



# Fundraising & Acceptance of Donations Policy

FINAL V3.5

*THIS POLICY APPLIES TO ALL GRANTS AND DONATIONS*

Dated:	August 2025
Next Review Date:	August 2027

# FUNDRAISING & ACCEPTANCE OF DONATIONS POLICY

## SECTION 1 - Ethical Fundraising Policy Statement

The Talk About Trust is dedicated to equipping young people aged 8- 25 with the knowledge, skills, and resilience to stay safe around alcohol and other substances. We seek funds from a diverse range of funders, including individuals, grant making organisations, public health, police and crime commissioners, companies and via community fundraising.

To ensure sustainability and complete independence from any influence, this policy provides clarity and guidelines to all our stakeholders that the highest standards are in place to ensure that donors understand that they may not inappropriately influence the charity or its outputs.

The Talk About Trust ensures that its resources follow the UNODC (United Nations Office on Drugs & Crime) evidenced principles of effective drug education and that resources are subject to pilot and trial before roll out. The Talk About Trusts' principal programme is independently evaluated to significantly delay the age that young people choose to drink whole drinks, ensuring that the Talk About Trust key goals are met ([About | Talk About Trust](#))

Our **key principles of responsible fundraising** are:

- ✓ The funds will support the mission of reducing alcohol and drug related harms
- ✓ No company or individual will unduly influence the Talk About Trust policy or actions either explicitly or implicitly
- ✓ Any funded initiative will not compromise the independent status of the Talk About Trust
- ✓ All monies raised are used exclusively for the purposes specified and in accordance with our stated mission and purpose ([About | Talk About Trust](#))
- ✓ We do not accept any alcohol, vaping, tobacco or gambling industry funding
- ✓ Indirect funding from charities or foundations with any funding from the alcohol, vaping, tobacco or gambling industry will only be considered where there is a government mandate or a robust third-party intermediary in place to independently manage the funds

Additionally,

- ✓ We have honest relationships with our donors and sponsors; all communications are truthful and transparent.
- ✓ All fundraising initiatives reflect our values and do not compromise the reputational standing of either ourselves or our donors
- ✓ We adhere to all the Fundraising Regulator's codes of practice to ensure best practice, transparency, and accountability (See Section 3).

### **Acceptance Criteria**

When deciding whether to accept any particular donation, the Chief Executive and the Trustees have a 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 the charity's ethical position, harm reputation or put future funding at risk. The Talk About Trust complies with all relevant legislation including money laundering rules, the Bribery Act and Charity Commission guidance, including terrorism and political activity.

The Talk About Trust would therefore not accept any of the following where the donation:

- × Was known to be associated with criminal sources
- × Would help further a donor's personal or business objectives, which conflict with the mission and values of the Talk About Trust
- × Would significantly damage the reputation of the Talk About Trust
- × Was linked to any inappropriate brand endorsement or marketing

**Under no circumstances** would the Talk About Trust accept a donation from any organisation, grant maker, company or individual who seeks to influence the content or communication of any element of Talk About Trusts' resources, training, website material or any other outputs.

If there is any uncertainty as to the suitability of any donations or grants then it will be independently reviewed, in line with this policy, by designated trustees sitting on the Ethical & Standards sub-committee.

## SECTION 2 - Fundraising Policy

### 1. Fundraising by Staff

1.1 Participation in fundraising activities by staff is voluntary and will not be imposed on individuals.

### 2. Funding Applications

2.1 The Chief Executive is responsible for the co-ordination of all funding applications and the acknowledgement of all grants, donations, and gifts. This will ensure that an excessive solicitation of any single source of funds is avoided.

2.2 Donor anonymity will be protected whenever specified by the donor.

2.3 The Finance Manager is responsible for ensuring that all grants, donations & gifts are properly recorded, and a specific fund established and tracked for all 'Restricted Funds'.

### 3. Acceptable Fundraising Activities

3.1 Acceptance of any contribution, gift or grant is at the discretion of Talk About Trust. The staff and/or trustees will not accept any gift unless it can be used or expended consistently with the purpose and mission of the Talk About Trust.

3.2 No irrevocable gift, whether outright or life-income in character, will be accepted if under any reasonable set of circumstances, we believe the gift would jeopardize the donor's financial security.

3.3 The Talk About Trust will refrain from providing advice about the tax or other treatment of gifts and will encourage donors to seek guidance from their own professional advisors to assist them in the process of making their decision.

