

APPROVED



St Luke's Fundraising Policy

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ORIGINAL APPROVAL DATE	October 2022
RE-APPROVAL DATE	October 2023

Introduction

At St Luke's Sheffield we will always aim to ensure that all of our income generation is legal, open, honest and respectful.

We will be transparent 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.

The Policy outlines the principles that must underpin all fundraising activities in which St Luke's are involved and aims to:

- Maximise benefit from fundraising opportunities and donations
- Ensure accountability and transparency of all financial transactions
- Ensure donors receive appropriate support, contact and recognition.

The purposes of this Policy include:

- To support existing fundraising activities, guide new ones and provide an acceptable framework within which to raise funds.
- To guide the development, operation and management of fundraising activities to raise funds.
- To ensure a consistent standardised approach to forms of fundraising across St Luke's including appropriate financial management, governance, policy and regulatory compliance.
- To maintain a high standard of public accountability and ethical practice in fundraising.
- To ensure that our fundraising is carried out in line with the Fundraising Regulator's Code of Fundraising Practice.

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
- Charity Commission
- Data Protection Act 2018 (DPA)
- General Data Protection Regulation (UK GDPR)
- Privacy and Electronic Communications Regulations 2003 (PECR)
- Fundraising Regulator Code of Fundraising Practice
- Gambling Act 2005.

Code of Fundraising Practice – The Fundraising Regulator

St Luke's commits to adhere to the Fundraising Code of Practice, which sets out the responsibilities that apply to fundraising carried out by charitable institutions and third-party fundraisers in the UK. (See Appendix 1 for the full Code of Fundraising Practice).

The code aims to:

- Promote a consistent, high standard of fundraising
- Make sure charitable institutions, their governing bodies and fundraisers know what is expected of them
- Set out the standards we use when considering complaints
- Provide a benchmark for organisations and fundraisers to assess their practices against so they can identify necessary training and monitor and set policy priorities for their fundraising
- Develop a culture of honesty, openness and respect between fundraisers and the public.

1. Donations

1.1 Acceptance of donations or gifts

St Luke's will be guided by the Code of Fundraising Practice and the St Luke's Ethical Fundraising Policy on the acceptance and refusal of donations. St Luke's decision on whether to accept or decline a donation or gift will always consider the charity's best overall outcome ensuring these align with our charitable aims and objectives.

All donations received are deemed as unrestricted income unless specified and subsequently agreed with the Fundraising Team. If St Luke's is unable to accept the request for the specified donation and the donor does not want the donation to be used in any other way, St Luke's will not accept or will refund the donation on the basis of transparency.

1.2 Refusals of donations or gifts

- If a donation is received, which may not be acceptable under the terms of this policy, the Head of Fundraising will alert the Director of Income Generation, Media & Marketing and the CEO at the earliest opportunity. This will be investigated further and if required, will be referred to the board with the necessary information regarding the donation.

- All anonymous donations of £10,000+ or donations of a potentially suspicious nature will be alerted to the Head of Fundraising, Director of Income Generation, Media & Marketing and the CEO to decide on whether The Charity Commission need to be notified (in line with current Charity Commission guidelines and our Anti Money Laundering Policy), and will follow guidance on the handling of such donations.

1.3 Donation or Gift processing

All donations received must be processed by our Supporter Relations Team in accordance with the Fundraising Code of Practice and St Luke's cash handling policy.

2. Supporter Contact Preferences

All supporters have the legal right to update and/or change their 'consent' preferences at any time. The fundraising team will work closely with the Data Protection Officer (DPO) and will abide by the St Luke's Data Protection Policy with regards to our supporter data. We will meet all legal requirements relating to data protection as per our policy, including:

- The Data Protection Act 2018 (DPA);
- The UK General Data Protection Regulation (UK GDPR);
- The Privacy and Electronic Communications (EC Directive) Regulations (PECR) 2003, including the requirements of the Telephone Preference Service (TPS) and the Fundraising Preference Service (FPS).

2.1 Requests for removal from database

- Once informed of a change of 'consent', the Supporter Care Team must update St Luke's CRM within 2 working days of the request by following the current Fundraising Preference Process. All 'consent' preferences must be followed for all mailings/emails and phone contacts.
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- Where the individual requests their data to be "Erased" or "Deleted", this will be recognised as a Request for Erasure under the UK GDPR and DPA. The DPO will be immediately informed. The DPO will also handle the request.

2.2 Fundraising Preference Service requests

The Fundraising Preference Service was set up in 2015 with the Cross-Party Review of Fundraising Regulation agreed that a service should exist for members of the public to control the nature and frequency of direct marketing approaches that they receive, including fundraising communications. This is in addition to the existing Telephone Preference Service and Mail Preference Service where individuals can opt out of all unsolicited direct marketing phone calls and mailings from all types of organisations, including charities.

The service is a website where members of the public can request that named charities stop contacting them with direct marketing (via post, email, text or phone).

All colleagues must follow the 'Managing FPS Requests' process when notified of an FPS request from a St Luke's supporter. Any questions must be directed to the Head of Fundraising.

3. Fundraising Activities

St Luke's Fundraising Team will endeavour to follow all standards outlined by the Code of Fundraising Practice when raising income from a range of specific fundraising methods.

4. Due diligence of Donations

St Luke's will endeavour to carry out appropriate levels of due diligence dependent on the size and nature of the donation as per the Code of Fundraising Practice prior to accepting the donation. Due diligence must be carried out to assess an organisation or person St Luke's is considering a partnership or association with. This is ensuring St Luke's is protected from any potential harm to its reputation and/or finances.

Due diligence must be carried out by the Account Manager of the potential partnership and logged on the CRM using the Due Diligence form as a guide. The Head of Fundraising must be notified if anything contentious is unearthed during this research. The Head of Fundraising will then escalate to the Director of Income Generation, Media & marketing, the CEO & the COO.

5. Fundraising Agreements

St Luke's will follow the guidance on Fundraising Agreements as per the Code of Fundraising Practice and will ensure all third-party fundraisers and commercial partners have a written agreement in place for both community and corporate supporters.

6. Fundraising Complaints

All complaints made to the Fundraising department must be notified to the Head of Fundraising in the first instance and then escalated where required. The St Luke's Complaints policy must be followed and all complaints must be logged each quarter, reported to the Board.

7. Review

It is recommended that this policy is reviewed on an annual basis.

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Date: October 2022

Review: October 2023