

# MORE HOUSE SCHOOL

## POLICY

### KINDNESS – SPIRIT - RESPONSIBILITY

#### **ETHICAL FUNDRAISING Policy**

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##### **History**

This Policy was first adopted in November 2024, and is subject to a three year review cycle, or earlier if guidance from the Chartered Institute of Fundraising and/or the Fundraising Regulator should change.

##### **Introduction**

At the heart of fundraising ethics lies the need to ensure that the trust of the donor is not violated, which requires legal compliance, openness, transparency, and respect. The following code is designed to this end.

This Code should be read in conjunction with the More House Gift Acceptance Policy November 2024.

##### **A. Donors' Rights**

1. All fundraising solicitations by or on behalf of the School or its subsidiary or associated entities will disclose the School's name and the purpose for which the funds are requested. Printed solicitations (however transmitted) will also include the School's address, registered charity number and other contact information.
2. Donors and prospective donors are entitled to the following, promptly upon request:
  - the most recent approved and published financial statements of the School (as filed at the Charity Commission);
  - confirmation of the charitable status of the School;
  - a copy of this Policy.
3. Donors and prospective donors are entitled to know, upon request, whether an individual soliciting funds on behalf of the School is a volunteer or an employee.
4. Donors will be encouraged to seek independent advice if the School has reasonable cause to think that a proposed gift might adversely affect the donor's ability to honour existing financial commitments, legal or social obligations.
5. The privacy of donors and prospective donors, including requests to remain anonymous, will be respected within the constraints of the law. Any donor or prospective donor's records that are maintained by the School will be kept confidential within the constraints of the law and according to the School's Privacy Policy. Donors have the right to see their own donor record and to challenge its accuracy.
6. Donors and prospective donors will be treated with respect. Every effort will be made to comply with their requests:
  - to limit the frequency of solicitations,
  - not to be solicited by telephone or other technology, and
  - not to receive any printed material concerning the School.

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##### **B. Fundraising Practices**

1. Fundraising solicitations on behalf of the School will:
  - be truthful and not misleading;
  - not take advantage of any mistakes by the donor;
  - not offer financial advice;
  - fairly and informatively describe the School's activities in relation to whatever the donor has intended for the School's use of his/her donated funds, and
  - respect the dignity and privacy of those who benefit from the School's activities.
2. Volunteers and employees who solicit or receive funds on behalf of the School shall be required:
  - to be aware of the relevant sections of the Fundraising Regulator's Code of Fundraising Practice;
  - to adhere to the provisions of this Policy;
  - to act with fairness, integrity, and in accordance with all applicable laws;
  - to adhere to the provisions of applicable professional codes of ethics, standards of practice etc.;
  - to cease and desist from any further solicitation of a prospective donor who to our knowledge considers fundraising asks to be harassment or applying undue pressure;
  - to disclose immediately to the School any actual or apparent conflict of personal interest;
  - not to accept donations for purposes that are inconsistent with the School's objects, objectives, or mission, and
  - not to solicit donations from anyone deemed to be a vulnerable adult (see section G. below).
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. Compensation policies for fundraisers, including performance-based compensation practices (such as salary increases or bonuses) will be consistent with the School's policies and practices that apply to non-fundraising personnel.
4. The School will not sell, rent out, or share with any third party outside the School, its supporters list, or any other personal information unless it is part of the School's processing activities and in line with its Privacy Policy. The School is committed to keep your data as safe as possible and will comply with all requirements relating to data protection.

##### **C. Complaints**

1. The School will respond promptly to a complaint by a donor or prospective donor about any matter relating to fundraising. The Governing Body and the Headmaster will be informed about all complaints. If the complaint is not resolved to the satisfaction of the donor/prospective donor in liaison with the Development Director, the complaint will be escalated for resolution by the Headmaster.
2. All complaints and resolutions will be noted in the minutes at the Governing Body Meetings and reported to the Fundraising Regulator on an annual basis.

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3. If the complainant does not feel the complaint has been satisfactorily resolved they can contact the Fundraising Regulator by completing the complaints form [Make a complaint | Fundraising Regulator](#), by emailing [complaints@fundraisingregulator.org.uk](mailto:complaints@fundraisingregulator.org.uk), calling 0300 999 3407 (Monday to Friday, 09.30 am – 4.30 pm) or sending a letter to Fundraising Regulator, Eagle House, 167 City Road, London, EC1V 1AW.

