



UK YOUTH

Ethical Fundraising Policy

1. Introduction

UK Youth is committed to ensuring all young people are equipped to thrive and empowered to contribute at every stage of their lives. Our mission is to build a society that understands, champions and values the power of youth work for all by increasing investment into the youth sector, building cross-sector partnerships, and embedding and sharing effective practices.

1.1

We would only be able to work towards achieving this aim with the financial support that we receive from a wide range of supporters.

1.2

We always aim to be open, honest, and fair and to operate in a way that meets the law, fundraising regulations, and best practices, including the Code of Fundraising Practice (attached in Document Control), which outlines the standards expected of all charitable fundraising organisations.

2. Purpose

2.1

To ensure our long-term sustainability, we are committed to ensuring we have a broad base of funding sources, and as such, we need to have appropriate policies and procedures in place to ensure all fundraising carried out by the charity (or on behalf of, or in aid of) is done so in an appropriate, ethical, and legal manner.

2.2

We recognise that not upholding people's trust in our organisation could negatively impact our reputation, work, and colleagues in our network. It could also jeopardise our ability to deliver services and support young people.

2.3

Our [Public Fundraising statement](#) (Appendix 10.1) provides a clear and transparent explanation to all our supporters of our commitment and practice in this area.

3. Audience

3.1

Everyone involved in fundraising must know and comply with this policy's ethical issues and procedures.

3.2

This policy applies to all staff, volunteers, trustees, partners, committees, donors, and fundraisers acting for or aiding UK Youth.

4. Definitions

4.1 Staff

This policy considers 'staff' to include permanent and temporary employees, agency staff, and contractors.

5. Policy

5.1 Fundraising

5.1.a Fundraising Practices

UK Youth commits to ensuring all fundraising activity is legal, open, honest, and respectful.

5.1.b Fundraising Standards

UK Youth adheres to the following fundraising standards:

- All fundraising activities will comply with all relevant laws and regulations,
- We will only use fundraising techniques we would be happy with personally,
- All our communications will be truthful and transparent,
- All monies raised will be for the stated purpose of the request and will comply with the UK Youth's mission and purpose,
- We will ensure donor rights are always respected.

5.1.c

UK Youth recognises that people want to support UK Youth in diverse ways and for distinct reasons, and we are committed to building relationships beyond just financial donations.

5.1.d

We are committed to ensuring our supporter base represents the diversity of the young people we work with across our network by ensuring our fundraising is informed by our [Diversity, Equity, and Inclusion Policy](#).

5.1.e

We will not partner with anyone who goes against our mission, such as those who mistreat or show bias against young people or take advantage of them. No donations or financial support will be accepted from such individuals or companies.

5.1.f

We will carefully evaluate all funding for its flexibility. We will prioritise open and trusting practices in line with our commitment to [IVAR's flexible funding parameters](#), ensuring that we do not pass disproportionate monitoring, evaluation, reporting, public comms, media, or storytelling requirements onto our network, delivery partners or grantees.

5.1.g

We will not prioritise funding that requires inappropriate measures of impact that do not align with the aims of the activity for which the income is intended, or that are

not appropriate for specific groups of young people (as referenced in UK Youth's Impact Framework).

5.1.h Professional Fundraisers

UK Youth staff is the charity's primary vehicle for fundraising.

5.1.h.i

We hire skilled professionals and train our fundraising staff to navigate the complexities of fundraising.

5.1.h.ii

If UK Youth engages professional fundraisers, these third parties are subject to the same due diligence assessment as all funders who, when working on behalf of UK Youth, are subject to this policy and any others that apply, such as our Ethics Policy.

5.1.h.iii

We ensure that the remuneration of fundraisers is proportionate to the expected benefit.

5.1.h.iv

We are transparent about UK Youth's use of professional fundraisers.

5.1.i Opportunity Assessment

UK Youth's [Opportunity Assessment Procedure](#) (Appendix 10.2) outlines the process for all new opportunities, including renewals/ new opportunities with existing funders.

