



# Ethical Fundraising Policy

This policy sets out how we manage the ethical issues and social responsibility within fundraising.

Specifically, we aim at all times to be open, honest, fair and to operate in a legal way that meets not only the law, but also fundraising regulation and best practice, including the [Code of Fundraising Practice](#). We will take all reasonable steps to make sure our fundraising is carried out in a way that reflects positively on fundraising in general, including not unreasonably intruding on a person's privacy, not putting undue pressure on a person to donate, not using unreasonably persistent approaches and accepting a request to end an interaction.

Everyone who is involved in fundraising has a responsibility to be aware of and comply with the ethical issues and procedures in this policy.

## People And Organisations

### Trustees

The trustees are aware of and will comply with Charity Commission guidance [CC3a](#), regarding trustees responsibilities, particularly in relation to always acting in the charity's best interests and managing any conflicts of interest.

The trustees are also aware of and follow the 6 principles in Charity Commission 20 ([Charity Fundraising: a guide to trustees duties](#)).

We will always be honest about what we can achieve when asking for funds, submit realistic budgets, use the funds for the purpose intended and ensure that we provide any reports required, on time.

We will ensure that everyone is aware of and consistently complies with the [regulatory guidance on fundraising behaviours](#) and respond promptly and effectively to any [fundraising complaints](#).

## Supporters

Supporters have a right to expect us to provide clear, truthful information on our work, including reporting on how we spend the funding we are given and managing donors' information responsibly.

We will comply with the guidance issued by the Charity Regulators and UK law, including in respect of openness and honesty with our supporters and members of the public.

We will respect the privacy and contact preferences of our donors. We will respond promptly to requests to cease contacts or complaints and act to address their causes.

## Beneficiaries

How we represent our beneficiaries, in our communications, is always respectful of them and portrays them in the way they would wish to be seen. We will only use personal information that they have given consent for and for the purposes they have agreed and will not disclose anything that might put them at risk, particularly children and vulnerable people.

## Donors

We will ensure that there is not:

- Unreasonable intrusion on privacy.
- Unreasonably persistent fundraising.
- Undue pressure to donate.

And we will not accept a donation that is not in the charity's best interests.

We will also ensure that we do not mislead existing or potential donors, including by leaving out information, giving inaccurate or unclear information or exaggerating details. We will take all reasonable steps to treat existing or potential donors fairly, so that they can make an informed decision about any donation.

We take all reasonable steps to avoid asking for regular donations (for example, by direct debit) from anyone aged under 18.

## Vulnerable Individuals

In communicating we will be mindful of indicators that may suggest an individual may be vulnerable, using [REAL](#):

- **Retain** - and repeat the information you give him/her?
  - Do you have to repeat what you have said over and over again?
- **Explain** I- able to properly explain or communicate the decision they have made?
  - Are they joining in the discussion or just agreeing with what you are saying?
  - Are they asking questions that aren't related to what you are saying?
- **Able** - to understand what they are being told?
- **Listen** – able to listen, follow and understand the discussion taking place, or are they just repeating what you say?

If an individual shows signs of possible vulnerability, we will:

- Consider communication preferences.
- Not make assumptions about him/her.
- Ask him/her what they need and how you can help them better.
- Empathise and sympathise with him/her.
- Try asking questions in a different way.
- Summarise anything that has been decided or agreed in plain English.

We:

- Will not place any undue pressure on individuals to donate.
- Do not either solicit nor accept donations from anyone whom we know or think may not be competent to make their own decisions.
- Are sensitive to any particular need that a donor may have.

## Commercial Partners

We will not partner with any organisation that produces goods/services or acts in a way that is contrary to our charitable objects, or values.

We are aware of and comply with the Charity Commission [RS2 – Charities and Commercial Partners](#).

We will ensure that any commercial agreement represents a fair deal for the charity and.

- Clearly establishes what we expect to gain from it, prior to entering into an agreement.
- Set up appropriate systems to monitor and review the partnership.
- Take appropriate steps to identify and manage any risks.
- Ensure from the outset that the expectations of both the charity and the company have been agreed and.
- Can be managed effectively and appropriately.

We will disclose any commercial partnerships in our Annual Report.

## Statutory Authorities

They will also be mindful of [RR7 - Independence of Charities from the State](#). In particular, they will ensure that they remain independent and that any funding provided does not discharge the statutory duties of the State.

## Systems And Procedures

### Donations

If supporters wish their donation(s) to be used in a specific way, or for a specific purpose, they may make a restricted donation by providing written instructions with their donation. We will always respect this.

### Refusals

We abide by the law which requires us, in deciding whether to accept or refuse a donation, to consider which action is in the charity's best overall interest. We have adopted a Refusals & Acceptance of Donations policy, which covers this in detail.

### Due Diligence

We will undertake reasonable [due diligence of donors](#), to ensure they don't hold views or are involved in activities that might be incompatible with our role and damage our reputation. In terms of donations, we will ensure that any gift is safe to accept and, doing so, would be in the best interests of your charity. We will also consider issues, such [suspicious donations](#), or managing large anonymous gifts, or those from vulnerable individuals.

### Literature and Marketing

The trustees have adopted the Charity Commission's suggestions regarding funding and fundraising and are unanimous that all literature, appeals and campaigns clearly explain what would happen in the event of a failed appeal.

- All fundraising will be carried out with clear distinction and explanation as to whether it is a broad or specific appeal.
- For general appeals the trust will include all appeals and any literature will include a written disclaimer, relinquishing the donors right to have the property returned provided funds are used in accordance with the trust objects.
- All specific appeals will include a wider secondary purpose in keeping with the trusts objects which funds will be applied in the event of there being a surplus.
- In the event of there being a failed bid where the purpose of the appeal cannot be achieved (initial failure) the trust will donate the funds to the Norfolk Community Foundation ([norfolkfoundation.com](http://norfolkfoundation.com)), a charity dedicated to building stronger communities and improving the lives of people in Norfolk.

## AI Imagery

If we use AI generated, stock or digitally enhanced imagery, particularly where the subject may be emotive or challenging, we will ensure that the way in which we do so is not reasonably likely to mislead and, potentially, influence people. For example, we may make our policy on its use publicly available and use watermarks, alt text and/or footnotes and/or explain this in content text. We may not do so where its context and/or content is unlikely to mislead or influence. For example, an image of intergalactic war or use of a stock image on a post about opening hours.

We recognise that AI deep fakes can be difficult to identify but those using our social media will be made aware of the risk. We will not like, share or support in the comments any imagery or content that we reasonably suspect to be fake.

## Artificial Intelligence

We have adopted and comply with the [Charity AI Ethics & Governance Framework](#).

## Bullying And Abuse

The trustees have zero tolerance for abuse, including discrimination, bullying and sexual harassment, not only for fundraising staff and volunteers, but for anyone who is involved with our charity. We will maintain a culture of respect and equality, will ensure that there are processes to raise concerns that everyone is aware of and is confident to use and we will deal with any allegations of abuse promptly, sensitively and in accordance with employment and any other laws.

## Complaints

We have a clear and publicly available complaints procedure which also applies to third-party fundraisers. We ensure that those involved in fundraising are aware of this and able to advise members of the public about it. Any complaint would be investigated thoroughly and fairly to find out the facts of the case, avoiding unnecessary delay and we would always respond to complaints fairly and in a way that is proportionate.