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SEND the Right Message Fundraising Policy

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1 Introduction

At STRM (SEND the Right Message) 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.

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.

1.2.2 Nobody directly or indirectly employed by or volunteering for STRM shall accept commissions or bonuses for fundraising activities on behalf of STRM.

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 SEND the Right Message 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 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.

2. Legal requirements

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

- Charities (Protection and Social Investment) Act 2016
- Charities Act 2006 Fundraising Policy 4 Version 1: Aug 2018
- Charities Act 1992
- Data Protection Act 2018
- General Data Protection Regulation (GDPR).



- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Fundraising Regulator Code of Fundraising Practice
- Institute of Fundraising Treating People Fairly Guidance
- Gambling Act 2005
- Mental Capacity Act 2005
- Bribery Act 2010

3. Fundraising compliance

3.1 STRM Trustees take ultimate responsibility for fundraising compliance.

They delegate operational management of fundraising to the Management Committee.

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 STRM.
- 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)

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 STRM

5.2 Staff at STRM is responsible for implementing this policy and adhering to the related procedures. They should make themselves familiar with this Fundraising Policy

5.3 General behaviour – Your fundraising must be legal and must be open, honest, and respectful.

5.4 You must always be polite to people.

5.5. You must not unfairly criticise or insult other people or organisations.



5.6. You must not encourage a donor to cancel or change an existing donation in favour of a donation to another charitable institution.

5.7 While reasonable persuasion is allowed, you must not fundraise in a way which is an unreasonable intrusion on a person's privacy, is unreasonably persistent or places undue pressure on a person to donate.

5.8 You must not continue to ask a person for support if that person clearly indicates – by word or gesture – that they do not want to continue to speak to you. You must end the conversation in a polite way.

6. Treating Donors Fairly guidance.

6.1 Roles with responsibility for fundraising are:

- Community Fundraiser
- CEO
- Other colleagues who from time to time will be directly or indirectly involved in fundraising activity

6.2 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 of STRM, prior to the commencement of the activity.

Any event not covered by this policy must obtain its own insurance cover and be approved by STRM Trustees.

6.3 Vulnerable people

6.3.1 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 SEND the Right Message and responding appropriately. If a supporter is deemed unable to make an informed decision the member of staff must not accept the donation.

6.3.2 SEND the Right Message 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.



6.3.3 You must consider the needs of any possible donor who may be in vulnerable circumstances or need extra care and support to make an informed decision.

6.3.4 You must not exploit the trust, lack of knowledge, apparent need for care and support or vulnerable circumstances of any donor at any time.

6.3.5 You must not take a donation if you know, or have good reason to believe, that a person lacks capacity to decide to donate, or is in vulnerable circumstances which mean they may not be able to make an informed decision.

Among other things, you should consider:

- any physical or mental-health condition the person may have
- any disability the person may have
- any learning difficulties the person may have
- whether the person is facing times of stress or anxiety (for example, following the death of a loved one or redundancy)
- whether a donation is likely to affect the person's ability to
- sufficiently care for themselves or leave them in



financial
hardship.

- how well the person can communicate and understand what they are being told.
- whether the person is under the influence of alcohol or drugs; and
- the person's age.

6.3.6

If a donor donates while they do not have the capacity to make an informed decision, you must return the money to them.

6.3.7 You must take all reasonable steps to avoid asking for regular donations (for example, by direct debit) from anyone aged under 18. Young people aged between 16 and 18 can take part in charity lotteries, but if you receive money for a lottery from a child or young people aged under 16 you must return the money.

For more standards on fundraising that involves children (in particular, age limits and data protection), see section



10 Fundraising involving children. Acceptable fundraising activities.

10.1 Before fundraising activity can be initiated approval must be sought from the CEO of SEND the Right Message.

10.2 All fundraising by means of lotteries, e.g., raffles, etc. must comply with the required licensing arrangements.

11.. Donations or gifts

11.1 STRM 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.

11.2 Additionally STRM 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 individual:



e.g., arms dealings and tobacco; are from individuals, groups or organisations which are known to take advantage of older or vulnerable people; receive personal gifts to STRM staff members, which should be always discouraged; are from unknown sources of funding. STRM 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.

