

# Ethical Fundraising Policy and Procedures



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# Ethical Fundraising Policy and Procedures



## 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 Chartered 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.

## 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. The Chief Executive is responsible for policy implementation.
4. The Fundraising and Development Coordinator is responsible for overseeing and monitoring the use of the policy.

## 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.
3. 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.
4. This policy relates to all fundraising activities including
  - a) Fundraising events and campaigns
  - a) Fees for commissioned services
  - a) Sponsored challenge events
  - a) Donations in kind
  - a) Digital and electronic fundraising
  - a) Shares
  - a) Cash donations
  - a) Legacies
  - a) Individual and corporate and donations
  - a) Pro bono work
  - a) Grants
  - a) Sponsorship
  - a) Corporate gifts

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5. 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.

### Context

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.

### 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.

### 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.

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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.

### Commercial partners

Cambridge House will not endorse products, treatments or companies.

### 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.

### 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.

### 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

### 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

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- 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.

### 3. Managing the Fundraising Process

#### a) Authorisations and Reporting

- i) All fundraising applications and bids must be approved by the Chief Executive or Finance Director 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 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 Finance Director.
- 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 Fundraising and Development Coordinator 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 Fundraising and Development Coordinator 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 Fundraising and Development Coordinator is responsible for ensuring that the drafting of funding applications and bids meets corporate standards.

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- 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 Finance Director.
  - 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 Finance Director.
- 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.

### 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.



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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 Finance Director) 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 Chartered 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](#)





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### Appendix 2

## Cambridge House Complaints Policy and Procedure

We want to help you resolve your complaint as quickly as possible.

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### Policy statement

- a) Cambridge House is committed to providing a high-quality service to everyone we deal with. In order to do this, we need you to give us any comments about our service, and to tell us when we get things wrong. We want to help you resolve your complaint as quickly as possible.
- b) We treat as a complaint any expression of dissatisfaction with our service which calls for a response. We listen to your complaints, treat them seriously, and learn from them so that we can continuously improve our service.
- c) A complaint is an expression of dissatisfaction, whether justified or not.
- d) Our policy covers complaints about:
  - the standard of service we provide
  - the behaviour of our staff (though we may consider other policies more appropriate e.g. Safeguarding)
  - any action or lack of action by staff affecting an individual or group
- e) Our complaints policy does not cover:
  - matters that have already been fully investigated through this complaints procedure or another policy
  - anonymous complaints
  - complaints already part of another resolution process e.g. legal cases or where the matter has previously been referred to a commissioner or funder
- f) This policy will be reviewed every three years by the Chief Executive
- g) Associated policies:

Data Protection, Privacy and Confidentiality
Equality, Diversity and Inclusion
Fundraising Pledge

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Safeguarding
Service Charter

### Our standards for handling complaints

- a) we treat all complaints seriously, however they are made
- b) you will be treated with courtesy and fairness at all times - we would hope, too, that you will be courteous and fair in your dealings with our staff at all times
- c) we will treat your complaint in confidence
- d) we will deal with your complaint promptly - we will acknowledge receipt of a written complaint within 5 working days and we will send you a full reply within 20 working days of receipt
- e) if we cannot send a full reply within 20 working days of receipt of your complaint we will tell you the reason and let you know when we will be able to reply in full
- f) we will publish information in our annual report on the numbers and categories of complaints we receive, and the percentage of complaints upheld.

### 2.1 Confidentiality

All complaints received will be dealt with confidentially and in accordance with the requirements of UK data protection law.

### How to complain

- a) You can make a complaint by email or post or via a non-legal advocate
- b) You can send an email to [feedback@ch1889.org](mailto:feedback@ch1889.org) or in writing to: Chief Executive's Office, Cambridge House, Unit F, Ground Floor, The Print Works, 22 Amelia Street London SE17 3PY
- c) We have a 2-stage complaints procedure. At each stage it will help us to resolve your complaint quickly if you can give us as much clear detail as possible, including any documents and correspondence, and stating that you are making a complaint in line with our procedure.