3.4 The Chief Executive of the Talk About Trust is authorised to accept donations of cash or publicly traded securities. Gifts of in-kind services will be accepted at the discretion of the trustees.

3.5 Certain other gifts, real property, personal property, in-kind gifts, non-liquid securities, and contributions whose sources are not transparent or whose use is restricted in some manner, must be reviewed by the trustees prior to acceptance due to the special obligations raised or liabilities they may pose for the Talk About Trust.

3.6 The Talk About Trust will respect the intent of the donor relating to gifts for restricted purposes and those relating to the desire to remain anonymous. With respect to anonymous gifts, the Talk About Trust will restrict information about the donor to only those staff members who need to know.

3.7 The Talk About Trust will not compensate, whether through commissions, finders' fees, or other means, any third party for directing a gift or a donor to the Talk About Trust.

3.8 The proposed activity should not attract adverse publicity for the Talk About Trust. Fundraising activities that meet with public disapproval can damage the reputation of the Talk About Trust.

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

3.10 All fundraising publicity must state quite clearly who will benefit from the fundraising scheme.

3.11 The Talk About Trust will provide acknowledgements to all donors.

## 4 Guidelines for Policy Implementation

### 4.1 Expenses

Any expenses incurred in the course of fundraising must be agreed, in advance, with the Chief Executive.

### 4.2 Charity brand and fundraising literature

The use of the charity brand (logo, charity name and charity number) can only be used if agreed in advance with the Chief Executive. Any literature including brochures used to attract support shall be coordinated through the Chief Executive so that the most accurate information appropriate to a particular fundraising effort is reflected.

### 4.3 Reports to donors

The Chief Executive will be responsible for providing reports on donations/grants if requested by outside organisations or individual donors. The Finance Manager will maintain a Grants Register and will provide monthly Fund Reports to the Chief Executive and quarterly Fund Reports to the trustees.

### 4.4 Volunteers

Whenever volunteers are to be involved in fundraising efforts, the Chief Executive will be responsible for the recruitment and induction process.

## SECTION 3 – Code of Fundraising Practice

The trustees will refer to the Code of Fundraising Practice when making decisions regarding fundraising. A summary of the key areas of the Fundraising Code are detailed below and the full code can be viewed at <https://www.fundraisingregulator.org.uk/code>

### 1. Key Principles & Behaviours

The work of those fundraising for the Talk About Trust will be Legal, Open, Honest and Respectful.

- 1.1 Funds raised for a particular cause will be used for that particular cause unless otherwise agreed with the donor
- 1.2 Fundraisers will not denigrate other individuals or organisations.
- 1.3 Fundraisers will not exaggerate facts relating to the potential beneficiary.
- 1.4 The Talk About Trust will not take advantage of mistakes made by the donor.
- 1.5 Fundraisers will take all reasonable steps to treat a donor fairly, enabling them to make an informed decision about any donation. This will include taking into account the needs of any potential donor who may be in a vulnerable circumstance or require additional care and support to make an informed decision.
- 1.6 The Talk About Trust will not engage in fundraising which is an unreasonable intrusion on a person's privacy, is unreasonably persistent or places undue pressure on a person to donate.
- 1.7 Fundraisers will not continue to ask an individual for support if that person clearly indicates – by word or gesture – that they do not wish to continue to engage; or they have reasonable grounds for believing, in the course of their engagement with the individual, that they are in vulnerable circumstances which mean they are unable to make an informed decision to donate.
- 1.8 The trustees will oversee the fundraising activities of the Talk About Trust and any third parties fundraising on the charity's behalf.
- 1.9 **Acceptance and Refusal of Donations** - The trustees (and their delegates) will act in the best interests of the charity when deciding to accept or refuse a particular donation.
- 1.10 **After the Donation**
  - a) Any specified reporting requirements must be complied with.
  - b) Gift Aid reclaims are only made for a donation where all the Gift Aid conditions are met. Any claims made under the small donations' rules are only made if all the small donation conditions are satisfied.
  - c) The Talk About Trust ensures that accepted donations are used to support the cause in accordance with the conditions attached to the donation, which may arise from donor's stipulations or representations made by the charity as to the uses of the funds.
- 1.11 **Complaints** – the Talk About Trust has a clear and publicly available complaints procedure and ensure that all complaints are investigated thoroughly and objectively to establish the facts of the case and responded to fairly, proportionately, and appropriately.
- 1.12 **Returning Donations** – the Talk About Trust seeks to use restricted funds for the purpose for which they were originally raised. If the Talk About Trust is unable to do so, then in exceptional circumstances it will seek permission from the donor for an alternate use or to be used as general funds.

