

8)ETHICAL FUNDRAISING POLICY (Model)

Reviewed: August 2025

For Review: August 2026

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1. Introduction

1.1 At Home-Start Kirklees, our fundraising promise to the general public and our existing supporters is that our fundraising, in all its forms, is legal, open, honest and respectful.

1.2 We will be honest about how donations are used to fulfil our mission, open about the methods we use to raise funds and who we work with, respectful to the wishes, preferences, personal information and circumstances of the people we interact with, and we will take all steps necessary to comply with the law and sector fundraising practice standards.

- We will take responsibility for our actions, ensuring that our fundraising is carried out in line with the Fundraising Regulator Code of Fundraising Practice.
- Nobody directly or indirectly employed by or volunteering for Home-Start Kirklees shall accept commissions or bonuses for fundraising activities on behalf of Home-Start Kirklees.
- No general solicitations shall be undertaken by telephone or

door-to-door to the public at their place of residence.

- If our fundraisers, those employed by Home-Start Kirklees or contracted to fundraise on our behalf, identify signs of vulnerability, they will respond appropriately and according to the principles of being legal, open, honest and respectful.
- We will always be respectful. This means being mindful of and sensitive to any particular need that a donor may have. It also means striving to respect the wishes and preferences of the donor.
- We will treat donors fairly. We will not discriminate against any group or individual.
- We will respond appropriately to the individual needs of our donors. We will consider all requests to adapt our approach (tone, language, communication technique) to suit the needs and requirements of the donor.

2. Legal requirements

2.1 This policy and related procedures take into account the following legal requirements and regulatory codes, standards and guidance:

- Charities (Protection and Social Investment) Act 2016
- Charities Act 2022
- Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Payment Card Industry Data Security Standards (PCI-DSS)
- Fundraising Regulator Code of Fundraising Practice (Appendix A)
- Institute of Fundraising Treating People Fairly Guidance
- Gambling Act 2005
- Mental Capacity Act 2005
- Bribery Act 2010.

3. Fundraising compliance

3.1 Home-Start Kirklees Trustees take ultimate responsibility for fundraising compliance. They delegate operational management of fundraising to the Business Development Manager and Director.

3.2 If the reach of a Home-Start Kirklees campaign or use of the Home-Start brand/trademark will appear nationally, the local Home-Start must consult with Home-Start UK before proceeding with this fundraising activity.

4. What are the fundraising activities covered by this policy?

4.1 Charitable Funds consist of but are not exclusively limited to:

- Money left in a legacy for the benefit of Home-Start Kirklees (or a certain part of Home-Start Kirklees)
- Money which has been raised through fundraising events
- Money which has been donated as a result of a fundraising appeal
- Corporate donations
- Charitable foundation funds
- Tangible personal property (gifts-in-kind)
- Property
- Pledges (for example Fixed Crowdfunding).
- Grant and foundation funds
- Cause based marketing
- Easyfundraising
- Giant Lottery Bonanza

5. Staff responsibilities

5.1 Charitable Funds are subject to a range of rules and guidance. The control and management of these Charitable Funds is the responsibility of the Board of Trustees of Home-Start Kirklees, who as the Trust Board of Home-Start Kirklees, delegate responsibility to Home-Start Kirklees Senior Management Team.

5.2 Staff at Home-Start Kirklees are responsible for implementing this policy and adhering to the related procedures. They should make themselves familiar with this policy as well as the [Code of Fundraising Practice](#) and the Institute of Fundraising (IoF) [Treating Donors Fairly guidance](#).

6. Vulnerable people

6.1 When responding to a supporter or member of the public in vulnerable circumstances, staff must take all necessary steps to understand if the supporter is able to make an informed decision about donating to Home-Start Kirklees and respond appropriately. If a supporter is deemed unable to make an informed decision the member of staff must not accept the donation.

7. Acceptable fundraising activities

7.1 Before fundraising activity can be initiated, approval must be sought from Home-Start Kirklees Director where the targeted amount is above £30,000.

