



# The Compassionate Friends

## **FUNDRAISING POLICY**

At The Compassionate Friends (TCF), our fundraising promise to the general public and our supporters is that our fundraising, in all its forms, is legal, open, honest, and respectful.

We will be honest about how donations are used to fulfil our mission, open about the methods we use to raise funds and with whom we work, respectful to wishes, preferences, personal information and circumstances of the people with whom we interact, and we will take all steps necessary to comply with the law and charity sector fundraising practice standards.

We will take responsibility for our actions, ensuring that our fundraising is carried out in line with the Code of Fundraising Practice.

Nobody, directly or indirectly employed by or volunteering with TCF shall accept commissions or bonuses for fundraising activities on behalf of TCF.

No general solicitations to the public shall be undertaken by telephone or door-to-door.

If our fundraisers, those employed by TCF or contracted to fundraise on our behalf, identify signs of vulnerability, they will respond appropriately and according to the principles of being legal, open, honest, and respectful.

We will always be respectful. This means being mindful of and sensitive to any need that a donor may have. It also means striving to respect the wishes and preferences of the donor.

We will treat all donors fairly. We will not discriminate against any group or individual.

## **Legal Requirements**

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

- Charities (Protection and Social Investment) Act 2016
- Charities Act 1992
- Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Payment Card Industry Data Security Standards (PCI-DSS)
- Fundraising Regulator Code of Fundraising Practice
- Gambling Act 2005
- Mental Capacity Act 2005
- Bribery Act 2010

## **Fundraising Compliance**

TCF Trustees take ultimate responsibility for fundraising compliance. They delegate operational management of fundraising to the CEO and the Head of Fundraising.

The Head of Fundraising has the role of TCF's Fundraising Compliance Officer.

## **The Fundraising Activities Covered by this Policy**

Charitable funds consist of but are not exclusively limited to:

- Money left in a legacy for the benefit of TCF
- Money raised through fundraising events
- Money donated as a result of a fundraising appeal
- Corporate sponsorship
- Charitable foundation funds
- Tangible personal property (gifts-in-kind)
- Property
- Shares or bonds
- Pledges

## **Staff Responsibilities**

Charitable funds are subject to a range of rules and guidance. The control and management of these charitable funds are the responsibility of the Board of Trustees of TCF, who delegate responsibility to TCF's senior management team.

The staff at TCF is responsible for implementing this policy and for adhering to the related procedures. Staff members should make themselves familiar with this policy as well as the Code of Fundraising Practice and the Institute of Fundraising's Treating Donors Fairly guidance.

Roles with responsibility for fundraising are:

- Head of Fundraising
- Events & Community Fundraiser
- Head of Communications (not yet appointed)
- Head of Finance (at present a member of the board)
- CEO
- Other colleagues who from time to time will be directly or indirectly involved in fundraising activity.

## **Fundraising by Staff**

Participation in activities to raise funds for TCF by staff is voluntary and should not be imposed on individuals. The existing charity insurance arrangement covers staff for certain 'low risk' fundraising activities. However, approval must be sought from the CEO prior to the commencement of the activity. Any event not covered by this policy must obtain its own insurance cover and be approved by TCF's CEO.

## **Vulnerable People**

When responding to a supporter or member of the public in vulnerable circumstances, staff must take all necessary steps to understand if the supporter is able to make informed decisions about donating to TCF and respond appropriately. If a supporter is deemed unable to make an informed decision the member of staff must not accept the donation.

TCF will ensure two members of staff are present when receiving a donation from a vulnerable donor, e.g., with illnesses or conditions affecting their judgement.

## **Acceptable Fundraising Activities**

Before fundraising activity can be initiated approval must be sought from TCF's Head of Fundraising.

All fundraising by means of lotteries, e.g., raffles, etc., must comply with the required licensing requirements.

All fundraising publicity must state clearly how the fundraising will benefit TCF and where further information of TCF's fundraising policy can be located.

It should be the responsibility of the Head of Fundraising to coordinate the soliciting of funds from individuals, foundations, businesses, corporations, and organisations in order to avoid an excessive number of solicitations in the name of TCF.

## **Donations or Gifts**

TCF in deciding whether to accept or decline a donation or gift will consider the charity's best overall interests and will not accept donations from donors whose activities appear to be in direct conflict with TCF's charitable aims and objectives.