### 2. Working with Volunteers

- 2.1 The Talk About Trust will collect and store volunteers' personal contact information in line with GDPR (General Data Protection Regulation), will consider the use of Disclosure Checks where appropriate, will not discriminate on the grounds of race, sex, sexual orientation, religion or belief, age, disability,

pregnancy or maternity, or gender reassignment when recruiting and managing volunteer fundraisers and will only reimburse out-of-pocket expenses for volunteers.

- 2.2 The Talk About Trust will make it clear to all volunteers that anyone raising money must ensure that the organisation receives all that money.
- 2.3 The Talk About Trust will carry out appropriate risk assessments.
- 2.4 The Talk About Trust will check the suitability and credentials of volunteer fundraisers to act as responsible people on the organisation's behalf and provide such training and support as may be needed to enable volunteer fundraisers to effectively carry out their role in a legal, open, honest, and respectful manner.
- 2.5 Volunteers will be expected to follow the fundraising principles laid out in this policy.

### 3. Working with Children

The Talk About Trust does not involve children under the age of 18 in fundraising staff-led activities.

### 4. Working with Third Parties

The Talk About Trust engages third party freelance and/or consultants for fundraising with all such arrangements made in writing via a formal 'Terms of Engagement' and 'Job Description'. All third parties are expected to follow the fundraising principles laid out in this policy and their work is overseen by the Chief Executive.

### 5. Personal Information and Fundraising

The Talk About Trust collects personal data from donors and keeps them up to date with the activities of the charity. The collection and storage of personal data is in line with the GDPR regulations and full details are available in our Data Protection & Privacy policy.

### 6. Content of Fundraising Communications

The Talk About Trust takes all reasonable steps to ensure that communications:

- Are suitable for those targeted
- Adhere to copyright laws and that permission is obtained from the rights holders for the use of images, logos etc.
- Include all legally required information (registered charity status or number etc.)
- Do not imply money is for a restricted purpose when it may be used for different purposes or for general funds.
- Contains any advertisements are legal, decent, honest, and truthful.
- Are not misleading by inaccuracy, ambiguity, exaggeration, omission or otherwise.
- Have evidence to prove all claims, whether direct or implied, are capable of objective substantiation.
- Avoid causing offence on the grounds of race, age, religion, sex, sexual orientation, or disability
- Justify the use of potentially shocking images and give warnings of such material.
- Justify the frequency of contact
- Do not pressurise potential donors
- When fundraising in partnership with one or more organisations' that it clearly states how monies will be allocated between the organisations.

## 7. Mail

The Talk About Trust uses email to communicate with supporters but ensures that all such communications meet the GDPR regulations.

## 8. Telephone

The Talk About Trust does not currently use telephone calls to contact prospective supporters requesting funds – this is usually done via email, formal application or by an organized face to face meeting.

## 9. Digital media

- All digital platforms comply with the Equality Act 2010.
- The Talk About Trust ensures that a contact number and/or an email address are easy to locate.
- **Data** – Use of Cookies meet regulations and are notified to users, unsubscribe requests must be addressed in a timely manner, privacy notices should be used
- **Content** – The Talk About Trust has the necessary intellectual property permissions to use or share digital content, such as images, audio, video etc.
- **Electronic Payments** - adhere to the standards that apply to electronic payments, such as the Payment Card Industry-Data Security Standard (PCI- DSS) for processing card transactions, and the Direct Debit Guarantee for processing Direct Debits.
- **Online Raffles and Lotteries** – comply with legislation
- Trading is permitted in the governing document of the Talk About Trust and they comply with all relevant consumer law and digital commerce legislation. Descriptions and images of goods are sufficiently accurate that donors are not misled about what they are buying and the Talk About Trust complies with legal requirements as to delivery, cancellation, refunds and returns.
- **Online Fundraising Platforms (e.g., Crowdfunding)** - monies raised through online fundraising platforms may go directly to a registered charity; to a fundraiser or fundraisers to pass on to a registered charity; or to a beneficiary who is not a registered charity. Where a Fundraising Platform receives a proportion of the donation or gift aid as remuneration for hosting a fundraising campaign, they must ensure that the specific details are clearly visible to individuals donating through their site and displayed before the point at which financial details are requested (i.e. how their remuneration will be calculated and the amount of remuneration they will receive). There are a number of other considerations so the Talk About Trust will consult the full code in instances where they are involved in an online fundraising platform.

