



GCG Fundraising Policy

1. Purpose and Scope

This policy sets out the standards, responsibilities and procedures for all fundraising activity carried out by or on behalf of Gamesley Community Group (GCG). It applies to:

- All staff, volunteers and trustees involved in fundraising.
- Any third-party fundraising partners, agencies or subcontractors engaged by GCG to raise funds.
- All fundraising methods used by GCG (public collections, events, online campaigns, legacies, etc).

The policy is designed to ensure that fundraising is conducted in a manner that is **legal, open, honest and respectful**, reflecting the core principles of the Code of Fundraising Practice.

2. Governing Principles

Fundraising at GCG will:

- Comply with all relevant legal and regulatory requirements (including but not limited to charity law, data protection, and the Code of Fundraising Practice).
- Be aligned with GCG's values and mission, ensuring that fundraising methods and partnerships reflect its ethos.
- Ensure transparency and integrity in all donor communications and fundraising materials.
- Treat all donors, beneficiaries, volunteers and staff fairly, ethically and respectfully.
- Take proper account of risk — including reputational risk — and ensure decisions are recorded and monitored
- Provide appropriate protection and support for fundraisers (staff, volunteers or third party) from harm or harassment.

3. Responsibilities and Governance

- The Board of Trustees has overall responsibility for GCG's fundraising activities, ensuring oversight and accountability.

- The Board must adopt and keep under review this Fundraising Policy and ensure that sufficient resources, training and governance are in place.
- Operational responsibility for fundraising is delegated to the designated Fundraising Lead (or equivalent staff member) who reports to the Board.
- All staff, volunteers and trustees engaged in fundraising must familiarise themselves with the Code of Fundraising Practice and this policy, and complete any training required.
- The Board must ensure that any third-party fundraisers, platforms or agencies used by GCG are subject to due diligence, monitoring and written agreements.

4. Donor Communications and Ethical Fundraising

- All communications with donors must be accurate, honest, and not misleading. GCG must ensure claims about the use of donations are substantiated.
- GCG will not exert undue pressure, use persistent behaviour, or target vulnerable individuals inappropriately. Fundraising must be undertaken in a way which reflects positively on GCG and the charitable sector.
- Donations must not be solicited from children aged under 16 for regular giving (e.g., direct debits) and extra care must be taken with young people aged 16-17.
- GCG will ensure that donors understand how their donation will be used, and will notify donors promptly if funds raised cannot be used for the intended purpose or if there is surplus.
- GCG will respect donor privacy and comply with all applicable data protection laws. Any marketing or donor communications must allow donors to opt-out (or otherwise have clear choice).
- GCG will have a transparent and accessible complaints procedure for concerned donors, and must respond promptly to complaints about its fundraising.

5. Working with Third-Party Fundraisers, Platforms and Partnerships

- Before engaging any third-party fundraiser, agency or platform, GCG will carry out proportionate due diligence (including on values, reputation, previous fundraising conduct, safeguarding, data protection, etc).
- The relationship will be formalised by a written agreement setting out roles, responsibilities, monitoring arrangements, termination rights, and reference to the Code of Fundraising Practice.

- GCG will monitor its fundraising partners appropriately, with frequency and intensity of monitoring proportionate to the risk involved
- For any fundraising platform used (online or otherwise), GCG will ensure the platform is transparent about fees, gives donors clear information on how donations are processed, and meets the relevant standards of the Code.

6. Specific Fundraising Methods

- **Public / street collections:** GCG will ensure compliance with local licensing and permissions. Collections will clearly display the charitable institution name/registration number, and donor information (including how funds will be used) will be clear and accessible.
- **Unstaffed / convenience giving methods** (e.g., contactless, QR code, donation points) must include clear identification of GCG, any third-party involvement, and any fees or deductions.
- **Events and online campaigns:** will follow GCG's event management and risk-assessment policies, ensure donations are handled securely, and that promotional material is accurate and aligned with the Code.
- **Legacies:** Where GCG offers will-writing or legacy advice services, it will provide at least two independent providers for testators to choose from, in line with the Code.
- GCG will ensure no fundraising method targets individuals in vulnerable circumstances without tailored safeguards; special attention will be paid when donors might lack capacity.

7. Fundraiser Safeguarding & Support

- GCG will take reasonable steps to protect fundraisers (staff, volunteers or contractors) from harm, harassment or undue pressure while conducting fundraising. Processes will be in place for them to raise concerns or complaints.
- Training will be provided to fundraisers on ethical standards, safeguarding, dealing with vulnerable people, and how to stop or withdraw from an approach if the potential donor asks.
- Fundraisers will not be incentivised by commission schemes that may create undue pressure or conflict with values—GCG will ensure the method of paying fundraisers aligns with GCG's values.

8. Risk Management, Record-Keeping and Monitoring

- GCG will include fundraising in its risk register: assessing risks to reputation, financial integrity, safeguarding, donor experience and regulatory compliance.

- All major decisions about fundraising (including new methods, campaigns, partnerships, large donations) will be documented, including rationale, risk assessment, approvals, and any mitigation.
- Records of fundraising income, costs, donor communications and monitoring will be maintained for an appropriate retention period (minimum six years or as required by GCG's financial policies).
- The Board will regularly review fundraising performance, policy compliance and complaints or incidents arising from fundraising activities.

