

## **Reach Learning Disability Ethical Fundraising Policy**

This Ethical Fundraising Policy is agreed and held by our Board of Trustees.

### **1. About Reach Learning Disability and our Vision and Values**

Reach Learning Disability (Reach) exists to support people with learning disabilities in Nottinghamshire. Reach is a registered charity and company limited by guarantee. It is governed by a Board of Trustees (the Board). The Board meets on a quarterly basis.

#### **Our Vision**

A community where people with learning disabilities can make a good future for themselves – a safe, healthy and happy life filled with purpose, achievement, opportunity and friendship.

#### **Our Mission**

We work to achieve an enduring and positive impact by supporting all those who place their trust in us – people with learning disabilities, their families and carers. To accomplish this, we will bring together the support of extraordinary people in our community and the imagination, skills, commitment and compassion of our team.

#### **Our Values**

- everything we do should inspire trust and confidence.
- we all need to feel safe, encouraged and valued.
- everyone has the right to aspire.
- understanding individual needs takes time and care.
- we all have the right to share in the life of the community.
- the voices of people with learning disabilities AND their families must be heard.
- our commitment to high standards must underpin all that we do.

### **2. Rationale for Fundraising**

To help guarantee the availability of ongoing funds to pay for its work, Reach aims to maintain a broad base of different sources of funding. The purpose of this policy is to ensure clarity and openness to all our stakeholders.

We build relationships with multiple types of stakeholder to create stable, diverse and increasing income streams to help cover the costs of delivering high-quality services to people with learning disabilities and their families in Nottinghamshire. This includes contributions towards operational costs, funding small and major capital projects, and supporting innovation and the development of best practice.

Our stakeholders with regards to fundraising include grantmakers, commissioners, community and sports groups, educational establishments, local and national companies and individual members of the general public. The primary aim of developing these relationships is to secure cash income, although it can also be for the purpose of securing sponsorship, volunteers, support-in-kind and developing stronger local, regional and national partnerships.

We subscribe to the Fundraising Levy and the Fundraising Promise as required by the Fundraising Regulator.

### **3. Key Issues for the Organisation to Consider**

Key reputational risk in accepting funding from, or partnering with, any external organisation or individual.

Reach recognises it has a responsibility to its stakeholders and participants to consider the ethical issues that may arise in working with or accepting funding from an organisation/individual and the associated risks. Consideration has been given by Trustees to risk arising from fundraising activities.

The decision-making course Reach will follow when ethical dilemmas arise is to analyse potential risk with the Audit Committee.

This approach will be outlined to potential partners to ensure clarity and openness for Reach's stakeholders.

- **Fundraising activity including participation in events or products for donation leads to injury, death or damage to charity's reputation**

**Mitigation:** risk assessment undertaken of all events, these are reviewed and held centrally on Fundraising Sharepoint group; review health & safety risk relating to products and packaging to ensure fulfil legal requirements; ensure staff with responsibility for insurance are aware of fundraising plan and activities; clarify internal responsibilities between fundraising team and centres; establish approval process for fundraising activity; ensure fundraising events staff receive up to date training and have skills required to manage events safely and efficiently; Service Level Agreements or appropriate written agreements outlining roles, responsibilities, relevant laws and regulation, and processing of monies are in place with all third party event organisers including volunteers.

- **Reach is exposed to liability because of a partner (or sub-contractor) acting in its name, or through itself acting on a partner's bad advice.**

**Mitigation:** Pre-contract dialogue to ensure both parties are aware of relevant risks and that appropriate risk mitigation measures (including if contractual risk allocation and insurance) are in place; Service Level Agreement with partners and sub-contractors. Seek professional advice from legal advisers as appropriate.

