

Fundraising policy

Help Impact (the “Charity”)

1. Purpose

1.1 The purpose of this policy is to detail the principles and processes that govern how the Charity performs its fundraising activities.

1.2 This policy is intended to be a working document that trustees should review every six to twelve months according to the Charity’s needs.

2. Fundraising principles

1.3 Charitable purposes

The Charity applies the funds received as a result of its fundraising activities only for its charitable purposes.

1.4 Effective control and protection of reputation

Trustees should follow legal rules and recognised standards of fundraising.

Trustees should:

- consider donors, supporters and public perception when deciding about income expectations and other goals including fundraising methods and any fundraising costs.
- ensure that there is effective control over fundraising activities performed both by the Charity and by other people and/or organisations that carry it out for the Charity.
- assess and respond to criticisms and complaints if required.

Trustees have the duty to protect the Charity’s reputation and so should manage any potential reputational risks.

1.5 Managing and safe keeping of assets

Trustees should ensure that there are effective financial controls and safeguards in place to duly manage and protect the Charity’s assets. This includes checking that the Charity:

- receives all the funds to which it is entitled, if and where people are given permission to raise money on its behalf
- protects received income
- clarifies both publically and internally which funds are restricted to be used in a specific way (if applicable)
- ensures that the Charity only accepts donations which are in its interests

- ensures complete and accurate returns are made so that the Charity receives tax reliefs to which it is entitled
- protects other Charity assets used in your fundraising.

1.6 Fundraising costs

Trustees should make certain that any fundraising costs are in the Charity's best interests and that there is transparency in relation to all costs.

1.7 Intervening where an appeal is being run using the Charity's name without permission

In case there is an appeal run using the Charity's name without permission, trustees should contact the people running the appeal and intervene reasonably and promptly.

1.8 Appeals for a particular purpose

If an appeal is being organised for a particular purpose, the Charity should include a statement indicating what will happen to funds received if the total funds raised are insufficient or exceed the target.

1.9 Donation sources

The Charity accepts funding from individuals, companies, other charities and other organisations that trustees deem to be appropriate.

1.10 Donation forms

The Charity accepts donations that trustees deem to be reasonable including but not limited to cash, donations in kind and pro bono work.

2 Monitoring and staying alert

2.1 Trustees should understand and regularly monitor all fundraising activities, the overall financial position and be able to demonstrate how fundraising supports the long term strategy for the achievement of the Charity's objectives.

2.2 Trustees should be alert to any potential fundraising fraud and suspicious donations. If necessary, trustees should contact police and/or appropriate authorities.

2.3 Trustees should be able to identify substantial donations and perform appropriate due diligence including:

- assessing any risks potentially arising from accepting a donation
- considering whether it would be appropriate to accept funds from a particular donor (this applies both to individuals and organisations)
- having reasonable assurance that the donation is not from any illegal or inappropriate source
- ensuring that any conditions attached to donations are appropriate and are in the Charity's interests.

2.4 In case the Charity receives a legacy from a will, trustees should:

- ensure solicitors or practitioners dealing with the will are registered with relevant regulatory bodies

- ask to see a copy of the will if there are any concerns.
- 2.5 In case of large grants and/or close working relationships with a donor, trustees should perform further due diligence:
- if a donor is an individual, take steps to verify the identity, and review any potential concerns
 - understand the business of an organisation making a donation and ensure that a donation would be appropriate
 - check the details of a company making a donation on the Companies House website
 - check registration and details of a charity making a grant with a charity regulator
 - look out for exceptional features, such as but not limited to unusually large amounts, conditions or complex banking and transfer arrangements
 - perform web search to identify any potential concerns.
- 2.6 In case of any conditions attached to a donation, trustees should ensure that these conditions are in the Charity's best interests. The acceptance of these conditions should be in line with the Charity's purposes, priorities and activities. In case trustees consider that conditions may potentially not be consistent with the Charity's interests, they should refuse the donation.
- 2.7 Trustees should record their decisions to refuse or accept potentially higher risk donations.
- 2.8 Trustees should consider questions specified in the Charity Commission's "Know your donor tool" depending on the size and nature of a donation. The questions are detailed in Appendix 1.

