



Francis Holland Schools

<b>Name of Policy</b>	Development Policy
<b>Author</b>	Development Director SSQ and Head of Development RP
<b>SLT Approval</b>	Autumn 2022
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<b>To be read in conjunction with</b>	Data Protection Policy Anti-Money Laundering Policy Bribery Policy

<b>Revision History</b>	
This section should be completed by the reviewer each time this policy is reviewed	
<b>Changes made</b>	<b>Date</b>
Cross referencing added	Spring 2021
Full review and revamp of policy	Autumn 2022

**Availability of this document:**

Copies of this document are available at [francisholland.org.uk/policies/](http://francisholland.org.uk/policies/) or on request from the school office, Francis Holland School (Regent’s Park, Ivor Place, London NW1 6XR or Francis Holland School (Sloane Square), 39 Graham Terrace, London SW1W 8JF.

**Application of this document:**

This policy applies to both Sloane Square and Regent’s Park, and to the EYFS as well as junior and senior schools.

## **Development Policy**

### **Introduction and Scope**

The Trust is committed to the highest standards of conduct in all its activities related to fundraising and development. This document outlines:

- The policies relating to the research, cultivation, solicitation of gifts and stewardship of donors and potential donors;
- The required administration of gifts to ensure the Trust maintains clear and auditable records to demonstrate all gifts to the Schools are used in accordance with the donor's wishes; and
- The requirements for handling data of donors to ensure the School remains compliant with the Data Protection Act 1998.

Details of all opportunities to support the Trust, and the associated naming and stewardship, will be made available on the Francis Holland Schools websites, plus through specific materials on bursaries, legacies and any future capital projects which will be made available at appropriate events and through direct mailing campaigns.

## STANDARDS RELATING TO THE TRUST'S RELATIONSHIP WITH PROSPECTS AND DONORS

### POLICY GOVERNING THE USE OF DATA

#### [Francis Holland School Trust Data Retention Schedule](#)

The Development Office will maintain relationships on behalf of the Trust with many individuals and organisations both on a local and national level. The Office will maintain a variety of information systems – both paper-based and electronic – that support and facilitate this work and therefore records personal information on individuals, including details of relationships with the Trust and members of its staff.

At all times, the Office seeks to act in line with relevant standards concerning the capture, maintenance and use of this personal information. Specifically:

1. The Development Office will record information on individuals and organisations gathered from the public domain, research information sources and from interactions with that individual that will include, but is not limited to: contact details, employment history, education and graduation records, details of specific interactions with the Trust/School and with members of staff, and details of gifts that have been made.
2. The Development Office will take care to perform due diligence on all sources of information used through its research, and draw only on publicly available, credible and verifiable sources of information in the preparation of internal documents.
3. At all times, the Development Office will ensure that all information on donors and prospective donors is handled with the utmost confidentiality and professionalism, and that any information that is retained by the Department is used only for the purposes of fundraising.
4. Such data as the Trust/Schools hold on an individual or organisation shall be kept up to date and complete, insofar as is reasonably possible. The Development Office will retain records only as long as required by the Data Protection Act 1998 and the wider Trust Data Security policy.
5. Individuals shall be permitted to ask the Trust to cease processing their data, although the Trust shall always be permitted to keep records of a former pupil's academic progression, payment of fees and other administrative information that may remain relevant after the pupil has ceased to attend the School. The Trust may also keep a record of a request to suppress other use of data, in order that this request can be honoured.
6. An individual's records on the database should only be deleted with the approval of the Bursar.
7. The Trust recognises that donors and potential donors expect that there is good communication within the Trust about their relationship with the institution. To this end, members of staff will record details of interactions with prospective donors and will, in turn, brief staff and members of the Trust/Schools management accordingly.
8. Where an individual requests that their gift be recognised anonymously, the member of staff with responsibility for the relationship with that individual will agree with him/her the extent of this anonymity: whether it extends only to public recognition, or whether the donor wishes to keep their gift anonymous from members of staff too. The Chair of Governors, Heads, Bursar and Development Manager will, at minimum, be informed of

the name of the individual making the gift, and will manage any information processing required accordingly. The donor should be aware that even an anonymous gift will be potentially known by these individuals.

9. All personal data will be handled as per the FHST Data Protection Policy, in line with the recent changes to GDPR requirements. This policy is available on the Trust's website <http://www.francisholland.org.uk/policies>.

## **POLICY ON ETHICAL FUNDRAISING AT THE SCHOOL**

Relationships with potential donors, and management of resulting gifts, will be undertaken to the highest standards of ethical probity and in line with best practice, given the potential for these interactions to reflect on the reputation of the Schools and their founder.

1. The Trust will commit publicly to the following approach to its development activity:
  - a. "We promise integrity, transparency, and the respectful treatment of all donors and their gifts. We also commit to maintain the highest standards of stewardship of funds received by the Trust".
2. This policy outlines a series of principles that will guide the Trust in its dealings with current and prospective donors and their gifts. The Trust will not accept gifts from, or enter into a philanthropic relationship with any prospective donor or individual whose behaviour is not in line with these values or that would require the Trust to behave in any manner contrary to these values.
3. The Schools have outlined the key objectives that are priorities for fundraising consistent with the current strategic plans. The Development Office will, as a first call on its resources, seek donors who will support these key priorities.
4. All members of the Development Office, and so far as possible, all other staff and volunteers acting on the Schools' behalf, must bear the following key principles in mind when interacting with potential donors to the Trust:
  - a. Does the potential gift fit with the relevant School's strategic mission, and is it consistent with the goals outlined in its current strategic plan?
  - b. Is there evidence that the proposed gift, or any of its terms will:
    - i. Require action that is illegal?
    - ii. Seriously damage the reputation of the School?
    - iii. Create unacceptable conflicts of interest?
    - iv. Require the School to change the way that it normally does business, for example by accepting a student whose academic qualifications would not normally merit the award of a place?
    - v. Harm the School's relationship with other benefactors, partners, alumni, staff, students or potential students?
  - c. The Trust will not accept a gift from a source that insists on remaining wholly anonymous, on the basis that there is a risk that such a source might transgress one or more of the above principles.
  - d. If any member of staff feels that they are dealing with a potential gift that calls into question any of the above principles, it is his/her responsibility to raise the matter with the Bursar.

