



THE ENGLISH COLLEGE IN PRAGUE
ANGLICKÉ GYMNÁZIUM

Fundraising and Donations Policy

1. Introduction

The English College in Prague – Anglické gymnázium, o.p.s., with its registered office at Praha 9, Vysočany, Sokolovská 320, post code 190 00, ID No.: 257 19 815, registered with the register of public interest companies maintained by the Municipal Court in Prague, Section O, File 69 (the ECP or the College) issues this Fundraising & Donations Policy. College's objectives are to provide an English-medium education for young people in Prague, primarily of Czech origin, which is second to none academically, but which also develops every individual's potential to the full and prepares them for the practical, social, intellectual and moral challenges that they will face in today's globalised society. Its Founders are the English College Foundation, a charity registered with the Charity Commission for England & Wales - charity number 1015053.

Concern for others has always been at the heart of the school and its students and staff have always raised money for Czech and UK charities and for ECP scholarships and bursaries. But following the purchase of the school building in August 2021, we are also now looking to raise funds for the future development of the site to benefit both students and staff.

This Fundraising and Donations Policy sets out the principles and procedures under which the College seeks to operate when undertaking fundraising activities. Its fundraising is led by the Headmaster, and is subject to the oversight of the Governors of the school.

2. General Principles

The values of the College and its Founders require all fundraising to be carried out responsibly and ethically. At the heart of our fundraising lies the need to ensure that our objectives, integrity and reputation are upheld. This requires openness, transparency and oversight. There is a need for the College to ensure that we do not expose ourselves to reputational risk by accepting donations

from questionable or inappropriate sources, but we must also ensure that our fundraising is conducted ethically, with consideration for our donors.

The College adopts the following general principles, which apply to all fundraising:

- all funds raised for a particular cause must be used for that cause
- we provide potential donors with the information to enable them to make informed decisions about their donations
- we do not seek or accept donations if we know or suspect that a potential donor lacks capacity and will return any donations made by someone who lacked capacity at the time
- we do not make unreasonable intrusions into privacy, are not unreasonably persistent and will not place undue pressure on anyone to donate
- we will not ask for support if a person has clearly indicated that they do not wish to continue to engage
- we are transparent about our fundraising and include a report about fundraising in the College's annual report and accounts

3. Donors' Rights

3.1 All donations should be made without coercion and as an informed decision.

All fundraising approaches by, or on behalf of the College, will disclose the school's name and the purpose for which the funds are requested. Printed requests will also include the School's address and contact details.

Donors and prospective donors are entitled to the following, promptly upon request:

- the most recent financial statements of the College
- confirmation of our o.p.s. status
- a copy of this policy, which is available on our website www.ecp.cz

Donors and prospective donors are entitled to know, upon request, whether an individual soliciting funds on behalf of the College is an employee, volunteer or a consultant fundraiser working on behalf of the College. Currently all fundraising efforts are solely led by the College's staff and we do not employ consultants.

3.2 Donors will be acknowledged and recognised as they may reasonably wish.

The privacy of donors will be respected. Any donor records that are maintained by the College will be kept confidential. The ECP Directive on the Protection of Personal Data explains how we collect, store, manage and protect personal information.

3.3 Donors and prospective donors will be treated with respect. Every effort will be made to honour requests to:

- limit the frequency of approaches
- not be contacted by telephone or other methods
- limit the amount and frequency of printed or online material that they are sent

If any donors or prospective donors ask to be excluded from fundraising approaches, this is recorded on the fundraising database/software and acted upon so they are excluded from all approaches or those methods from which they have asked to be included.

3.4 Use of Donations

Donors have the right to ask that their donations be allocated to a specific area of school activity. The College will meet these requests wherever possible and appropriate in order to deliver their objectives. See also 11 and 14.1.

3.5 Complaints

The College will respond promptly to a complaint by a donor or prospective donor about any matter covered in this policy. A designated member of staff will attempt to satisfy the complainant's concerns in the first instance. A complainant who remains dissatisfied may request in writing a review of their complaint by the Headmaster, and will be advised of the outcome of this review.

4. Constituency

The school is committed to the principle that it seeks donations from individuals who have a clear relationship with the College - current and former parents, alumni and supporters – or individuals and organisations that have been carefully identified as having a potential interest in supporting a specific activity or initiative.

