

FUNDRAISING POLICY

Adopted:

Review date:

1. Aims and Objectives

To help guarantee the availability of ongoing funds to support the Charity's mission to support ex veterans and their families, the Charity aims to maintain a broad base of different sources of funding. The purpose of this policy is to ensure clarity and openness to all our stakeholders and that our fundraising, in all its forms, is legal, open, honest and respectful.

2. Legal Compliance

This policy and related procedures takes into account the following legal requirements and regulatory codes, standards and guidance:

- a) Charities (Protection and Social Investment) Act 2016
- b) Charities Acts 1992, 2006, 2011 and 2022
- c) Data Protection Act 2018
- d) UK General Data Protection Regulation (UKGDPR).
- e) Safeguarding Vulnerable Groups Act 2006
- f) Equality Act 2010
- g) Payment Card Industry Data Security Standards (PCI-DSS).
- h) Proceeds of Crime Act 2002
- i) Fundraising Regulator Code of Fundraising Practice
- j) Institute of Fundraising Treating People Fairly Guidance
- k) Gambling Act 2005
- l) Mental Capacity Act 2005
- m) Bribery Act 2010.

3. Fundraising Compliance and Management

- a) The Charity takes ultimate responsibility for fundraising compliance. They delegate operational management of fundraising to Jon Williams and Kye Charlesworth.
- b) Charitable Funds are subject to a range of rules and guidance. The control and management of these Charitable Funds is the responsibility of the Board of Trustees of the Charity, who as the Trust Board delegate responsibility to John Langley.

Other staff members may from time to time be directly or indirectly involved in fundraising activity.

4. Partnership Working

- a) The Charity actively seeks opportunities to work together with external organisations and individuals to achieve shared objectives. However, the trustees acknowledge it is vital that the Charity maintains its independence and does not allow any external partnership to bring the name of the Charity into disrepute. The Charity therefore accepts financial support from, and partnership working with, companies and individuals on the following conditions:
 - i. There are strong grounds for believing that it will result in a benefit to the Charity's beneficiaries;
 - ii. the Trustees are satisfied that no adverse publicity will result from accepting such support;
 - iii. there is no attempt on the part of the company or individual to influence the Charity's policy or actions either explicitly or implicitly; and
 - iv. that initiatives do not compromise the independent status of the Charity.
- b) The Charity will maintain accountability and open and honest relationships with all its partners, by regularly monitoring and evaluating its work.

5. Avoidance Criteria

The Charity will not accept any funding from companies directly involved in activities that run contrary to its overall charitable objectives / vision / aims. It will not accept financial support or partnerships with companies involved with any of the following activities, including but not limited to human rights abuses; manufacture of environmentally hazardous products or chemicals; mining; water pollution carbon emissions; organisations that do not pay real living wage; child labour/exploitation.

6. Acceptance Criteria

- a) When deciding whether to accept any donation or gift, the Trustees have a duty to demonstrate to the Charity Commission that they have acted in the best interests of the Charity, and that association with any particular donor does not compromise the Charity's ethical position, harm its reputation or put future funding at risk.
- b) The Charity will ensure it complies with all relevant legislation, including money laundering rules, the Bribery Act and Charity Commission guidance, including terrorism and political activity.
- c) The Charity will therefore not accept any of the following where the donation:
 - i. Appears to be in direct conflict with the Charity's charitable aims and objectives
 - ii. Would cause detriment to the Charity's reputation
 - iii. Was known to be associated with criminal sources and/or illegal activity
 - iv. Would help further a donor's personal objectives, which conflict with those of the Charity
 - v. Would lead to a possible decline in support for the Charity, and so risk a fall in the resources available to fund its work or damage its longer-term fundraising prospects

- vi. Would expose the Charity to adverse publicity or otherwise expose the Charity to or impact adversely on the Charity's reputation
- vii. Is a personal gift to the Charity's staff members, which should be discouraged at all times
- viii. Accepting a donation from any particular source is inconsistent with Government policy

