



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.

This document sets out the principles under which the School will seek to operate when undertaking its fundraising activities. It is in line with the Code of Fundraising Practice from the Fundraising Regulator and the Institute of Fundraising (IoF).

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 are used exclusively for that cause.
- We speak respectfully about all individuals and organisations.
- We present information honestly and accurately.
- We act with integrity and fairness in all interactions with donors, including when errors occur.
- We enable donors to make informed decisions by providing clear and accessible information.
- We are sensitive to individual needs and circumstances and ensure our approach is appropriate and respectful.
 - We encourage donations through genuine engagement, never through pressure or coercion.
 - We only seek and accept donations when we believe the donor has the capacity and understanding to make that decision.
 - We respect privacy and approach prospective donors with care and professionalism, ensuring persistence is proportionate and considerate.
 - We honour the wishes of individuals who choose not to be contacted about fundraising.
 - We clearly state the name of the School and/or Trust, our charitable status, and how donations will be used.
 - We provide relevant information—such as recent financial statements and policies—to any donor who requests it.
 - All official fundraising requests are made by employed staff members of the School.
 - We respect a donor's wish to remain anonymous, in line with legal, ethical, and practical considerations. The School's Development Team Privacy Statement outlines how personal information is collected, stored, managed, and protected.
 - Donors are acknowledged and recognised in ways that reflect their preferences.
 - We maintain accurate records of individuals who request to be excluded from fundraising communications, including through the Fundraising Preference Service, and we act promptly on those requests.

3. Legitimate Interest

- 1) The School periodically reaches out to current parents, staff, and other supporters (such as governors and trustees) to seek financial support for capital projects and bursary fundraising initiatives. At present, the School is actively fundraising for the development of a new Wellbeing Canopy and Reflection Space as well as bursary funding.
- 2) The School believes it has a legitimate interest in contacting current parents, staff and supporters regarding these fundraising efforts. Once a parent no longer has a child enrolled at the School, any further communication from the Development Office will be based on their opt-in consent. Similarly, when a staff member leaves the School, or a Governor / Trustee reaches the end of their term of office, they are requested to become part of the alumni community, and any future communication from the Development Office will be subject to opt-in consent.
- 3) 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
- 4) 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 and supporters on its database. Fundraising will focus on contacts held on the database in addition to current parents

5. Means of Solicitation

- 1) Fundraising solicitations on behalf of the School or the Trust will uphold the General Principles outlined in section 2.
- 2) The School and the Trust will abide by all applicable laws and regulations relating to the acceptance, solicitation and use of donations. 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.
- 3) The School employs a range of direct solicitation methods which include emails, leaflets and event related material as well as letters as well as face-to-face approaches.
- 4) 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.

Direct Mail

Printed 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, will be sent out up to twice a year.

The School's *High Flyer* newsletter, is sent out once a year, usually including 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 over a period of time.

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.

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.
- 2) Anyone over the age of 80 would not be called unless they have specifically indicated that they wish to receive such contact.
- 3) 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.
- 4) 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. Anyone who has signed up to the Telephone Preference Service would not be called.

- 5) 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. Training would cover relevant requirements of the Fundraising Regulator's Code of Fundraising Practice, including specific rules relating to telephone fundraising.
- 6) 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 review the call notes and send a letter to everyone who receives a call.
- 7) 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.
- 8) Callers would be employed by the School and paid an hourly rate. Their remuneration 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.

6. Ensuring Compliance

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.

Staff and volunteers with concerns about our fundraising practice should raise them in accordance with the School's whistleblowing policy.

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.

7. Openness and Accountability

- I) 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.
 - 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.

8. Gift Acceptance

The School and the Trust shall accept donations that meet the following criteria:

1. Alignment with Strategic Objectives

Donations must support the School's stated vision: "*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.*"

2. Consistency with Organisational Values

All gifts must reflect and uphold the values of the School and the Trust.

3. Contribution to Financial Sustainability

Donations should represent a legitimate source of income that supports the School's financial requirements.

4. Compliance with Institutional Objectives

Restricted gifts will be accepted only where the restriction aligns with the objectives and priorities of the School or the Trust, does not conflict with their strategic direction, and does not impose conditions that would result in disproportionate administrative or implementation costs relative to the value of the gift.

5. Application of Funds

All accepted restricted gifts shall be applied exclusively for the agreed purpose. The full value of each gift, including any Gift Aid where applicable, will be directed to the charitable purpose without deduction for administrative or overhead costs.

6. Due Diligence Requirements

Appropriate due diligence shall be undertaken to verify the identity of donors and the source of funds. Many donors will be known to the School through established relationships such as alumnae, parents, or long-term supporters.

7. Avoidance of Unnecessary Conditions

Donations that involve additional steps or conditions without a clear and legitimate purpose may be declined.

8. Assessment of Donor Connection

Donations from individuals or entities with no discernible link to the School or Trust, and without a reasonable explanation for their interest, may be refused.

Right to Decline Donations

The Governing Body reserves the right to refuse any donation where:

- The purpose does not align with the School's fundraising objectives;
- There is uncertainty regarding the appropriateness or legality of the source.

Any refusal shall be documented with clear reasoning and communicated in a manner that is respectful and avoids offence.

9. Handling of Donations

- 1) 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.
- 2) 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.
- 3) Card transactions are made through the School's bank's merchant services.
- 4) 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.

- 5) All receipts are recorded and cash is counted in the presence of two individuals.

10. 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 presence on the School's donor wall.
- 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.
- 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.

11. 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.

12. 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 Admissions, Development and Marketing, October 2025
Approved by the Full Governing Body December 2025**

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