

FSC Fundraising policy

Agreed 26/03/2021 by Council

Date for review (26/03/23)

March 2021

Forest School Camps (FSC) believes that fundraising should be a positive experience for existing and potential donors and for our volunteers.

We aim to follow best practice in all areas of fundraising and to respect the needs and wishes of donors wherever possible. FSC is a registered Charity and refers to the [Fundraising Regulator's Code of Fundraising Practice](#) in all areas of fundraising.

1. Ethical fundraising

FSC is always grateful for donations and grants, but will not accept funds in circumstances:

- Where the donor has acted, or is believed to have acted, illegally in the acquisition of funds, for example where funds are tainted through being the proceeds of criminal conduct.
- Where acceptance of the funds would, in the judgement of the Executive Committee, having taken professional advice where appropriate, significantly damage the effective operation of FSC in delivering its mission, whether because such acceptance would:
 1. harm FSC's relationship with other benefactors or partners
 2. create unacceptable conflicts of interests
 3. materially damage the reputation of FSC
 4. detrimentally affect the ability of FSC to fulfil its mission in any other way.

For example, funds would not be accepted from organisations directly involved in the defence or arms sector, as these would be considered as working against the principles of FSC.

Anonymous donations

Because an informed decision on acceptance cannot be made, FSC cannot accept anonymous gifts over £5,000 and the identity of donors must be made available, at a minimum, to the Chair of Council or other member of the Executive Committee. This includes donations that are received through third parties.

2. Our supporter promise

- FSC is committed to making a difference to the lives of children and young people. That is why we encourage people to make a donation if they are able to, however, we appreciate that everyone's situation is different and we only want people to donate who are comfortable doing so.
- We will always respect donors' privacy and adhere to the EU's General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Regulations (PECR).
- Any supporter information given to us will be kept confidential. We will never pass on supporter details to a third party for marketing or fundraising purposes.
- We make sure we are as cost effective as possible, so the donations we receive can have the greatest impact.
- We will make it easy for supporters to tell us if they don't want to receive further fundraising asks from us, and we'll make sure we respect their wishes.

3. Treating donors fairly

We take all reasonable steps to treat donors fairly, enabling them to make informed decisions about their donation. We recognise that, from time to time, fundraisers may come into contact with individuals in vulnerable situations who may not be in a position to make informed decisions about their donation.

These vulnerabilities may be in relation to:

- physical and mental medical conditions
- disability
- learning difficulties
- times of stress or anxiety
- financial vulnerability
- language or communication barriers
- the influence of drugs or alcohol

We refer to the Institute of Fundraising's guidelines in their paper '[Treating Donors Fairly](#)' in identifying an individual who may be in a vulnerable position.

We also recognise that some vulnerable circumstances may change over time, affecting an individual more strongly at some points e.g. recently bereaved donors.

We recognise that children under the age of 16 represent a vulnerable group, but FSC do not seek actively to engage or fundraise from any person under the age of 16.

However, where young people under the age of 16 choose to donate or fundraise on our behalf, we require signed consent from their parents or guardians. Under certain circumstances, we may decide that it would not be appropriate to accept the gift, for example, where the child appears to be particularly vulnerable or the sums seem disproportionate to the age of the child.

We recognise that all donors are individuals with unique circumstances and needs. We will not discriminate or make assumptions about any individual donor, but use our judgement to act appropriately in the best interests of the donor. Staff are encouraged to demonstrate sensitivity and thoughtfulness in all interactions with donors.

We believe all donors should be treated with respect. In the case of individuals in vulnerable circumstances, additional steps may be taken to respond to their needs appropriately.

These steps may include:

- communicating in clear language
- repeating information where necessary
- avoiding jargon
- showing patience
- providing information in the clearest way possible, and providing information in alternative formats if necessary
- checking the donor's understanding at key points of the interaction
- asking if the donor would prefer to receive information in a different format or be contacted in a different way

Refusal of donations from individuals in vulnerable circumstances

FSC fundraisers should not accept a donation if they have reasonable grounds for believing the individual lacks the capacity to make a decision about a donation.

If, after a donation has been made, FSC receives information that the individual lacked the capacity to make the decision to donate, the donation should be returned.

4. Donations acceptance and refusal

General Principles

In deciding whether to accept or reject a donation, staff and trustees of FSC must act in the interests of the charity in pursuing its purposes.

FSC must, when deciding whether to refuse a donation, do so only if to accept it would be more detrimental to the charity than rejecting it.

Procedures for acceptance of donations

Multiple donations from a single individual or organisation should be considered at their cumulative value.

All donations of more than £10,000 will receive a due diligence check by FSC fundraising staff using the criteria set out in this document. All documentation for checks on donations between £10,000 and £20,000 will be completed by the Fundraising Committee alongside the Finance committee, whether or not the check raises any specific concerns.

All donations of £20,000 or above from new donors will be presented to the Executive Committee for approval at Executive meetings or outside those meetings, accompanied by relevant supporting documentation.