7.2 All fundraising by means of lotteries, e.g. raffles, etc. must comply

with the required legislation and the Fundraising Regulator code of conduct.

- 7.3 All fundraising publicity must state quite clearly how the fundraising will benefit Home-Start Kirklees and where further information of Home-Start Kirklees fundraising policy can be located.
- 7.4 Any gift worth more than 1% of Home-Start Kirklees annual income in the year in which it is received will be declared in the annual statement of accounts.
- 7.5 It shall be the responsibility of the Business Development Manager 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 Home-Start Kirklees.
- 7.6 Appeals will contain truthful and accurate examples of the charity's work. Appeals will only name families and volunteers and use verbatim quotes with their prior agreement. Where families' own names and pictures are used, a full briefing will be provided prior to consent being given so they are prepared for how this will feel and what to expect from this.
- 7.7 It is often the difficult circumstances that families find themselves in which explain the need for Home-Start Kirklees' work and which prompt donors to give. It is legitimate and necessary for fundraisers to state these. Messages and images that portray the challenging circumstances that families encounter, if representing the truth, are not in themselves harmful, but a lack of balance is. Fundraising staff will seek to present a balanced picture of our work, whilst not shying away from portraying the very difficult circumstances that families find themselves in.

8. Donations or gifts

- 8.1 Home-Start Kirklees is committed to ensuring that the values of donors, organisations, companies and brands with whom we work, and from whom we receive funding, are consistent with our own organisational values.
- 8.2 We are pleased to work with, and to receive funding from, a range of external organisations and supporters to help it achieve its charitable objectives. Our trustees acknowledge that the generosity of our donors, supporters and sponsors enables us to carry out our charitable activities in line with our mission.
- 8.3 Home-Start Kirklees does not endorse, accredit or approve any corporate products, brands, services, initiatives or industries. Any activity or promotion deemed appropriate for the charity does not mean that Home-Start Kirklees endorses a particular product.
- 8.4 The charity cannot guard against all future events and it may only be at some later stage that problems surrounding a given source of funding become apparent. In which case we reserve the right to revisit our position as it is deemed necessary. However, we will take

steps to ensure that we have a robust decision-making process when considering prospective donations and the conditions attaching to them so that any future issues can be prevented as far as is reasonably possible.

- 8.5 All decisions on acceptance and refusal of donations must be grounded in Home-Start Kirklees' vision, purpose, values and operational policies. Furthermore, any decisions we make will be made on practical and principled grounds rooted in this policy, and not influenced by any individual's personal, political, religious or commercial interests.
- 8.6 Home-Start Kirklees will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.
- 8.7 Additionally, Home-Start Kirklees will not work with companies or individuals who participate in activities which:
- could cause detriment to the charity's reputation
 - will disproportionately decrease the amount of donations to further the work of the charity
 - undermine our vision and values
 - are from individuals, groups or organisations which are known to take advantage of vulnerable people
 - are personal gifts to Home-Start Kirklees staff members, which should be discouraged at all times
 - are from unknown sources of funding. Home-Start Kirklees will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal
 - potentially harm our relationships with other donors, service users, stakeholders or volunteers
 - expose us to undue adverse publicity or reputational risk
 - require unacceptable expenditure or additional charity resources.
- 8.8 In the cases above, we will conduct risk assessment to consider whether by accepting a donation or entering into a formal partnership, such an acceptance would damage the effective operation of the Charity in fulfilling its stated objectives, have an unacceptable and detrimental effect on the charity's reputation and relationships with other stakeholders, or lead to a demonstrable net decline in the assets of the charity
- 8.9 The trustees recognise that the business world is increasingly complex, fluid, opaque and multinational in nature. In some instances, a company or brand with a socially responsible stance or image may be a subsidiary of a parent company with a questionable track record and/or less principled credentials that could pose a reputational risk to Home-Start Kirklees. This requires fundraisers,

senior managers and trustees to take a nuanced, balanced and pragmatic approach to decisions - informed by sufficient due diligence and research - about the source and likely impact of corporate support

