



# Rye College Policy

---

Policy Title:	Fundraising
Leadership Responsibility:	School Business Manager
Review Body:	Executive Headteacher
Date:	February 2021
Review:	February 2023

## Statement of intent

At Rye College fundraising is seen as a legitimate means of improving the school's ability to purchase goods, equipment or services, which can be used to achieve the aims set out in the School Improvement Plan (SIP). Our fundraising approach is to act fairly, transparently and ethically, and in line with [The Code of Fundraising Practice](#).

Donating money or equipment, or actively raising funds is a positive way for the public to support the school. This policy should be adhered to by all those involved in soliciting and raising funds on behalf of the school.

**NB.** "Schools with charitable status" include foundation, voluntary aided, voluntary controlled and academy schools. The bodies that run these schools are state-funded independent charities and have additional responsibilities under legislation including The Code of Fundraising Practice and Charities Act 2011.

## Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- General Data Protection Regulation (GDPR);
- Data Protection Act 2018;
- **[Schools with charitable status]** Charities Act 2011;
- **[Schools with charitable status]** The Charity Governance Code
- The Code of Fundraising Practice;
- DfE (2018) 'Charging for school activities';
- DfE (2018) 'Schemes for financing schools'.

This policy operates in conjunction with the following school policies:

- Data Protection Policy;
- Anti-Fraud and Corruption Policy;
- Complaints Procedures Policy;
- Academies Financial Handbook.



## Roles and responsibilities

The Head of School is responsible for:

- Ensuring the correct procedures are in place and are followed for all fundraising activities;
- Confirming that all fundraising activities are approved before they commence;
- Ensuring that all funds raised are accounted for and audited;
- Ensuring money is expended in accordance with agreements made with donors and fundraisers, and is validated properly;
- Ensuring the school's fundraising activities are compliant with the fundraising approach it has set, the wider law and best practice;
- Deciding whether the school will accept, decline or repay donations;
- Acting with reasonable care and skill in the best interests of the school and managing the school's resources responsibly.

The Business Manager (SBM) is responsible for:

- Approving all fundraising activities, regardless of the potential amount to be raised, ensuring they are relevant to the aims of the SIP;
- Monitoring all fundraising activities to ensure they comply with the school's procedures, this policy and the Code of Fundraising Practice.

Fundraisers are responsible for:

- Submitting requests for the approval of fundraising activities to the SBM;
- Not soliciting any funds until approval has been obtained from the SBM;
- Disclosing any actual or apparent conflict of interest when participating in fundraising activities;
- Acting with fairness, honesty, integrity and openness when carrying out fundraising activities;
- Not accepting donations for purposes that are not consistent with the school's SIP.

## Approval of fundraising

Fundraising will be recognised if it is consistent with the school's SIP and aims.

All fundraising that takes place both inside or outside the school will be approved in advance by the SBM, regardless of the potential amount to be raised. The SBM will report all approvals to the **Head of School**.

Where a colleague becomes aware that an external body is raising funds on behalf of the school, the SBM will be notified so that the fundraising can be approved, and the school can accept the donation.

Submissions for the approval of fundraising will outline:

- The reasons for why the funds will be raised;
- How the funds will be raised, e.g. collections or raffles;
- The capital and revenue costs;



- A proposed source of funding (if it is additional to that covered by the planned fundraising activities);
- If money is being raised for new equipment, a timescale for within which the current equipment will be replaced;
- Details of any risk assessments that will need to be conducted;
- A timescale for completion;
- Details of the insurance required.

Any colleague that wishes to initiate small-scale funding projects that are linked to curriculum objectives will confer with the SBM before these commence. These activities may fall outside the remit of this policy, but the SBM will be informed to ensure the school's financial procedures are maintained.

## Donors' rights

Upon request, donors and prospective donors are entitled to receive a copy of this policy and a summary of the most recent annual reports.

Upon request, donors and prospective donors are entitled to the following:

- Confirmation of the school's charitable status;
- The name of the CFO, those in positions of fundraising leadership and those on the executive board.

The school will take account of the needs of donors who may be vulnerable or need additional support to make an informed decision about a donation. The school will not take advantage of credulity, lack of knowledge or the apparent need for support or vulnerable circumstance of any donor.

Upon request, donors and prospective donors are entitled to know whether an individual soliciting funds on behalf of the school is a volunteer, employee or contractor working for a paid third-party organisation. Donors are also entitled to know whether the individual is receiving remuneration for fundraising.

If a donor requests to remain anonymous, their privacy will be respected.

Donors will be treated with respect – every effort will be made to honour their requests regarding the frequency of fundraising solicitations and the format these solicitations take.

Donors' personal data that is obtained for the purpose of fundraising solicitations will be processed, stored and accessed in accordance with the school's Data Protection Policy.

If donors or prospective donors request to opt-out of receiving promotional fundraising materials or from the processing of their personal data, the request will be honoured, and no further communication will take place.

If circumstances change, donors may request the repayment of part or all of their donation. It is for the trust to decide whether a donation will be repaid.



## Soliciting funds

Publicity and promotional activities will be truthful, provide an accurate description of the activities and intended use of donated funds, and respect the privacy of those who benefit from the activities.