- **Reach is unable to fulfil its obligations or terms of contract to funders/commissioners**

**Mitigation:** Tenders and funding applications developed and approved by Senior Management Team according to agreed protocol: the project fits the current strategic plan; the risk is within acceptable levels; there are no untoward financial implications. Trustees informed of planned, current and successful applications at quarterly meetings and any special meetings as appropriate. Delivery and management of funded and commissioned projects and activities is monitored monthly by senior managers with quarterly feedback to Chief Executive and Trustees. Progress also reported to funders and commissioners in line with their requirements. Concerns about meeting project outcomes, financial management or other major issues arising from funded and commissioned work will be brought to attention of Chief Executive and relevant funder/commissioner.

- **Reach is exposed to liability due to poor performance, behaviours and decisions by staff and volunteers undertaking fundraising**

**Mitigation:** Fundraising staff induction and ongoing fundraising staff and volunteer training to meet identified needs. Reach's Fundraising Director is member of the Chartered Institute of Fundraising.

Robust induction and ongoing training for **all** trustees, staff and volunteers; updates at supervisions and staff meetings; regular review and cascading of Fundraising Code of Practice and reminders of the Fundraising Promise.

Insurance policies are current, relevant and appropriate for the activities that take place. Fundraisers are aware that insurance policies are necessary.

Policies and procedures that pertain to fundraising either directly or indirectly are in place and reviewed regularly by appropriate managers. These include our Fundraising Complaints Policy, Data Protection Policy and Safeguarding of Vulnerable Adults and Children Policies. All staff and volunteers involved in any fundraising activity are made aware of their responsibilities with regards to key policies and must sign to confirm understanding. Staff and volunteers are DBS checked and receive safeguarding training.

Procedures are in place to protect supporter data, with relevant privacy notices available to view on our website. Procedures are in place to enable supporters to change their communication preferences at any time. These are reviewed at least annually or more by the fundraising team.

- **Vulnerable adults and minors**

**Mitigation:** We take every effort to ensure we do not knowingly directly fundraise from vulnerable people and people under the age of sixteen.

Many of the people who use Reach services (clients) express a wish to get involved in fundraising activities and enjoy being active citizens. The Fundraising Team work closely with our Centre Managers to enable clients to participate safely in their chosen fundraising activities in ways that are comfortable and appropriate to each individual, with risk assessments made and activities offered in compliance with relevant legislation and Reach policies and procedures. The Fundraising Team will work with centres to communicate opportunities that may be of interest through general communications such as posters, social media posts etc and not through named communications targeted at individuals.

Fundraising staff will be mindful at all times of their responsibilities towards other vulnerable adults during the course of their work and will not deliberately target vulnerable adults or seek to take advantage of a vulnerable person in the course of fundraising or other activities.

All Reach staff – both fundraising and non-fundraising - will receive induction and training to inform them of their responsibilities with regards to fundraising and vulnerable people.

Fundraising materials will be produced so as to portray people with learning disabilities and their carers in ways that are respectful and convey dignity and self-agency. People will not be portrayed as victims or in any way that undermines their rights as citizens.

Where children or young people under the age of sixteen are involved in fundraising activity – for example through an event or volunteering – this will only be undertaken with appropriate permission from parents/guardians. Appropriate training, induction or information will be provided to young people.

- **Reach is exposed to liability due to poor performance of a supplier**

**Mitigation:** Suppliers used by the fundraising team include, but not exclusively, our database provider Blackbaud, events organisers (including commercial and voluntary), and printers. Contracts or service level agreements are in place with all commercial providers and appropriate written agreements are in place with volunteers and voluntary groups. We have a named customer service contact at Blackbaud and keep abreast of issues relating to their service provision by regular review of the voluntary sector press. We are aware of the support that agencies such as the Information Commissioner's Office can provide if required.

- **Reach is exposed to liability due to perception that fundraised income is not used for expressed purpose**

**Mitigation:** Language in fundraising materials is clear about how fundraised income will be used; staff and fundraising volunteers are aware of responsibilities with regards to transparency.

Procedures are in place by which the Fundraising Director can ensure that the Senior Management Team and Centre teams are kept informed of monies raised and can also communicate priority funding needs to the Fundraising team. These include: weekly Senior Management Team meetings; one-page summaries of funded projects sent to relevant staff; a spreadsheet outlining funded projects, financial information, proposed outcomes and key dates which informs monthly discussion between the fundraising team and Group Manager – Client Services and Centre Teams.

