 - that they are receiving remuneration for the appeal

10. Protection of Vulnerable People and the Public

- 1) The School and the Trust do not tolerate:
 - unreasonable intrusion into privacy
 - unreasonably persistent approaches
 - placing undue pressure on a person to give money or property
- 2) The School and the Trust recognise that vulnerable people may be at particular risk or particularly susceptible to unreasonable intrusion, unreasonable persistence or undue pressure.
- 3) The School and the Trust will take into account the need to protect vulnerable people and the public for unreasonable intrusion, unreasonable persistence or undue pressure in:
 - the design and planning of its fundraising programme
 - deciding the frequency of any fundraising contact
 - deciding the methods of fundraising contact

- where relevant, deciding the time of day of fundraising contact
- in settling the text and appearance of materials and scripts
- in designing training for staff and volunteers
- in steps to ensure compliance

11. Gift Acceptance

The School and the Trust will accept gifts that:

- Aim to support the School's objectives, as set out in the School's vision, namely to, "...inspire girls to pursue the highest academic, personal and moral standards and empower them to become responsible global citizens who have a positive impact on the world."
- Fit within our organisational values
- Support our financial needs as a legitimate component of our income

Gifts for restricted purposes will be accepted providing the restriction is within the objectives of the School or the Trust as appropriate, 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.

All gifts given for a restricted purpose which are accepted will be received and used solely for the purpose agreed between the donor and the School or the Trust as appropriate. The full value of every gift (including Gift Aid if applicable) is used for the charitable purpose of the School or the Trust as appropriate; there is no administrative or overhead charge.

12. Refusal of Gifts

- 1) 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 contact with them as a member of the alumnae community, parent or long-term supporter. Current identification evidence will be requested from:
 - any donor whose identity is not already known to the School
 - for any donor (including those known to the School) for a sum, or series of sums within a 12 month time frame, exceeding £25,000¹
- 2) For any donor proposing to donate a sum or series of sums exceeding £25,000 the School and the Trust 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 either to the reputation of the School or the Trust
 - 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
- 3) 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 or the Trust is asked to cash a cheque and return part of the donation
 - the School or the Trust is asked to convert foreign currency

¹ Unverified or suspicious donations or a series of donations over £25,000 must be reported to the Charity Commission as a serious incident.

- 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 or Trust and no explanation for interest in their work
- 4) The School and the Trust will not accept gifts in cases where to do so would not be in the best interests of the School and/or the Trust i.e. might:
- compromise its status as an independent organisation
 - involve or risk conduct contrary to the School or Trust's anti-bribery policy
 - create unacceptable conflicts of interest
 - expose the School or Trust 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 or the Trust
- 5) If the Development Director feels that a donation or prospective donation may conflict with any of the principles set out above then the gift or donor will be referred for further scrutiny to the Head Mistress and Bursar.
- 6) If the Head Mistress and Bursar do not consider there to be a conflict, then the solicitation plan will resume. If the Head Mistress and Bursar agrees there is a conflict then the solicitation plan will cease.
- 7) If the Head Mistress and Bursar believe there are significant complexities involved they must inform the School's Governors and the Trust's trustees as appropriate. The sole consideration in making a decision will be, in the light of all information available, if the best interests of the School and the Trust are served by accepting or refusing the donation in question.
- 8) Where concerns are raised under this policy about a gift that has already been accepted by the School or Bursary Fund, a similar process of consideration will be followed to that set out above in order to determine whether it is appropriate to retain the gift, to return it to the donor or take other action.
- 9) The Development Director is to inform the Head Mistress of all donations of all proposed or prospective donations of more than £250 from anyone connected with a current or prospective pupil for consideration. This must take place whether or not they believe there is any conflict with the principles set out above. If the Head Mistress believes there may be cause for concern, the above process will be followed for determination as to whether or not the gift should be accepted.

13. Handling of Donations

In line with best practice from the Institute of Fundraising, 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 the School or the Bursary Fund via bank transfer.

Card transactions are made through the School's bank's merchant services and all handling is PCE-DSS compliant.

In terms of Gift Aid, the School does not attempt to claim Gift Aid on any donations which do not meet HMRC guidance, but 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 applied Gift Aid serves as a receipt for tax purposes. Donors can be provided with a schedule of their donations during the course of a tax year to assist with income tax returns if they request this information.

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

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 Development Team and/or the Head Mistress. From time to time, other forms of recognition are offered in line with the value of gifts, such as invitations to special events or, subject to availability, a block in the School's donor window.

Names of members of the School's legacy society, the Ivy Leaf Society, all appear on a plaque in the main reception of the School, unless the member has stated they do not wish to be recognised in this way. No indication as to the amount of money they have bequeathed is given.

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.

15. Reporting Serious Incidents in Connection with Fundraising

- 1) The School and the Trust are required to report serious incidents to the Charity Commission.
- 2) A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:
 - loss of a charity's money or assets
 - damage to a charity's property
 - harm to a charity's work, beneficiaries or reputation
- 3) Examples of serious incidents which could arise in connection with fundraising include:
 - suspicions or allegations of criminal activity including theft, fraud, bribery and money laundering

- suspicious financial transactions, suspicious or unverified donors, particularly if the donation or series of donations totals £25,000 or more
 - circumstances in which a report has to be made to the Information Commissioner's Office
 - links to terrorism through donors
 - investigation by the police or another regulator, significant adverse findings by a regulator, significant penalty from a regulator
 - harm to beneficiaries or donors/the public
 - circumstances affecting negative media attention or adversely affecting the School or the Trust's reputation
- 4) If staff or volunteers believe there may have been a serious incident, they must immediately inform their line manager and the Development Director. The Development Director shall apply the procedures of the School and the Trust for the consideration, management and reporting of serious incidents. Staff and volunteers may in addition report serious incidents using the whistleblowing policies of the School and the Trust.

16. Data Protection

The Manchester High School for Girls Development Team Privacy Statement explains how the Development Team collects, stores, manages and protects personal information.

It outlines the types of personal information that we hold and how this is used to provide services to our alumnae, supporters and friends of the School.

The Development Team is part of the School which means that the School is ultimately responsible for how the Development Office uses people's information.

Questions

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

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**Policy drafted by the Director of Development and Marketing in consultation with
 Veale Wasbrough Vizards, February 2017**

Reviewed by: Director of Development and Marketing September 2019.

Appendix I: Information for Inclusion in the Governor's Annual Report and Accounts

- The approach taken by the School to fundraising activities and in particular whether a professional fundraiser or commercial participator carried out any of those activities
- Whether the charity (or those acting on its behalf) is subject to undertaking to be bound by a voluntary scheme for regulating fundraising, or any voluntary standard of fundraising and, if so, what scheme or standard
- Any failure to comply with the standard
- Whether the charity monitored activities carried out by any person on behalf of the charity for the purposes of fundraising and if so, how
- The number of complaints received by the charity or a person acting on its behalf about activities by the charity or by a person on behalf of a charity for the purpose of fundraising
- What the charity has done to protect vulnerable people and other members of the public from unreasonable intrusion into privacy, unreasonably persistent approaches and placing undue pressure on a person to give money or property