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room to create
a better future.

Fundraising policy

April 2024

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CRAWLEY FRIENDS HOUSING ASOCIATION

FUNDRAISING POLICY

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1. Introduction

1.1 In common with many charitable organisation, Crawley Friends Housing Association (CFHA) will need to approach the public to ask for money to support its valuable work in helping those in need. In return, the public place their trust in organisations like CFHA to raise money in a considerate and responsible way and to use it effectively.

1.2 Trustees have a key role to play in setting the organisation's approach to raising funds, making sure that it is followed in practice and reflects the organisation's values.

1.3 As the regulator of charities in England and Wales, the Charity Commission expects charities that fundraise to do so in a way which protects their charity's reputation and encourages public trust and confidence in their charity. This includes following the law and recognised standards, protecting charities from undue risk, and showing respect for donors, supporters and the public.

2. Aims and objectives

2.1 Although Crawley Friends Housing Association is not registered as a charity with the Charity Commission, it respects the same values and accepts that it has a range of responsibilities which affect the way it carries out fundraising, whether or not it is done by volunteers, other supporters, staff or contractors.

2.2 Some are legal or regulatory requirements and all have an ethical dimension. So, this policy is designed to help CFHA and its supporters stay within the law and the accepted fundraising Code of Practice which it follows and which can be read through the attached link:

[Code-of-Fundraising-Practice-October-2019.pdf \(fundraisingregulator.org.uk\)](#)

3. Policy Statement

3.1 At CFHA, our fundraising promise to the general public and our existing supporters is that our fundraising, in all its forms, is legal, open, honest and respectful.

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

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

(b) Nobody directly or indirectly employed by or volunteering for CFHA shall accept commissions or bonuses for fundraising activities on behalf of CFHA.

(c) If our fundraisers, or those 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.

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

(e) We will treat donors fairly. We will not discriminate against any group or individual.

(f) We will respond appropriately to the individual needs of our donors. We will consider all requests to adapt our approach (tone, language, communication technique) to suit the needs and requirements of the donor.

4. Fundraising compliance

4.1 Trustees take ultimate responsibility for fundraising compliance. Delegation of operational management of fundraising will be determined by the Trustees.

5. Fundraising activities covered by this policy

5.1 Charitable Funds may consist of but are not exclusively limited to:

- Charitable foundation funds and grants
- Corporate sponsorship
- Individual ad hoc donations
- Money which has been raised through fundraising events
- Money which has been donated as a result of a fundraising appeal
- Money left in a legacy for the benefit of CFHA
- Tangible goods (gifts-in-kind)
- Shares or bonds
- Pledges

6. Responsibilities

6.1 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. However, operational responsibility may be delegated to one or more specific trustees along with staff, contractors and/or volunteers.

7. Fundraising by trustees and volunteers

7.1 Participation in fundraising activities (for the purposes of this policy, meaning specifically participating in or completing the activity) is voluntary and should not be imposed on individuals. Approval must be sought from the Trustees prior to the commencement of the activity. Any event not covered by this policy must obtain its own insurance cover and be approved by the Trustees.

8. Vulnerable people and Safeguarding

8.1 When responding to a supporter or member of the public in vulnerable circumstances, trustees, volunteers and contractors must take all necessary steps to understand if the supporter is able to make an informed decision about donating to CFHA and respond appropriately. If a supporter is deemed unable to make an informed decision the trustee, volunteer, employee or contractor must not accept the donation.

8.2 CFHA will ensure two representatives (trustees, volunteers, staff or contractors) are present when receiving a donation from a vulnerable donor e.g. with illnesses or conditions which may affect their judgement.

8.3 CFHA already operates a separate Safeguarding policy.

9. Recognised fundraising activities

9.1 Before fundraising activity can be initiated approval must be sought from the CFHA Trustees.

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

9.3 All fundraising publicity must state quite clearly how the fundraising will benefit CFHA and where further information of its fundraising policy can be located.

9.4 It shall be the responsibility of the Chair of Trustees and, if appropriate, the delegated Fundraising Manager (whether external contractor, employee, trustee or volunteer) 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 CFHA.

10. Donations or gifts

10.1 In deciding whether to accept or decline a donation or gift, CFHA will consider the organisation's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.

10.2 CFHA will not work with companies or individuals who participate in activities which:

- Could cause detriment to CFHA's reputation.
- Will disproportionately decrease the amount of donations to further the work of CFHA.
- Undermine our vision and values.
- Are associated with unsuitable products, corporations or individuals or organisations which are known to take advantage of vulnerable people.
- Are from unknown sources of funding. CFHA 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 illegal activities.
- Potentially harm our relationships with other donors, service users, stakeholders or volunteers.
- Expose us to undue adverse publicity or reputational risk.
- Require unacceptable expenditure or additional resources.

10.3 If supporters wish to make a donation to a specific area of CFHA's work then they should provide written instruction to this effect with their donation. CFHA will always respect this. If we are unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way, we will refund the donation.