For donations between £10,000 and £20,000 or those relating to returning donors, Executive Committee will delegate this responsibility to the Treasurer.

FSC staff should raise any concerns they have with specific donations with the Executive Committee, even if under the £20,000 threshold.

Legacy gifts

Legacy gifts over £10,000 will be subject to the same procedures as donations from living individuals, as set out in this policy. Executors and family members may stand as a proxy for the deceased in discussions regarding the agreed use of the donation and similar matters, but only the deceased themselves will be taken into consideration for the acceptance or refusal of the donation.

Due Diligence Checks

The following checklist should be completed by fundraising staff and/or Finance Committee for all donations and grants in excess of £10,000, to the best of our ability and on the basis of the information available at the time.

For an organisation:

1. What is the organisation's legal status? (Stock exchange listing, registration at Companies House, Charity Commission etc.) If the organisation is outside the UK, relevant web searches should be conducted.
2. What is the source of the donation?
3. Are there investments which may be of concern?
4. Are public financial records in order including required returns?
5. If organisation is a subsidiary, what is their parent company (repeat questions 1-4)

6. Is there record of any recent activity, controversy or public perception of the organisation or its parent company which may be of concern given the acceptance policy guidelines above?
7. What are the details of the donation? (Include size of donation; purpose; what the organisation expects in return)

For an individual:

1. Is the individual already known or connected to FSC, its work or any individual already known and trusted by FSC?
2. Has the individual met with a member of FSC Fundraising, Finance or Executive Committees to discuss their donation?
3. Are there any concerns over the source of the donation (with a recognition that it may be difficult to establish the source of an individual's donations)?
4. Is there record of any recent activity, controversy or public perception of the individual which is considered to be of concern given the acceptance policy guidelines above?
5. What are the details of the donation? (Include size of donation; purpose; what the individual expects in return.)

A written record of any research should be saved, alongside any supplementary documents and meeting notes.

If concerns are raised on any point, then these should be passed on in the first instance to the Finance Committee and ultimately the Executive committee, according to the agreed thresholds.

The research framework above will be used to inform these following questions in relation to all proposed gifts over £10,000:

1. Does the donation result from illegal activities (including but not limited to unlawful discrimination, violation of international conventions on human rights or any form of theft, bribery, fraud, tax evasion, money laundering or terrorist activity) whether in the UK or overseas?
2. Would acceptance of the donation harm FSC's relationship with other donors, funders, partners or beneficiaries?
3. Would acceptance of the donation require action on behalf of FSC or its staff that is considered illegal?
4. Does the donation result from activities that are considered directly contradictory to the mission and vision of FSC or is tied to a specific activity which is not in keeping with the vision and mission of FSC?
5. Will acceptance of the donation give rise to an actual or perceived conflict of interest between the donor and their activities and the area of work being funded?

6. Would acceptance of the donation lead to the loss of staff or volunteers or the inability to recruit staff or volunteers?
7. Can it be shown clearly that the cost to FSC of accepting the donation will be greater than the financial value of the donation itself?

5. Event attendance by donors or other parties

Where donors – either individuals or as representatives of organisations - attend invite-only events hosted by FSC, a risk of reputation damage exists. To address this risk, a reasonable level of vetting using personal information provided to the charity and publicly available information should take place. This is in line with GDPR guidelines and our own Privacy Policy available on our website.

Decisions regarding event attendees will be taken on the same basis as donation acceptance: that the guest attending an event hosted by FSC would be detrimental to the achievement of the purposes of FSC, as set out in its constitution, set against the benefit of having the individual attend the event.

In reaching a decision, the ethics and values of FSC may be taken into account, but they cannot be the decisive factor.

This vetting will not take the form of the formal process set out as above, but when vetting is complete, a note of the outcome of vetting for the guest group will be added to event records and any concerns will be communicated in the first instance to the Fundraising Committee. If the concern is considered of a serious nature in relation to the guidelines above, a decision on the action to be taken will be taken by the Fundraising Committee, escalating to the Executive Committee if appropriate.

It is not practical to vet very large numbers of guests who are invited to events, particularly in circumstances when the guests are not known personally to FSC organisers e.g. inviting individual givers to an event. The guest list will be vetted around one week before the event takes place where appropriate.

It is recognised that in some cases only small amounts of verifiable information on individuals are available to FSC, and the risk involved in holding invite-only events with individuals not well known to the charity rises correspondingly.

In some cases supporters and other individuals may undertake to hold events in support of FSC, which may directly involve members of FSC staff. While due care should be taken in these third party events to ensure that associating with such an event would not represent a risk to FSC, it is recognised that the same level of vetting is not possible or practical at an individual level.

Events are also held by individuals in support of FSC which have no direct involvement by FSC staff or representatives. Though FSC has no direct control over these events and cannot be responsible for any aspect of independently held events, efforts should be made when staff are made aware of these events to ensure where possible that the name, logo or other information about FSC is used accurately and appropriately by organisers.

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