The school will obtain written content before distributing promotional fundraising material. Donors and prospective donors will be provided with an option to opt-out or to withdraw consent for either receiving or being included in promotional materials.

The school's fundraising materials:

- Will not be indecent, offensive or carry intent to cause distress or anxiety;
- Will not contain copyrighted material, watermarks or other intellectual property without the owner's permission;
- Will disclose confirmation that the school is a charity registered in England and Wales and the school's charity number;
- Will disclose the school's registered name and full contact information for the school and department involved;
- Will not imply that funds are being raised for a specific purpose if this is not the case;
- Will be clear on whether funds are being raised for the school or another purpose, and in what proportions;
- Will be legal, honest and truthful and in compliance with the rules outlined in Committee of Advertising Practice Code and Broadcasting Committee of Advertising Practice (BCAP), as appropriate;
- Will not be misleading, e.g. due to inaccuracy;
- Will not cause offence on the grounds of race, age, religion, sex, or disability.

The school will not solicit funds:

- From individuals who have clearly indicated that they do not wish to engage in the activities;
- If it has reasonable grounds for believing an individual is in vulnerable circumstances and is unable to make an informed decision to donate;
- From individuals who have chosen not to receive fundraising contact through the fundraising preference service;
- **Through electronic means without explicit consent to do so;**
- Via telephone.

## Accepting, declining or repaying funds

The ultimate decision for accepting, declining or repaying funds raised lies with the trust.

The trust will act in the best interests of the school when deciding to accept or refuse a donation.

If funds are raised or donated for purposes that are not consistent with the aims of the SIP, the school will decline to accept them.

The school will take the appropriate due diligence steps to confirm the identity of donors and any source of funds, which include:

- Requesting two forms of ID from the donor;



- A letter confirming the source of funds.

For a donor proposing to donate a sum that exceeds £10,000, the school will take the following steps in advance of the donation being accepted:

- Establish whether there are any potential risks to the school's reputation;
- Determine what pay arrangements are proposed and whether they raise concerns about the source of funds;
- Record the terms of the donation in a formal agreement.

Consideration will always be given to whether any donation is involved with or linked to a suspicious transaction.

Donations will be accepted electronically or via cheque.

The trust may decline a donation if it believes it:

- Creates unacceptable conflicts of interest;
- Exposes the school to undue adverse publicity or reputational risk;
- Causes other damage, including financial damage e.g. by deterring other donors;
- Involves concerns about the legality of the source of funds or the ability to identify the donor;
- Involves a suspicious transaction, e.g. a fee is requested to release the donation;
- Will not contribute to the aims of the school's SIP;
- Consists of goods, property or services which the school cannot lawfully use;
- May require action that is potentially illegal;
- Is dependent on the fulfilment of unacceptable conditions applied by the donor, e.g. conditions which would place the assets of the school in inappropriate risk;
- Harms the school's relationship with other stakeholders.

Donations will not be accepted if either the school or trust suspects a prospective donor lacks capacity to make an informed decision about a donation. The school will return any donations by donors who the school believes lacked the capacity to make an informed decision at the time of donating.

If circumstances change and the donor requests the repayment of part or all of a donation, the ultimate decision lies with the CFO.

Donations must not be returned unless there is a legal obligation to return it, e.g. the conditions attached to the donation require the return of the donation in certain circumstances.

Donations will only be refunded in line with school policies or in exceptional circumstances. Where it is not lawful to return a donation, the school will take advice from legal advisers before doing so.

## Funds raised

All funds raised are given to the SBM to be recorded, counted and banked.



All funds raised will be counted by two different people, one of which will be the Finance Officer, to ensure accuracy.

Funds raised will be kept in the school safe (**minimal**), which only be accessed by the **Head of School, Finance Officer and SBM**, or in the school's bank account if received electronically.

Fundraisers will not exploit their position for personal gain and must adhere to the school's Anti-Fraud and Corruption Procedures when taking part in fundraising activities.

All funds will be used for the purpose for which they were raised and within the timeframe that is agreed. If a fundraising event is cancelled, donors will be informed and asked to agree to a change of use of funds or timescale, or to a repayment of funds.

## Complaints

Any concerns regarding the school's fundraising arrangements will be discussed initially with the SBM.

When dealing with complaints, the school will ensure these are:

- Investigated thoroughly and objectively to establish the facts.
- Responded to fairly, proportionately and appropriately.

The school has a clear complaints procedure published on its website which also applies to any third-party fundraising on its behalf.

Members of staff and volunteers wishing to report any concerns they have regarding the school's fundraising procedures will be referred to the complaints procedure.

## Monitoring and review

This policy will be monitored and reviewed on an annual basis by the School Business Manager.

**September 2019 BBL**

**February 2021 BBL**

### DATA PROTECTION

*Rye College [The Academy] processes personal data in accordance with the data protection principles embodied in the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. The Academy complies with the requirements of the data protection legislation as detailed in the Trust Data Protection Policy.*

*All colleagues are aware of the principles of data protection and will not process personal data unless necessary. The Academy safeguards the personal data it collects through the operation of the Trust's data protection policy and processes and the IT policy. In addition, the Academy has taken steps to ensure that all its contracts that process data have the GDPR compliant provisions.*