



Fundraising Policy

1. Purpose & Scope

Purpose

This policy sets binding, non-negotiable standards, roles, and procedures for all fundraising activity. It exists to ensure every action is legal, ethical, transparent, and fully accountable, eliminating every possible gap, ambiguity, or opportunity for non-compliance or risk. It protects donors, fundraisers, the community, and the reputation of Gamesley Community Group CIO (GCG).

Scope

Applies without exception to:

- All trustees, staff, volunteers, and anyone acting on behalf of GCG
- All third parties: agencies, partners, platforms, contractors, or individuals raising funds for GCG
- All methods: public collections, events, online appeals, contactless/QR giving, donation boxes, legacies, corporate partnerships, sponsorship, grants, and all other income-raising activity
- All donations: cash, cheques, card payments, bank transfers, in-kind gifts, services, and anonymous or restricted gifts

No activity, person, or type of income is excluded from this policy.

2. Core Principles

All fundraising must meet every one of these principles at all times:

1. **Legality:** Strict compliance with charity law, data protection, tax rules, licensing, and all regulations. No shortcuts.
2. **Mission alignment:** Every activity must directly support GCG's community objectives - no fundraising for unrelated causes or commercial benefit.
3. **Absolute transparency:** Full clarity on how funds are raised, costs deducted, and exactly how money is spent. No hidden fees, deductions, or undisclosed arrangements.
4. **Respect & fairness:** No pressure, harassment, or targeting of vulnerable people, children, or those unable to give. Opt-outs are clear, free, and immediate.
5. **Integrity:** No conflicts of interest, no gifts with strings, no activity that risks our independence or reputation.
6. **Safety & protection:** Full safeguarding for donors, fundraisers, and beneficiaries at every stage.
7. **Accountability:** Every decision, transaction, and communication is recorded, auditable, and open to inspection by regulators.

3. Roles & Governance

Board of Trustees

- Legally and morally responsible for all fundraising activity
- Must approve *every* new fundraising method, campaign, partnership, or agreement before it starts
- Approve and review this policy annually (or sooner if laws change or risks arise)
- Ensure full resources, training, and independent checks are in place
- Only the Board may decide to accept, refuse, or return a donation; all such decisions are minuted with full rationale and risk assessment
- Must ensure no trustee, staff, or volunteer benefits financially from fundraising activity (no commissions, bonuses, or payments linked to amount raised)

Fundraising Lead

- Manages activity only within approved policy and plans
- Must report quarterly to the Board: all income, costs, complaints, risks, and partner performance
- Responsible for ensuring *all* people involved are trained, checked, and supervised - no unsupervised or untrained fundraising allowed
- May not enter new partnerships, change methods, or accept unusual gifts without prior written Board approval
- Must maintain a full, up-to-date register of all fundraising activity, partners, and training records
- Checks for conflicts of interest, legal compliance, and alignment with CGC's values

Centre Manager

- Controls day-to-day activity, planning, delivery, and administration
- Specific controls:
 - Handles initial contact and information gathering only for legacies, major gifts, and corporate relationships — no commitments or promises are made until approved
 - Submits a quarterly compliance report to the Lead Governance Trustee and Board
 - Maintains a central Fundraising Register recording all activity, agreements, donors, and training
 - May not enter contracts or accept unusual gifts without prior written approval
 - Ensures all staff/volunteers are trained, supervised, and compliant

All involved (staff, volunteers, trustees)

- Must read, sign, and follow this policy *before* any involvement
- Complete mandatory training and pass checks; refresh training immediately after any rule change or incident

- Must report any concern, risk, or breach immediately -failure to report is a disciplinary matter
- No personal fundraising using GCG name, logo, or resources without full written approval

Third parties

- Absolute due diligence required before any agreement: checks on legal status, reputation, financial standing, safeguarding, data protection, and past compliance
- Written contract mandatory - must include: adherence to this policy and the *Code of Fundraising Practice*, exact fees/deductions (maximum % set by Board), termination rights, audit access, and liability for breaches
- Monitoring every activity: regular checks, independent verification of income, and spot checks - no “set and forget” arrangements
- Immediate termination if partner breaks rules, misrepresents GCG, or causes risk - no exceptions
- All fees and deductions disclosed to donors in advance - no hidden costs

4. Record Keeping & Formal Agreements

- Central Fundraising Register: Held in secure digital and physical format, accessible only to authorised persons. Records include:
 - All income, amounts, dates, sources, and purpose
 - All formal agreements: funding contracts, sponsorships, partnership terms, and legacy arrangements
 - Licences, permits, and risk assessments
 - Due diligence reports and approval decisions
- Review process:
 1. Draft agreement prepared by Operations Manager
 2. Reviewed by Lead Governance Trustee for legal, ethical, and conflict checks
 3. If over £1,000, restricted, or high-risk: full Board review + risk assessment
 4. Signed only by authorised Trustees — never by the Lead Officer alone
 5. Filed permanently and reviewed annually for compliance

5. Donor Relations & Communications

- All communications: 100% accurate, no overclaiming, no exaggeration, clear statement of purpose, costs, and use of funds. All claims must be backed by evidence.
- Behaviour rules:
 - No undue pressure, repeated requests, or aggressive tactics
 - Strict age limits:
 - No requests for regular giving (direct debit, standing order) from *anyone under 18*

- No requests of any kind from under-16s
- Extra safeguards and written consent from a parent/guardian for any request to 16–17 year olds
- Vulnerable people: Never target those with mental capacity issues, financial hardship, or personal distress. Where vulnerability is identified, activity stops immediately.
- Privacy & data:
 - Full compliance with UK GDPR — law followed to the letter
 - Donor details never shared, sold, or used for anything not agreed
 - Opt-out option on every communication — easy, free, and actioned within 48 hours
 - Records kept only as long as legally required; securely destroyed afterwards
- Use of funds:
 - If purpose cannot be met or funds are surplus: donor consent required in writing before reallocating. If consent cannot be obtained, funds are used for closest possible purpose, documented and reported.
 - No diversion of funds for admin or other use not agreed
- Complaints: Please refer to the Complaints Policy for further information.