5.2 Acceptance, refusal, and return of donations

There is only sometimes a straightforward right or wrong answer when complex decisions arise. Instead, we must weigh the potential positive and negative consequences to decide what will be in the organisation's best interests.

5.2.a

We have a responsibility to act in the best interests of the charity, which means when deciding whether to refuse a donation, we must only do so if accepting it would be more detrimental to the charity being able to achieve its objectives than rejecting it. These matters will be decided on a case-by-case basis.

5.2.b Acceptance

UK Youth will only accept donations that are consistent with the organisation's mission and strategy.

5.2.b.i

When accepting a donation, we will ensure that association with any donor or donation does not compromise UK Youth's ethical position, harm our reputation, or jeopardise future funding.

5.2.b.ii

We will not partner with any organisation that produces goods/services or acts in a way that is contrary to our charitable objects or values nor any who are opposed in word or deed to our mission, e.g., who do not treat young people fairly, express or exercise bias against young people, or who take advantage of young people.

However, our Public Fundraising Statement emphasises that accepting a donation does not imply endorsement.

5.2.b.iii

We know and comply with the Charity Commission RS2 for Charities and Commercial Partners. We will ensure that any commercial agreement represents a fair deal for the charity and

- Establishes what we expect to gain from it before agreeing,
- Set up appropriate systems to monitor and review the partnership,
- Take appropriate steps to identify and manage any risks,
- Ensure from the outset that the expectations of both the charity and the company have been agreed, and
- Can be managed effectively and appropriately.

5.2.b.iv

We will disclose any commercial partnerships in our Annual Report.

5.2.c Refusal

As a charity, we are obligated not to decline opportunities or funding that will help us achieve our charitable objectives without good reasons. When deciding, we will consider the extent to which a potential partner has taken positive steps to mitigate or resolve past issues of concern.

5.2.c.i

Donations will only be refused in exceptional circumstances, when:

- It would be unlawful to accept it (e.g., the organisation knows the gift comprises the proceeds of crime) or
- Accepting the donation would be detrimental to achieving the organisation's purposes, as set out in its constitution. This anticipated detriment must be set against the benefit of having the funds from the donor, which would enable the organisation to pursue its purposes.

5.2.d Return

We might be asked or required to return a donation on rare occasions. Accepted contributions can only be returned when:

- It contradicts the acceptance criteria outlined in section 5.2. a above, or
- The terms and conditions of the gift provide for it to be returned in certain instances or
- Where the law specifically provides for the gift to be returned in certain instances or
- An 'ex-gratia payment' (a payment because of a compelling moral, but not legal obligation) is made. This type of donation return will only be permitted where the charity has received an order from the Charity Commission for England and Wales

5.2.d.i Refunds

In these circumstances, particular thought should be given to the terms and wording used for a specific appeal to explain to donors what will happen if the appeal can no longer be achieved or if they raise too much or too little money. In all fundraising efforts, we will clearly and explicitly state what would happen to any surplus donations and what will happen to donations if more funds are needed.

5.2.e Communicating with donors

5.2.e.i

The responsibility for communicating with the donors, including the final decision to refuse or return a donation, lies with the Director of External Relations. This includes all thank you's and donor appreciation.

5.3 Due diligence

5.3.a

We will undertake reasonable due diligence of donors to ensure they do not hold views or are involved in activities that might be incompatible with our role and damage our reputation, as addressed in our [Opportunity Assessment Procedure](#) (Appendix 10.2).

5.3.b

In terms of donations, we will ensure that any gift is safe to accept, and doing so would be in the best interests of our charity.

5.3.c

We will also consider issues such as suspicious donations, managing large anonymous gifts, or those from vulnerable individuals.

5.3.d

All new opportunities will be evaluated using our [Opportunity Assessment Procedure](#) (Appendix 10.2).

