

UNIVERSITY COLLEGE SCHOOL
ETHICAL FUNDRAISING POLICY

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MISSION OF THE SCHOOL

University College School ("the School"), a charitable organisation registered with the Charity Commission (Charity Number 312748), encourages the solicitation and acceptance of gifts for purposes that will help the School to further and fulfil its mission. The mission of the School, as set out in the Statutes, is:

"The Charity is established to promote the education of boys and girls, by the provision of a school or schools. In the selection of Pupils no religious test shall be adopted or imposed and no applicant for a school appointment shall be at any disadvantage on the ground of religious opinion. Selecting Pupils with no regard to race or creed, the school tries to foster in them a sense of community alongside a tolerance of and a respect for the individual. To achieve this, the school seeks to offer a range of opportunities for personal and for group endeavour. The Charity aims that the school should achieve academic excellence through the encouragement of intellectual curiosity, breadth of study and independence of mind."

PURPOSE OF THIS POLICY

On behalf of the Trustees, the Development Office solicits gifts from individuals, corporations, and charitable trusts and foundations, to help further the mission of the School. These policies and guidelines govern the acceptance of gifts by the School and provide guidance to prospective donors and their advisers when contemplating and/or making gifts to the School. The provisions of these policies shall apply to all gifts offered to and/or received by the School.

The Trustees and the Development Office are not responsible for the financial, tax or legal position of donors or of prospective donors in relation to their gifts. Donors or prospective donors must take such advice as they deem necessary and in no circumstances are they entitled to rely on guidance offered by the Trustees and/or the Development Office, whether written or verbal, which can only ever be generic in nature.

To comply with money laundering and related legislation as this might apply from time to time the Trustees and/or the Development Office might require donors and potential donors to provide reasonable proof of identity and, if necessary, furnish information as to the origin of the gift to be donated.

DONOR CHARTER

University College School (UCS) believes passionately that intellectual curiosity, breadth of study and independence of mind combine to achieve academic excellence and mature, well-rounded personal development.

We select children with no regard to race or creed – and invite them to benefit from, and contribute to, a UCS community which prizes tolerance of, and respect for, the individual. Our commitment to access includes a facility to offer fee assistance, which dovetails with our desire to create a balanced and socially aware pupil body.

We offer the fullest range of opportunities for personal development and group endeavour, including Drama, the arts, Music, Sport, culture and, of course, academic subjects. These are the forums in which we draw out individual talent, rejoice in personal achievement and foster communal endeavour.

Children at UCS benefit from outstanding facilities. Our resources are shared across the Pre-Prep, Junior Branch, Senior School and Sixth Form.

We constantly look for ways to ensure that our facilities best reflect the ambition of the school – as attested by recent changes to the school landscape; including the Creative Learning Centre, the Sixth Form Centre, the New Pavilion and pitches.

In achieving this ambition, UCS has a responsibility to ensure that the processes of securing and receiving funds to support our work do not compromise our integrity, the trust of our supporters and donors or our commitment to pupils, family, staff and the communities we serve.

MISSION STATEMENT FOR DEVELOPMENT & ALUMNI RELATIONS AT UNIVERSITY COLLEGE SCHOOL

Mission Statement:

The Development and Alumni Relations Office builds mutually beneficial relationships with the wider UCS community in order to foster a sense of belonging with past pupils, and secure philanthropic funding for the benefit of current and future pupils.

RESPONSIBILITIES TO OUR DONORS

Donor rights

All fundraising solicitations, by or on behalf of, UCS will disclose UCS's name and purpose for which the funds are requested. Printed solicitations (however transmitted) will also include its address or other contact information.

Donor entitlements

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

- The most recent School annual report and financial statements;
- Confirmation of the exempt educational charitable status of UCS;
- A copy of these guidelines;
- Confirmation of whether an individual soliciting funds on behalf of UCS is a volunteer, an employee, or a hired fundraiser.

Donors and prospective donors will be treated with respect. If we have been so informed, we will honour their requests to:

- Limit the frequency of solicitations;
- Not to be solicited through specific means (e.g. telephone or email);
- Receive printed material concerning UCS.

Anonymity

UCS will be transparent about gifts received, their sources and purposes. In cases where a donor wishes to remain anonymous, such anonymity will be respected for all public purposes. UCS may disclose details of any donor where it is required to do so by law, by any governmental or other regulatory authority, or by court order.

Privacy

The privacy of donors will be respected. Any donor records that are maintained by UCS will be held in accordance with the law and as such kept confidential to the greatest extent possible. Donors have the right to see their own donor record, and to challenge its accuracy.