- e. The Heads, Bursar and relevant staff will be alerted to any Suspicious Donations, which will be subject to further investigation before they can be accepted. If, following further investigation, the purpose of a Suspicious Donation is thought to be linked to money laundering or other criminal activity, the Trust will alert the police and Charity Commission. Suspicious Donations may include the following:
  - i. large donations or interest-free loans (>£25000) from individuals or organisations unknown to the charity
  - ii. where conditions are attached to a donation other than those relating to allocation of funds to the Trust's objectives
  - iii. where the donation is for a specified period of time, giving the Trust the interest but with the principal sum to be returned at the end of the specified period, and possibly to another person or organisation
  - iv. where the donation is given in a foreign currency
- 5. All donations / loans to FHST over £25,000 or £10,000 if in cash, will be subject to AML checks as standard procedure. The Bursar is authorised to decide whether or not this approach may be pursued for all gifts under these values, but where the matter is not clear-cut or the gift concerned exceeds £25k, then he may recommend that a Committee of Governors meets (involving a minimum of 3 members) to consider the Trust's response. As decisions about acceptance of gifts often need to be taken quickly, under public scrutiny, the Group may on occasion be required to meet virtually rather than in person.
- 6. The Development Office will prepare a briefing document for the meeting, providing all relevant public knowledge about the potential gift/donor, and where possible the office should also take soundings from those within the Trust's network about the issue under consideration, to try to provide informal intelligence.
- 7. Sometimes, ethical issues may arise after a gift has been accepted, and, in some cases, spent. The same set of principles should apply as outlined above, and a Governors' Committee should meet to discuss what course of action the Trust should take. In exceptional circumstances, the Trust should be prepared to return a gift, rather than compromise the reputation of the Trust.
- 8. In turn, the Trust undertakes that:
  - a. All communications made to potential donors concerning a project will be full, truthful, and comply with the law;
  - b. The donor's right to privacy will be respected;
  - c. Any gift will be applied for the purpose for which it was originally requested, unless explicit consent is given otherwise by the donor, or, in the case of bequests, for the purposes described in the donor's will or for similar purposes agreed with the donor's executors;
  - d. The donor's personal data will be respected, and there will be transparency in the Trust's communications with its donors and prospective donors;
  - e. Any concerns raised in relation to the above points will be dealt with swiftly and effectively;
  - f. Where a gift involves the establishment of an endowment fund to support a particular activity at either School in perpetuity, the donor will be entitled to receive an annual report that outlines how much the current endowment is worth;

- g. Where a donor believes that the Trust has contravened any of the above principles, s/he should bring their objection to the attention of the Bursar in the first instance.

## **POLICY ON ACKNOWLEDGMENT OF GIFTS AND SUBSEQUENT ENGAGEMENT WITH DONORS**

### **Overview**

The Trust will ensure that all donors are appropriately thanked and recognised for their gift, so that their experience of giving is positive and reflects the importance the Trust places on their support. All contacts and discussions with those who have made gifts will be coordinated by the Development Office. The Development Office operates on the principles that:

- a. every gift, no matter what size, should be acknowledged promptly and graciously;
- b. the size of the gift will determine the manner in which the School expressed its appreciation.

### **Acknowledgement of gifts**

The manner in which gifts will be acknowledged will vary according to the size of the gift, and also will depend on whether the gift is:

- a. a single gift of cash, shares or other securities;
- b. a gift pledged in multiple instalments over a period of time;
- c. a legacy or any gift which will be transferred to the Trust on the death of the individual promising the donation.
- d. from an individual or company/Trust.

Please refer to table in Appendix 1 which outlines the responsibilities and timelines for acknowledgement and thanking of gifts to the Trust. Please note that recognition and stewardship will be based on the value of a gift inclusive of any Gift Aid that can be reclaimed on that gift.

The events, activities and publications outlined in Appendix 1 form the core programme of activities, events and communications through which the Development Office will engage with donors (and potential donors). These are additional to any activities which The Development Office or the relevant academic department may institute which are specific to the nature of the gift itself, e.g. a tour of a new building.

### Guideline for accepting philanthropic income and other gifts

The Trust seeks and encourages charitable donations from a range of sources including individuals, companies, charitable trusts and foundations, alumni and friends of the Trust.

All relationships with third parties should be subject to prior and continuing consideration in order to confirm that they support the Trust's mission, vision and strategic aims and are consistent with the overall objectives of the Trust.

Careful review of proposed and on-going relationships is required in order to mitigate the risk of ethical issues causing damage to the Trust's reputation, reducing the Trust ability to secure funding and reducing its capacity to develop beneficial relationships in the future.

**Further consideration is also required to confirm that proposed receipts and the terms of such receipts are in the Trust's best interest.**

**Accordingly, all gifts are accepted at the Trust's discretion and following a proportionate review. The Trust's Guidelines for accepting philanthropic income and other gifts sets out the process for such review. Responsibility for the review of proposed gifts rests with the Development Office, reporting to the Heads. This includes a review of the ethical considerations as well as the wider scope of any proposal.**