- 8.10 Given the above and the variety of ways in which Home-Start Kirklees might engage with a company, and the complexity of corporate ownership, we will make any decision to refuse a donation or engage in a fundraising activity on a case-by-case basis and informed by 'due diligence' research into the company's activities. Such checks will help us to determine the risk of an association with a particular company, provide evidence of the suitability of a partner and the likelihood of a successful partnership.
- 8.11 If supporters wish to make a donation to a specific area of Home-Start Kirklees work then they make a specified donation by providing written instruction to this effect with their donation. Home-Start Kirklees will always respect this. If Home-Start Kirklees is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way Home-Start Kirklees will refund the donation.
- 8.12 Refusals of donations or gifts: If a donation is received which may not be acceptable under the terms of this policy the Business Development Manager will alert the Director and Trustees at the earliest opportunity. This will be researched further, and the matter will be referred to the board with the necessary information regarding the donation. If the trustees choose to refuse a donation, they need to be able to demonstrate to the Charity Commission that they have acted in line with the charity's objects.
- 8.13 All anonymous donations of £25,000 (in one transaction or cumulatively) or more will be reported to [The Charity Commission](#) as a serious incident (in line with current [Charity Commission guidelines](#)). The Trustees should also report a suspect donation to [Action Fraud](#) and/or other appropriate authorities. It is the Business Development Managers responsibility to report suspicious donations to Chair and Treasurer of the board of Trustees.
- 8.14 Legacies: The Business Development Manager deals with all contacts regarding legacies. If an enquiry is made by potential legators, they must refer the conversation to the BDM, and agree a relationship management plan.
- The Business Development Manager will notify the senior management team of a potential legacy and seek legal advice should there be requirements around the Will/bequest.
- When the legacy money is received, this will be processed by the Administration and Finance Manager. The Administration and Finance Manager will deal with all administrative arrangements including correspondence with the solicitors or family to acknowledge receipt of the monies. This manager will also be responsible for confirming whether any publication of the bequest is appropriate.
- All new legacies will be communicated to the Board of Trustees, both when notified and when received.
- Home-Start Kirklees will encourage general legacies but will adhere to

the strict wishes of the legator at all times.

The charity may refuse a legacy where in its view it is under a moral obligation to do so, and where it is compromising a legal claim that has a reasonable prospect of success or has the authority of an Order from the Charity Commission.

8.15 Pledges (fixed crowdfunding): 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

8.16 Solicitation of charitable trusts and corporates

- It shall be the responsibility of the Business Development 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
- Home-Start Kirklees will not endorse products, treatments or companies. Sponsorship arrangements (for example of events) will be clearly publicised, and conflicts of interest considered as part of event risk management.

8.17 Fundraising Collections

- Home-Start Kirklees will ensure that all fundraising collections are carried out sensitively to protect the organisation's reputation in the mind of the public.
- Home-Start Kirklees will ensure that adequate permission for a static collection is obtained and can evidence this sufficiently where required; and that all collectors can be clearly identified.

8.18 Handling of Cash Donations - Home-Start Kirklees will adhere to the following good practice when handling cash donations resulting from face-to-face activities:

- Large amount of cash received (over £50) must be collected, counted and recorded by two unrelated individuals and counted in a secure environment, wherever possible. (Collection boxes must only be examined and opened by two unrelated individuals).
- Unsecured cash must never be left unattended or in an unattended environment.
- Cash must be banked as soon as is practicable.
- Cash not banked immediately must be placed in a safe or other secure location. The Administration and Finance Manager will take responsibility for the safe storage and banking of cash.
- 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.