Donor details

We do not sell supporter details on to third parties.

UCS considers its relationship with pupils, families, Old Gowers and supporters to be a lifelong one and we will look to retain your personal details until you tell us to remove them from our records.

Reasonable persuasion

UCS will not put individuals under undue pressure to give, although in carrying out fundraising activity in accordance with this policy it may use reasonable persuasion to encourage prospective donors or legators to give.

Third parties

If UCS is working with an independent third party organisation or individual as a 'professional fundraiser' to solicit philanthropic gifts on its behalf, the arrangement will be subject to the relevant legal requirements and a 'written agreement'. Before soliciting donations a relevant disclosure or solicitation statement must be made available to all prospective donors. Third party fundraisers will be required to operate in accordance with this policy.

Third party fundraisers will not be paid by commission other than in exceptional circumstances and where the conditions are set out in the Institute of Fundraising Code of Practice have been met.

Legal advice

Donors are encouraged to seek independent legal and/or financial advice if UCS has any reason to believe that the proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members. UCS is unable to and will not give legal or financial advice.

Data protection

UCS is committed to protecting the rights and privacy of individuals in accordance with the Data Protection Act 1998. UCS needs to process certain personal data about staff and students in order to fulfil its purpose and to meet its legal obligations to statutory bodies

and the government. UCS will process such information according to the Data Protection Principles that are set out in the DPA.

To ensure that all staff, and others who process personal data on behalf of UCS are doing so in accordance with these principles at all times, UCS has developed a privacy notice. This is included as an addendum to this policy.

Reputation

The legal and reputational rights of potential donors will always be considered as part of the due diligence process applied to potential gifts to UCS. A clear distinction will be drawn between what is rumour or speculation, and what is confirmed fact or legal finding. However, potential donors must be aware that UCS has the right to consider any potential reputational risks that may result from the current or past public perception of said donor. UCS ultimately has the absolute right to determine a potential gift as unacceptable according to this consideration and to refuse or return it.

Conditions on a gift

Where a donor offers to make a donation with conditions attached, UCS reserves the right to make the final decision on acceptance or refusal of the gift. Any gift with attached conditions that contravene UCS's vision and strategic aims or which UCS cannot otherwise meet will not be accepted.

Additional costs

Any additional costs associated with the acceptance of a gift need to be clearly identified and agreed with the donor. UCS reserves the right to not accept a gift if the additional costs to UCS outweigh the potential benefit of the gift.

Gift administration document

For a major gift to be accepted by UCS, the donor may be required to sign a document which sets out the administration of the gift. A copy will be held by both UCS and the donor. This document should detail how the gift will be used and the payment schedule.

The School's right over the gift

UCS has the right to use the gift in the way stipulated by the document signed at the time the gift is made. If necessary, due to programme, organisational, legal or regulatory changes, alternative uses of restricted/designated philanthropic donations will be discussed with the donor or donor's legal designate(s). If the donor is deceased or legally incompetent and UCS 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. If necessary, the matter will be referred to the School's Fundraising Ethics Committee. UCS has the right to review and reconsider any previous decisions made by the Fundraising Ethics Committee upon the availability of new information concerning the Donor or the Gift.

Vulnerable donors

Fundraisers must take all reasonable steps to treat a donor fairly, enabling them to make an informed decision about any donation. This must include taking into account the needs of any potential donor who may be in a vulnerable circumstance or require additional care and support to make an informed decision. If a fundraiser believes the person they are working with to be in a vulnerable circumstance or may require additional care and support to make an informed decision, they should inform their line manager who will then follow up with the Fundraising Ethics Committee to make a decision on whether this person should or should not be solicited.

Stewardship and reporting

Donors can expect to be thanked and recognised for their gift. Where appropriate, donors will be offered opportunities for continuing engagement with the activities they have funded. However, donors will not receive any preferential treatment in respect of the business affairs or selection criteria or process. In particular, no donation shall lead to any departure from standard policies and procedures in respect of the recruitment and admission of pupils, the appointment or promotion of staff, procurement or governance and management (including the governance and management of any activity or facility funded by a donation). UCS will provide all donors with a general report on their contribution to the institution's goals. It will also comply with any specified reporting requirements in a timely and honest manner.