11.3 Refusals of donations or gifts

If a donation is received which may not be acceptable under the terms of this policy the CEO will report to the Trustees of STRM. 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)

12. Donation or Gift processing

12.1 All donations or gifts must be conveyed to the CEO at the earliest possible opportunity accompanied by all original correspondence pertaining to the donation or gift. 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 maintained by the Fundraising Volunteer.

When donations or gifts are received, a completed receipt of a donation form must accompany them.

12.2 A 'Receipt of Donation' sheet will be completed by the fundraising volunteer 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;



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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.

13. Responsibilities relating to fundraising involving children

There are some activities which children and young people cannot carry out. The age restriction depends on the activity and where it is carried out.

These activities include: street and house-to-house collections; lotteries or raffles; and events involving alcohol.



13.1.1 You must keep to any relevant age limits set by law when organising fundraising activities.

13.1.2 You must make sure that your staff understand their responsibilities and what they must do in relation to activity organisers, the children taking part, and the parents or guardians of those children.

13.1.3 You must give the children or young people taking part, and their parents or guardians, guidance on how to carry out fundraising safely and legally.

13.1.4 You must not give children under 16 overall responsibilities for handling money or responsibility for counting collected money.

13.1.5 You must use the Disclosure and Barring Service (in England and Wales), Disclosure Scotland (in Scotland) and Access NI (in Northern Ireland) to carry out checks on any adults working with children, if the law says you must do this.

13.1.6 You must only contact children on school premises if you have the approval of the head teacher or a member of the school's staff chosen by the head teacher, and you must follow any procedures you have agreed with them.



13.1.7 You must get permission before taking or publishing photographs of children. If the child is over 13 years old, they can give this permission themselves. If they are under 13, you must get permission from their parents or guardian.

13.1.8 You must not allow anyone under the age of 16 to carry out house-to-house collections.

14. Processing donation

Cash

14.1.1 You must not leave unsecured cash unattended.

14.1.2 You must count cash in a secure place.

14.1.3 You must make sure that all cash you have collected is counted and recorded by two unrelated people, wherever possible.

14.1.4 You must make sure that cash donations are placed in a sealed container or collecting box.

14.1.5 If you do not bank cash immediately, you must put it in a safe or another secure place.



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14.1.6 You must bank cash as soon as possible. Pass to the CEO of STRM as soon as possible to bank donations as quickly as possible.

14.1.7 You must check that the cash you have banked matches your income summaries, as soon as possible. If possible, someone who is not involved in counting or cashing up the money must do this.

14.1.8 Floats

A person you have nominated must sign for your floats.

You must keep floats and any money made from sales separate from the cash handler's personal money.

If you use money from a float for petty-cash spending, you must record this separately and keep any receipts.

14.1.9 Cheques

You must not give change in return for cheques.

You must not issue a refund for a cheque donation until the cheque has cleared and the money has appeared in your organisation's account.



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14.1.10 Gift Aid

Gift Aid allows registered charities to reclaim tax on donations made by UK taxpayers. This effectively increases the amount of the donation.

You must only claim Gift Aid for a donation if all of the Gift Aid conditions are met. One of these is that a donor's Gift Aid declaration must meet HMRC's guidance on Gift Aid.

15. Fundraising communications and advertisements

Charitable institutions tell people about their cause in different ways. It is important that your communications are appropriate to your audience and provide clear information so that donors can make an informed decision. This section covers standards related to marketing your campaign. It also includes standards for fundraising over the phone and by post (for emails and messages to mobile devices see section 10 Digital).

15.1.1 You must meet the UK Code of Non-broadcast Advertising and Direct and Promotional Marketing (CAP Code) and the UK Code of Broadcast Advertising



(BCAP Code) and make sure all advertisements are legal, decent, honest, and truthful.

15.1.2 You must be able to show that you have taken all reasonable steps to make sure that communications are suitable for the people they are aimed at.