## 10. Trusts

- The Talk About Trust obtains permission of referees before submitting applications, with the referee seeing the application before submission.
- The Talk About Trust assesses that the objectives of the donor trust are a good 'fit' with its' own objectives.
- Administrative requirements of the donor trust regarding payment are strictly adhered to
- Any conditions attached to the grants are recorded, understood, and agreed to by both parties before the grants are formally accepted.
- Appeals against a decision are only made in rare circumstances – such as where there are clear mistakes of fact, or the donor trust has a specific appeals procedure.

- Any changes about how grants may be spent, which differ from what was originally proposed, the donor trust's approval will first be obtained in writing if that is a requirement of the donor trust's funding.
- All reporting guidelines and requirements are recorded and followed.
- If there are potentially serious problems with the funded work (for example, the likelihood of significant delays to timetables or real risk of failure to complete), the Talk About Trust informs the donor trust as early as possible.
- If an appeal for a specific project is so successful that not all money can be allocated to it, or projects do not go ahead the Talk About Trust would seek advice from the Charities Commission regarding the use or return of remaining funds.

## 11. Major Donors

A "Major donor" is an individual or family with the potential to make or procure a gift which would have a significant impact on the work of the organisation.

- The trustees must take reasonable steps to assess and manage risks to the Talk About Trusts activities, beneficiaries, property, work, and reputation. Money laundering and adverse publicity about a donor are examples of how an organisation could be exposed to criminal liability and suffer reputational damage.
- The Talk About Trust will undertake due diligence on both the financial and reputational dealings of potential partners before donations are accepted.
- Fundraisers should be aware of the Proceeds of Crime Act 2002 and that it applies to money or other property that has been obtained through conduct that is criminal under UK law, even if obtained in ways that are legal in another country.
- If giving gifts to a major donor, fundraising organisations must ensure that any benefits are appropriate for the organisation to be giving and proportionate to the size of the donation received. Some benefits may cause Gift Aid relief to be lost and others may be subject to the tainted donations rules.
- When talking about finances and financial benefits, fundraisers must inform donors that they are not in a position to offer formal financial advice.

## 12. Corporate Partnerships

A "Corporate Partnership" is a partnership between a fundraising organisation and a commercial entity, where the commercial entity provides money, skills, or other resources to the fundraising organisation.

- The Talk About Trust will carry out a process of due diligence, proportionate to the scale of the relationship, before engaging in a partnership and ensure there are no conflicts of interest, or potential conflicts of interest relating to the partnership.
- If goods or services are being sold during the course of the partnership, there should be a written agreement governing the relationship between the company and the Talk About Trust.
- The Talk About Trust states on letters and other documents that contain a request for money or other property for the benefit of the charity its name and the fact that it is a registered charity, the charity number, and the trustee names.

## 13. Raffles & Lotteries

The terms 'raffles' and 'lotteries' are interchangeably used but cover the same activity. The Gambling Act 2005 (the "Act") defines a lottery as an arrangement where individuals pay for an opportunity to win a prize

that is selected entirely by chance (or, where the selection process involves more than one stage, the first stage relies wholly on chance).

Raffles and lotteries are heavily regulated and the Talk About Trust always refers to the regulations before undertaking. Generally, our raffles are categorized as 'Incidental lotteries' which do not require a licence or registration with the local authority. Incidental Lotteries are incidental to an event, tickets are only be sold during the event, on the premises where the event is held, the draw does not rollover; and deductions from the profits going to good causes do not exceed £100 in costs and £500 in prizes.

## 14. Fundraising through Payroll Giving

The Talk About Trust does not participate in any Payroll Giving Schemes.

