

GIFT ACCEPTANCE, FUNDRAISING PRACTICE AND FUNDRAISING COMPLAINTS POLICY

Overview

Cranleigh School was founded on the generosity and foresight of donors, and we continue to receive much-valued financial support today. Our position as a leading independent boarding school would not be possible without visionary donors who pledge to secure our future and we remain indebted to them.

The School conducts its business activities in the UK and overseas in an honest and ethical manner.

The policy clarifies Cranleigh's commitment to implementing best practice in all of its fundraising activities that underpin these objectives, and is in line with the current guidance provided by the Fundraising Regulator. This gift acceptance and fundraising policy seeks to outline the principles by which the Cranleigh Giving Office will and will not pursue potential donations, and to establish guidelines governing potentially controversial gifts or donors.

The Cranleigh Giving Office manages the fundraising activities of two charities: Cranleigh School and the Cranleigh Foundation.

- 1. **Cranleigh School** and **Cranleigh Preparatory School** together form a registered charity (charity number 1070856) which seeks to raise funds for the provision of bursaries and the establishment of a sufficient endowment to sustain the future needs of the Schools. The charity is overseen by a board of governors.
- 2. The Cranleigh Foundation is a registered charity (charity number 1122918) which seeks to raise funds for bursaries for children who would benefit from Cranleigh's supportive environment because they have difficult home circumstances following the death of one or both parents and/or as a consequence of having a parent or sibling with serious health issues. The charity is overseen by a board of trustees.

For the purposes of this policy, Cranleigh refers to both the schools and the Foundation.

The Schools' Governors and Foundation Trustees encourage the solicitation and acceptance of gifts and grants which enable them to fulfil their strategic objectives. Gifts will be sought only for purposes that have been approved by the Governing Body and the Trustees.

The ultimate responsibility to accept or decline a donation resides with the Governors and Trustees.

Ethical fundraising principles

Cranleigh believes and maintains the principle that all gifts should be made:

- without coercion and as an informed decision
- with full transparency and agreement regarding the use of the gift by the School
- in full confidence that the donor will be acknowledged and recognised as he/she wishes

Acceptance of a donation does not imply any endorsement of the donor's opinions or policies.

Fundraising solicitations on behalf of Cranleigh will:

- be truthful
- accurately describe Cranleigh's activities and the intended use of gifts
- respect the dignity and privacy of those who benefit from Cranleigh's activities
- be made in accordance with any applicable requirements under charity law and the Code of Fundraising Practice

Volunteers and employees who solicit funds on behalf of the School shall:

- adhere to the provisions of these guidelines
- act with fairness, integrity, and in accordance with all applicable laws
- adhere to the provisions of any applicable professional codes of ethical practice which apply to them as individuals
- cease solicitation of a prospective donor who identifies solicitation as harassment or undue pressure
- disclose immediately to the Headmaster, Governors and Trustees any conflict of interest,
 and
- not accept donations for purposes that are inconsistent with the Cranleigh's strategic and educational objectives

Paid fundraisers, whether employed staff, short-term contractors or consultants, will not be paid finders' fees, commissions or other payments based on either the number of gifts received or the value of funds raised. They will be compensated by a salary, hourly wage or fee. Their compensation will be consistent with the School's policies and practices that apply to non-fundraising personnel.

Any donor records held by the Cranleigh Giving Office will be kept secure and confidential and maintained in accordance with its data privacy policy which can be found on the <u>School website</u>. Records will only be accessed by members of the Cranleigh Giving Office and Finance Department.

Donors' rights

Donors and prospective donors and their privacy will be treated with respect.

Donors and prospective donors are entitled to the following, promptly upon request:

- the most recent annual report and financial statements
- confirmation of the charitable status of Cranleigh School and Cranleigh Foundation
- a copy of this policy

Donors will be encouraged to seek independent advice if Cranleigh has any reason to believe that a proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members.

Donors' requests to remain anonymous will be respected in recognition and stewardship activities.

Cranleigh does not sell its donor and alumni lists and contact details.

Please also refer to the website to download the <u>Cranleigh Giving Privacy Policy</u> on your rights regarding your personal information.

Complaints about fundraising

The Cranleigh Giving Office will acknowledge a complaint made in writing by a donor or prospective donor about any matter that is addressed in this policy within three working days of receipt. Following acknowledgement, the Head of Cranleigh Giving will attempt to satisfy the complainant's concerns in the first instance without undue delay, and usually within 10 working days of the acknowledgement. A complainant who remains dissatisfied will be informed that they may appeal in writing to the Headmaster within five working days of the original response from the Head of Cranleigh Giving. The Headmaster will respond to this appeal within a further 20 working days. If for any reason we are unable to respond to you within the timeframes, we will inform you of this and provide you with an amended timeframe. If the issue remains unresolved the complainant can pursue the matter with the <u>Fundraising Regulator</u>.

From whom does Cranleigh seek funds?