5.3.e

We consider these to be **areas of legitimate concern** when undertaking due diligence:

- Tobacco
- The sex industry/pornography
- Alcohol
- The production and sale of arms
- Extractive industries like oil, gas, and mining actively damage the environment and contribute to climate change, or any industries with a significant, negative impact on the environment (e.g., chemical companies, fast fashion, industrial agriculture) where there is no climate-positive commitment or adherence to the UN's Sustainable Development Goals.

5.4 Legal obligations and commitments

5.4.a

UK Youth's trustees are aware of and comply with Charity Commission guidance CC3a regarding trustees' responsibilities, particularly about always acting in the charity's best interests and managing conflicts of interest. The trustees follow the six principles set out by Charity Commission 20.

5.4.b

UK Youth will always be honest about what we can achieve when asking for funds, submitting realistic budgets, using the funds for intended purposes, and ensuring that we provide any reports required on time.

5.4.c

We will ensure that everyone is aware of and consistently complies with the regulatory guidance on fundraising behaviours and respond promptly and effectively to any fundraising complaints.

5.4.d

We understand and comply with all legal obligations:

- All funds raised for a particular cause must be used for that cause.
- A donation given by someone who lacked capacity at the time of donating must be returned.
- Our Annual Report and Accounts will include
 - Our approach to fundraising activity, and whether a professional fundraiser or commercial participator was used,
 - Details of any voluntary regulatory fundraising schemes or standards which the charity or anyone fundraising on its behalf has agreed to,
 - Any failure to comply with a scheme or standard cited,
 - Whether and how the charity monitored fundraising activities carried out on its behalf,
 - How many complaints the charity or anyone acting on its behalf has received about fundraising for the charity and

- What has the charity done to protect vulnerable people and others from unreasonable intrusion on a person's privacy, unreasonably persistent approaches, or undue pressure to give during or in connection with fundraising for the charity?
- When using donor information in a case study or any other type of publicity, organisations must comply with confidentiality duties and data protection laws if publishing a case study that includes information that could identify a donor.
- Trustees (and their delegates) must act in the charity's best interests when accepting or refusing a particular donation.
- Fundraisers must be aware of when benefits nullify potential tax relief such as Gift Aid or top-up payments available under the small donation rules. Organisations must not attempt to reclaim tax on the sum of benefits to prevent the donation from qualifying under Gift Aid or the small donation rules.
- Any specified reporting requirements to which a donation is subject must be complied with.
- Fundraising organisations must only make a Gift Aid claim concerning a donation if all the conditions are met. One of these is that a donor's Gift Aid declaration must comply with the guidance issued by HMRC. Where a donation is not eligible for Gift Aid and the organisation wishes to claim under the small donations' rules, it must only do so if all the conditions are satisfied.
- Fundraising organisations must ensure that accepted donations are used to support the cause according to the conditions attached to the donation, which may arise from the donor's stipulations and representations made by the charity regarding the use of the funds.

5.5 Financial Accountability

5.5.a

UK Youth will ensure our accounting and accountability comply with the highest legal, accounting, and ethical standards and be fully transparent.

5.5.b

We will ensure, through our annual accounts and statements, that we

- Regularly report on financial activities,
- Keep our spending on fundraising and administration as low as is cost-effective,
- Make clear the percentage of income spent on raising funds,
- Make clear the percentage of income spent on administration and
- Adhere to our reserves policy.

5.6 Donor rights

5.6.a

Donors or prospective donors are entitled to the following, promptly upon request

- UK Youth's most recently published annual report and financial statements.
- A copy of this policy.
- The results of any personal due diligence undertaken by UK Youth.

5.6.b

Donors may request that their gifts remain anonymous. This request will be respected where it is legally and ethically possible. SLT and the Board of Trustees will be informed of the names of all donors. Otherwise, the names of donors requesting anonymity for their gifts will not be shared beyond those directly involved in the donation's solicitation, approval, processing, stewardship, and auditing.

5.6.c

Donor privacy will be respected. All recorded donors will be kept by the Data Protection Act (2018). Donors have the right to view their donor records.