5. Overview of Fundraising Practices

5.1 Fundraising approaches on behalf of the College will:

- be truthful
- accurately describe the College's activities and the intended use of donated funds
- respect the dignity and privacy of those who benefit from the College's activities

5.2 Employees, volunteers and consultant fundraisers who solicit or accept funds on behalf of the College will:

- adhere to the provisions of this policy
- act with fairness, integrity and in accordance with all applicable laws
- cease approaches to a prospective donor when asked to do so
- disclose immediately to the College any actual or potential conflict of interest
- not accept donations for purposes that are inconsistent with the College's objectives
- ensure that no inappropriate benefit is secured by a donor in return for a gift

Paid fundraisers, whether staff or consultants, will not be paid finders' fees, commissions or other payments based on either the number or value of donations received. Currently all fundraising efforts are led solely by College staff and consultants and freelance fundraisers are not used.

5.3 As set out in 3.2, the College will not sell or exchange personal details of donors. The ECP Directive on the Protection of Personal Data explains how we store, manage and protect personal information.

5.4 The College will abide by all applicable laws and regulations relating to the soliciting, acceptance, and use of donations. The College will meet the provisions of applicable legislation intended to prevent bribery or other crimes in respect of donations.

6. Fundraising Practices

The College may use a range of direct and indirect methods of fundraising, such as personal meetings, the inclusion of a donation form with another mailing, and through links provided by newsletters and other communications.

Leaflets and donation forms may also be placed round the room at events for alumni, parents and supporters.

6.1 Face-To-Face Solicitations

Members of the Fundraising Team will meet with prospective and current donors, where appropriate, to discuss donations. Cash donations over 100,000 CZK will not typically be accepted at such meetings, but by a subsequent bank transfer.

6.2 Direct Mail

Printed fundraising materials, which may take the form of a leaflet requesting financial support for the school's general fundraising activities, development or bursary funds, along with a donation form, may be sent out no more than twice a year.

The school's electronic newsletter, which is sent out 5 or 6 times a year, may include articles relating to fundraising efforts and requests for support.

6.3 Email

Alumni, parents, supporters and other potential donors are contacted from time to time via email. Such emails may include information about methods by which they may make a donation. The recipient of the email will always be able to identify the school as the originator of the message.

It is always possible to opt-out of email communications by contacting the Fundraising Team on fundraising@englishcollege.cz

6.4 Telephone Fundraising Campaigns

The College currently has no plans to hold a telephone fundraising campaign. Should one occur in the future the following guiding principles will apply:

The College would contact, by phone, from an identifiable number, those members of the alumni, parent and supporters community who have an up-to-date telephone number and who have not indicated an unwillingness to receive calls.

All those called for the purpose of a donation will receive a pre-call letter (either by post or email) giving the opportunity to opt out of that particular telephone campaign or telephone campaigns in general. Anyone who wishes to be

excluded from such campaigns would be removed from the calling list. If during a telephone campaign anyone asks not to be called, or to be approached at all, they would be removed from the calling list.

Callers would be members of the Fundraising Team. They would be trained at the start of the telephone campaign and required to speak to those they call with courtesy and respect. Requests for donations would be made carefully, following training, to ensure that nobody feels pressured into making a donation. One of the purposes of the call would be to request a donation, but it may also be to check contact details, convey school news and learn news from the individual. Callers may also ask for feedback on events and seek consent to contact in the future.

7. Content of Fundraising Material

The College is committed to ethical standards in the content of fundraising materials, texts and in particular:

- printed materials will include the College's identification details
- will not imply funds are raised for a specific, restricted purpose if this is not the case
- will not be misleading because of inaccuracy, ambiguity, exaggeration, omission or any other reason
- will be backed by objective evidence for all direct or implied claims
- will not use material that contains other people's copyright material, marks or other intellectual property without their permission
- will be legal, decent, honest and truthful in compliance with competition rules, Act No. 40/1995 Coll. on the regulation of advertising, as amended, and other legislation as appropriate
- will not cause offence on grounds of race, age, religion, sex, sexual orientation or disability
- will not commit any crimes or misdemeanours in respect of fundraising

