

# Fundraising Policy

Issued: October 2017

Review: October 2020



## **Overview**

Aneurin Leisure is the trading name of Life Leisure Trust, a registered charity. Aneurin Leisure is committed to its charitable aims, and fundraises in order to improve community life through leisure, learning and culture. We concur with the Fundraising Promise to be open, honest, fair and legal.

This policy seeks to cover the ethical issues and social responsibility within fundraising. All Aneurin Leisure staff involved in fundraising have a responsibility to be aware and have a thorough understanding of the ethical issues referred to in this policy.

## **Supporters**

Aneurin Leisure respects the rights of its supporters to clear, truthful information on the work of Aneurin Leisure; to openly report on how we spend donated and statutory monies and to manage supporters' information responsibly.

We will comply with the charity commission, UK and European Law in every respect, including those regarding openness and honesty with our supporters, donors and members of the public.

As members of the Fundraising Regulator's scheme we will follow its Fundraising Promise, which helps to ensure that organisations raising money for charity from the public, supporters and donors have transparency in their operations.

Aneurin Leisure will respect the privacy and contact preferences of all supporters. Aneurin Leisure will respond promptly to requests to cease contact or complaints and act to address areas of concern.

## **Refusals**

Aneurin Leisure in deciding whether to accept or decline a donation will consider the charity's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.

Additionally Aneurin Leisure will not undertake business with companies or individuals who participate in activities which could cause detriment to the charity's reputation; which will disproportionately decrease the amount of donations to further the work of the charity.

## **Use of Donations**

If supporters wish to make a donation to a specific area of Aneurin Leisure's work (e.g. Library Service), then they make a specified donation by providing a written instruction to this effect with their donation. Aneurin Leisure will make every endeavour to respect this.

## 1. Introduction

The following must be read in conjunction with the Code of Fundraising Practice, which is issued by the Fundraising Regulator and outlines the standards expected of all charitable fundraising organisations across the UK.  
([www.fundraisingregulator.org.uk](http://www.fundraisingregulator.org.uk))

In line with the Code of Fundraising Practice all Aneurin Leisure's fundraising activities will be; **Legal, Open, Honest and Respectful.**

Charitable Funds consist of:

- Money donated to the Trust in appreciation
- Money left in a legacy for the benefit of the Trust (or a certain part of the Trust)
- Money which has been raised through fundraising events
- Money which has been donated as a result of a fundraising appeal

Charitable Funds have to be accounted for in a different way from other mainstream funding and are subject to a different set of rules and guidance. The control and management of these Charitable Funds is the responsibility of the Trustees, who as the Trust Board of Aneurin Leisure delegate responsibility to Aneurin Leisure's Senior Management Team.

## 2. Policy Statement

Aneurin Leisure is committed to its charitable aims, and fundraises in order to improve community life through leisure, learning and culture. We concur with the Fundraising Promise to be open, honest, respectful and legal. Aneurin Leisure welcomes the contribution that the charitable funds make to the delivery of its services and value the work of its sponsors who donate money Aneurin Leisure. The Trustees will ensure that the highest standards are in place for the protection of these donations.

- a) The legal principle underpinning fundraising is that all funds raised for a particular cause must be used for that particular cause.
- b) Aneurin Leisure will not denigrate other individuals or organisations.
- c) Aneurin Leisure will not exaggerate facts relating to the potential beneficiary.
- d) Aneurin Leisure will not take advantage of mistakes made by the sponsor.
- e) i) Aneurin Leisure will take all reasonable steps to treat a sponsor fairly, enabling them to make an informed decision about any donation. This must include taking into account the needs of any potential sponsor who may be in a vulnerable circumstance or require additional care and support to make an informed decision.  
ii) Aneurin Leisure will not exploit the credulity, lack of knowledge, apparent need for care and support or vulnerable circumstance of any sponsor at any point in time. There is more information available about responding to the needs of people in vulnerable circumstances and helping sponsor to make informed decisions in the Institute of Fundraising's ['Treating Donors Fairly' Guidance](#).  
iii) If Aneurin Leisure knows or has reasonable grounds for believing that an individual lacks capacity to make a decision to donate, a donation must not be taken.