Cranleigh is committed to the principle that it solicits gifts from those individuals who have (or have had in the recent past) an active relationship with the School – Old Cranleighans, supporters, staff, parents and former parents – or those individuals or organisations which have been carefully identified as having a potential interest in supporting a specific activity or initiative.

Thanks, recognition and stewardship

Cranleigh is committed to the public and private recognition of its donors where it is desired.

Formal acknowledgement of all donations will be sent to each donor upon acceptance of a gift.

Unless the donor wishes to remain anonymous, the donor's name may be listed in printed and online materials prepared by the Cranleigh Giving Office. Cranleigh does not explicitly advertise the particular value of gifts given by any individual, unless in extraordinary circumstances and only with the express consent of the donor.

In cases where a donor wishes to remain anonymous, such anonymity will be respected for all public purposes. Cranleigh will, however, disclose details of any donor where it is required to do so by law, by any governmental or other regulatory authority, or by order of a court. The identity of anonymous donors will remain confidential to those Cranleigh staff who need to know.

Most donors wish to hear about the progress of the activity they have supported. The annual report will provide feedback about the use of donations received over the previous year.

Acceptance of donations

By law, irrespective of internal delegation, the ultimate responsibility in respect of the acceptance or refusal of all donations lies with the Governors and Trustees. They must ensure that the best interests of Cranleigh have been served in accepting or refusing the donation in question.

The vast majority of donations will be perfectly acceptable and arise from formal appeals. Such donations can be accepted by the Cranleigh Giving Office without further referral.

Gifts from parents and families with children at Cranleigh

We welcome gifts from parents and families whose children are at Cranleigh because such gifts help us to continue to provide opportunities to all our pupils and to secure the School's financial future. These gifts can only be accepted if they support defined projects or opportunities available to a wide range of pupils. Gifts cannot be made to offset School fees or the cost of a trip or activity for an individual pupil who is related or known to a donor.

The decision of a parent to make or not make a gift to Cranleigh will have no bearing on the academic, sporting or co-curricular opportunities open to an individual pupil.

Gifts from prospective employees and contractors at Cranleigh

In no circumstances will a gift be accepted where the donor expects a position or contract at the School to be offered, and in no circumstances will such a position or contract be offered in recognition of a donation. All positions and contracts at Cranleigh are gained through academic or professional merit alone.

Gifts from prospective parents

We are aware of the risks involved in being offered donations from those who are a 'prospective parent' (i.e. those whose children have not yet been offered a place at Cranleigh). To that end:

 no link will be made between entry and a future donation; all children entering the School will do so entirely on their own merit, within the constraints of the normal admissions processes of the School

Gifts to staff

Please refer to the anti-bribery and corruption policy in the Cranleigh School Employment Handbook.

Refusal of donations

There may be the rare occasion where a donation should be refused, for example, if acceptance is considered likely to:

- damage the effective operation of Cranleigh in fulfilling its objective
- cause harm to relationships with other stakeholders
- create an unacceptable conflict of interest
- require expenditure beyond the School's resources

- involve the School in unexpected responsibilities because of their source, condition, or purposes
- damage Cranleigh's reputation.

If any of the above circumstances arise, members of the Cranleigh Giving Office should refer the donation, prior to accepting it, in the first instance to the Headmaster. If required the Head of Cranleigh Giving, the Headmaster and Director of Operations will then discuss and document their decision-making process. If, in their judgement, the donation requires further consideration prior to acceptance, they will refer the matter to the Chair of Governors/Trustees.

Should a donation be refused for any reason, records will be kept to indicate why it was refused and any such refusal will be couched in appropriate language so that it does not cause offence.

Financial accountability

Cranleigh's financial affairs are conducted in a responsible manner, consistent with the ethical obligations of stewardship and the legal requirements of the Charity Commission.

All donations will be used to support the missions of Cranleigh Schools and Foundation.

In line with the Code of Fundraising Practice, 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 (CAF) are sent to CAF to be processed and the money is passed to the Cranleigh Giving Office by bank transfer.

The cost effectiveness of the Cranleigh's fundraising programme will be reviewed regularly by the Governors and Trustees.

Donations of shares are co-ordinated between the donor and Head of Cranleigh Giving.

Restricted donations

All restricted or designated donations will be used for the purposes for which they are given. If necessary, due to programme or organisational changes, alternative uses will be discussed where possible with the donor or the donor's legal designate. If the donor is deceased or legally incompetent, and Cranleigh is unable to contact a legal designate, the donation will be used in a manner that is as consistent as possible with the donor's original intent.

Gift Aid and tax-efficient giving

Cranleigh is committed to reclaiming Gift Aid on all gifts given by UK income tax payers where a Gift Aid declaration is signed. To that end, every acknowledgement letter to a donor who has gift-aided his or her donation serves as a receipt for tax purposes.

Cranleigh also seeks to provide tax-efficient methods of giving to Cranleigh from other countries where it is legal and moral to do so.

10 May 2021