8. Ensuring Compliance

All fundraising material and call scripts must be approved by the Headmaster who will only approve the material if it conforms with the College's fundraising strategy and is in compliance with the law and this policy. [Whistleblowing Policy](#)

The College will monitor fundraising campaigns by:

- actively seeking feedback
- attendance at meetings and during telephone campaigns, if held
- operating a complaints process

Staff and volunteers with concerns about our fundraising practice should raise them in accordance with the College's

9. Transparency and Accountability

The College is committed to transparency and accountability in its fundraising. In particular:

- care is taken to ensure all fundraising literature and scripts are clear and meet all legal and regulatory requirements
- a complaints procedure is in operation
- a report on fundraising is included in the annual report and accounts

Members of the Fundraising Team who make approaches to members of the public must:

- give the name of the College as the organisation for which funds are being raised
- explain they are an employee of the school

10. Protection of Vulnerable People

The College does not tolerate:

- unreasonable intrusions into privacy
- unreasonably persistent approaches
- placing undue pressure on a person to make a donation

The College recognises that vulnerable people may be at particular risk or particularly susceptible to unreasonable intrusion, unreasonable persistence or undue pressure. The College will take into account the need to protect vulnerable people from unreasonable intrusion, unreasonable persistence or undue pressure in:

- the design and planning of its fundraising programme
- deciding the frequency of any fundraising contacts

- deciding the methods of fundraising contacts
- deciding the content of materials and scripts
- designing training for staff and volunteers
- taking steps to ensure compliance

11. Donations

11.1 Core Principles

While donations are welcome, much more important is the independence, reputation and financial independence of the school. All donations, no matter how small, must be reviewed prior to their acceptance to ensure none of the above is compromised in any way.

Appropriate due diligence steps will be taken to confirm the identity of a donor and the source of any funds. The majority of donors will be known to the College as part of a continuous contact with them as a parent, member of the English College in Prague Network or long-term supporter.

Donations cannot carry any form of condition, whether relating to the use of the money or the obligation of the school to the donor, with the exception of section 14.1 below.

If the donor so wishes, the school will make a commitment to spend the donation on the intended item (capital item, scholarship etc) however this is not a binding agreement, just an intention made in good faith.

The donation will not be accepted for the purpose of obtaining any benefit for the donor or a person close to the donor. The donation is made voluntarily and without consideration. In no circumstances will a donation be accepted where the donor expects a place or position at the School to be offered, or preferential treatment for a particular student. All places and positions at the School are gained solely on the basis of a selection procedure for the relevant position according to academic or professional merit.

12. Purpose and Size of Donation

The College will accept donations that:

- aim to support the school's objectives
- fit within our organisational values

Donations can be in the form of a monetary gift, the purchase of equipment or other capital expenditure, or the funding of bursaries or scholarships. Significant donations are defined as having a monetary value or equivalent of 100,000 CZK or over. Small donations are of lesser value.

13. Acceptance of Donations

Donations for restricted purposes will be accepted providing the restriction is within the objectives of the College, is not inconsistent with our priorities and is not subject to terms that will cost more to implement or administer than the value of the gift. All gifts given for a restricted purpose that are accepted will be received and used solely for the purpose agreed between the donor and the school as appropriate.

13.1 Review of Donors

In all cases donations are reviewed by the Headmaster and the Business Operations Manager (BOM). The BOM writes a report about the nature of the donation. This report will include the following:

- the amount(s) and proposed donation timescale (if staged payments)
- whether the donation is personal or from a company that the donor is associated with
- a short description of the donor and their personal/professional background
- a short description of the origin of their personal wealth and the sectors in which was gained (for personal donations)
- a short description of the company on whose behalf the donation is being made (for company donations)

It is intentional that there is not an exhaustive list of the sectors and types of personal wealth from which ECP does not wish to accept donations. Each case will be investigated as fully as possible by the BOM with a risk-averse approach to reputational damage.