3 Fundraising methods

- 3.1 The Charity intends to use the fundraising methods detailed below. In future the Charity may also use other fundraising methods as trustees deem appropriate.
- Fundraising events - organisation of a fundraising event should involve the following steps:
 - Preparing a budget
 - Defining the target audience
 - Event planning including venue, food and drink, and entertainment
 - Marketing
 - Ticket sales (if applicable)
 - Sending thank you notes
 - Charity raffles at fundraising events
 - Participating in fundraising challenges
 - Reaching out to friends and family (word of mouth).

Appendix 1 – Charity Commission’s “Know your donor – key questions” tool

1. General information

- Who are the donors
- What is known about them?
- Does a charity have a well-established relationship with them?
- Do any identity checks need to be made? Full use should be made of internet websites, particularly to check whether a donor organisation is registered with another regulator. Registration may provide access to the organisation’s accounts and governing document.
- Are the UK donors tax payers, and can gift aid be reclaimed?
- If gift aided, does the donation fail all the three tests, in which case it is a tainted charity donation? The tests establish whether the person or linked person or entity gains a financial advantage from the donation; whether one of the main or sole purposes is to obtain a financial advantage directly or indirectly from the charity for the donor or linked person; and the donor is not a wholly owned subsidiary of the charity or a “relevant housing provider”.
- In what form is the money being received? Cash, cheque, bank transfer?
- Have any public concerns been raised about the donors or their activities? If so, what was the nature of the concerns and how long ago were they raised? Did the police or a regulator investigate the concerns? What was the outcome?
- Would any adverse publicity about the donor have a damaging effect on the charity?

2. The nature of the donation and any conditions

- How big is the donation?
- Is it a single donation, or one of a number of regular donations, or the first of multiple future donations?
- Is the donation one of a series of interest-free loans from sources that cannot be identified or checked by the charity?
- Are there unusual or substantial one-off donations?
- Does the donation come with any conditions attached? What are they? Are they reasonable?
- Is there a condition that funds are only to be retained by the charity for a period and then returned to the donor, with the charity retaining the interest?
- Is the donation conditional on particular organisations or individuals being used to apply the funds?
- Is the donation conditional on being applied to benefit particular individuals either directly or indirectly?
- Is there a suggestion that a charity is being used as a conduit for funds to a third party?
- Is the donation in sterling or another currency, perhaps with a requirement that the donation be returned in a different currency?
- Are any of the donors based, or does the money originate, outside the UK? If so, from which country? Does this country/area pose any specific risks?

- Are donations received from unknown bodies or international sources where financial regulation or the legal framework is not rigorous?
- Is the donation received from a known donor but through an unknown party or an unusual payment mechanism where this would not be a typical method of payment?
- Is anything else unusual or strange about the donation?

3. What trustees should do if they are suspicious

- If due diligence checks reveal evidence of crime, trustees must report the matter to the police and/or other appropriate authorities
- If the trustees have reasonable cause to suspect that a donation is related to terrorist financing, they are under specific legal duties under the Counter-Terrorism act to report the matter to the police. In the case of money laundering, reports can be made to the police, a customs officer (HMRC), or an officer of the Serious Organised Crime Agency
- Such issues should be reported to the Commission under reporting serious incidents regime, especially if significant sums of money or other property are donated to the charity from an unknown or unverified source. This could include an unusually large one-off donation or a series of smaller donations from a source you cannot identify or check. We would expect trustees to report any such payment (or payments) totalling £25,000 or more.
- Check the donor against the consolidated list of financial sanctions targets and proscribed organisation
- Consider whether to refuse the donation.