- iv) A donation given by someone who lacked capacity at the time of donating will be returned.
- f) Aneurin Leisure will not engage in fundraising which:
  - Is an unreasonable intrusion on a person's privacy;
  - Is unreasonably persistent;
- g) Aneurin Leisure is not registered for Gift Aid, so Gift Aid will not be claimed on donations.

### **3. Fundraising by staff**

Participation in fundraising activities by staff is voluntary and should not be imposed on individuals. The existing Trust insurance arrangement covers staff for certain 'low risk' fundraising activities, however approval must be sought from the Senior Management Team prior to the commencement of the activity. Any event not covered by this policy must obtain its own insurance cover and be approved by Aneurin Leisure's Senior Management team. The Trust's insurance policy states that 1 able bodied adult is covered to carry up to £2,500.

### **4. General policies regarding use of donations**

Donations are to be in the best interests of Aneurin Leisure, all donations must meet the legal requirements stated by the Charity Commission and the Institute of Fundraising. The sponsor is entitled to accountability and appreciation for his/her donation. Each donation will be acknowledged by the relevant Strategic Business Unit Manager if under £200 and the Managing Director if over £200.

On receipt, all donations should be processed through the sponsor database, which is maintained by the finance team in the Regain building in order to ensure the above requirements are met.

If supporters wish to make a donation to a specific area of Aneurin Leisure's work (e.g. – Library Service), then they make a specified donation by providing written instruction to this effect with their donation. Aneurin Leisure will always respect this. If Aneurin Leisure is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way Aneurin Leisure will refund the donation.

Aneurin Leisure in deciding whether to accept or decline a donation will consider the charity's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives. Aneurin Leisure will not accept any donors which:

- i. Restrict use based upon age, race, colour, sexuality or sex.
- ii. Gifts associated with unsuitable products, corporate and individuals e.g. arms dealings and tobacco
- iii. Personal gifts to Trust staff members should be discouraged at all times

Additionally Aneurin Leisure will not knowingly undertake business with companies or individuals who participate in activities which could cause detriment to the

charity's reputation; which will disproportionately decrease the amount of donations to further the work of the charity.

To engage a sponsor Aneurin Leisure may offer them benefits related to the size and frequency of the donation, appropriate for the organisation to be giving and proportionate to the size of the sponsorship. Aneurin Leisure is aware that these benefits nullify potential tax relief and all activities of this nature will be referred to the Director of Finance before being offered to the sponsor.

## **5. Acceptable fundraising activities**

The proposed activity should not attract adverse publicity for the Aneurin Leisure. Fundraising activities that meet with public disapproval can damage the reputation of Aneurin Leisure. Those events that have an added health and/or wellbeing benefit for participants are positively encouraged.

Before fundraising activity can be initiated approval must be sought from Aneurin Leisure's Senior Management team

All fundraising by means of lotteries, e.g. raffles, etc. must comply with the required licensing arrangements

All fundraising publicity must state quite clearly how the fundraising will benefit Aneurin Leisure and where further information of Aneurin Leisure's fundraising policy can be located.

## **6. External charities and fundraising**

Only charities approved by Aneurin Leisure's Senior Management Team will be allowed to fundraise on any Aneurin Leisure site. External charities will be required to complete all necessary documentation (Appendix A) and adhere to guidelines laid down by Aneurin Leisure.

Any charity raising funds on Aneurin Leisure premises will be asked to clarify what (if any) merchandise they will be selling. Any charity including goods or wares deemed inappropriate by the Senior Management Team may result in the external charity's application being refused.

External charities will be required to complete and forward to the partnerships, Funding and Contracts Manager a Fundraising and Returns Form (see appendix 2) in which they will declare sums raised during collections on Aneurin Leisure's sites.

If any Aneurin Leisure staff member wishes to fundraise on any of the Aneurin Leisure sites approval must be sought from the Senior Management Team. A response to the enquiry will be given as soon as possible.

The Marketing Manager needs to approve all literature regarding fundraising events, including events held by external charities on Aneurin Leisure sites.

