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Registered provider of social housing: H2452 | **Registered with Ofsted**: 2791302

Policy

Fundraising

Policy Author (name and title)	Gaynor Haskell – Fundraiser
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Board / Committee approval date	
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Has this policy been signed off by the Client Forum (if applicable)?	
Who does this policy apply to?	All staff, volunteers, third-party fundraisers and clients taking part in fundraising activities.

This policy is accompanied by the following supporting document:

- Appendix 1 : **The Fundraising Promise**
- Appendix 2 : **Collections Definition**

Values

Respect	**Empowerment**
▪ Value diversity and fairness ▪ Act with honesty and integrity ▪ Treat people with care and compassion	▪ Support the needs of each individual ▪ Encourage personal development and independence ▪ Provide safety, stability and security
Responsibility	**Excellence**
▪ Work together, in partnership ▪ Take responsibility for our actions ▪ Continue learning and improving	▪ Provide a first-class service ▪ Deliver excellent value for money ▪ Explore innovative ways of working

Contents

Policy 1
Fundraising 1
Values 1
Respect 1
Empowerment 1
- Value diversity and fairness 1
- Act with honesty and integrity 1
- Treat people with care and compassion 1
- Support the needs of each individual 1
- Encourage personal development and independence 1
- Provide safety, stability and security 1

Responsibility 1
Excellence 1
- Work together, in partnership 1
- Take responsibility for our actions 1
- Continue learning and improving 1
- Provide a first-class service 1
- Deliver excellent value for money 1
- Explore innovative ways of working 1

Contents 2
POLICY 3
1. ..... Introduction 4
Purpose 4
Our approach 4
What are our expectations? 4
2. ..... Legislation and Guidance 4
3. ..... Use of personal data and consent 4
4. ..... Our fundraising activity 4
5. ..... Unauthorised activities 5
6. ..... Acceptance of donations 5
Money laundering and suspicious donations 6
7. ..... Donations 6
Anonymous donations 6
Donations from vulnerable people 7
8. ..... Fundraising Performance 7
9. ..... Client Involvement 7

10 ……..……..……Complaints 7
11 ……Fundraising Enquiries & Registration 7
12 ……Policy Review Cycle 7
Policy Review Cycle 7
Appendix 1 - The Fundraising Promise 8
1. We will commit to high standards 8
2. We will be clear, honest and open 8
3. We will be respectful 8
4. We will be fair and reasonable 8
5. We will take care not to cause nuisance or disruption to the public. 8

Appendix 2 – Collections Definition …… 9

Introduction

Purpose

1.1 This policy outlines how Transform Housing & Support approaches fundraising and its ethical and sustainable responsibilities. All Transform staff, volunteers and third-party fundraisers have a responsibility to be aware of and have a thorough understanding of this policy.

1.2 This policy is aligned to **our values** which is an integrated part of our fundraising.

Our approach

1.3 We are committed to responsible fundraising practice; therefore, we are registered with the Fundraising Regulator and have signed up to the **fundraising promise** meaning our fundraising activity will always be legal, open, honest and respectful.

What are our expectations?

1.4 As a Transform member of staff, volunteer or third-party fundraiser involved in any fundraising activity to raise funds for Transform Housing, or for other charities in support of Transform, you must follow this policy. Fundraising activity includes all activities covered by the **Code of Fundraising Practice**.

1.5 Transform staff who are involved in fundraising activity that does not follow this policy, could be in breach of a disciplinary rule.

2. Legislation and Guidance

2.1 We will comply with the Charity Commission and UK law in every respect, including those regarding openness and honesty with our supporters and members of the public.

2.2 As members of the Fundraising Regulator's scheme, we follow its **Fundraising Promise.**

3. Use of personal data and consent

3.1 We respect the privacy and contact preferences of all supporters and will respond promptly to requests to update contact preferences. All personal data held by Transform will be handled in accordance with the applicable data protection regulation and Transform's privacy notice can be found **here.**

4. Our fundraising activity

4.1 Transform Housing & Support raises funds to support its homeless and vulnerable clients to live an independent and fulfilling life. Fundraising adds value by funding specific projects such as housing and equipment. It also supports our client grant scheme whereby we provide grants that improve health and wellbeing, provide access to education and training and support with moving on from Transform.

4.2 Transform accepts in kind donations (goods and products) that can be directly used by our clients including toiletries, new clothing, and food donations.

4.3 Transform also benefits from pro-bono support where services by skilled and experienced professionals are provided including conveyancing, IT support, maintenance, and marketing.

4.4 Transform Housing & Support may take part in face-to-face street collections and collections that take place on private land (with the owners written consent). A member of the fundraising team will brief volunteers and staff before collections take place as the fundraising regulators code of practice must be adhered to at all times when street collections are carried out. All briefings will be recorded on a checklist document that will include the guidance set by the **fundraising regulator** – any volunteer or staff member taking part will need to sign a copy of this confirming they understand and will adhere to the code.

