



# ELIZABETH COLLEGE FOUNDATION

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## FUNDRAISING CODE OF PRACTICE

### A. Introduction

1. The Elizabeth College Foundation was established to assist Elizabeth College in continuing to provide an excellent all-round education for children of the Bailiwick. It comprises both a Guernsey Registered Charitable Trust (CH91) and a UK Registered Charity (1120954).
2. The Elizabeth College Foundation Fundraising Code of Practice is designed to ensure that in all fundraising activities the trust of donors is upheld, which requires openness, transparency and respect.
3. All fundraising will be undertaken by the Elizabeth College Foundation Office or staff, representatives and volunteers working on behalf of the office. Such fundraising shall be monitored and reviewed by the Trustees of the Elizabeth College Foundation, Elizabeth College UK Foundation and the Elizabeth College Board of Directors, including approving and monitoring compliance with this Code of Practice.

### B. Fundraising Objectives

4. The Trustees and Board of Directors will permit the Foundation Office to seek funding for a particular project provided that it:
  - a. is approved by the Board of Directors as being strategically important to Elizabeth College in improving the provision of education at the school;
  - b. fits with the Foundation's charitable objects, namely: the provision, preservation, protection and improvement of Elizabeth College and Elizabeth College Junior School educational facilities, lands and buildings; and the awarding of bursaries and scholarships to students to assist in the furtherance of their education;
  - c. is fully-costed (including all additional staff and running costs); and
  - d. Involves no ongoing financial commitment from the Foundation beyond the initial grant.
5. All fundraising will be undertaken in accordance with the guidance of the charity regulator within the relevant jurisdiction and recognised standards for fundraising, including, as appropriate (having regard to the relevant jurisdiction):
  - a. Guernsey Charity legislation
  - b. UK Charity legislation
  - c. The Fundraising Regulator Code of Fundraising Practice for the United Kingdom
  - d. Charity Commission for England and Wales guidance

### C. Donors' Rights

1. All fundraising solicitations by or on behalf of Elizabeth College and its Foundation will disclose the College's name and the purpose for which the funds are requested.
2. Donors and prospective donors are entitled to the following, promptly upon request:
  - a. confirmation of the charitable status of Elizabeth College Foundation;

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Foundation and Marketing Director

- b. a copy of this fundraising code of practice; and
  - c. a copy of the Elizabeth College Foundation complaints policy.
3. Donors and prospective donors are entitled to know, upon request, whether an individual soliciting funds on behalf of the College and its Foundation is an employee, a volunteer or a hired solicitor.
4. Donors will be encouraged to seek independent advice if a proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members.
5. The privacy of donors, including requests to remain anonymous, will be respected. All donor records that are maintained by the College and its Foundation will be kept confidential to the greatest extent possible. Donors have the right to see their own donor record, and to challenge its accuracy.
6. The Foundation will seek the consent of donors to include their names in any donor lists. The Foundation will not sell its donor list or publicise any details other than the names of donors.
7. The College will respond promptly to a complaint by a donor or prospective donor about any matter that is addressed in this Fundraising Code of Practice. The Foundation Director will attempt to satisfy the complainant's concerns in the first instance. If the issue remains unresolved the complainant may pursue the matter in accordance with the Foundation's Complaints Policy.

## **D. Fundraising Practices**

1. Fundraising solicitations on behalf of Elizabeth College and its Foundation will:
  - a. accurately describe the College's activities and the intended use of donated funds; and
  - b. respect the dignity and privacy of those who benefit from the Foundation's activities.
2. Donors and prospective donors will be treated with respect. Every effort will be made to honour their requests to:
  - a. limit the frequency of solicitations;
  - b. not to be solicited by telephone or other technology; and
  - c. not receive printed material concerning the Foundation and/or the College.
3. Fundraising activities either face to face or by telephone/other means shall always provide an opportunity for potential donors, without embarrassment, to decline to become involved or donate.
4. All fundraising communication will include a clear single step opt out of future communications.
5. Employees, volunteers and hired solicitors who solicit or receive funds on behalf of the College and/or the Foundation shall:
  - a. adhere to the provisions of this code;
  - b. act with fairness, integrity, and in accordance with all applicable laws;
  - c. cease solicitation of any prospective donor who identifies solicitation as undue pressure or harassment, or who is perceived as being vulnerable or unable to make an informed decision;
  - d. disclose immediately to the College any actual or apparent conflict of interest; and
  - e. not accept donations for purposes that are inconsistent with the Foundation's objects or mission.

6. 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.

## **E. Acceptance of Gifts**

1. The following principles should be considered for all gifts which may, in the opinion of the Trustees, have a controversial dimension and which should in any case be considered in the case of all gifts that may amount to over £1 million in total value:
  - a. Does the potential gift fit with the Foundation's charitable objects?
  - b. Is there credible evidence that the proposed gift will be made from a source that arises in whole or in part from an activity that:
    - i. evaded taxation or involved fraud?
    - ii. violated international conventions that bear on human rights?
    - iii. involved any illegal activity?
  - c. Is there evidence that the proposed benefaction, or any of its terms will:
    - i. require action that is illegal?
    - ii. seriously damage the reputation of the Foundation or the College?
    - iii. create unacceptable conflicts of interest?
    - iv. harm the Foundation or College's relationships with stakeholders (e.g. donors, alumni, parents, staff, pupils).
2. In the case of potential gifts which may conflict with any or all of the above principles, it is the responsibility of the Foundation Director, at an early stage in discussions to alert the Trustees and/or College Directors. The Trustees and Board of Directors will then decide whether or not further discussion should be pursued with the potential benefactor.

## **F. Financial Accountability**

1. The financial affairs of the Elizabeth College Foundation will be conducted in a responsible manner, consistent with the legal requirements of national regulators and the ethical obligations of stewardship.
2. All donations to the Elizabeth College Foundation or the Elizabeth College UK Foundation will be used to support the charitable objectives of the Foundation(s).
3. All restricted or designated donations will be used, as far as possible, for the purposes for which they are given. If necessary due to programme or organisational changes, alternative uses will be discussed where possible with the donor or the donor's legal designate. If the donor is deceased or legally incompetent, and the Foundation 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 and at the Trustees' discretion.