7. Processing of and Refusals of donations or gifts

- a) Receipts
 - i. All donations or gifts must be conveyed to the finance team at the earliest possible opportunity accompanied by all original correspondence pertaining to the donation or gift, which will be retained by the Charity. A receipt of donation form should also be completed with the donor, including their full name, contact details, address, and email address
 - ii. On receipt, all donations should be processed through the donation record management system, which is maintained by the Charity
 - iii. The finance team is responsible for allocating the donation to the appropriate fund as communicated by fundraising including dealing with any restrictions to such donations
 - iv. The Charity will adhere to the following good practice when handling cash donations resulting from face-to-face activities:
 - Cash must be collected and counted in a secure environment, wherever possible;
 - cash must be banked as soon as is practicable;
 - cash not banked immediately must be placed in a safe location; and
 - at the earliest possible date, reconciliation must be made between cash banked and income summaries.
- b) If supporters wish to make a donation to a specific area of the Charity's work and they make a specified donation by providing written instruction to this effect with their donation, the Charity will always respect this. If the Charity is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way, the Charity will refund the donation.
- c) If a donation is received which may not be acceptable under the terms of this policy the head of finance will alert the CEO at the earliest opportunity. This will be researched further and the matter will be referred to the board with the necessary information regarding the donation.
- d) All anonymous donations of £25,000 or more will be reported to The Charity Commission as a serious incident (in line with current Charity Commission guidelines).
- e) Legacy and in memoriam donations:
 - i. Legacy donation will be subject to the Charity's Legacy Policy.
 - ii. Gifts in memoriam - donations or gifts to honour, in remembrance or otherwise recognise individuals, whether the donor is living or by bequest, will be received by the Development Team. It will be the policy of the Charity not only to receive such gifts but also encourage efforts to remember and honour donors.

8. Purchasing

- a) The Charity will not knowingly purchase goods and/or services produced and delivered under conditions which involve any form of abuse or exploitation of third parties.

- b) Evidence (not exhaustive) of such abuse and exploitation includes:
 - i. The use of child labour
 - ii. Failure to pay employees a living wage
 - iii. Working hours are excessive
 - iv. Evidence of any form of inhuman, unreasonable or discriminatory treatment of employees
- c) The Charity expects suppliers to accept responsibility for labour and environmental conditions under which products are made and services are provided and to make written statement of intent regarding the company's policy.

9. Donor research

- a) Research on donors and prospects is an acceptable and intrinsic part of fundraising. This may include:-
 - i. Day to day 'desktop research' of the Charity's active major donors and active supporters such as trustees of trusts, owners of companies and volunteers
 - ii. Day to day desktop research on prospective donors/supporters of the Charity, as set out in our Privacy Policy
 - iii. Carrying out data selections on the Charity's fundraising database
 - iv. Research conducted by a third party to identify cold prospects to the Charity
 - v. Wealth screening by a third party against external databases to provide donor profiles
- b) Any approaches undertaken by the Charity will be handled in a sensitive and appropriate manner and comply with current data protection legislation, as set out in our Privacy Policy.
- c) Where research is conducted by a third party, that supplier will be required to adhere to this Fundraising Policy.

10. Database of donors

- a) The Fundraising Manager (Kye Charlesworth) shall be responsible for development, maintenance and compliance of a record of donors and prospects.
- b) Recording Data
 - i. Only data specified in the Charity's official data forms should be stored on individuals. Information that falls outside of the categories outlined will not be collected or stored.
 - ii. If it is evident that no further contact will be made with the individual, then it should not be recorded in the first instance if possible.
 - iii. Additional legal rules apply to "sensitive personal data", and we should not collect sensitive personal data for the purposes of donor research. Sensitive personal data is information as to:
 - racial or ethnic origin
 - political opinions
 - religious beliefs
 - trade union membership
 - physical or mental health or condition

- sexual life
 - the commission or alleged commission of any offence
- c) Retaining Data
- i. If an individual has expressed that they do not wish their data to be processed in the way described in this policy, then we will respect that and not undertake any further research on them. Data held regarding potential donors will be destroyed when it becomes clear that they do not wish to be approached by the Charity in regard to fundraising, or 3 years after they have been identified as a prospect, whichever is sooner.
 - ii. The Charity will respect the privacy and contact preferences of all donors and will respond promptly to requests to amend contact details, including the removal of contact details from the fundraising database.

11. Further Points

- a) The Charity recognises that, in accepting funding from statutory bodies, it must consider the policy implications and obligations that might be tied to it and ensure that these do not contravene the aims of the Charity.
- b) The Charity can seek to raise funds from a series of charitable Trusts and Foundations, but recognises that, simply because these have been registered with the Charity Commission does not mean that they are ethical givers. The Charity therefore does not accept money from any charitable trust if it is a requirement of grant receipt to advertise any company or organisation whose activities run contrary to the Charity's aims.
- c) This statement of policy is meant as a working guide for the Charity. Any final decisions will be governed by the Board of Trustees. It is the duty of the Board to advise of any potential conflicts of interest with regards to funding or partnerships, and for the Board to act in the best interests of the Charity at all times.
- d) The Charity will respond to all complaints from sponsors and members of the public in a timely, respectful, open and honest way.