

## **G3 Fundraising and Development Policy**

### **Key Information**

Charity Number: 312855

Email: [development@purcell-school.org](mailto:development@purcell-school.org)

Telephone: 01923 331131

Name of Data Controller: The Purcell School

### **Definitions**

'We', 'Our', 'The School', 'Development Team': The Purcell School

'Supporters', 'Community', 'You' 'Your': Anyone with an association to The Purcell School i.e. alumni, current and former parents, current and former staff, donors, Trusts, Foundations and friends.

### **Background**

This policy aims to outline the importance of fundraising and the need for a coherent and co-ordinated fundraising strategy at The Purcell School.

As a charitable organisation, we are subject to Charities Law, and the Governors are required to ensure that the School meets its charitable aims and all fundraising meets regulatory standards. The Fundraising Regulatory Board (FRB) was established by the government following the 2016 Charities Act to promote ethical practice in fundraising and to grow public trust and confidence within stakeholder communities. As we are subject to Charity Commission directives, we must adhere to the professional Fundraising Code. We have also signed up to the Fundraising Regulator and contribute annually to the levy ensuring best practice and to demonstrate compliance with the law

<http://www.fundraisingregulator.org.uk>.

We are required by the Fundraising Regulator to demonstrate that we have an accessible fundraising policy and a defined complaints procedure. In addition, we have a commitment to the highest standards of good practice and to ensure that all fundraising activities are open, legal and fair. At the heart of this is honesty, accountability and transparency. As well as compliance, Governors must ensure that fundraising is in line with the Charity's values and mission.

The Purcell School are committed to protecting your privacy and data. This policy applies to all supporters of the School, including but not limited to, alumni, parents (current and former), staff (current and former), Friends and grant making organisations.

This policy works alongside the internal documents 'Legitimate Interest Assessment' and the 'Staff Code of Conduct', in particular to support colleagues in work, whilst promoting values and aims of The Purcell School. As part of our operations we collect and process personal data and act as the 'data controller' as defined by the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR). For more detail on our data handling, security and processing, please see the School's Fundraising and Development Privacy Notice and Data Protection Policy available on our website.

### **Fundraising Aims of the School**

Fundraising priorities for The Purcell School are set by the Principal, Bursar, Head of Development and Philanthropy and the Governing Body. All School fundraising activities

require the permission of the Principal in advance. This should be in consultation with the Development Team in the first instance. All fundraising at The Purcell School must comply with the Code of Conduct outlined by the Fundraising Regulator. The Code of Conduct can be found here: <https://www.fundraisingregulator.org.uk/code/all-fundraising>. All future fundraising must be in line with the School's aims, ethos and the School's Strategic Plan as outlined by the Principal.

Fundraising in the name of The Purcell School MUST only be for one of the following purposes:

- To enable students whose parents cannot afford the full fee, and who may not receive a full Government Music and Dance scheme place, to access, via the bursary fund, an education provided by the School;
- To provide opportunities, events or activities to benefit the School community as a whole;
- To generate capital income in areas such as new buildings, development of the existing School site or provision of instruments or other equipment;
- For any other purpose which furthers the charitable objectives of The Purcell School;
- For external, registered charities (i.e. a cause chosen by students, such as a local charity) in agreement with the Development Department.

All Purcell School staff and parents of Purcell School students are asked to assist with development by:

1. Being ambassadors for The Purcell School and recommending The Purcell School for support to their friends, colleagues and business contacts
2. Not making requests directly to the School's donors (including alumni, trusts, major donors or corporate partners) for financial assistance for their children or themselves either whilst the student is at school or when they move on to undergraduate studies.

The Development Team is responsible for making approaches to funding sources (such as trusts, foundations, organisations or individuals) on behalf of the School and can advise on sources of financial support should this be necessary.

If a staff member identifies a fundraising opportunity with a new or potential donor, the Head of Development and Philanthropy and the Principal should be informed. Any cultivation plan for a potential donor should be led by the Head of Development and Philanthropy or the Principal, in close collaboration with the referring contact. Maintaining appropriate long-term relationships with potential donors is vital to growing development income. Effective training, handovers and internal communication should also be implemented for all those involved in this process.

### **Data Protection and Communication**

Under the UK GDPR and Data Protection Act 2018, the School must have a legal basis to process personal data or send communications to individuals on the database. We use a combination of consent, legitimate interest and legal obligation as our legal basis, the latter relating to financial donations which may need to be processed for compliance with the Proceeds of Crime Act 2022, the Bribery Act 2010 and Money Laundering Regulations 2007.

It is considered reasonably expected, and with minimal privacy impact, to use our legitimate interest to process the personal data on the Development database (this does not include communications which are detailed below). This ensures, amongst other things, that we maintain an accurate and up-to-date database which effectively serves its purposes. A Legitimate Interest Assessment (LIA) has been carried out to ensure this processing is

necessary and does not override the rights, freedoms and interests of the individuals on the database.

Communication with individuals will be carried out under a consent based approach. In order to provide a timely and relevant schedule of communication, consent is requested via an 'opt in' method from all individuals and in some cases obtained electronically. This process is not deemed intrusive on privacy, particularly as those on the database have some form of relationship with the School. We will refrain from contacting those who have told us they do not wish to be contacted and will maintain a 'suppression' list of these individuals to ensure this does not happen. Electronic communication will be sent in line with the Privacy and Electronic Communication Regulations (PECR) and e-marketing (including emails containing the same) will not be sent to individuals who have not responded to our consent request by opting-in to these communications.

For those who do not respond to a consent request, the School will, on occasion, send general School news and updates by email which will not include e-marketing. We may also send occasional communications of various purposes via post under our (and your) legitimate interest. Individuals can opt out of these communications at any time and we will explain how to do this within the communications.

These processes do not include communications from the School in order to fulfil its contractual and legislative requirements as per the Fundraising and Development Privacy Notice, Parent Privacy Notice and Student Privacy Notice.

### **Fundraising Data Processing**

Records are to be made of ALL charitable donations to The Purcell School, irrespective of whether income has been restricted to a certain project. Each donation is then coded, particularly if the money is to be allocated for a certain appeal or project. Each donation is recorded on ToucanTech (the School's fundraising database) to ensure that:

- the terms of donation are complied with
- we acknowledge and thank the donor appropriately, in accordance with our Donor Recognition Policy
- we can accurately forecast budgets against targets
- we have an accurate picture of all charitable income for The Purcell School

Any financial support offered by a donor to The Purcell School will be treated as a 'charitable gift' (with Gift Aid where applicable). Donors may add a restriction to the purpose of their gift (e.g. for a Bursary), but the donation must not have any propitious benefit for the donor and must be made via the Principal, Bursar or Development Office (who will undertake the necessary due diligence). The funds will then be used only for the activity or project for which they have been given as a charity, The Purcell School reserves the right to refuse any gifts if it feels that the use of such funds is too restrictive, is unethical or that it fails the due diligence test. Please refer to the Purcell School's Fundraising & Gift Acceptance Policy for further details.

<b>Policy Author/Reviewer</b>	<b>Policy Date/Review Date</b>	<b>Next Review Date</b>
Chris Harbour	September 2022	September 2023
Adam Wroblewski	September 2022	September 2023
Adam Wroblewski / Chris Harbour	September 2023	September 2024