Complaints

UCS will acknowledge complaints by a donor or prospective donor about any matter that is addressed in this document within 5 working days, and will aim to resolve a complaint within 21 working days. A designated member of the Development & Alumni Relations Office will consider and attempt to satisfy the complainant's concerns in the first instance. A complainant who remains dissatisfied will be informed that s/he may appeal in writing to the Headmaster of University College School, and will be advised of the disposition of the appeal.

Contact details

Telephone: +44 (0) 207 433 2139

Postal address: Director of Development & Alumni Relations
 University College School
 Development & Alumni Relations Office
 Frogna1
 Hampstead
 London
 NW3 6XH
 Email: development@ucs.org.uk

OUR LEGAL STATUS

University College School is a charity registered in England and Wales under charity number 312748, with its registered office at Frogna1, Hampstead, London, NW3 6XH.

PRINCIPLES OF PRACTICE

The Council for Advancement and Support of Education (CASE) Principles of Practice – Fundraising standards in educational institutions

UCS subscribes to CASE's Principles of Practice – Fundraising standards in educational institutions, published in July 2015. The Principles of Practice – Fundraising standards in educational institutions are consistent with the detailed 'Code of Fundraising Practice' produced by the Institute of Fundraising and used as the basis of adjunctions by the Fundraising Standards Board.

These industry standards have been adapted and incorporated into our Ethical Fundraising Policy.

The CASE principles of best practice in relations to fundraising standards are:
Institutional Policies and Guidelines

1. The institution will only accept donations that comply with its own published ethical policies for the acceptance and refusal of philanthropic donations and that are in the best interests of the institution. If a donation is turned down, a permanent record will be kept of the reasons for that decision.
2. The institution will publish a Donors' Charter or similar setting out in summary form their intentions in respect of their relationship with donors and supporters.
3. The institution will have a clear policy for handling any complaints from donors or prospective donors. Any complaint will be treated seriously and with respect and the complainant will receive a response within a reasonable time frame. Where the complaint is found to be valid, appropriate measures will be taken to address the concerns and issues raised and to prevent similar issues arising in the future.
4. The institution will have a clear policy on donor recognition. Associated schemes and practises for donor recognition will be proportionate to the significance of the gift and will comply with both prevailing charity and tax law.

The Donor

5. Donors will be provided with accurate information about the institution and the purpose for which their philanthropic funds are being solicited.
6. Any philanthropic funds raised will be used for the purpose for which they were solicited. Institutions will inform donors in a timely manner should the activity they are funding be changed in a significant manner or experience problems that could prevent the agreed outcomes being achieved.

7. Where an agreement between the institution and the donor exists funds can only be repurposed with the explicit prior permission of the donor or as charity law allows, but where there is no individual agreement the institution will obtain a general permission to repurpose funds.
8. All key conditions relating to major donations will be contained in a signed Gift Agreement or exchange of correspondence with which both parties will comply.
9. The institution may use reasonable persuasion to encourage prospective donors or legators, but it will not put individuals under pressure to give.
10. Fundraising for legacies will be carried out with due regard to the potential legator's freedom to provide for his/her family and other and will take account of the needs and situation of vulnerable individuals where appropriate. Fundraisers will make it clear that they cannot give financial and legal advice on drawing up wills.
11. The institution will provide all donors with appropriate general reports on their contribution to the institution's goals e.g. an annual Benefactor's Review for regular givers and other donors. It will also comply with any specified reporting requirements that are a condition of a specific donation, as set out in a gift agreement, in a timely and honest manner.
12. Information about prospects and donors will be kept secure and in compliance with the Data Protection Act (1998).
13. Donors will be informed, through appropriate means (such as web sites, donation forms, and individual discussions) and prior to making a donations, about the institutions policy on publicising donor names and on its obligations under the Freedom of Information Act (2000) to reveal, in certain circumstances, the identity of donors who would otherwise have remained anonymous.

Fundraisers and Volunteers

14. The institution will ensure that all those who solicit gifts on its behalf (including volunteers and students) are fully briefed as to the standards of practice and behaviour that the institution expects. Compliance with these principles and any institution specific rules will be monitored on an on-going basis by senior management.
15. The institution and all fundraisers will respect the clearly expressed preferences of donors and prospects about the method and timing of fundraising approaches and will ensure that those preferences are appropriately recorded and disseminated across the institution.
16. If the individual is working with an independent third-party organisation or individual as a 'professional fundraiser' to solicit philanthropic gifts on its behalf, the arrangement will be subject to the relevant legal requirements and a 'written agreement'.

