

Cambridge House's Ethical Fundraising Policy & Procedures



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A. Introduction

- 1) Cambridge House aims to tackle poverty and social injustice and to achieve this we seek funding from a range of sources.
- 2) Most of our current funding comes from earned income, statutory sources, and charitable foundations. We also seek to increase funding from individual and corporate donors.
- 3) Cambridge House is committed to:
 - a) Being open, honest, fair and accountable.
 - b) Ensuring all fundraising:
 - i) Complies with relevant legislation, including legislation on data protection, money laundering and bribery, and government guidance in relation to acts of terrorism and political activity.
 - ii) Is consistent with best practice and with the guidelines provided by the Institute of Fundraising and the Charity Commission.
- 4) This policy has been drawn up to provide guidance to all those engaged in fundraising activity on behalf of Cambridge House.

B. Policy Management and Implementation

- 1) Cambridge House is governed by a Council of Management comprising the charity's trustees, who are also the company's directors.
- 2) The Council of Management is responsible for endorsing this policy and deciding when the policy needs reviewing or amending.
- 3) Fundraising is the responsibility of the organisation's leadership team:
 - a) The Chief Executive is responsible for policy implementation.
 - b) The Deputy Chief Executive is responsible for overseeing and monitoring the use of the policy.

C. Policy Aims

- 1) This policy seeks to cover the ethical issues and social responsibility within fundraising.
- 2) All fundraising activities carried out on Cambridge House's behalf must be consistent both with this policy and with best practice in the charitable sector to ensure that any donation from, or relationship with, a third party does not in any way compromise this policy, damage Cambridge House's reputation or jeopardise future fundraising opportunities.

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- 4) All Cambridge House trustees, staff, trainees and volunteers involved in fundraising have a responsibility to:
 - a) Be aware and have a thorough understanding of the ethical issues referred to in this policy.
 - b) Ensure the policy is employed consistently and rigorously and all fundraising activity complies with its principles.
- 5) This policy relates to all fundraising activities including
 - Fundraising events and campaigns
 - Sponsored challenge events
 - Digital and electronic fundraising
 - Cash donations
 - Individual and corporate and donations
 - Grants
 - Fees for commissioned services
 - Donations in kind
 - Shares
 - Legacies
 - Pro bono work
 - Sponsorship
 - Corporate gifts
- 6) The financial threshold to which the policy applies is:
 - a) Individual cash donations of over £5,000
 - b) All donations of over £10,000
 - c) Cumulative donations of £10,000 over a 12-month period
 - d) Although gifts worth less than £10,000 may not be subject to detailed scrutiny by Leadership and the Board of Trustees, acceptance will nevertheless be considered by all staff and volunteers involved in fundraising against the ethical guidelines in this policy and may be referred for further scrutiny if there is perceived to be conflict with any of the principles set out in this policy.

D. Context

- 1) Cambridge House actively seeks opportunities to work with external organisations and individuals to achieve shared objectives. However, it is essential that Cambridge House:
 - a) Maintains its independence
 - b) Does not allow any third party to bring its name into disrepute or jeopardise future funding opportunities.

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E. Relationship with Supporters

- 1) Cambridge House respects the rights of its supporters to clear, truthful information on the work of Cambridge House, therefore we will:
 - a) Openly report how we spend donated and statutory monies.
 - b) Be transparent and honest.
 - c) Do what we say we are going to do.
 - d) Answer all reasonable questions about our fundraising activities and costs
 - e) Abide by the conditions attached to the donations and grants we receive.
- 2) We will respect the privacy and contact preferences of all donors.
- 3) We will respond promptly to requests to cease contact.
- 4) We will respond promptly to complaints and act as best we can to address their causes.
- 5) We will never accept a donation from someone we believe to be vulnerable and not in an informed position to make a decision about their donation.
- 6) We will never sell donor information to third parties and will do our best to keep contact details up to date and accurate.
- 7) We will not use techniques such as telemarketing or door-to-door collections.
- 8) We will ensure that any benefits received by donors are appropriate for the organisation to be giving, and proportionate to the size of the gift.

F. Risk Assessment

- 1) We abide by the law which requires us, in deciding whether to accept or refuse a donation and or financial support, to consider which action is in the charity's best overall interest.
- 2) Cambridge House will not therefore, accept financial support from, or enter into a partnership with, any third party involved with activities which might damage the reputation of the organisation and thus damage its longer term fundraising prospects.
- 3) We will carefully consider ethical complexities regarding donations on a case by case basis with reference to the values of Cambridge House, the practices set out in this policy and, if appropriate, seek the advice of our solicitors and or the Charity Commission.
- 4) The responsibility for the judgement on whether Cambridge House should refuse a donation lies first with the Chief Executive, then the Finance Subcommittee and ultimately the Council of Management.

G. Commercial partners

Cambridge House will not endorse products, treatments or companies.

