**Kingston Centre for Independent Living (KCIL) Fundraising Policy**

This ethical fundraising policy sets out how we manage the ethical issues 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](https://www.fundraisingregulator.org.uk/code).

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

### **Ethical Fundraising - 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 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 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.

### **Ethical Fundraising - Vulnerable Donors**

In seeking donations, if an individual shows signs of possible vulnerability, we will:

* Consider communication preferences.
* Not make assumptions about him/her/them.
* Ask him/her/them what they need and how you can help them better.
* Empathise and sympathise with him/her/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.

### **Ethical Fundraising - 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 vulnerable people.

### **Ethical Fundraising - 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.

### **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 suspicious donations, or managing large anonymous gifts (over £1,000), or those from vulnerable individuals.

Anonymous donations are acceptable if adequate safeguards are in place to identify suspicious circumstances.

**Indicators of Suspicious Donations:**

* Unusual or substantial donations, especially in cash or from overseas.
* Requests to act as a conduit for passing donations.
* Conditions that do not allow trustees to ensure proper use of funds.

### **Fundraising 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. We have adopted a Refusals & Acceptance of Donations policy, which covers this in detail.

### **Cash Donations Policy**

Although cash donations through collection tins and drop-ins to the KCIL office are acceptable, there are specific considerations and safeguards in place. The trustees are required to take reasonable and appropriate steps to know who the charity’s donors are and will not accept a donation if the risk to the charity is assessed to be greater than the benefit of having the funds donated.

Particular attention is given to suspicious circumstances, especially when significant sums are donated, particularly if this is unusual, in cash, or from overseas. Any prospective donor who wishes cash to be forwarded in advance or for the charity to pay some of the donation to a third party will always be considered highly suspicious. In such cases, the trustees may consider reporting suspicious donations as a Charity Commission Incident report.

Overall, the acceptance of cash donations is approached with caution, ensuring that the charity’s integrity and compliance with legal standards are maintained.

**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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/284729/rs2text.pdf). 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.

### **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.

### **Fundraising Regulations - Trustees**

The trustees are aware of and will comply with Charity Commission guidance [CC3a](https://www.gov.uk/guidance/charity-trustee-whats-involved), 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](https://www.gov.uk/government/publications/charities-and-fundraising-cc20)).

We will ensure that everyone is aware of and consistently complies with the Fundraising Regulator [guidance on fundraising behaviours](https://www.fundraisingregulator.org.uk/more-from-us/resources/key-behaviours-guidance-fundraisers) and respond promptly and effectively to any [fundraising complaints](https://www.fundraisingregulator.org.uk/more-from-us/resources/complaints-handling-guidance).

### **Acceptance and Refusal of Donations Policy**

The governing body of the charity must be involved in decisions related to refusing or returning donations, and these decisions should align with a policy set by the institution.

Donations should not be refused or returned except in exceptional circumstances. If a donation is refused, a record of the decision and the reasons for it must be maintained. Additionally, due diligence must be conducted on potential partners regarding their financial and reputational dealings before accepting donations, appropriate to the size and nature of the donation.

Refunds for donations should only be issued in accordance with the charity’s policies or in exceptional circumstances. If there is uncertainty about whether a refund should be given, it is advisable to seek legal advice. A refund must be provided if a donor correctly exercises their right to one.

For further guidance, references are made to resources from the Chartered Institute of Fundraising and the Charity Commission for England and Wales regarding the practicalities of accepting, refusing, and returning donations.

**Version Control - Approval and Review**

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