All fundraisers and staff aware of the Fundraising Code of Practice regulations regarding use of fundraising monies against statement of purpose.

#### **4. Partnership Working**

Reach actively seeks opportunities to work together with external organisations and individuals to achieve shared objectives. However, Reach maintains its independence and does not allow any external partnership to bring the name of Reach into disrepute.

Reach therefore accepts financial support from, and partnership working with companies and individuals on the following conditions:

- There are strong grounds for believing that it will result in a benefit to Reach's beneficiaries
- The Chief Executive and Trustees are satisfied that no adverse publicity will result from accepting such support
- There is no attempt on the part of the company or individual to influence Reach's policy or actions either explicitly or implicitly
- That initiatives do not compromise the independent status of Reach

#### **Cause-Related Marketing, Affinity Marketing and Product/Service Endorsement**

- Reach does not endorse or approve the products or services of any company. A statement to this effect will be included alongside any branding or promotion associated with products.
- Only Reach will have direct access to its database and beneficiaries

- In order to ensure that all of Reach cause-related promotion reflects The Organisation's values, any potential initiative must come to the Senior Management Team for approval. If there are judged to be ethical dilemmas the Senior Management Team will raise with the Audit Committee.

### **Avoidance Criteria**

Reach will not accept any funding from companies directly involved in activities that run contrary to its overall charitable objectives / vision / aims. It will not accept financial support or partnerships with companies where we recognise that the company's activities may conflict with our organisation values. Any decision to reject a donation is to be made by Trustees.

### **Acceptance Criteria**

When deciding whether to accept any particular donation, the Chief Executive and Trustees recognise their duty to demonstrate to the Charity Commission that they have acted in the best interest of the charity, and that association with any particular donor does not compromise Reach's ethical position, harm its reputation or put future funding at risk. Reach complies with all relevant legislation, including money laundering rules, the Bribery Act and Charity Commission guidance, including terrorism and political activity.

Reach would therefore not accept any of the following where the donation:

- Was known to be associated with criminal sources and/or illegal activity
- Would help further a donor's personal objectives, which conflict with those of Reach
- Would lead to a possible decline in support for Reach, and so risk a fall in the resources available to fund its work or damage its longer term fundraising prospects
- Would otherwise impact adversely on Reach's reputation
- Accepting a donation from any particular source is inconsistent with Government policy

### **Purchasing**

Reach will not knowingly purchase goods and/or services produced and delivered under conditions which involve any form of abuse or exploitation of third parties.

Evidence (not exhaustive) of such abuse and exploitation includes:

- The use of child labour
- Failure to pay employees a living wage
- Working hours are excessive
- Evidence of any form of inhuman, unreasonable or discriminatory treatment of employees

Reach expects suppliers to accept responsibility for labour and environmental conditions under which products are made and services are provided and to make written statement of intent regarding the company's policy.

### **Further Points**


Reach recognises that, in accepting funding from statutory bodies, it must consider the policy implications and obligations that might be tied to it and ensure that these do not contravene its aims and objectives. Trustees are made aware of their public accountability for upholding this policy on induction and through ongoing training.

Reach can seek to raise funds from a series of charitable Trusts and Foundations, but recognises that, simply because these have been registered with the Charity Commission does not mean that

they are ethical givers. Reach therefore does not accept money from any charitable Trust if it is a requirement of grant receipt to advertise any company or organisation whose activities run contrary to the Organisation's aims.

Reach will maintain accountability and open and honest relationships with all its partners, by regularly monitoring and evaluating its work.

This statement of policy is meant as a working guide for the Organisation. Any final decisions will be governed by the Board of Trustees. It is the duty of the Board to advise of any potential conflicts of interest with regards to funding or partnerships, and for the Board to act in the best interests of the Organisation at all times.

<b>Ethical fundraising policy reviewed and approved:</b>	
<b>Signature (Chief Executive):</b>	
<b>Date:</b>	<b>May 2021</b>