## 7. Guidelines for policy implementation

To maximise the effectiveness and efficiencies of the services provided by Aneurin Leisure, guidelines that govern fundraising for the benefit of Aneurin Leisure can be found here. The policy establishes the fact that the co-ordination and direction of all gift solicitation is the responsibility of the Senior Management Team.

### a) Appeals for funds and approaches to donors

It shall be the responsibility of the Senior Management Team to coordinate the soliciting of funds from individuals, foundations, businesses, corporations and organisations in order to avoid an excessive number of solicitations in the name of Aneurin Leisure.

### b) Gift processing

It shall be the responsibility of the Strategic Business Unit Manager and other senior staff to inform the finance team when a gift is received and what purchase it shall be utilised for. It shall be the responsibility of the Finance Team to record and acknowledge receipt of all gifts, including cash, pledges, gifts-in-kind and legacies. The Finance team will ensure all donations are passed down, recorded and acknowledged, i.e. credit card and standing order payments. All gifts and donations should be processed through the finance team. Supporter anonymity will be protected whenever specified.

- When donations are received, a completed receipt of donations form must accompany them. **See appendix C.** An email confirmation will be issued to the member of staff who pays it in.
- The finance team is responsible for allocating the donation to the appropriate fund as described on the form by the fundraising office;
- All bank statements should be checked on a weekly basis to ensure amounts deposited in the bank agree to receipts. The Finance team and the Finance Director will meet twice-yearly to reconcile the accounting records and identify any errors/omissions.

### c) Gift acceptance

All gifts (appeal and non-appeal donations) must be conveyed to the Finance team at the earliest possible opportunity accompanied by all original correspondence pertaining to the gift, which will be filed by the Finance team.

A 'Receipt of Donation' sheet will be completed by the finance team and the following information must be included on the sheet:

- The donor's name and complete address must be provided. If the gift is from other than an individual i.e. corporation, organisation, charitable trust, etc. a contact name and job title should be reported in addition to that of the company.
- Email address and telephone number of the donor,
- Date of gift received
- Fund name/code to which gift is to be credited.

- Other special instructions i.e. is this a specified or unspecified donation.
- Does the donor require notification of when the donation was spend or what it was spent on?

See Appendix B for Flowchart

#### **d) Gift recording and acknowledgement**

- Upon receipt of a unique donation (i.e. not general fundraising) and the appropriate supporting documents the Finance team will record the donation and send acknowledgement of receipt to the donor.
- Donations will be recorded by the use of fund codes on the donor database.
- All donors will receive a thank you letter as soon as possible and gifts of less than £200 will be acknowledged by the Strategic Business Unit Manager, more than £200 will be acknowledged by the Managing Director.
- Staff involved in securing of a donation may also express written gratitude to the donor and forward a copy of the letter to the Partnerships, Contracts and Funding Manager.

See Appendix C for Flowchart

#### **e) Charity brand and fundraising literature**

The use of the charity brand (logo, charity name and charity number) will be agreed through the Senior Management Team. Any literature including brochures used to attract support shall be co-ordinated through the Marketing Manager and relevant departments so that the most accurate information appropriate to a particular fundraising effort is reflected.

Accordingly, the Marketing team shall ensure all literature is kept updated. The marketing office will be responsible for establishing and maintaining a master calendar that incorporate the schedules of all fundraising mailings, events and solicitations.

#### **f) Reports to sponsors**

It shall be the responsibility of the Finance Manager, with the support of the Strategic Business Unit Manager, to compile official reports on appeal donations/grants if requested by outside agencies or individual donors.

#### **g) Volunteers/Children**

Whenever volunteers are to be involved in fundraising efforts, the Human Resources Department will assist in the selection and recruitment of the volunteers by working with the Strategic Business Unit Managers to provide volunteers extra training and information required for the fundraising activity.

Aneurin Leisure will obtain explicit parent or guardian consent to involve children under the age of 16 in fundraising activities and will abide by any age relevant limits imposed by legislation

## **h) Solicitation of charitable trusts and corporates**

It shall be the responsibility of the Partnerships, Funding and Contracts Manager to co-ordinate the solicitation of charitable trusts and companies. This co-ordination will ensure that an excessive solicitation of any single source of funds is avoided.