### 3.1 The Stages of the Complaints Procedure

#### a) Stage 1

This is the first opportunity for the department or team to resolve your dissatisfaction, and the majority of complaints will be resolved at this stage. In the first instance, we will try to get your complaint resolved by the Head or Director of the service or team against whom the complaint has been made. Upon receipt of your complaint we will contact the relevant team Head or Director and ask them to deal with your complaint unless the complaint is specifically about that individual. A complaint response may take the form of a letter, email or telephone call, but the outcome will always be recorded by Cambridge House.

#### b) Stage 2

If you are dissatisfied with this response you may request a review of the response. This review will be conducted by another Director, Head of Service, or the Chief Executive.

### 3.2 Timescales for handling a complaint:

#### a) Stage 1 - maximum 20 working days

- acknowledgement within 5 working days
- full response within 20 working days

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### b) Stage 2 - maximum 20 working days

- acknowledgement within 5 working days
- full response within 20 working days

### 3.3 Extending time limits

- a) We aim to complete all complaints within the timescales above; however, if a complaint is very complex it may occasionally be necessary to extend the time limit. If this is the case, we will keep the complainant informed of progress with the investigation, the reasons for the delay, and the new deadline.
- b) Following each stage of the procedure, the complainant has a maximum of 20 working days from the date of the final response to request that their complaint be progressed to the next stage.

### If you remain dissatisfied

If having followed the 2 stages of our complaints procedure you remain dissatisfied, depending on the type of complaint you can:

- ask the **Legal Ombudsman** to consider the complaint. The Legal Ombudsman can be contacted at PO Box 6806, Wolverhampton WV1 9WJ (telephone: 0300 555 0333 or email: [enquiries@legalombudsman.org.uk](mailto:enquiries@legalombudsman.org.uk)). Normally, you will need to bring a complaint to the Legal Ombudsman within 6 months of receiving a final written response from us about your complaint. For information about their criteria for whether or not to investigate complaints, you should contact them.
- complain to the **Charity Commission** Regulator at any stage. Information about the kind of complaints the Charity Commission can involve itself can be found on their website at: <https://forms.charitycommission.gov.uk/raising-concerns/>
- complain to your **Member of Parliament** <https://members.parliament.uk/FindYourMP>
- complain to your **Local Authority Councillor** (please visit your council website for details)

### Remedies

- a) When we get things wrong, we will act to:
  - accept responsibility by saying sorry
  - explain what went wrong and why
  - put things right by making any changes required
- b) The action we take to put matters right (i.e. redress) in response to a complaint, can include any combination of the remedies set out in the list below. The general principle we follow is that a complainant should, as far as possible, be put in the position he or she would have been in, had things not gone wrong.
- c) The remedy chosen needs to be proportionate and appropriate to the failure in service and take into account what people are looking for when they complain. An apology is normally appropriate, but other action may also be necessary:
  - remedial action, which may include reviewing or changing a decision on the service given to an individual complainant
  - service desired by complainant (immediately, if appropriate)
  - putting things right (for example change of procedures to prevent future difficulties of a similar kind, either for the complainant or others)
  - training staff

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### 5.1 Comments

- a) Quality of service is an important measure of the effectiveness of Cambridge House, therefore learning from complaints is a good way of helping to improve and develop the way we work. As well as learning from your complaints, we are also interested in other ideas that you may have on how we might do things better.
- b) You can make your comments by email to [feedback@ch1889.org](mailto:feedback@ch1889.org) or in writing to: Chief Executive's Office, Cambridge House, Unit F, Ground Floor, The Print Works, 22 Amelia Street London SE17 3PY. We will use your comments to help improve our service and the way we do things. However, the 2-stage procedure outlined above does not apply to comments.

### Unreasonable behaviour

- a) All complaints will be processed in accordance with this policy. However, during this process, staff may have contact with unreasonable complainant behaviour and unreasonably persistent complainants.
- b) We define this as "those who, because of the frequency or nature of their contact with Cambridge House, hinder the reasonable ability of staff to deliver services"
- c) In these cases, we reserve the right to limit your access to staff; or to limit the means by which you can contact staff; or to terminate the complaint process prematurely.

### Recording complaints

- a) We will log all the complaints that we receive so that we can monitor the types of problems we are encountering, the best way to resolve them, and how long we are taking to resolve them. This also helps us to take a closer look at how we can improve our own service delivery.
- b) We will handle your information in line with all current data protection legislation.
- c) This policy and procedure replaces all previous complaints policies and procedures including for fundraising.

**ENDS**