

CODE OF ETHICAL FUNDRAISING FOR EPSOM COLLEGE AND THE EPSOM COLLEGE DEVELOPMENT DEPARTMENT

Introduction

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

A. Donors' Rights

1. All fundraising solicitations by or on behalf of the Epsom College Development Department will disclose the Development Department's name and that of Epsom College and the purpose for which the funds are requested. Printed solicitations (however transmitted) will also include the Development Department's address and other contact information.
2. Donors and prospective donors are entitled to the following, promptly upon request:
 - the most recent financial statements of Epsom College (as filed at Companies House);
 - confirmation of the charitable status of Epsom College and the Epsom College Development Department;
 - a copy of this ethics code.
3. Donors and prospective donors are entitled to know, upon request, whether an individual soliciting funds on behalf of Epsom College or its Development Department is a volunteer or an employee.
4. Donors will be encouraged to seek independent advice if the Development Department has reasonable cause to think that a proposed gift might adversely affect the donor's ability to honour existing financial commitments or 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 Epsom College or its Development Department will be kept confidential within the constraints of the law. 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.
7. The Development Department will respond promptly to a complaint by a donor or prospective donor about any matter that is addressed in this ethics policy. The Development Department Director will make every effort to satisfy the complainant's concerns. Where the complainant is not satisfied with the proposed resolution of the complaint this will be referred within two weeks to the Chairman of Epsom College.

B. Fundraising Practices

1. Fundraising solicitations on behalf of Epsom College and Epsom College Development Department will:
 - be truthful;

- fairly and informatively describe Epsom College and the Development Department's activities in relation to the whatever the donor has intended for the College's use of his/her donated funds, and
 - respect the dignity and privacy of those who benefit from the College's activities.
2. Volunteers and employees who solicit or receive funds on behalf of Epsom College or the Development Department shall be required:
- to be aware of the relevant sections of the Institute of Fundraising's code of fundraising practice;
 - to adhere to the provisions of this code;
 - 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 the knowledge of Epsom College or the Development Department identifies solicitation as harassment or undue pressure;
 - to disclose immediately to Epsom College and the Development Department any actual or apparent conflict of personal interest, and
 - not to accept donations for purposes that are inconsistent with Epsom College's objects, objectives or mission.
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 College's policies and practices that apply to non-fundraising personnel.
4. Epsom College and the Development Department will not sell or rent out or share with any third party outside of Epsom College its supporters list or any other personal information.
5. The Chair of the Fundraising Sub-Committee of the Epsom College Development Department will be informed within one week of any complaints by donors or prospective donors and of all the action taken and the Chairman of Epsom College and the Headmaster will be informed at least quarterly of the number, type and disposition of complaints received from donors or prospective donors about matters that are addressed in this code.

C. Financial Accountability

1. The financial affairs of the Epsom College Development Department 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 Epsom College.
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 College 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.
4. The cost effectiveness of the College's fundraising programme will be reviewed regularly by the Epsom College Board of Directors.

D. Acceptance and Refusal of Donations

1. The ultimate responsibility to accept or refuse a donation resides with the Epsom College Board of Directors.
2. There is a legal obligation for the Development Department to undertake a degree of due diligence when or accepting donations. This applies especially to major donations given to the College and also to donations with a monetary value of over £10,000.
3. The Development Department would only decline a donation if it is felt by the Trustees that the gift:
 - falls outside Epsom College or the Development Department's charitable objects or objectives; or
 - consists of goods, property, or services, which Epsom College 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 Trustees believed such conditions would place the assets of Epsom College or the Trust at undue risk.
4. The Development Department would decline a donation if it is felt by the Trustees 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;
 - could seriously damage the reputation of Epsom College or the Development Department.
5. Gifts from parents and families with children at the College are important because they help us to provide high quality facilities and opportunities to all our pupils.
6. 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 fund.
7. The decision to make a donation will have no bearing on the academic, sporting or extracurricular opportunities open to an individual pupil.
- 6 All donations are allocated to meet the donor's intentions and are non-refundable.

Helen Tranter
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