#### **D. Financial Accountability**

1. The financial affairs of the School will be conducted in a responsible manner, consistent with the ethical obligations of stewardship and the legal requirements of national regulators.
2. All donations will be used to support the mission of the School.
3. All restricted donations will be used for the purposes for which they are given. If necessary, due to programme or organisational changes, and subject to due compliance with the constraints of charity law, alternative uses will be discussed where possible with the donor or the donor's legal designate. If the donor is deceased or has become legally incompetent, and the School is unable to contact a legal designate, subject to compliance with charity law in such circumstances the donation will be used in a manner that is as consistent as possible with the donor's original intent.

#### **E. Acceptance and Refusal of Donations**

1. The ultimate responsibility to accept or refuse a donation is the responsibility of the Board of Governors. The Governors delegate responsibility to the Headmaster and Development Director for the day to day operation of fundraising activity.
2. There is a legal obligation for the School to undertake a degree of due diligence when accepting donations. This applies especially to major donations given to the School and also to donations with a monetary value of over £10,000. The Headmaster and Development Director will consult with the Chair of Governors, should there be a gift of over £10,000 where the due diligence has raised issues of concern. The Chair of Governors will escalate to the Governing Body.
3. The School will decline a donation if it is felt by the Development Director/Headmaster and Governing Body that the gift:
  - falls outside the School's charitable objects or objectives; or
  - consists of goods, property, or services, which the School cannot lawfully use, convert, sell or exchange, in support of its charitable aims; or
  - is dependent on the fulfilment of unacceptable conditions applied by the donor. For example, if the Governing Body believed such conditions would place the assets of the School at undue risk.
4. The School will also decline a donation if it is felt by the Governing Body that there is evidence the donation will be made from a source that arises in whole or in part from an activity that:
  - evaded taxation or involved fraud;
  - violated international conventions that bear on human rights;
  - involved any illegal activity;

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- could seriously damage the reputation of the School.
5. In appropriate cases the Development Director will escalate issues to the Headmaster and Board of Governors for consideration of matters identified in E3 or E4 above for final decision as to whether a donation should be declined. Further details can be found in the More House School Gift Acceptance Policy.

#### **F. Gifts from Alumni and Families**

1. Gifts from alumni, parents and families with children at the School are important because they help us to provide high quality facilities and opportunities to all our pupils.
2. Such gifts can only be accepted if they support defined projects or opportunities to a wide range of pupils, for example a capital development or bursary programme.
3. The decision of a parent to make a donation will have no bearing on the academic, sporting or extracurricular opportunities open to an individual pupil.
4. The acceptance of a donation from a prospective parent will have no bearing on the admission to the School of an individual pupil or future placement.
5. The decision to return a donation would be an exceptional circumstance and be considered in line with Charity Commission guidance.

#### **G. Vulnerable Adults**

1. The Development Director and team will be mindful of supporters who may show signs of being in a vulnerable situation.
2. All reasonable steps will be taken to engage people in the right way, be mindful of their financial needs, and of course avoid any instances where a donor feels they have been taken advantage of. If appropriate, additional support can be provided to help supporters make an informed decision about donating.
3. When the School becomes aware, by direct contact, that a supporter is in a vulnerable situation it will always cancel any existing regular donations or commitments.
4. The School will always stop direct debits received from donors and direct ask fundraising communications if a third party (e.g. a family member, carer or friend) advise that the donor is vulnerable in some way; if the School is satisfied that such third party is entitled to act on the donor's behalf.
5. Where the School become aware, by direct contact, that a supporter is in a vulnerable situation it will ensure that no further direct ask fundraising communications are sent. This will either be in perpetuity or until they advise they would like to receive such communications.

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*A Code of Fundraising Practice issued by the Fundraising Regulator became effective in October 2019. It contains much more detail than within the summary above. Anyone involved in fundraising on behalf of the School or its subsidiary or associated entities must ensure that they are aware of the Code and meet the Standards therein. The Regulator announced in 2022 that it was undertaking a Code review between 2022-24. It intends to produce an updated Code in early 2024 for consultation with stakeholders in mid-2024 and final published new Code in early 2025. The Development team will keep a watching brief on the Code development and update this document accordingly if necessary.*

***November 2024***