

Fundraising Policy

This document outlines The King's School, Ely (King's Ely) policy for accepting donations and details the principles under which the School operates when undertaking its fundraising activities. The King's School, Ely is a registered charity (no. 802427) The School is a charitable company limited by guarantee registered in England and Wales with number 2440509. This policy also applies to Fairstead House School, a member of the King's Ely family of Schools

King's Ely is registered with the Fundraising Regulator and Institute of Development Professionals in Education.

King's Ely will not accept donations where sources fall short of the standards determined in this document, or if a donation has been illegally or unethically obtained, or if acceptance may damage the reputation of the School.

King's Ely is grateful to all donors for their support and is dedicated to treating donors with the highest level of care and respect.

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 King's Ely, please contact the Development Manager.

Related Policies

The School has the following policies which can be found on the school website www.kingsely.org:

- Anti-Corruption and Bribery Policy
- Anti Money Laundering Policy
- Gift Policy
- Data Protection Policy
- Whistleblowing Policy

A: Donor Charter

1. Making a donation to King's Ely 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:
 - 1.1. Be truthful and 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. Accurately describe the intended use of funds donated and give a clear explanation of how you can make, amend and cancel your donation.
 - 1.4. Process and thank you for your donation promptly.



- 1.5. Ensure your donation 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 donation in a manner that is as consistent as possible with your original intent.
- 1.6. Keep you updated (at least annually in the Donor Report) 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 available by contacting the Development Office directly: development@kingsely.org
- 1.7. Recognise your donation publicly where appropriate, such as in our annual Donor Report or Benefactors' list, 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 donations 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 donation.
- 1.10 Respond promptly to a complaint by a donor or prospective donor about any matter that is addressed in this policy. The Fundraising Complaints Procedure is given below at section.

B: King's Ely Fundraising Code

1. 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.
2. The Development Office may solicit donations from individuals, corporations and charitable trusts and foundations to provide financial support to help 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.
3. All solicitations and appeals for funds on behalf of the School will:
 - 3.1. adhere to the provisions of this policy and the Code of Fundraising Practice;
 - 3.2. 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);
 - 3.3. be truthful and accurately describe the School's activities;
 - 3.4. 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;
 - 3.5. respect the dignity of the donor and of those who benefit from the School's activities.

4. Employees who solicit or receive funds on behalf of the School will:
 - 4.1. adhere to the provisions of this policy and the Code of Fundraising Practice;
 - 4.2. 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);
 - 4.3. adhere to the provisions of applicable professional standards (including the Charity Commission and the Fundraising Regulator);
 - 4.4. answer all questions from current or potential donors promptly and honestly;
 - 4.5. disclose immediately to the Principal any actual or apparent conflict of interest;
 - 4.6. 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;
 - 4.7. 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;
 - 4.8. not accept donations for purposes that are inconsistent with the Donation Acceptance Policy (see section C below).
5. The School's fundraising programme, undertaken by the Development Office, is funded by the School. 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.
6. Donors will be encouraged to seek independent advice if the School has any reason to believe that a proposed donation might significantly affect their financial position, taxable income, or relationship with other family members.
7. In accordance with B 4.8 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.
 - 7.1. 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.
 - 7.2. 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.
 - 7.3. If a donor's vulnerability means they lack the capacity to make an informed decision, solicitations should not be made, nor donations accepted (see B.9 below).
8. In accordance with the 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.
 - 8.1. If a fundraiser believes that a donor lacks the capacity to make an informed decision about a donation, 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.

- 8.2. If, after receiving a donation, King's Ely 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.
9. Donors are entitled to give the School notice requiring it to stop direct marketing, including fundraising. Should a donor request that solicitations be stopped, the School will act to stop direct marketing communications within 21 days of receiving the request.

C: Donation Acceptance Policy

1. The ultimate responsibility to accept or decline a donation resides with the Board of Governors.
2. Donations up to but not including a value of £25,000 (as a single donation or series or pattern of donations in any rolling year) may be accepted by the Development Manager, who shall be accountable to the Governors through the School's management structure.
3. The School is committed to undertaking due diligence when soliciting and accepting donations. Due diligence is completed to:
 - 3.1. ensure that it is appropriate for the School to accept the donation;
 - 3.2. give reasonable assurance that the donation is not from an illegal or inappropriate source;
 - 3.3. protect the School's reputation both internally and externally;
 - 3.4. prevent threats to the School's independence;
4. 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:
 - 4.1. the identification of the donor;
 - 4.2. verification of their identity;
 - 4.3. 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.