17. Third party fundraisers will not be paid by commission other than in exceptional circumstances and where the conditions set out in the IoF Code of Practice have been met.
18. If the institution uses volunteers or pupils or ex-pupils on its behalf to cultivate and/or solicit gifts from prospective donors then the organisation will comply with its consequent legal duties and the donor will be made aware of the nature of that relationship

GIFT ACCEPTANCE POLICY

Types of gift we accept and any exceptions

UCS will accept gifts that:

- Aim to support the School in fundamental purpose of education.
- Aim to support the School's overall vision and strategic aims.
- Fit within our institutional values.
- Support our financial needs as a legitimate component of our income.

The School will not accept gifts that:

- Derive in part or in whole from activity that is illegal.
- Do not support UCS's objects, overall vision and strategic aims.
- Conflict with UCS's principles of academic freedom and equality.
- Could damage UCS's reputation or deter other donors.
- Could cause any damage, including financial, to UCS.

Policy review and updating schedule

This Gift Acceptance Policy shall be reviewed annually to determine if amendments are necessary to address changes or new situations.

FUNDRAISING ETHICS COMMITTEE

The Fundraising Ethics Committee (FEC) is a body established to make final decisions over gifts, whether potential or realised, to the School.

The FEC is made up of the following members:

- Chair of the Committee: The Headmaster of UCS
- The Governor with responsibility for Development
- The Chief Operating Officer
- The Director of Development & Alumni Relations

Terms of Reference

1. To ensure that the School operates effective, systematic and proportionate systems for research into donations offered to or solicited by the School.
2. For each case brought to the Committee:
 - a. To consider any strategic, financial, legal, ethical and reputational issues associated with the gift or proposed gift;
 - b. To determine whether the gift in question may be accepted or the proposed gift solicited.
3. If subsequent events (including the availability of new information, or a change of School policy) so require the School may, at the discretion of the Fundraising Ethics Committee, review and reconsider previous decisions to accept or solicit particular donations. The response to such circumstances may include returning any donations, or undoing any naming decisions undertaken by the School, but shall at all times be transparent and proportionate.

Fundraising Ethics Committee referrals:

For the School and its Development & Alumni Relations Office to operate efficiently and effectively higher value gifts will attract a greater degree of scrutiny.

Gift Value	Process
£0 - £25,000	None
£25,001 - £100,000	Gift acceptance approval by Director of Development & Alumni Relations
£100,001 - £500,000	Gift acceptance approval by Headmaster as Chair of Fundraising Ethics Committee
£500,000 - £1,000,000	Gift acceptance approved by Fundraising Ethics Committee
£1,000,000+	Gift solicitation approved by Fundraising Ethics Committee

NAMING POLICY

The UCE Naming Policy is a distinct document and can be found on our website at www.ucs.org.uk/support-us/ethical-fundraising

PRIVACY NOTICE UCS SCHOOL – ALUMNI

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those (data subjects) whose data is held by an organisation (data controller). These place an emphasis on making privacy notices understandable and accessible.

The school interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR says that the information provided to data subjects about how the school processes their personal data must be:

- Concise, transparent, intelligible and easily accessible
- Written in clear and plain language
- Free of charge

This privacy notice provides information about how we process the personal data of our alumni. Some of our systems are provided by third parties, e.g. hosted databases. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

We will keep in touch with all Old Gowers and use contact details to keep members updated about Old Gower Club activities, news and events. If you are happy for us to contact you about our charitable activities, we ask you to let us know your data preferences so that we can ensure our communications are relevant to you. From time to time we will contact you to ask for your preferences. You can update your data preferences at any time by contacting the development office at development@ucs.org.uk or Tel: 020 7433 2310. Your data preferences will not affect our contact with you as a current parent or Friend of the school. Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent.

We do not share or sell personal data to other organisations for their own purposes. To help fulfil our strategic objectives as a charity, we will analyse publicly available data about potential donors (e.g. from LinkedIn, Companies House, Charity Commission, Who's Who, articles in publications) to create a profile of interests and preferences so that we can make appropriate requests.

We do not transfer personal data outside of the European Economic Area unless we are satisfied that the personal data will be afforded an equivalent level of protection. The retention period for alumni data will be unlimited as long as the school believes it has a relationship to serve with the alumnus/ alumnae.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

You can complain at any time about how the school has handled your data, the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113. A template letter, should you need it is at the appended to this notice.

Appendix

[Your full address]

[Phone number]

[The date]

Victoria Heeley
University College School
Frognaal
London
NW3 6HX

Dear Ms Heeley

Information rights concern

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website (www.ico.org.uk) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully

[Signature]