Consideration will be given to whether any donation involved or is linked to any suspicious transaction, for example:

- a fee is requested to release the donation
- the College is asked to cash a cheque and return part of the donation
- the College is asked to convert foreign currency
- the proposed donation involves other additional steps with no clear purpose in the making of the donation

- the donor has no link to the College and no clear explanation for interest in their work

The College will not accept donations in cases where to do so would not be in the best interests of the school eg where it might:

- compromise its status as an independent organisation
- involve or risk conduct contrary to the school's Fundraising & Donations policy
- create unacceptable conflicts of interest
- expose the College to adverse publicity or reputational risk
- cause any other damage, including financial, for example by deterring other donors
- involve concerns about the legality of the source of funds or the ability to identify the donor
- involve the acceptance of funds from proscribed organisations, designated individuals or sanctions targets
- in any other way be in conflict with the values and objectives of the College

13.2 Significant Donations

In the case of donations of 100,000 CZK or more, the Headmaster & BOM report will conclude with:

- a statement of the risks (if any) of accepting the donation
- a recommendation of whether the donation should be accepted

This report will be sent to the Chairman of the Board of Governors and the Chairman of the Finance Committee, who together will decide to either accept, query or reject the recommendation of the Headmaster and BOM. Their decision will be reported to Governors at the next Board meeting.

If a significant donation is accepted, the Headmaster shall conclude a formal written agreement on donation on behalf of the College with the donor. The agreement shall set out terms of the donation.

13.3 Small donations

Small donations of less than 100,000 CZK will be reviewed by the Headmaster and BOM as described in section 3.1. On the completion of the report they will jointly make a decision as to whether it can be accepted. This decision will be

actioned immediately. The report will be forwarded to the Chairman of the Finance Committee, who will report to the main Board in due course.

If a small donation is accepted, ECP will issue a donation receipt to the donor or conclude a formal written agreement if requested by the donor.

14. Transparency

The following statement is displayed on the ECP website, alongside the name of donors:

“The generosity of all those who choose to make a donation to the English College in Prague is greatly appreciated. Whether for general school funds, specified items or individual scholarships or bursaries, these donations are really welcomed and change lives. For the avoidance of any doubt, the English College in Prague needs to make it clear that donations of any type or amount cannot in any way either officially or unofficially be related to preferential treatment in terms of admissions of new pupils or influence the application of normal school processes and rules to existing pupils. This

statement is to protect both parties from the risk of unfavourable interpretations of such donations.”

Donations are only made on the agreement that the donor agrees that his/her name/company name are openly declared on the website. The amount and the purpose of the donation do not need to appear on the website, however it is not prohibited. The donor's consent to publish his/her name/ company name and the amount of the donation on the website of ECP should be in writing if possible.

14.1 Recognition

If the donor so wishes, the school is at liberty to associate the donor's (or donor's company name) with a particular project, capital item or bursary and/or scholarship. The donor has no legal right to be linked to a particular project.

15. Returned Donations

The school reserves the right to unconditionally return the donation to the donor for any reason and remove the donor's name from the website for an indefinite period of time after the donation was made.

The donor has no right to reclaim the donation.

16. Handling of Donations

Cash and cheques must be banked at the earliest possible opportunity in accordance with the law. Cash and cheques that have not yet been banked must be stored securely.

16.1 Acknowledgement, Recognition and Stewardship

Donors will be acknowledged and recognised as they reasonably wish and the College is committed to the public and private recognition of its donors, if desired.

Each donor can expect to receive a formal and personalised letter from the Headmaster.

17. Reporting Serious Incidents in Connection with Fundraising

The College is required to report / committed to reporting serious incidents, particularly suspected offences and crimes, to the relevant government authorities.

17.1 A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- loss of the College's money or assets
- damage to College property
- harm to the College's work or reputation

Examples of serious incidents that could arise in connection with fundraising include:

- suspicions or allegations of criminal activity including theft, fraud, bribery and money laundering
- suspicious financial transactions, suspicious or unverified donors
- investigation by the police or another regulator, significant adverse findings by a regulator, significant penalty from a regulator
- harm to beneficiaries or donors/the public
- circumstances affecting negative media attention or adversely affecting the College's reputation

If a member of the Fundraising Team believes there may have been a serious incident, they must immediately inform the Headmaster, who will apply the

College's procedures for the consideration, management and reporting of serious incidents. The Fundraising Team may in addition report serious incidents using the Whistleblowing policy of the College.