5. Due diligence will be referred to the Principal for further scrutiny for any donation:
 - 5.1. Of £25,000 or more (as a single donation or series or pattern of donations in any rolling year);
 - 5.2. likely to draw significant public attention;
 - 5.3. associated with a naming opportunity (see section D); or
 - 5.4. where the donor's link to the School or motivations for giving are unclear;
 - 5.5. where the donors dependants are taking part in the admissions process or have received notification they haven't passed the entrance exams.

Should further consideration be required, or in circumstances where there could be any perceived conflict of interest in their making a decision, the Principal shall pass the matter to the Chair of the Board of Governors whose decision will be regarded as final.

6. A donation is liable to be refused if it:
 - 6.1. appears to be connected with a child currently applying for admission to King's Ely, except with the explicit written consent of the Chair of the Board of Governors at the time, taking such legal advice as appropriate to establish the lawfulness of accepting the donation;
 - 6.2. appears to be connected to a pupil whose academic progression, grades or matters of discipline are currently under review by the Principal, except with the explicit written consent of the Chair of the Board of Governors, taking such legal advice as appropriate to establish the lawfulness of accepting the donation;
 - 6.3. 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;
 - 6.4. 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;
 - 6.5. is being made by an individual or organisation involved in, or strongly suspected to be involved in, criminal or fraudulent activity;
 - 6.6. is at odds with the objectives of the Charity, its policies or beneficiaries;
 - 6.7. is in contravention of the 2010 Bribery Act or the schools Anti Bribery Policy.
7. An anonymous donation, where the School may only deal with an intermediary who will not identify the donor, even to the Principal, 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 to determine what action, if any should be taken.
9. Donations in kind (donations 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 King's Ely. 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 donations in kind accepted by the School become the property of King's Ely, 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

D: Naming Guidelines

1. It is not the Board of Governor'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 Board of Governors continue to consider it is in the School's interests.
2. Prizes/Awards
 - 2.1. 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.
3. Any endowed or named fund/prize must be accompanied by a document setting out terms. If a donor is considering making a donation (including donations in kind) for a specific purpose, or on restricted terms, they are encouraged to discuss their plans with the School.

E: Legacies

1. King's Ely has a long history of benefaction through legacy pledges. All fundraising activities regarding legacies will comply with section 15 of the Code of Fundraising Practice.
2. 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.
3. Potential testators intending to leave a donation (including donations in kind) for a specific or restricted purpose are encouraged to discuss their plans with the School.
 - 3.1. 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.
4. The School will adhere to the wishes of the testator with regard to publicity of the donation. Should these wishes be unknown, the School will contact the estate to ascertain their wishes.

F: Data Protection

1. The 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.
2. All records created in accordance with this policy are managed in accordance with the School's Records Management Policy.
3. 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.
4. When sharing personal data with a third party processor, for example mailing houses, the Development Office will ensure that all issues, such as data ownership, fitness for use and confidentiality, are governed by a formal contract.

G: Fundraising Complaints Procedure

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 concern or complaint. We take these seriously and seek to address them appropriately.

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

In the first instance, concerns or complaints should be raised with the Development Manager, using the details below:

Email: development@kingsely.org

Post: Development Manager, King's Ely, The Old Palace, Ely CB7 4EW

Telephone: +44(0)1353 660700

Complaints about the Development Manager should be sent to the Principal. Please include your name and contact details in your email or letter so that we can get back in touch with you easily.

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.

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

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

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.

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 Concerns and Complaints Policy.

If you are not satisfied with our response, please contact the Development Manager within one month of the date of that response using the details above, and your complaint will be investigated by a member of the School Leadership Team. Your request will be acknowledged within five working days of receipt.

The SLT will aim to complete their investigation within 28 working days and will write to you setting out the outcome of their review, the rationale for their decision and any remedies they propose.

What to do next

If you are still not satisfied, you are entitled to make a complaint to the Fundraising Regulator regarding King's Ely. 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:

www.fundraisingregulator.org.uk/complaints/make-complaint