5.6.d

In communicating with potential or existing donors, we will be mindful of indicators that suggest an individual may be vulnerable and engage with them accordingly.

5.6.e

In all instances, we will follow our [Privacy](#) and [Data Protection](#) policies.

5.7 Protecting and Respecting Charity Beneficiaries

5.7.a

We represent our beneficiaries in our communications by always respecting them and portraying them how they wish to be seen.

5.7.b

We will only use personal information they have consented to and for their agreed purposes.

5.7.c

We will not disclose anything that might put them at risk, particularly children and vulnerable people.

5.8 Complaints

UK Youth will respond promptly to a donor or prospective donor complaint, adhering to the UK Youth [Complaints Policy](#) in all circumstances.

5.9 Independence

UK Youth will remain independent of the State, and none of our funding will discharge the statutory duties of the State unless and only if those funds are received to support the delivery of its charitable purposes.

6. Responsibilities

6.1 Board of Trustees

The Board of Trustees is accountable for this policy.

6.2 Finance Committee of the Board of Trustees

The Finance Committee (FinCo), a sub-committee of the Board of Trustees, will consider any fundraising matters that require board decision or oversight, for example, when an Opportunity Assessment presents an ambiguous situation.

6.3 SLT

SLT ensures this policy implements ethical standards by embedding them in their directorates' relevant decision-making procedures and processes. They are responsible for championing and implementing ethical decision-making in line with this policy within their areas of responsibility.

7. Monitoring and compliance

7.1 Compliance

Appropriate screening methods and measures to ensure compliance will be built into the procedures supporting this policy's implementation.

7.2 Compliance

We encourage all staff to use the [Whistleblowing Policy](#) and procedure should they wish to report any concerns about behaviour that breaches the standards in this policy.

7.3 Partners

To manage funding partnerships within an ethical framework, UK Youth may develop a protocol that outlines expectations. For a partnership considered to have some level of risk, either because it is a higher amount, multi-year, high-profile, involves the use of logos or other collateral, or because of donor track record, UK Youth may request an entire disclosure principle, requiring the partner to provide information on its business practice, about specific ethical / avoidance criteria, so that UK Youth can make an informed decision.

8. Participation Statement

UK Youth is committed to involving young people and key stakeholders in how we manage and improve our support services. When this policy or procedure is reviewed, we will endeavour to consult and involve young people/stakeholders to consider their views.

9. Commitment to review

This policy, accompanying procedures, and supporting documents will be reviewed every three years or sooner when any changing legislation has an impact.

10. Appendices

10.1 [Public Fundraising Statement](#)

10.2 [Opportunity Assessment Procedure](#)

Document control sheet

Document Name: Ethical Fundraising Policy

Owner: Director, External Relations

Operations Document History: n/a

Related policies and procedures:

- Data Protection [POLICY](#)
- Whistleblowing [POLICY](#)
- Privacy [POLICY](#)
- Complaints [POLICY](#)
- Diversity, Equity, and Inclusion POLICY
- [Delegation of Authority](#)

Legislation or regulatory guidance that impacts on this policy:

- Fundraising Regulator, [Code of Fundraising Practice](#) and [Fundraising Promise](#)
- <https://www.gov.uk/guidance/charity-trustee-whats-involved>
- Charity Commission, [CC3a](#) and [CC20](#)
- Six key principles
- Charities Act [1992](#), [2011](#), [2016](#), and [2022](#)
- Information Commissioner's Office (ICO), [Data Protection Guidance](#)
- Independence of Charities from the State, [RR7](#)
- Charity Commission, [RS2 – Charities and Commercial Partners](#)
- [Modern Slavery Act 2015](#)
- [Equality Act 2010](#)
- [Bribery Act 2010](#)
- [Data Protection Act](#) (2018)

First issue: June 2024

Next Review Date: June 2027

Document approved by: Senior Leadership Team (Jacob Diggle, David Watts, Thora Eberts, Oby Bamidele)

Date approved: June 2024

Name: Oby Bamidele (Interim-COO)