9. Donor research and monitoring

- 9.1** 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. It must be stressed that any approaches undertaken by Home-Start Kirklees will be handled in a sensitive and appropriate manner and comply with current data protection legislation. Donor and prospect research activity is limited to the Business Development Manager who is fully briefed on the application of GDPR to this activity.
- 9.2** We will conduct proportionate due diligence on donors and partners based on the size and nature of the gift. For high-value or corporate donations, checks may include Companies House records, sanctions lists, and public reputation. All due diligence findings will be documented and reviewed by SMT and Trustees.
- 9.3** Documenting Fundraising Decisions: Home-Start Kirklees will maintain written records of key fundraising decisions, including acceptance or refusal of donations, partnership agreements, and risk assessments. These records will be retained in accordance with our data retention policy and made available to the Board of Trustees for oversight and compliance purposes.
- 9.4** Monitoring Third-Party Fundraisers: Home-Start Kirklees will actively monitor all third-party fundraisers to ensure compliance with the Fundraising Regulator Code of Fundraising Practice. This includes regular reviews, spot checks, and requiring third parties to report on their activities and adherence to our ethical standards.
- 9.5** The Business Development Manager shall be responsible for development, maintenance and compliance of a record of donors and prospects.
- 9.6** Home-Start Kirklees shall seek from managers and staff, details of donors which may be used to solicit support.
- 9.7** The names and addresses of donors and any other information about them will be recorded in accordance with the Data Protection Act. All such data will be regarded as confidential to Home-Start Kirklees.
- 9.8** Data held regarding potential donors will be destroyed when it becomes clear that they do not wish to be approached by Home-Start Kirklees in regards to fundraising, or 3 years after they have been identified as a prospect, whichever is sooner.
- 9.9** Home-Start Kirklees will respect the privacy and contact preferences of all donors and will respond promptly to requests to amend contact details, including the removal of contact details from the fundraising database.

9.10 On receipt, all donations should be processed through the donation record management system, which is maintained by the Business Development Manager.

10. Digital Fundraising Practices

10.1 Home-Start Kirklees recognises the importance of ethical digital fundraising. We will ensure that all online campaigns, including those on social media and third-party platforms, are transparent, secure, and respectful of donor privacy. We will clearly identify ourselves in digital appeals and provide secure payment options.

10.2 Opt-Out Mechanisms and Donor Preferences: All fundraising communications will include a clear and easy way for donors to opt out of future contact. We will respect donor preferences and ensure that requests to amend or remove contact details are processed promptly in accordance with data protection laws.

11. Accessibility and Inclusion

11.1 We are committed to making our fundraising activities inclusive and accessible to all. We will provide reasonable adjustments for people with disabilities and ensure that our communications are available in accessible formats and languages where appropriate.

12. Donation sharing with other organisations

12.1 From time to time, Home-Start Kirklees may receive a donation or funding which is intended for use by more than one charity.

12.2 Where the funding has been solicited e.g. via a grant application or proposal, clear documentation regarding the proposal, how funds will be used, and how the charities will account individually and collectively for expenditure, must be in place prior to agreeing a final receipt of funds.

12.3 Home-Start Kirklees is committed to providing reporting around donation sharing within a reasonable framework.

13. Complaints

13.1 Home-Start Kirklees will respond to all complaints from sponsors and members of the public in a timely, respectful, open and honest way in line with Home-Start Kirklees.

13.2 Any complaints received centrally will be logged. All complainants will be offered access to the Chair of Trustees.

13.3 Home-Start Kirklees Compliments, Concerns and Complaints Policy is located on the Home-Start Kirklees website.

13.Appendix A

[Code of Fundraising Practice | Fundraising Regulator](#)

Policy Changes

Version Number	Summary of Changes Made	Authorised By	Date Issued
1.0	Update on reference to job titles	Amy O Neill	12.08.24
	Finance Policy states specifically large amounts of cash over £50 must be double counted. Added for consistency.	Emma Franks	21.08.24
	Added additional info regarding <ul style="list-style-type: none">• Documenting decisions• Monitoring partners• Due diligence• Digital fundraising• Accessibility• Opt-outs	Amy O'Neill	1.08.25