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H. Anonymous donations

- 1) Cambridge House will not accept anonymous donations over £5,000 because they cannot be risk assessed according to the criteria detailed in section F above.
- 2) The identity of donors who wish to remain anonymous must be known to the Chair of Trustees, Company Secretary and the Chief Executive.

I. Use of donations

- 1) If supporters wish to make a donation to a specific area of Cambridge House's work (e.g. Cambridge House Law Centre or the Cambridge House Youth Empowerment Service), they may make a restricted donation by providing written instructions to this effect with their donation.
- 2) We will always respect this.

J. Accountability

- 1) Cambridge House will publish a Fundraising Pledge approved by the Council of Management on our website.
- 2) The Pledge will include links to our:
 - a) Annual Report
 - b) Fundraising Complaints Procedure

K. Fundraising Practices

1) Reporting requirements:

- a) All restricted funding must be:
 - i) Identified in fundraising pipeline documents and secured fundraising reports with details of its purpose.
 - ii) Allocated to the appropriate service and or activity in our accounting system.
- b) Unrestricted income must be reported clearly separate to restricted funds.
- c) Information about fundraising activity, including detail on unrestricted funds and restricted funds must be reported to the Council of Management and reviewed by its Finance Subcommittee.
- d) The Finance Subcommittee must be informed at least annually of the number, type and disposition of complaints received from donors or prospective donors about matters addressed in this policy.
- e) As specified in the Charities Act 2016, we will report any and all complaints received about fundraising and outline our approach to fundraising in our annual report.

2) Remuneration of fundraisers

- a) Paid fundraisers, whether staff or consultants, will be compensated by a salary, retainer or fee, and will not be paid finders' fees, commissions or other payments based on either the number of gifts received or the value of funds raised.
- b) Cambridge House does not have performance-based compensation policies for staff; therefore there are no performance-based compensation practices for fundraisers.

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3) Managing the Fundraising Process

a) Authorisations and Reporting

- i) All fundraising applications and bids must be approved by the Chief Executive or Deputy Chief Executive before they are submitted to the awarding or commissioning body.
- ii) All proposals to submit partnership or consortium applications or bids must be authorised by the Chief Executive or Deputy Chief Executive at the scoping stage.
- iii) All partnership or consortium applications or bids require memorandums of understanding between the participating organisations authorised by the Chief Executive or Deputy Chief Executive.
- iv) All fundraising applications and bids must be reported to trustees in a Fundraising Pipeline Report.
- v) All successful applications and bids must be reported to trustees in an Income Report.

b) Knowledge Management

- i) Data Protection:
 - All fundraising records that include donors' personal data will not be kept longer than is necessary.
 - This means that data that is being processed for a particular purpose will not be kept unless it is still required for that purpose.
 - Before deleting any information we will consider whether there are any other legal requirements that mean certain elements of the data need to be retained, e.g., for financial auditing purposes.
- ii) All intentions to apply for funding must be notified to the Development Officer in writing, with the following information:
 - Intended purpose
 - Intended request
 - Anticipated submission date
 - Anticipated decision date.
- iii) On occasions when more than one service expresses an interest in applying to the same funding source, Leadership will decide which potential application meets strategic business objectives.
- iv) All paperwork related to successful and unsuccessful applications and bids will be filed centrally by the Development Officer including:
 - Emails and notes of meetings and telephone call with funders
 - Completed applications and/or the text provided in online applications
 - Positive and negative application response letters
 - Terms of conditions for approved grants and bids
 - Reports to funders and commissioners and grant claims

c) Quality Assurance

- i) The Development Officer is responsible for ensuring that the drafting of funding applications and bids meets corporate standards.
- ii) Leadership will approve all applications for funding before they are submitted, a minimum of 3-working days before the submission deadline.
- iii) All financial projections and assumptions will be recorded in spreadsheets and filed centrally with the application.
- iv) All calculations and projections related to deliverables (outputs and outcomes) will be recorded in spreadsheets and filed centrally with the application.
- v) All financial projections and assumptions will include an appropriate overheads contribution to ensure full cost recovery unless authorised otherwise in writing by the Chief Executive or Deputy Chief Executive.
- vi) All staff costs calculations will include statutory Employers National Insurance and 5% pension contributions unless approved otherwise in writing by the Chief Executive or Deputy Chief Executive.

d) Third Party Fundraising

- i) Any third party, including individual fundraisers e.g. challenge fundraisers, undertaking fundraising for Cambridge House will be required to adhere to principles and practices set out in this policy.
- ii) Any professional organisation undertaking fundraising for Cambridge House will be required to provide comprehensive, transparent reporting on their fundraising aims, objectives and methods at all times.
- iii) Third parties must not disclose any information of a confidential nature obtained during their relationship with a Client, unless it is information within the public domain or information which may otherwise be legally disclosed.
- iv) Where unauthorised fundraising comes to our attention, we will:
 - Contact the individuals running the appeal promptly
 - Establish whether the appeal accords with Cambridge House's values, objectives and the practices set out in this policy
 - If necessary, seek an injunction to restrain any individual or organisation from raising funds in Cambridge House's name
 - If necessary, report uncooperative individuals and/or organisations to the Charity Commission and/or the Police.