15.1.3 Your marketing communications must not contain anything that is likely to cause serious or widespread offence. You must take particular care to avoid causing offence on the grounds of race, age, religion, sex, sexual orientation, or disability. This will vary according to the context, type of communication, audience, product, and commonly accepted standards of decency at the time of the communication.

15.1.4 Your marketing communications must not contain anything that is likely to cause fear or distress without a justifiable reason. If you can justify it, the fear or distress likely to be caused must not be excessive.

15.1.5 You must not use a claim or image that some people may find shocking merely to attract attention. If you use images that some people may find shocking, you should give warnings about this material.



15.1.6 You must make sure literature includes all information that you have to include by law, for example, registered charity status or number, full company name and registered office if this applies.

15.1.7 If you are fundraising in partnership with one or more charitable institutions, you must state how the money will be split between the organisations.

15.1.8 If you change any of the details in case studies or use real examples to inspire a case study, you must make this clear and you must be able to prove that the case study is representative of a real situation.

15.1.9 You must be able to justify how often you contact people, balancing the need to communicate with not overwhelming or bombarding people.

15.1.10 You must meet trademark and copyright law and make sure that you get permission to use images, logos and so on from the people or organisations who hold the rights to these.

15.2 Reports to sponsors

It shall be the responsibility of the Fundraising Volunteer with the support of the CEO, to compile



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official reports on appeal donations/grants if requested by outside agencies or individual donors.

16. Donor recognition

16.1 Each donation will be acknowledged by the CEO.

16.2 Sponsor' names may be published in the STRM Annual Report, newsletter, website and/or social media.

17. Database of donors

17.1 The Fundraising Volunteer shall be responsible for development, maintenance and compliance of a record of donors and prospects, working closely with the Director and accountable to the Trustees

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

17.3 STRM will respect the privacy and contact preferences of all donors and will respond promptly to requests to amend contact details, including the



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removal of contact details from the fundraising database

Processing personal data (information)

Protecting personal data makes sure people can trust you to use their data legally, fairly, and responsibly. This section sets out the standards we expect when you process personal data, including standards related to direct marketing.

The rights people have over their data

The General Data Protection Regulation (GDPR) gives people the following rights in law regarding their personal data.

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

Rights in relation to automated decision making and profiling special category data.



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Certain types of data need stronger protection. This includes, for example, information relating to their:

race;
ethnic background;
political opinions;
religion;
trade-union membership;
genetics;
biometrics (computerised details used to identify a person through their unique characteristics, for example through fingerprint scanning and facial recognition);
health;
sex life; or
sexual orientation (sexuality).

Guidance on conditions for processing special category data is available from the ICO.

You must meet all legal requirements relating to data protection, including:

the Data Protection Act 2018;
the General Data Protection Regulation (GDPR); and



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the Privacy and Electronic Communications (EC Directive) Regulations (PECR) 2003, including the requirements of the Telephone Preference Service (TPS), and any revisions to e-privacy legislation that results from the European Commission's review of PECR that began in 2017.

You must keep up to date with guidance from the ICO. This includes the ICO's direct marketing guidance, its GDPR consent guidance and legitimate interests' guidance.

If you process personal data, you must pay the data protection fee to the ICO, unless you are exempt.

When processing personal data (including information that is available to the public) for any purpose, you must: have a lawful basis (a valid legal reason) for collecting, using, and keeping the personal data (for more information on the grounds (or 'conditions') for processing personal data, see articles 6 and 9 of the GDPR);

give people concise, open, understandable and easily accessible information about how you will process their personal data, including who your organisation is, what you are going to do with their personal data and who (if anyone) you will share it with; only process personal



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data in ways that the person whose data it is would reasonably expect; and not do anything unlawful with personal data.

18. Complaints

18.1 STRM will respond to all complaints from sponsors and members of the public in a timely, respectful, open and honest way in line with STRMs Complaints Policy.

This policy was adopted by SEND the Right Message Charity	31 August 2021
Date to be reviewed	31 August 2022
Signed on behalf of the provider	
Name of signatory	Vicki Lamb
Role of signatory	Chair of Trustees
Next Review August 2023	31st August 2023