Additionally, TCF will not accept monies from funders, whether trusts, companies, organisations or individuals, which:

- could cause detriment to the charity's reputation
- will disproportionately decrease the amount of donations to further the work of the charity
- undermine TCF's vision and values
- are associated with unsuitable products, corporate or individual
- are known to take advantage of vulnerable or bereaved people
- give personal gifts to TCF staff members or volunteers. This should be always discouraged.
- potentially harm our relationships with beneficiaries, other donors, stakeholders, and volunteers.
- expose TCF to undue adverse publicity or reputational risk.
- require unacceptable expenditure or additional charity resources.

We will also not accept funding from unknown sources of funding. TCF will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal.

If supporters wish to donate to a specific area of TCF's work, then they make a specified donation by providing written instruction to this effect with their donation. TCF will always respect this. If TCF is unable to accept the request for the specified donation and the sponsor does not want the donation to be used in any other way, TCF will refund the donation.

### **Refusal of Donations of Gifts**

If a donation is received which may not be acceptable under the terms of this policy, the Head of Fundraising or 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 decision.

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) and will follow TCF's guidance on handling of such donations.

### **Processing of Donations or Gifts**

All donations must be conveyed to the Head of Fundraising at the earliest possible opportunity accompanied by all original correspondence pertaining to the donation or gift, which will be filed by the Head of Fundraising. A receipt of donation/thank-you letter will be sent to the donor.

All donations will be logged by the Head of Fundraising on the donors' records on Beacon.

The Head of Fundraising will also allocate the donation to the appropriate fund on Beacon if needs be.

Note will be made if the donor is willing for the donation to be acknowledged publicly on social media, on the TCF website, or in the annual report.

### **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 Head of Fundraising. It will be TCF's policy not only to receive such gifts but also encourage efforts to remember and honour donors.

## **Legacies**

The Head of Fundraising deals with all contacts regarding legacies. If staff members are contacted by potential legators, they must refer the conversation to the Head of Fundraising and agree a relationship management plan.

The Head of Fundraising will seek legal advice should there be requirements around the will or the bequest.

When the legacy has been received, this will be processed by the Head of Fundraising who will deal with all administrative arrangements including correspondence with the solicitors or family to acknowledge receipt of the monies. The Head of Fundraising is also responsible for confirming whether any publication of the bequest is appropriate.

TCF will encourage general legacies but will always adhere to the strict wishes of the legator.

## **Solicitation of Charitable Trusts and Corporates**

It shall be the responsibility of the Head of Fundraising to coordinate the solicitation of charitable trusts and companies. This coordination will ensure that an excessive solicitation of any single source of funds is avoided.

TCF will not endorse products, treatments or companies. Sponsorship arrangements (for example of events) will be clearly publicised, and conflicts of interest considered as part of event risk management.

## **Fundraising Collections**

TCF will ensure that all fundraising collections are carried out sensitively to protect TCF's reputation in the mind of the public.

TCF will ensure that adequate permission for a static collection is obtained and can evidence this sufficiently when required; and that all collectors can be clearly identified.

## **Handling of Cash Donations**

TCF will adhere to the following good practice when handling cash donations

Cash must be collected, counted, and recorded by two unrelated individuals in a secure environment wherever possible. (Collection boxes must only be examined and opened by two unrelated individuals).

Unsecured cash must never be left unattended or in an unattended environment.

Cash must be banked as soon as is practicable.

Cash not banked immediately must be placed in a secure location and the Head of Fundraising notified.

As soon as possible, reconciliation must be made between cash banked and income summaries.

### **Reports to Sponsors**

It is the responsibility of the Head of Fundraising to complete official reports on grants received.

### **Donor Recognition**

A donor to TCF is entitled to appreciation for his or her donation. Each donation will be acknowledged by the Head of Fundraising.

Sponsors' names may be published in TCF's annual report, newsletters, website and/or social media. It will be at the Head of Fundraising's discretion to inform the sponsor should there be a cost implication to their recognition, e.g., a plaque.

### **Donor Research**

Research on donors and prospects is an acceptable and intrinsic part of fundraising. It must be stressed that any approaches undertaken by TCF will be handled in a sensitive and appropriate manner and comply with current data protection legislation. Donor and prospect activity is limited to the Head of Fundraising and other members of fundraising staff.

### **Database of Donors**

The Head of Fundraising is responsible for development, maintenance and compliance of a record of donors and prospects.

Data held on potential donors will be destroyed when it becomes clear that they do not wish to be approached by TCF about fundraising, or three years after they have been identified as a prospect, whichever is sooner.

TCF 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.

### **Complaints**

TCF will respond to all complaints from sponsors, donors and members of the public in a timeous, open, honest and respectful way.