4.5 Transform Housing & Support may take part in static collections (where a collection tin is left in one place for a set amount of time). We will only do this for a maximum of 15 locations per year. Collection tins will be numbered and each one will have a record, that includes at least one contact name (ideally two), their email address, contact numbers and the full address of where the collection tin is located – it will also detail when the collection tins are exchanged/emptied and this will always be carried out by a member of the fundraising team.

4.6 Our fundraising activities are developed and overseen by professional fundraisers who are all directly employed by Transform Housing & Support. Fundraisers employed by Transform receive appropriate training including Safeguarding and Data Protection and are familiar with the Fundraising Regulators Code of Practice.

5. Unauthorised activities

5.1 Any fundraising activity carried out on behalf of Transform should be in line with the values of Transform and should not damage our reputation or attract adverse publicity.

5.2 It is the policy of Transform Housing & Support not to engage in specific high-risk fundraising activity including house-to-house collections or telephone fundraising

6. Acceptance of donations

6.1 Transform Housing, when deciding whether to accept a donation or gift, will consider the charities best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.

6.2 These decisions will be reached on a case-by-case basis, with staff and Trustees guided by the **Chartered Institute of Fundraising's Accepting, Refusing and Returning Donations guidance.** Consideration will be given to:

- Is there reason to believe the donation is linked to criminal activity?
- Does the organisation undermine our purpose and values?
- Could it cause detriment to our reputation?
- Is the donor associated with products not compatible with Transform e.g., organisations selling alcohol, tobacco, or gambling services?
- Would it require unacceptable expenditure or additional charity resources?
- Will it result in personal benefit to Trustees or staff?
- Is there a conflict of interest?

Money laundering and suspicious donations

6.3 Transform Housing & Support is committed to preventing its fundraising activities and donations from being used for money laundering, terrorist financing or other criminal activity. All fundraising and donations must comply with applicable UK legislation and **Transform's Anti-Money Laundering Policy and Procedure.**

Where there are concerns about the source of a donation, the identity of a donor, an unusual transaction or any other circumstances that may indicate money laundering or terrorist financing, the donation or transaction must be referred to the Nominated Officer in accordance with Transform's Anti-Money Laundering Policy and Procedure. Staff and volunteers must not make further enquiries or alert the donor to any suspicion without first seeking advice from the Nominated Officer.

Transform will undertake appropriate due diligence on donors and donations where this is considered necessary and will retain appropriate records. Donations will not be accepted, returned or otherwise dealt with where doing so could breach legal or regulatory requirements. Any decision to refuse or return a donation will be made in accordance with this policy, the Anti-Money Laundering Policy and Procedure and relevant Charity Commission guidance.

7. Donations

7.1 Unrestricted donations are very valuable to Transform as they enable us to direct funds to priority projects and develop and grow as an organisation to achieve our charitable aims and objectives. If supporters wish to make a restricted donation they will need to provide written instructions to this effect by emailing us at fundraising@transformhousing.org.uk or in writing to:

Fundraising Team
Transform Housing & Support
Bradmere House
Brook Way
Leatherhead
Surrey
KT22 7NA

Anonymous and cash donations

7.2 Special consideration will be given to anonymous donations where the source of the donation cannot be established. The circumstances and value of any significant anonymous donation will be considered in accordance with **Transform's Anti-Money Laundering Policy and Procedure** and relevant Charity Commission guidance. Anonymous donations of £10,000 or more will be referred to the appropriate senior colleague for consideration of any money laundering, terrorist financing, reputational or other risks. Where an anonymous donation is £25,000 or more, the matter will be considered for reporting to the Charity Commission as a serious incident, in accordance with its current guidance.

As per **Transform's Anti-Money Laundering Policy and Procedure,** Transform will not accept cash payments in excess of £5,000, including linked cash payments forming part of a transaction of £5,000 or more.

Donations from vulnerable people

7.3 We follow the **Charted Institute of Fundraising's Guidance on Treating Donors Fairly (responding to the needs of people in vulnerable circumstances)** and take special consideration to donations involving potentially vulnerable donors. We take a four-stage approach:

- Being respectful – being mindful of and sensitive to any particular need a donor may have
- Being responsive – adapting our approach and being flexible to meet the needs of individuals
- Being fair – not making decisions based solely on a particular characteristic
- Being accountable – taking responsibility for our actions ensuring our work is carried out in line with the Code of Fundraising Practice.

8. Fundraising Performance

8.1 Fundraising performance will be communicated in our annual financial statements and on the Transform website.

9. Client Involvement

9.1 Client engagement in fundraising is promoted, however their involvement must be risk assessed by the Service Manager and Head of Business Development.