## 15. Events

- When identifying a suitable venue/ location for an event, the Talk About Trust considers issues of equal access for all (even if an event is being targeted at a specific group of people), ensures the venue complies with legal requirements about health and safety, ensures the venue/location is fit for purpose (taking note of any restrictions), and is able to justify any environmental impact the event may have.
- **Risk Assessment & Insurance** – the Talk About Trust carries out a sufficient and suitable risk assessment before undertaking an event of any size, carries out the Disclosure and Barring Service, Disclosure Scotland or Access NI checks where appropriate, ensures any compulsory insurance policies (for example, covering employees and use of cars) are in place, ensures there is sufficient third-party public liability cover in place.
- **Licences/Permissions** – the Talk About Trust ensure that any required permissions or licences are obtained from the local authority or other relevant bodies/landowners, does not exceed the maximum number of participants dictated by permissions/licences or local conditions.
- If applicable observes the Countryside Code (or other relevant code).
- Follows specific guidance if events are held on Open Access Land
- **Written Agreements** – has written agreements with all external parties clearly highlighting all parties' rights, responsibilities, and obligations. Written agreements must be in place with any party that is a professional fundraiser or a commercial participator.
- **Promotional Materials** - ensure that all marketing materials have accurate and clear details of the event and clearly state how the money raised from the event will be used.
- **Events Organised by Third Parties** – the Talk About Trust will have an agreement with the event organiser allocating specific responsibilities and risk.
- **'In Aid of' Managed Events** - A volunteer acting 'in aid of' an organisation is raising funds but acting independently of the organisation. An organisation will often not know about the volunteer's acts. If the Talk About Trust is aware, then they will make it clear to the individual or group that it is their responsibility to organise all aspects of the event and ensure that there are proper arrangements in place for monies to be transferred to the organisation quickly and efficiently.
- The Talk About Trust ensures that their health and safety arrangements (e.g., adequate medical cover and evacuation arrangements) are appropriate in the context of the event.
- Any food being supplied complies with regulations applying to food.
- If selling/providing alcohol, the relevant licences/permissions are in place and age limits must be adhered to.

## 16. Public Collections

Collections for cash, goods and Direct Debits whether carried out in public places, from house to house or on private property.

The Talk About Trust does not undertake public collections.

## 17. Static Collections

Appeals involving the use of static collecting boxes – either floor standing or on counters in shops, pubs, hotels, hospitals, reception areas etc.

The Talk About Trust use static collection boxes for general donations via boxes in PiP Café & the Community Room. These are emptied and counted by the Finance Assistant on a weekly basis.

## 18. Legacies

Key Principles

- a) A fundraiser must not exert undue influence on a potential legator.
- b) The Talk About Trust must ensure that any legacy fundraising activity is done whilst considering the duty of trustees to optimise the benefit to the fundraising organisation; the potential legator's freedom to provide for her/his family and others; and the sensitivities of the potential legator and his/her family and friends.
- c) The Talk About Trust must ensure fundraisers do not provide legal advice.

The Talk About Trust does not currently raise any funds via legacies and will follow the full guidance in the Fundraising Code of Practice relating to potential future funds from legacies.

## 19. Payment of Fundraisers

The Talk About Trust ensures that the remuneration of fundraisers is proportionate to the benefit reasonably expected to be obtained and does not use commission payments. Volunteers only have their out-of-pocket expenses reimbursed. Trustees are not paid for fundraising on behalf of the Talk About Trust.

## 20. Handling Donations

Covers donations received in person and donations received through the post.

- a) Records are made of donations in the charity Grant Register to ensure that the terms of donations are complied with.
- b) Professional fundraisers, commercial participators and other fundraisers must not make deductions from cash received unless agreed with the organisation.
- c) Local Authorities may impose additional rules about making deductions from collections and fundraisers must comply with these where relevant.
- d) Expenses must be met (where previously agreed) by the organisation after receipt of the donation.
- e) **Cash** - Cash must be collected, counted, and recorded by two unrelated individuals, wherever possible. Unsecured cash must never be left unattended or in an unattended environment. Cash must be banked as soon as is practicable in line with our Financial Procedures policy and kept in a secure location until safely banked.

- f) **Cheques** - Cheques must be banked promptly.
- g) **Card Transactions** – the Talk About Trust do not accept payments via card unless through the online store which complies with the relevant standards. Where charges are made for transferring payments, the total donation amount is recorded as income, with a further record of expenditure to cover the charges.
- h) **Direct Debits** – the Talk About Trust do not accept donations via Direct Debit.
- i) **Children** - Children under 16 are not left with overall responsibility for handling money and/or responsibility for counting collected money.
- j) **Floats** – floats are recorded and given to a nominated individual. Where petty cash expenditure is paid from the float, this is recorded separately, and any receipts kept. Floats and any sale monies received are kept separate from the cash handler’s personal money.