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L. Financial Accountability

- 1) Cambridge House's financial affairs will be conducted in a responsible manner, consistent with its Finance Policies and Procedures, the ethical obligations of stewardship, and the legal requirements of the Charity Commission and Companies House.
- 2) All donations will be used to support the mission of Cambridge House.
- 3) All restricted donations will be used as agreed with the donor:
- 4) When, due to changes in circumstances a restricted donation cannot be used according to the donors wishes:
 - a) Alternative uses will be discussed with the donor or the donor's legal designate(s).
 - b) In the event that an alternative use is not acceptable to the donor the amount will be repaid.
 - c) If the donor is deceased or legally incompetent, and Cambridge House is unable to contact a legal designate, Cambridge House will seek legal advice and, if appropriate, use the donation in a manner consistent with the donor's original intent.
- 5) An audited annual financial report will be produced which will disclose the total amount of philanthropic income and expenditure (unrestricted funds) and be factual and accurate in all material respects in accordance with the requirements of the Charity Commission.
- 6) The cost effectiveness of Cambridge House's fundraising programme will be reviewed annually by the Leadership Team (Chief Executive and Deputy Chief Executive) and reported to the Council of Management.

ENDS

Appendix 1

Our Fundraising Pledge to Donors

Your generosity is behind everything we do. That's why, when you support our work, we make these promises to you:

We have high standards

- 1) We have an Ethical Fundraising Policy approved by our Council of Management.
- 2) We are organisational members of the Institute of Fundraising and therefore committed to its Code of Fundraising Practice.
- 3) We adhere strictly to fundraising and data protection legislation and guidelines.
- 4) We take prompt action if we find any failure to meet these standards.

We are honest and open

- 5) We tell the truth and do not exaggerate.
- 6) We do what we say we are going to do.
- 7) We answer all reasonable questions about our fundraising activities and costs. Our most recent annual reports and accounts are [HERE](#)

We are clear

- 8) We are clear about who we are and what we do.
- 9) We are clear about how you can support us and how your gifts are used.

We are respectful

- 10) We do not use fundraising techniques such as telemarketing or door-to-door collections or outsource to fundraising agencies.
- 11) We work hard to ensure our fundraising work is unobtrusive and appropriate for our supporters.
- 12) We will never sell your data to any third party.
- 13) We will not share your details with other charities.
- 14) We respect the rights, preferences and privacy of our donors. If you indicate a wish to only be communicated with in a certain way, or not to be communicated with at all, we will honour that request.
- 15) We will never accept a donation from someone we believe to be vulnerable and not in an informed position to make a decision about their donation.

We are fair and reasonable

- 16) We make every effort not to use words or images that are unduly distressing or offensive.
- 17) We strive to cause minimal disruption to our donors and will not make excessive contact attempts.

We are accountable

- 18) We are committed to being open and honest in our communications, and we value all feedback.
- 19) If you are unhappy with anything we've done whilst fundraising, you can contact us to make a complaint. Our complaints procedure is available [HERE](#)

Appendix 2

Cambridge House Fundraising Complaints Procedure

We treat all comments and complaints as an opportunity to improve. We are happy to acknowledge the mistakes that we have made, sincerely apologise for them, and then try to prevent them from happening again in the future. Our complaints procedure is as follows:

Stage 1

- a) Initially, please send your complaint in writing to the Deputy Chief Executive who will conduct an investigation.
 - Please feel free when contacting us about a complaint, to let us know how you think it could be resolved.
- b) We will acknowledge your complaint in writing within 14 working days.
- c) We will try to resolve your complaint as quickly as possible.
- d) We will advise you of the outcome of this investigation within 30 days.

Stage 2

- a) If you are not satisfied with the outcome of our Stage 1 investigation, please write to or email the Chief Executive.
- b) A response will be sent to you within 30 days.

Stage 3

- a) If you are not satisfied with the response of the Chief Executive, please write to the Chair of Trustees.
- b) The Chair of Trustees will send a response to you within 30 days of the referral.

Occasions when we cannot to respond to a complaint

- a) When a complaint is about something that Cambridge House has no direct connection to.
 - We may choose to reply to clear our name but we are not obliged to.
- b) When someone unreasonably pursues a complaint that we have already responded to at Stages 1, 2 and 3 of our Complaints Procedure.
 - If we choose not to reply again, we will always inform the complainant of our decision to do this.
- c) When a complainant is being obviously abusive, prejudiced or offensive in their manner.
- d) When a complainant is harassing a staff member.
- e) When a complaint is incoherent or illegible.
- f) When a complaint has clearly been sent to us and numerous other organisations as part of a bulk mailing or email.
 - In this instance we can chose whether it is necessary for us to reply or not.
- g) Cambridge House cannot respond to complaints made anonymously.
 - However, we will investigate the complaint and use the information to improve in any way that we can.

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