10. Complaints

10.1 We aim to ensure that everyone who donates to Transform Housing & Support has a positive experience, however we understand that sometimes this may not be the case. If you would like to make a complaint about our fundraising activity, please visit our **Complaints Policy**.

10.2 If you have concerns about Transform's fundraising practice and can't resolve your concerns within Transform, you should share them with the **Fundraising Regulator**.

11. Fundraising enquiries and registration

11.1 All staff, volunteers and third-party fundraisers interested in fundraising for Transform should email fundraising@transformhousing.org.uk or call 01372 387100 to register their fundraising activity and obtain advice and support from the fundraising team.

11.2 Anyone fundraising in aid of Transform (staff, volunteers, or third-party fundraisers) who has not registered their activity with the fundraising team will be deemed to be acting independently of Transform, and, as such, the charity takes no responsibility for their actions.

12 Policy Review Cycle

Policy Review Cycle

12.1 This policy is subject to a **yearly** review. Transform will undertake a formal review of this policy by no later than one year from the date shown above, or earlier, if significant changes and arrangements take place, or if legislation, regulatory requirements, or best practice guidelines so require.

Appendix 1 – The Fundraising Promise

This promise outlines the commitment made to donors and the public by fundraising organisations which register with the Fundraising Regulator. Those who register with the regulator agree to ensure their fundraising is legal, open, honest and respectful. The standards for fundraising are set out in the Code of Fundraising Practice.

1. We will commit to high standards

- We will adhere to the Fundraising Code of Practice.
- We will monitor fundraisers, volunteers and third parties working with us to raise funds, to ensure that they comply with the Code of Fundraising Practice and with this Promise.
- We will comply with the law as it applies to charities and fundraising.
- We will display the Fundraising Regulator badge on our fundraising material to show we are committed to good practice.

2. We will be clear, honest and open

- We will tell the truth and we will not exaggerate.
- We will do what we say we are going to do with donations we receive.
- We will be clear about who we are and what we do.
- We will give a clear explanation of how you can make a gift and change a regular donation.
- Where we ask a third party to fundraise on our behalf, we will make this relationship and the financial arrangement transparent.
- We will be able to explain our fundraising costs and show how they are in the best interests of our cause if challenged.
- We will ensure our complaints process is clear and easily accessible.
- We will provide clear and evidence-based reasons for our decisions on complaints.

3. We will be respectful

- We will respect your rights and privacy.
- We will not put undue pressure on you to make a gift. If you do not want to give or wish to cease giving, we will respect your decision.
- We will have a procedure for dealing with people in vulnerable circumstances and it will be available on request.
- Where the law requires, we will get your consent before we contact you to fundraise.
- If you tell us that you don't want us to contact you in a particular way we will not do so. We will work with the Telephone, Mail and Fundraising Preference Services to ensure that those who choose not to receive specific types of communication don't have to.

4. We will be fair and reasonable

- We will treat donors and the public fairly, showing sensitivity and adapting our approach depending on your needs.
- We will take care not to use any images or words that intentionally cause distress or anxiety.

5. We will take care not to cause nuisance or disruption to the public

- We will be accountable and responsible
- We will manage our resources responsibly and consider the impact of our fundraising on our donors, supporters and the wider public.

- If you are unhappy with anything we've done whilst fundraising, you can contact us to make a complaint. We will listen to feedback and respond appropriately to compliments and criticism we receive.
- We will have a complaints procedure, a copy of which will be available on our website or available on request.
- Our complaints procedure will let you know how to contact the Fundraising Regulator in the event that you feel our response is unsatisfactory.
- We will monitor and record the number of complaints we receive each year and share this data with the Fundraising Regulator on request.

Appendix 2 – Collections Definition

Static Collections:

Static collections are when a collection tin is left at one location for an amount of time where people can donate coins or cash into the tin. Static collections will be recorded, details of contacts for the location will be obtained and information will be securely stored on our fundraising database Donorfy. All static collections will comply with the fundraising regulators code of practice – 8. Collecting money or other property and specifically section **8.5. Static Collections.**

Street Collections:

Street Collections are face to face fundraising collections at pre-arranged sites. Sites could either be shopping centres, in high streets or at supermarkets (just some examples). When carrying out face to face street fundraising Transform will ensure that the correct licence is obtained from the local authority or private landowner. When carrying out face to face street collections, Transform will not be signing donors up to monthly subscriptions or obtaining any personal information and we will only be using these collections to obtain one off donations on the specific day and raise awareness of the work in which Transform does. When carrying out face to face street collections we will be fully compliant with the fundraising regulators code of practice **8. Collecting money or other property**