

Ethical Fundraising Policy

1. Purpose and Principles

This ethical fundraising policy sets out how we manage the ethical issues and social responsibility within fundraising.

Specifically, we aim at all times to be open, honest, fair and to operate in a legal way that meets not only the law, but also fundraising regulation and best practice, including the Code of Fundraising Practice.

2. Responsibility

Everyone who is involved in fundraising has a responsibility to be aware of and comply with the ethical issues and procedures in this policy.

3. Charity Commission Fundraising Regulations – Trustees

The Trustees are aware of and will comply with Charity Commission guidance [CC3a](#), regarding Trustees responsibilities, particularly in relation to always acting in the charity's best interests and managing any conflicts of interest.

The Trustees are also aware of and follow the 6 principles in Charity Commission 20 ([Charity Fundraising: a guide to trustees duties](#)).

We will always be honest about what we can achieve when asking for funds, submit realistic budgets, use the funds for the purpose intended and ensure that we provide any reports required, on time.

We will ensure that everyone is aware of and consistently complies with the [regulatory guidance on fundraising behaviours](#) and respond promptly and effectively to any [fundraising complaints](#)

4. Charity Supporters And Donors

Supporters have a right to expect us to provide clear, truthful information on our work, including reporting on how we spend the funding we are given and managing donors' information responsibly.

We will comply with the guidance issued by the Charity Regulators and UK law, including in respect of openness and honesty with our supporters and members of the public.

We will respect the privacy and contact preferences of our donors. We will respond promptly to requests to cease contacts or complaints and act to address their causes.

5. Protecting Donors at Risk of Harm or Exploitation

In communicating with potential or existing donors we will be mindful of indicators that may suggest an individual may be at risk of harm or exploitation. We will use the REAL framework of recognising vulnerability and those at risk of financial abuse; this means considering the following when talking to donors:

- **Retain**
 - Is the donor able to retain and repeat the information you give them? Do you have to repeat what you have said over and over again?
- **Explain**
 - Is the donor able to properly explain or communicate the decision they have made? Are they joining in the discussion or just agreeing with what you are saying? Are they asking questions that aren't related to what you are saying?
- **Able**
 - Is the donor able to understand what they are being told?
- **Listen**
 - Is the donor able to listen, follow and understand the discussion taking place, or are they just repeating what you say?

If an individual shows signs of possibly being at risk, we will:

- Consider communication preferences.
- Not make assumptions about them.
- Ask them what they need and how you can help them better.
- Empathise and sympathise with them.
- Try asking questions in a different way.
- Summarise anything that has been decided or agreed in plain English.

We:

- Will not place any undue pressure on individuals to donate.
- Do not either solicit nor accept donations from anyone whom we know, or think may not be competent to make their own decisions.
- Are sensitive to any particular need that a donor may have.

6. Protecting And Respecting Charity Beneficiaries

How we represent our beneficiaries, in our communications, is always respectful of them and portrays them in the way they would wish to be seen. We will only use personal information that they have given consent for and for the purposes they have agreed and will not disclose anything that might put them at risk, particularly children and adults at risk.

7. Protecting & Respecting Staff and Volunteers

We have zero tolerance for abuse, including discrimination, bullying and sexual harassment, not only for fundraising staff and volunteers, but for anyone who is involved with our charity. We will maintain a culture of respect and equality, will ensure that there are processes to raise concerns that everyone is aware of and is confident to use and we will deal with any allegations of abuse promptly and sensitively.

8. Fundraising Due Diligence

We will undertake reasonable due diligence of donors, to ensure they don't hold views or are involved in activities that might be incompatible with our role and damage our reputation. In terms of donations, we will ensure that any gift is safe to accept and, doing so, would be in the best interests of your charity. We will also consider issues, such as suspicious donations, or managing large anonymous gifts, or those from individuals at risk.

9. Refusals & Acceptance of Donations Policy

We abide by the law which requires us, in deciding whether to accept or refuse a donation, to consider which action is in the charity's best overall interest.

10. Fundraising Commercial Partners

We will not partner with any organisation that produces goods/services or acts in a way that is contrary to our charitable objects, or values.

We are aware of and comply with the Charity Commission RS2 – Charities and Commercial Partners. We will ensure that any commercial agreement represents a fair deal for the charity and:

- Clearly establishes what we expect to gain from it, prior to entering into an agreement.
- Set up appropriate systems to monitor and review the partnership.
- Take appropriate steps to identify and manage any risks.
- Ensure from the outset that the expectations of both the charity and the company have been agreed and.
- Can be managed effectively and appropriately.

We will disclose any commercial partnerships in our Annual Report.

11. Restricted Donations

If supporters wish their donation(s) to be used in a specific way, or for a specific purpose, they may make a restricted donation by providing written instructions with their donation. We will always respect this.

12. Independence from the State

Trustees will also be mindful of RR7 - Independence of Charities from the State. In particular, they will ensure that they remain independent and that any funding provided does not discharge the statutory duties of the State.

13. Review

This policy will be reviewed biennially.