



Fundraising Policy

2023-24

Last Reviewed By Trustees: September 2023

Introduction

- 1.1** At Level Trust, 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 and vision, 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.
- 1.2.1** We will take responsibility for our actions, ensuring that our fundraising is carried out in line with the Code of Fundraising Practice
<https://www.fundraisingregulator.org.uk/sites/default/files/fr-code/Code%20Fundraising%20Practice%20October%202019.PDF>
- 1.2.2** Nobody directly or indirectly employed by or volunteering for Level Trust shall accept commissions or bonuses for fundraising activities on behalf of Level Trust.
- 1.2.3** No general solicitations shall be undertaken by telephone or door-to- door to the public.
- 1.2.4** If our fundraisers, those employed by Level Trust 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.
- 1.2.5** 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.
- 1.2.6** We will treat donors fairly. We will not discriminate against any group or individual.
- 1.2.7** 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.

Legal requirements

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

- Charities (Protection and Social Investment) Act 2016
- Charities Act 2006
- Charities Act 1992
- 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
- Institute of Fundraising Treating People Fairly Guidance
- Gambling Act 2005
- Mental Capacity Act 2005
- Bribery Act 2010

Fundraising compliance

1.4 Level Trust Trustees take ultimate responsibility for fundraising compliance. They delegate operational management of fundraising to the CEO and Leadership Team.

1.5 The CEO has the role of Level Trust's Fundraising Compliance Officer.

What are the fundraising activities covered by this policy?

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

- Money left in a legacy for the benefit of Level Trust (or a certain part of Level Trust)
- Money which has been raised through fundraising events
- Money which has been donated as a result of a fundraising appeal
- Corporate sponsorship
- Charitable foundation funds
- Tangible personal property (gifts-in-kind)
- Property

- Shares or bonds
- Pledges (for example Fixed Crowdfunding)

Staff responsibilities

1.7 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 Level Trust, who as the Trust Board of Level Trust, delegate responsibility to Level Trust's CEO and Leadership Team.

1.8 Staff at Level Trust 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 Fundraisings (IoF) Treating Donors Fairly guidance.

1.9 Roles with responsibility for fundraising are:

- Grants & Trusts Fundraising Manager (Catherine Farrell)
- Community Engagement Manager (TBC subject to appointment)
- CEO (Jennie White)
- Deputy CEO (Tina Edwards)
- Other colleagues who from time to time will be directly or indirectly involved in fundraising activity

Fundraising by staff

1.10 Participation in fundraising activities (for the purposes of this policy, meaning specifically participating in or completing the activity) by staff is voluntary and should not be imposed on individuals. The existing charity insurance arrangement covers staff for certain 'low risk' fundraising activities. However, approval must be sought from the CEO or Deputy CEO prior to the commencement of the activity. Any event not covered by this policy must obtain its own insurance cover and be approved by Level Trust's CEO or Deputy CEO.

Vulnerable people

1.11 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 Level Trust and respond appropriately. If a supporter is deemed unable to make an informed decision the member of staff must not accept the donation.

1.12 Level Trust will ensure two members of staff are present when receiving a donation from a vulnerable donor e.g. with illnesses or conditions

which affect their judgement.

Acceptable fundraising activities

1.13 Before fundraising activity can be initiated, approval must be sought from Level Trust's CEO or Deputy CEO.

1.14 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 Level Trust and where further information of Level Trust's fundraising policy can be located.

1.15 It shall be the responsibility of the CEO or Deputy CEO 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 Level Trust.

Donations or gifts

1.16 Level Trust in deciding whether to accept or decline a donation or gift 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.

1.17 Additionally, Level Trust 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 associated with unsuitable products, corporate or an unsuitable individual
- are from individuals, groups or organisations which are known to take advantage of people in poverty
- are personal gifts to Level Trust staff members, which should be discouraged at all times
- are from unknown sources of funding. Level Trust 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

1.18 If supporters wish to make a donation to a specific area of Level Trust's work, then they make a specified donation by providing written instruction to this effect with their donation. Level Trust will always respect this. If Level Trust is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way Level Trust will refund the donation.

1.19 Refusals of donations or gifts

- If a donation is received, which may not be acceptable under the terms of this policy Level Trust's accountant will alert the CEO (or the Deputy CEO if the CEO is not available) 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.
- All anonymous donations of £25,000 or more will be reported to The Charity Commission as a serious incident (in line with current Charity Commission guidelines) and will follow Level Trust's guidance on the handling of such donations.