## **i) Types of gifts**

Individuals and organisations may have several options to fulfil gift/grant commitments. The various gift types are:

- Gifts-in-kind
- Restricted grants / specified donations
- Major gifts
- Matching gift

## **j) Donor recognition**

The Senior Management Team will determine appropriate recognition for donors. Examples are:

- Placing the donor's name on a building
- Placing a plaque on a ward, etc.

Sponsor' names may be published in the Charitable Funds Annual Report, Aneurin Leisure's newsletter and social media. It will be at the Senior Management Team's discretion to inform the donor should there be a cost implication to their recognition, e.g. cost of plaque, etc.

## **l) Gifts in memoriam**

Gifts to honour, in remembrance or otherwise recognise individuals, whether the donor is living or by bequest, will be received by the Finance Team. It will be the policy of the Aneurin Leisure not only to receive such gifts but also encourage efforts to remember and honour donors.

## **m) Legacies**

- The Finance Director deals with all contracts regarding legacies. If Strategic Business Managers are contacted by potential legatos, they should encourage continued discussion.
- The Finance Director will notify the Senior Management Team the potential legacy and seek legal advice should there be requirements around the Will/bequest.
- When the legacy money is received, this will be processed through the finance team. The Finance Director will deal with all administrative arrangements including correspondence with the solicitors or family to acknowledge receipt of the monies. The Finance Director will also be responsible for confirming whether any publication of the bequest is appropriate.
- All new legacies will be communicated to the Trust Board.

- All legacies will be subject to the submission of an expenditure plan, prepared by the relevant Strategic Business Unit Manager for individual business units or by the Senior Management Team for non-specific funds, to ensure that the terms of the bequest can be met within a reasonable time.
- Aneurin Leisure will encourage general legacies but will adhere to the strict wishes of the sponsor at all times.

#### **n) Pledges**

Sponsors may be allowed to make pledge commitments to be paid over a specific period of time or when it is appropriate for items to be bought upon receipt.

#### **o) Donor research**

Research on donors and prospects is an acceptable and intrinsic part of fundraising. Data surrounding individuals and companies who wish to be associated with Charitable Funds will be stored in a confidential file within the marketing office. It must be stressed that any approaches undertaken by Aneurin Leisure will be handled in a sensitive and appropriate manner and comply with current data protection legislation.

#### **p) Database of donors**

Aneurin Leisure shall seek from internal departments, details of donors which may be used to solicit support.

Requirements vary depending on the type of communication with sponsors and what information is being processed. For example, supporters need to opt-in to receiving electronic marketing communications whereas direct mail can be sent with an opt-out. The [Code of Fundraising Practice](https://www.fundraisingregulator.org.uk/code-of-fundraising-practice/code-of-fundraising-practice/) sets out the key legal requirements and best practice standards for a range of fundraising techniques. Of particular note in relation to data protection are the Digital Media, Telephone Fundraising, and Direct Marketing sections of the Code, as well as the Data Protection Legal Appendices. (<https://www.fundraisingregulator.org.uk/code-of-fundraising-practice/code-of-fundraising-practice/>)

Aneurin Leisure will not retain any information on a sponsor or potential sponsor that they would not be comfortable sharing with the sponsor or prospective sponsor.

Aneurin Leisure will not share or use information in a manner that the sponsor would not wish.

#### **q) Fundraising Activities**

The Code of Fundraising practice recommends that organisations adhere to the most rigorous interpretation of the law applicable to an activity. Though the Code is intended to be comprehensive, fundraising events take many forms and as such the Code may not cover every aspect of a particular event. Event organisers should contact the Institute of Fundraising for further information if this is the case. The

Code should be read in conjunction with the Codes of Fundraising Practice, 'Charity Challenge Events' and 'Outdoor Fundraising Events in the UK'.

## **r) Outdoor Fundraising in the UK**

Aneurin Leisure will ensure that all outdoor fundraising events are delivered in a manner which ensures minimal impact on the natural environment as stipulated in the UK Charity Challenge Events code.

### **i) Fundraising Collections**

Aneurin Leisure will ensure that all fundraising collection is carried out sensitively to protect the organisation's reputation in the mind of the public.

The paragraphs below include stipulations as to a fundraiser's conduct and checks and balances for the handling of the resulting funds.