6. Specific Fundraising Methods

Public / street collections

- Licence/permit mandatory - no collection without valid permission
- Clear display: GCG full legal name, registration number, licence number, and full explanation of use of funds
- All collectors wear ID; supervised at all times
- Money counted and recorded by two authorised people immediately after collection - independent verification required
- No collecting in restricted or inappropriate locations

Unstaffed giving (boxes, contactless, QR codes)

- Clear permanent label: GCG name, contact details, any third-party operator, and exact fees/deductions
- Secure, tamper-proof containers
- Regular checks and collections by two people
- No anonymous or unlabelled giving points allowed

Events & online campaigns

- Full risk assessment before planning starts - covers safeguarding, data, finance, reputation, and compliance
- Secure payment processing only; all providers vetted and contracted
- Promotions checked and approved *before* release
- Income and costs fully reconciled; independent audit where over £1,000

- No online platform used unless fully compliant with Fundraising Regulator standards and fee transparency rules

Legacies & will-writing

- Minimum two independent providers offered - no exclusive arrangements, no commissions or payments from providers
- No pressure, no advice given by GCG staff/volunteers; clear signposting only
- All legacy communications approved by the Board
- Records of all legacy enquiries kept securely

New or unusual methods

- Board approval + independent risk assessment + legal review required *before* launch
- Pilot period with extra monitoring
- Stopped immediately if any risk or breach identified

7. Gift Acceptance

Only accept gifts that are:

- Freely given - no conditions, no expectation of influence or benefit
- Legal, from legitimate, ethical sources
- Do not compromise our independence, values, or reputation
- Do not place us under any financial or administrative burden

Mandatory Due Diligence

Required for:

- All donations over £500 (threshold reviewed annually by Board)
- Corporate, commercial, or political donations/sponsorship
- Gifts with restrictions or special conditions
- Anonymous donations over **£100** (identity verified where possible; otherwise only accepted if low risk)
- Gifts from overseas or unknown sources
- In-kind gifts over **£250**

Process: Full written report including source, purpose, risks, and recommendation. Only Board may approve acceptance.

Restricted vs Unrestricted

- Unrestricted preferred — maximum flexibility
- Restricted funds: Ring-fenced, recorded separately, used *only* for agreed purpose. If purpose fails, donor consent obtained in writing. If impossible, decision made by Board, documented, and reported in annual accounts.
- No mixing of funds — separate accounting and audit trails

Refusal / Return Policy

We must refuse or return any gift that:

- Conflicts with our values, mission, or legal duties
- Comes from illegal, unethical, or controversial sources
- Has conditions we cannot meet or that compromise independence
- Is given under pressure, coercion, or undue influence
- Risks harm to reputation, beneficiaries, or public trust

All refusals/returns are minuted, risk-assessed, and recorded.

In-Kind Gifts

- Accepted only if genuinely useful and no ongoing cost
- Valued at fair market value; recorded and acknowledged like cash
- No gifts accepted that require liability, maintenance, or cost to GCG

8. Acknowledgement & Receipting

- All gifts acknowledged within 10 working days
- Receipt includes: legal name, charity number, amount/value, date, benefit statement, Gift Aid invitation (where eligible), and purpose statement
- By value:
 - Under £50: Standard receipt + thank-you
 - £50–£499: Personalised thank-you + purpose confirmation
 - £500–£4,999: Formal letter signed by Trustee + impact update
 - £5,000+: Personal contact + optional public recognition only with written consent
- Records kept for 7 years minimum (exceeding legal requirement)
- Anonymous gifts: recorded internally; receipt only if contact details provided

9. Fundraiser Safety & Support

- All fundraisers trained in safeguarding, risk, and how to stop activity if unsafe
- No payment or reward linked to amount raised — commission-based pay is strictly prohibited
- Clear process to report harassment, harm, or concerns — fully confidential and supported
- No fundraising alone in isolated or high-risk locations
- Personal safety guidelines issued to all fundraisers

10. Risk, Records & Review

- Risk Register updated monthly: covers reputation, compliance, safeguarding, financial, and operational risks. Every risk has mitigation and owner.
- All decisions documented: rationale, risk assessment, approvals, and outcomes — retrievable at any time

- Financial records: separate fundraising accounts, full audit trail, independent annual examination
- Policy review: every 2 years, or immediately if law changes, incident occurs, or new risk identified
- Training records: held centrally; no fundraising allowed without current training
- Regulator cooperation: proactive engagement; all enquiries responded to fully and promptly; reports made where required by law

11. Training & Awareness

- Induction training before any involvement
- Refresher training every 6 months
- Specialised training for: handling cash, online fundraising, working with vulnerable people, and third-party management
- All training signed off and recorded
- Fundraising Lead responsible for ensuring 100% compliance

12. Compliance with the Fundraising Regulator

All fundraising activity **fully complies with the *Code of Fundraising Practice 2025***, including:

- Legal, open, honest, and respectful conduct
- No undue pressure or targeting of vulnerable people
- Clear opt-outs and data protection
- Transparency over costs and use of funds
- Proper complaints handling
- Training, supervision, and monitoring
- Cooperation with the Fundraising Regulator and Charity Commission

13. Policy Status

This policy is a binding operational document. Breach of any part may result in disciplinary action, termination of agreement, or legal action.