



## The Leys School Gift Acceptance and Fundraising Policy

The Leys is part of The Leys and St Faith's Schools Foundation, a registered charity (No. 1144035) and welcomes offers of donations to assist its development. Ultimate responsibility for acceptance or refusal of all donations lies with the Governors by law, irrespective of internal delegation. Their duty is to ensure the best interests of the school are served in accepting or refusing a donation, regardless of personal views or outside interests.

The Governors are pleased to accept lawful donations made in good faith, compatible with the school's aims, values and objectives.

### Ethical Fundraising Principles

Fundraising undertaken on behalf of The Leys will:

- Be truthful;
- Accurately describe the intended use of funds donated; and
- Adhere to applicable requirements under charity law and the Institute of Fundraising Code of Fundraising Practice.

Employees (or volunteers) who solicit funds on behalf of the school shall:

- Adhere to these guidelines;
- Immediately cease solicitation of an individual who identifies solicitation as harassment or undue pressure;
- Immediately cease solicitation of an individual in vulnerable circumstances who is unable to make an informed choice about a donation;
- Disclose immediately to the Headmaster any conflict of interest; and
- Not solicit or accept donations for purposes inconsistent with the school's objectives.

Paid fundraisers will not be paid with finders' fees, commissions or compensation based on number of gifts received or funds raised. They will be paid by a salary, hourly wage or fee, and their compensation consistent with the policies and practices that apply to non-fundraising staff.

### Gift Acceptance and Due Diligence

The vast majority of gifts can be accepted by the Development Office without further referral. However, under Money Laundering Regulations we have a responsibility to carry out due diligence checks on any amount over £10,000. This will primarily apply to gifts coming from countries listed as high risk, requiring Enhanced Due Diligence, along with those received from individuals and organisations previously unknown to The Leys and with no obvious connection to us.

Other circumstances where the source or purpose of the donation may require further consideration include, but are not limited to:

- Significant naming rights are attached;
- The donation is not in monetary form (e.g. a gift of shares or property);
- The cost to the school to administer the gift will be greater than the value of the gift itself;
- The donor is not someone with whom the school wishes to be associated;

- The donation is from a country which places restrictions on its residents making overseas donations;
- The donor, donor's family or donor's friends and associates will derive undue benefit from the donation;
- Conditions attached to the gift are impractical, may contradict the school's objectives, or are judged unreasonable by the Development Office, Governors and the Senior Management Team.

The Governors must take reasonable steps to know who the School's donors are, and whence donations arise, especially when considering large donations or the circumstances of a donation give rise to particular risk. In these circumstances, the Development Office may seek further assurance on provenance of funds. Acceptance of a donation does not imply any endorsement of a donor's opinions or policies.

In the first instance, matters for consideration will be referred to the Headmaster before the gift is accepted. If required, the Chair of Governors, Headmaster and Bursar will discuss whether a donation can be accepted and document their decision-making process.

In rare circumstances, a gift may be refused unless an agreement can be reached between the school and the donor, for example, a re-direction of the proposed gift to a current appeal.

In rare circumstances, a gift may be returned. This may occur if it was clear the donor was not able to make an informed decision to make a donation, or if it becomes clear that the gift will cause harm to the school's reputation, an unacceptable conflict of interest, harm relationships with stakeholders, or contradict the school's objectives. In England and Wales, the law provides for the return of donations of more than £50 made by credit/debit card within a seven-day cooling off period.

### **Fundraising from Persons in Vulnerable Circumstances**

Giving to a charity should be a positive experience for everyone involved. We recognise that some people we engage with through our fundraising activity may, at the time of interaction, not fully understand the nature or consequences of the donation they are considering. We also understand that an individual may have the capacity to make a decision, but may be vulnerable at that moment in time and will require further support or information before coming to an informed decision about whether to make a donation.

If we suspect an individual we engage with is lacking capacity, we will immediately end any fundraising discussions, in a way that seeks to protect that person while respecting their dignity and any desire they have expressed to support The Leys and St Faith's Schools Foundation. While we recognise that everyone has the right to support their favourite causes and charities, we know that we have an obligation to protect those who lack the capacity to make an informed decision.

Anyone may be considered vulnerable or requiring additional care and support at some stage in their life, depending on personal circumstances, bereavements, health, and so on. If a Leys fundraiser suspects someone may be vulnerable at that period in time, we will pause fundraising discussions and provide any additional support needed. This may include delaying acceptance of a gift to give further time for considering; a 'cooling-off period' in case a donor changes their mind; or suggesting a donor consult friends, family, or a legal representative for advice.

If, despite our best efforts, we inadvertently receive an unsolicited donation from a donor we believe lacked capacity to make an informed decision we may return the donation to the donor or, in certain circumstances, to a family member or designated representative.

## **Data Protection**

Donor records held by the Development Office will be held in accordance with the data protection statement [here](#).

The school will not sell its donor and alumni lists and contact details.

In all cases where a donor wishes to remain anonymous, such anonymity will be respected for all public purposes, as well as in meetings of school committees and affiliated committees. If required to do so by law, by order of a court, or by any governmental or regulatory authority, the school will disclose donor details. The identity of anonymous donors will be known to the Headmaster, the Chair of Governors, and to School staff who process the gift.

## **Donor Recognition**

Acknowledgement of donations will be sent to the donor on acceptance or notification of the gift. Unless a donor wishes to remain anonymous, their name may be included in the annual List of Donors, on the school website, and in other publications issued by the Development Office. The donation amount will not usually be stated unless formal consent has been requested and received in writing.

## **Fundraising Complaints Procedure**

The Leys and St Faith's Schools Foundation is registered with the Fundraising Regulator. We are committed to best practice and take all complaints very seriously.

If you have a concern or complaint about our fundraising, you can:

- Call the Development Office on 01223 508545
- Email us at [development@theleys.net](mailto:development@theleys.net)
- Write to us at The Leys School, Cambridge, CB2 7AD

We will take your complaint seriously and treat you politely and fairly. The following three-stage process will be followed for any fundraising complaints.

### **First stage**

If you make a complaint by telephone, we hope to resolve it during the call. If this is not possible, we will let you know how long it will take us to investigate and resolve it.

If you complain by email or post, we will acknowledge receipt and attempt to resolve it within five working days. If the complaint is more complex, we will first acknowledge receipt, and contact you again with a resolution within 10 working days of receipt.

### **Second stage**

We hope you will be satisfied with our response. If not, however, please let us know, and we will inform the Development Governor and escalate your complaint to a member of the Senior Management Team. They will lead an investigation and contact you with a resolution within one month.

### **Third stage**

If you are not satisfied by the resolution offered by the school, you can contact the Fundraising Regulator who will independently investigate your complaint. You can contact them via their website: [Make a complaint | Fundraising Regulator](#)

The Governors will be informed at least annually of the number and nature of any complaints received from donors or prospective donors about issues addressed in these guidelines.