### **ii) Face-to-Face Activity**

Face to Face activity describes all forms of public engagement which is designed to initiate a lasting relationship with Aneurin Leisure. This includes face-to-face collections in addition to fundraising to solicit committed gifts by standing order and/or direct debits. Below are details the general principles which Aneurin Leisure will adopt during face-to-face activity to avoid causing public nuisance or disturbance:

- Avoiding behaviour which may harm the reputation of the fundraising profession
- Terminating a conversation when a person does not wish to be engaged
- Avoiding deliberate obstruction or pursuing the public excessively (Walk no more than 3 steps with a member of the public)
- Maintaining distance from shop entrances, cash points and other street features
- Avoiding members of the public who are seated or 'on duty'
- Use of "team bags" is to be discouraged.
- Aneurin Leisure fundraising staff must have clearly visible identification badges which include fundraiser's identity; contact details including telephone number and logo of Aneurin Leisure; be of sufficient font size to be readable for people with visual impairments.

Additionally

Aneurin Leisure fundraisers must be identifiable by the public from a distance of 5 metres. Aneurin Leisure branded clothing:

- Must be visible and identifiable.
- Must not be tied around waists or covered by non-charity branded clothing or other property, or in any other way be obscured.
- Must be clean and in good condition to ensure legibility and brand integrity

Aneurin Leisure will take actions to safeguard the public, including:

- Identifying and terminating conversations with potentially vulnerable members of the public

- Being clearly identifiable as a charity representative through appearance

Aneurin Leisure Fundraisers will inform the public, making explicit to potential sponsors:

- Who they work for
- How the fundraiser's organisation will be paid
- Length of commitment expected of the potential donor
- Financial nature of the sponsor "ask"

**Note failure to adhere to the above may result in the Fundraising Regulator imposing a financial penalty on Aneurin Leisure**

### **iii) Handling of Cash Donations**

Aneurin Leisure will adhere to the following good practice when handling cash donations resulting from face-to-face activities. Cash handling guidance is important for three main reasons:

- to protect the organisation from fraud, theft or embezzlement
- to protect staff or volunteers from accusations of dishonesty or the temptation to commit fraud
- to assure sponsors that their donations and gifts are used for the purpose for which they were given.

### **iv) Cash Handling Guidance**

- a) Cash must be collected, counted and recorded by two unrelated individuals, wherever possible. (Collection boxes must only be examined and opened by two unrelated individuals)
- b) Unsecured cash must never be left unattended or in an unattended environment.
- c) Cash must be counted in a secure environment in the presence of two individuals.
- d) Cash must be banked as soon as is practicable, Aneurin Leisure policy for the transportation of cash is that it is collected by the Trust's designated courier.
- e) Cash not banked immediately must be placed in a safe or other secure location and the Strategic Business Unit Manager must be notified.
- f) At the earliest possible date, reconciliation must be made between cash banked and income summaries. Where practical, this must be undertaken by a person independent of the counting and cashing up of the money.

### **Complaints**

Aneurin Leisure will respond to all complains from sponsors and members of the public in a timely, respectful, open and honest way in line with Aneurin Leisure's Complaints policy.

## Appendix A

### Permission and returns form for external fundraising charities

Name of external charity:

Address:

Tel. no.:

Email Address:

Charity reg. number:

Name of contact and job title:

Date(s) of fundraising collection on Aneurin Leisure's sites:

Fundraising appeal/collection details:

Describe any merchandise you will be selling – please include price list:

## Appendix B

### Receipt of a Donation

*(To be completed and sent to Finance Team, Regain Building, Mill Lane, Ebbw Vale, NP23 6GR)*

Donator's Name: \_\_\_\_\_

DonatorsAddress: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ Postcode: \_\_\_\_\_

Donator's email \_\_\_\_\_

Donator's Telephone Number: \_\_\_\_\_

Amount of Donation: \_\_\_\_\_

Date of Donation: \_\_\_\_\_

Specified Purpose of Donation: \_\_\_\_\_

\_\_\_\_\_

Does the Donator require anonymity or can we include this information in newsletters/annual accounts?

Yes/No

## Appendix C – Donation/Gift Process

