

THE STUDENTS' UNION (THE SU) FUNDRAISING POLICY

Rationale: To set out how The SU adheres to the fundraising code of practice.

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Policy statement

The SU recognises the importance of ensuring any fundraising carried out is done so in accordance with the fundraising code of practice.

The SU aims to meet our legal commitments by:

- ensuring that there is an appropriate level of supervision in place to oversee any fundraising being carried out within The SU;
- ensuring compliance with the fundraising code of practice;
- ensuring that any relevant statutory accounting and reporting requirements are met in relation to fundraising;
- ensuring staff, student leaders and volunteers are familiar with this policy and receive training on their responsibilities.

Responsibilities for fundraising

The Board of Trustees are responsible for:

- setting and monitoring strategy and policy for fundraising;
- making decisions regarding donations/gifts that may not be acceptable under this policy;
- monitoring the overall approach taken to fundraising and seeking reassurance that this is satisfactory.

The Chief Executive is responsible for:

- ensuring the fundraising policy is put into practice;
- recommending and monitoring improvements for the Board of Trustees where fundraising activities are found to be unsatisfactory.

The Deputy Chief Executive and Volunteering & Societies Manager are responsible for:

- ensuring this policy is up to date;
- the design and implementation of local procedures for fundraising within The SU;
- investigating any concerns raised regarding fundraising activities;
- monitoring fundraising activities across The SU and providing assurance reports to the Board of Trustees.

Heads of Departments and managers are responsible for:

- having an appropriate awareness of the fundraising policy and the requirements of legislation as they apply to the work of their department/team;
- ensuring that staff and Student Members are made aware of and understand the fundraising policy along with any related procedures;
- ensuring that all staff, student leaders and volunteers who require fundraising training for their work receive this.

All staff, student leaders and volunteers are responsible for:

- co-operating with supervisors and managers on fundraising matters;
- ensuring any fundraising carried out is done so in accordance with this policy;
- reporting any fundraising concerns to an appropriate person (as detailed within this policy).

Arrangements for fundraising

Within The SU there are three types of possible fundraising:

- fundraising carried out for The SU;
- fundraising carried out for a student group;
- fundraising carried out for another charity.

The SU as a charity can only carry out fundraising activities that further its charitable purposes. This means it cannot directly fundraise for another charity unless doing so furthers its charitable purposes.

While The SU cannot fundraise for another Charity student groups can but in order for their fundraising to be covered by our insurance and to ensure they meet legal requirements they must get SU prior approval.

Any and all funds raised for another charity must also be processed through RAG accounts which are managed separately to the rest of The SUs' accounts.

To seek appropriate approval for fundraising an events plan should be submitted using The SU online event planner.

Rules for fundraising

All fundraising activities carried out by The SU (*or any of its affiliated student groups*) must comply with the following general rules which have been written in order to help ensure compliance with the fundraising regulator's code of practice. For the full rules regarding all matters relating to fundraising see the code of practice.

- 1) Your fundraising must be legal and must be open, honest and respectful.
- 2) You must be polite to people at all times.
- 3) You must not unfairly criticise or insult other people or organisations.
- 4) You must not encourage a donor to cancel or change an existing donation in favour of a donation to another charitable institution.
- 5) 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.
- 6) 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.
- 7) You and the fundraising materials you use must not mislead anyone, or be likely to mislead anyone, either by leaving out information or by being inaccurate or ambiguous or by exaggerating details.
- 8) Before you make any direct or implied claim in your fundraising which is likely to be taken literally, you must make sure that there is evidence to prove the claim.
- 9) You must not take advantage of mistakes made by a donor.
- 10) When talking about finances and financial benefits, you must tell donors that you are not in a position to offer formal financial advice.
- 11) Your fundraising must meet equality law as it applies in England, Wales, Scotland and Northern Ireland. You must not discriminate against people with characteristics protected under the law of these countries.
- 12) You must take all reasonable steps to treat a donor fairly, so that they can make an informed decision about any donation.
- 13) You must take into account the needs of any possible donor who may be in vulnerable circumstances or need extra care and support to make an informed decision.
- 14) You must not exploit the trust, lack of knowledge, apparent need for care and support or vulnerable circumstance of any donor at any time.
- 15) You must not take a donation if you know, or have good reason to believe, that a person lacks capacity to make a decision 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.
- 16) If a donor makes a donation while they do not have the capacity to make an informed decision, you must return the money to them.
- 17) You must take all reasonable steps to avoid asking for regular donations 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 person aged under 16 you must return the money.
- 18) You must make sure that you have any permission or licences you need for the event from the local authority or other relevant body such as land/building owner.
- 19) You must make sure that any insurance policies you have to have by law are in place. You must make sure you have sufficient third-party public-liability cover in place and must consider whether you should take out any other insurance cover.
- 20) You must be clear who (for example, you or the building owner) is insuring against which risk.
- 21) To run an exempt lottery (one which does not need a licence), you must meet the conditions set out in law.
- 22) You must also ensure your fundraising meets any legal requirements in terms of health & safety and GDPR.

Arrangements for donations & gifts

The SU 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 objectives.

Additionally The SU will not accept donations & gifts with companies or individuals who participate in activities which:

- could cause detriment to the charity's reputation
- undermine our vision and values
- are associated with unsuitable products, corporate or individual
- are from unknown sources of funding. The SU 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

If supporters wish to make a donation to a specific area of The SUs' work then they make a specified donation by providing written instruction to this effect with their donation. If The SU is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way it will be refunded.

All donations or gifts must be conveyed to the Head of Finance at the earliest possible opportunity accompanied by all original correspondence pertaining to the donation or gift for keeping.

When donations or gifts are received the following information must be collected:

- The donor's name and complete address. If the gift is from an organisation, a contact name and job title should be recorded in addition to that of the organisation's name
- Email address (*where available*) of the donor
- Date of gift received
- Any specific instructions attached to the use of the donation
- Confirmation if the donor is happy for their donation to be acknowledged publicly

The finance team is responsible for allocating the donation to the appropriate fund.

If a donation is received which may not be acceptable under the terms of this policy the Head of Finance will alert the Chief Executive 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*).

Complaints

The SU will respond to all complaints regarding fundraising and donations in a timely, respectful, open and honest way in accordance with our Complaints Policy.