10.4 Refusals of donations or gifts.

- If a donation is received which may not be acceptable under the terms of this policy it will be researched further and the matter will be referred to the board of Trustees with the necessary information regarding the donation.
- Particular caution will be exercised with any anonymous donations of £25,000 or more. (Charity Commission guidelines require such donations to be reported to them as a serious incident.)

10.5 Donation or gift processing.

- All donations or gifts must be conveyed to the Treasurer at the earliest possible opportunity accompanied by all original correspondence pertaining to the donation or gift, which will be filed in

the Xero accounting system. A receipt of donation form should also be completed with the donor, including their full name and contact details, and address.

10.6 Legacies

- The Treasurer will deal with all contacts regarding legacies. If trustees, volunteers, staff or contractors are contacted by potential legators, they must refer the conversation to the Treasurer and Chair, who will agree a relationship management plan.
- The Treasurer will notify the relevant Trustees of a potential legacy and seek legal advice should there be requirements around the will/bequest.
- When the legacy money is received, this will be processed by the Treasurer, who will also deal with all administrative arrangements including correspondence with the solicitors or family to acknowledge receipt of the monies.
- All new legacies will be communicated to the Board of Trustees, both when notified and when received.
- All legacies will be subject to the submission of an expenditure plan to ensure that the terms of the bequest can be met within a reasonable time.
- CFHA will encourage general legacies but will adhere to the strict wishes of the legator at all times.

10.7 Solicitation of charitable trusts and companies

- It shall be the responsibility of the Chair (via the designated Fundraising Trustee or Contractor) to co-ordinate the solicitation of charitable trusts and companies. This co-ordination will ensure that an excessive or duplicated solicitation of any single source of funds is avoided.
- CFHA will not endorse products, treatments or companies. Sponsorship arrangements (for example of events) will be clearly publicised and potential conflicts of interest considered as part of event risk management.

10.8 Fundraising collections

- CFHA will ensure that any fundraising collection is carried out sensitively to protect the organisation's reputation in the mind of the public.
- CFHA will ensure that adequate permission for a static collection is obtained, and can evidence this sufficiently where required; and that all collectors can be clearly identified.

10.9 Handling of cash donations

CFHA does not currently receive any cash from collections. However, if it should move in this direction, it will adhere to good practice when handling cash donations resulting from face-to-face activities and draw up a set of procedural guidelines appropriately.

11. Reports to donors

11.1 It shall be the responsibility of the Chair to organise the compilation of official reports on appeal donations/grants if requested by outside agencies or individual donors.

12. Donor recognition

12.1 A donor to CFHA is entitled to recognition for their donation. Each donation will be formally acknowledged privately by the Chair (or the designated contractor). Donor names may be published in the organisation's Annual Report, newsletter, website and/or social media platform.

13. Donor research

13.1 Research on donors and prospects is an acceptable and intrinsic part of fundraising. Data surrounding individuals and companies who wish to be associated with charitable funds will be stored in a confidential file. It must be stressed that any approaches undertaken by CFHA will be handled in a sensitive and appropriate manner and comply with current data protection legislation. Donor and prospect research activity is limited to the Chair and the designated Fundraising Trustee or Contractor.

14. Database of donors

14.1 The Chair and the designated Fundraising Trustee or Contractor shall be responsible for development, maintenance and compliance of a record of donors and prospects.

14.2 Data held regarding potential donors will be destroyed when it becomes clear that they do not wish to be approached by CFHA in regards to fundraising, or 3 years after they have been identified as a prospect, whichever is sooner.

14.3 CFHA 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.

15. Complaints

15.1 CFHA will respond to all complaints from sponsors and members of the public in a timely, respectful, open and honest way in line with its Complaints Policy.

16. Complying with this policy

16.1 **Monitoring compliance** - The Trustees will verify compliance with this policy through various methods, including but not limited to internal and external audits, and general feedback about operating procedures.

16.2 **Exceptions** - Any exception to the policy must be raised with the Trustees and approved by them in advance of exceptions taking place.

17. Related documents

17.1 Other CFHA policies that may be used to help ensure effective management of Fundraising include:

- Data Protection Policy
- Safeguarding Policy

18. Legislation and Regulations

18.1 The legislation listed in this policy is not intended to cover all legislation applicable to this policy. CFHA will take reasonable measures to ensure compliance with any and all applicable legislation by reviewing policies and procedures and amending them as appropriate. The legislation listed within this policy was considered at the time of the development of this policy, but subsequent primary and secondary legislation, case law and regulatory or other requirements will be considered and the policy reviewed and adapted in accordance with the requirements set out therein, even should such subsequent legislation not be explicitly listed within this policy.

18.2 The following is a list of key legislation relating to Fundraising:

- Charities (Protection and Social Investment) Act 2016
- Charities Act 2006
- 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
- Institute of Fundraising Treating People Fairly Guidance
- Gambling Act 2005
- Mental Capacity Act 2005
- Bribery Act 2010

19. Review

19.1 This policy will be reviewed each financial year or sooner if there is:

- A significant incident relating to this policy
- An organisational change related to this policy
- A change in legislation