1.20 Donation or Gift processing

- All donations or gifts must be conveyed to the CEO and Level Trust's accountant at the earliest possible opportunity accompanied by all original correspondence pertaining to the donation or gift, which will be filed by the Finance team. A receipt of donation form should also be completed with the donor, including their full name and contact details, and address
- On receipt, all donations should be processed through the donation record management system, which is held on the Fundraising Drive

1.21 When donations or gifts are received, a completed receipt of donations form must accompany them. The finance team is responsible for allocating the donation to the appropriate fund

1.22 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 (where available) and telephone number of the donor
- Date of gift received
- Other special instructions i.e. is this a specified or unspecified donation
- Does the donor require notification of when the donation was spent or what it was spent on?
- Upon receipt of a unique donation (i.e. restricted (for a specific purpose) or unrestricted (for any charitable purpose) donation) and the appropriate supporting documents the finance team will record the donation and send acknowledgement of receipt to the donor
- Is the donor happy for their donation to be acknowledged publicly e.g. on the Level Trust website / in the Level Trust annual report

1.23 Gifts in memoriam - donations or 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 Level Trust not only to receive such gifts but also encourage efforts to remember and honour donors

1.24 Legacies

- The Level Trust finance team deals with all contacts regarding legacies. If staff are contacted by potential legators, they must refer the conversation to the CEO and/or Level Trust's accountant, and agree a relationship management plan
- The finance team will notify the relevant managers and the CEO 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 finance team. The finance team will deal with all administrative arrangements including correspondence with the solicitors or family to acknowledge receipt of the monies. The finance team 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 by Level Trust's accountant, both when notified and when received
- All legacies will be subject to the submission of an expenditure plan, prepared by the relevant manager for individual services or by Level Trust's accountant for non-specific funds, to ensure that the terms of the bequest can be met within a reasonable time
- Level Trust will encourage general legacies but will adhere to the strict wishes of the legator at all times

1.25 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

1.26 Solicitation of charitable trusts and corporates

1.26.1 It shall be the responsibility of the Fundraising 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

1.26.2 Level Trust 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

1.27 Fundraising Collections

1.27.1 Level Trust will ensure that all fundraising collection is carried out sensitively to protect the organisation's reputation in the mind of the public

1.27.2 Level Trust 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

1.28 Handling of Cash Donations - Level Trust will adhere to the following good practice when handling cash donations resulting from face-to-face activities:

1.28.1 Cash 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)

1.28.2 Unsecured cash must never be left unattended or in an unattended environment

1.28.3 Cash must be banked as soon as is practicable

1.28.4 Cash not banked immediately must be placed in a secure location and the CEO or Deputy CEO must be notified

- 1.28.5 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

Reports to sponsors

- 1.29 It shall be the responsibility of the Deputy CEO, with the support of the Fundraising Manager and CEO, to compile official reports on appeal donations/grants if requested by outside agencies or individual donors

Donor recognition

- 1.30 A donor to Level Trust is entitled to appreciation for his/her donation. Each donation will be acknowledged by the Deputy CEO if under £500 and the Chief Executive if over £500
- 1.31 Sponsors' names may be published in Level Trust's annual Impact Report, annual Trustees' Report, newsletters, website and/or social media. It will be at the CEO's/Deputy CEO's discretion to inform the sponsor should there be a cost implication to their recognition, e.g. cost of plaque, etc.

Donor research

- 1.32 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 Level Trust 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 Fundraising Manager and Senior Leadership Team, with these members of staff fully briefed on the application of GDPR to this activity

Database of donors

- 1.33 The Fundraising Manager shall be responsible for development, maintenance and compliance of a record of donors and prospects, working closely with the Community Engagement Manager and Deputy CEO and accountable to the CEO
- 1.34 Level Trust shall seek from staff, details of donors which may be used

1.35 Data held regarding potential donors will be destroyed when it becomes clear that they do not wish to be approached by Level Trust in regard to fundraising, or 3 years after they have been identified as a prospect, whichever is sooner

1.36 Level Trust 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

Donation sharing with other organisations

From time to time, Level Trust may receive a donation or funding which is intended for use by more than one charity.

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.

Level Trust is committed to providing reporting around donation sharing within a reasonable framework.

Complaints

1.37 Level Trust will respond to all complaints from sponsors and members of the public in a timely, respectful, open and honest way in line with Level Trust's **Complaints Policy**.