9. Gift Acceptance and Donations

9.1 Principles

GCG welcomes donations that help to achieve its mission and support community benefit. All gifts and donations will be handled **ethically, transparently, and in line with the Code of Fundraising Practice and GCG's values.**

GCG will only accept donations that:

- Are **freely given** without expectation of influence over GCG's decisions, policies, or activities.
- Are **legal**, from a **reputable source**, and compatible with the organisation's aims.
- Do **not compromise GCG's integrity, independence, or reputation.**
- Do not place GCG under any obligation that would conflict with its charitable or community objectives.

9.2 Due Diligence

- GCG will conduct **proportionate due diligence** on all substantial donations, corporate partnerships, and sponsorships.
- Due diligence will consider the donor's identity, funding source, business activities, and potential reputational, ethical, or legal risks.
- Where concerns arise, the Fundraising Lead will prepare a report for the **Board of Trustees** to make a formal decision.
- Enhanced due diligence will apply to:
 - Donations over a set financial threshold (to be reviewed annually by the Board);

- Corporate or political donors;
- Gifts with restrictions or conditions;
- Donations from overseas or anonymous sources.

9.3 Restricted and Unrestricted Donations

- **Unrestricted donations** (general funds) are preferred and will be used to support the full range of GCG's charitable and community activities.
- **Restricted donations** (gifts given for a specific purpose) will be used only for that purpose, as agreed with the donor. If that purpose cannot be fulfilled, GCG will seek the donor's consent to apply the funds elsewhere, in line with the Code of Fundraising Practice.
- GCG will maintain accurate records to ensure restricted funds are used appropriately.

9.4 Refusing or Returning Donations

GCG reserves the right to **refuse or return** a donation if:

- Accepting it would conflict with GCG's values, mission, or legal obligations.
- It originates from an illegal, unethical, or politically sensitive source likely to cause reputational harm.
- It is given under undue influence or coercion.
- The donor seeks conditions inconsistent with GCG's independence or community benefit obligations.

Any decision to refuse or return a donation will be made by the **Board of Trustees**, supported by documented rationale and risk assessment.

9.5 In-Kind Gifts

- Non-cash gifts such as equipment, services, or volunteer time may be accepted if they are of genuine use to GCG's operations and do not create a financial or administrative burden.
- In-kind donations must be recorded and acknowledged in the same way as monetary donations, where appropriate.

9.6 Recognition and Stewardship

- GCG values all donors and will acknowledge gifts promptly and appropriately.
- Recognition will be proportionate, consistent with donor preferences, and must not imply endorsement or compromise GCG's independence.
- Donor details will be handled in accordance with **UK GDPR and data protection law**.

9.7 Gift Acknowledgement and Receipting

- **All monetary donations** will receive a written or electronic acknowledgement within **10 working days** of receipt.
- **Receipts** will include:
 - GCG's full legal name ("Gamesley Community Group CIC") and company number.
 - The **amount donated, date received, and method of payment**.
 - A statement confirming whether the donor received any benefit in return (to meet HMRC requirements).
 - A **thank-you message** and, where applicable, an explanation of how the donation will be used.
- **Donation acknowledgements by size:**
 - **Under £50:** Standard email or written thank-you and receipt.
 - **£50-£499:** Personalised thank-you (email or letter) from staff or the fundraising lead, confirming the purpose of the gift (if restricted).
 - **£500-£4,999:** Formal letter signed by the Chair or a Trustee, including specific impact information or project outcomes where appropriate.
 - **£5,000 and above:** Personalised letter and, where appropriate, a meeting or phone call from a senior representative. Public acknowledgement (e.g., website, event, or newsletter) will be offered, subject to the donor's consent.
- **Anonymous donations:** Recorded internally for audit purposes, but receipts cannot be issued unless contact details are provided.
- **In-kind gifts:** Will be acknowledged in writing, noting the nature and approximate value of the gift (if known).
- **Gift Aid:** Where applicable, GCG will invite eligible donors to complete a Gift Aid declaration form in line with HMRC guidance.

- GCG will retain records of all donations, acknowledgements, and receipts for **at least six years** for audit and compliance purposes.

10. Complaints, Feedback and Continuous Improvement

- GCG will maintain a transparent and accessible process for donors, volunteers or the public to raise concerns about fundraising.
- Complaints will be reviewed, responses provided in a timely manner, and key lessons learned will inform future practice.
- GCG will engage constructively and promptly with the Fundraising Regulator or other appropriate regulatory bodies if contacted about a fundraising enquiry or investigation.
- GCG will review this policy annually (or sooner if required) to ensure alignment with the Code of Fundraising Practice and good practice developments in the sector.

11. Training and Awareness

- All staff, volunteers and trustees involved in fundraising will receive induction on this policy, the Code of Fundraising Practice, and GCG's specific fundraising procedures.
- Refresher training will be provided at least annually or whenever significant changes occur in fundraising methods or regulation.
- The Fundraising Lead will maintain a register of training, ensure awareness of the Code and monitor compliance with this policy.

12. Policy Review

This Fundraising Policy is endorsed by the Board of Trustees as of [Date]. It will be reviewed and approved by the Board at least annually, or more frequently if there are significant changes to the Code of Fundraising Practice, regulation or GCG's fundraising activity.

Appendix A – Key References

- Code of Fundraising Practice (2025) – Fundraising Regulator. [Fundraising Regulator](#)
- Code Support Guides: Documenting fundraising decisions; Due diligence and fundraising; Monitoring fundraising partners. [VWV](#)
- Table of changes to Code. [Fundraising Regulator](#)

Review by HR Sub-Group-
Date of Board Acceptance –
Next Review Date –