

## Ethical Fundraising Policy

AbleChildAfrica is dedicated to working towards a world in which all disabled children are fully included as equal members of society and are able to achieve their full potential. To help guarantee the availability of ongoing funds to pay for this work, AbleChildAfrica aims to maintain a broad base of different sources of funding. The purpose of this policy is guide staff and Trustees on managing risk/conflict and to ensure clarity and openness to all our stakeholders. We also set out our intention to hold ourselves to the same high ethical standards as we do third parties and are committed to fundraising in an honest, transparent way and putting our supporters at the heart of everything we do as reflected in our Supporter Promise (see annex).

### Context

AbleChildAfrica actively seek opportunities to work together with third parties, including companies, individuals, trusts and foundations, to achieve shared objectives. However, it is vital that we maintain our independence and do not allow any external partnership to compromise our values or bring the name of the AbleChildAfrica into disrepute.

AbleChildAfrica therefore accepts financial support from, and partnerships working with, companies and individuals that meet the following conditions:

- There are strong grounds for believing the outcomes will result in benefit to disabled children and their families in Africa, and/or enable staff to work toward AbleChildAfrica's mission
- The Executive Director and Trustees are satisfied that the benefit of the funding / relationship significantly outweighs the risk of any adverse publicity'
- That no attempt is made by any third party to link a donation with an attempt to influence the operations or policy of AbleChildAfrica either explicitly or implicitly
- That the independent status of AbleChildAfrica is not in any way compromised by fundraising activities
- That the charitable status of AbleChildAfrica is not in any way compromised by fundraising activities

### Acceptance Criteria

Trustees (and so, on their behalf, Fundraisers) have a duty to maximise resources for AbleChildAfrica whilst acting in the best interest of the charity. Therefore, they must be able to demonstrate to the Charity Commission and other stakeholders that they have acted in line with AbleChildAfrica's objects.

AbleChildAfrica therefore will not accept any of the following where the donation:

- Is associated with criminal resources or activity
- Would lead to a decline in support for the charity
- Would help further a Donor's personal objectives, which conflict with those of AbleChildAfrica
- Would jeopardise or have the ability to damage AbleChildAfrica's reputation
- Could be shown to result in a material fall in the resources available to beneficiaries.

Where these circumstances do not apply, AbleChildAfrica's interests are best served by raising as much money as possible.

### **Avoidance Criteria**

In handling the ethical issue of when to accept and when to refuse donations, the following practice will apply.

If Trustees choose to refuse a donation, they must be able to demonstrate to themselves and the Charity Commission that they have acted in line with AbleChildAfrica's objects.

The position of AbleChildAfrica towards a contentious Donor is not the sum total of the personal beliefs of staff members or Trustees. Rather, it is determined by whether its charitable objects are affected by association with that Donor. It is the role of the Trustees to determine this rather than be guided by personal beliefs solely.

**AbleChildAfrica will not accept financial support or partnerships from companies or individuals whose revenues or income are derived from, or have been recently<sup>1</sup> associated with:**

- Activities, literature or policies that discriminate or promote prejudice against disabled people
- Child labour, exploitation or other forms of abuse to children (guided by AbleChildAfrica's Child Protection Policy)

**We will not knowingly prospect from such companies.**

**All other acceptance of financial support or partnerships from companies or individuals will be considered by Fundraisers and Trustees on a case-by-case basis.**

Where an offer of support is itself dependent upon AbleChildAfrica first spending its own money or resources in order to facilitate the execution of the original offer of support, care should be taken by the Fundraiser/s and Executive Director, and subsequently Trustees as to whether this would be placing charitable assets under undue and inappropriate risk.

### **Due Diligence Research**

Due Diligence will be carried out to make reasonable efforts to satisfy any questions prior to, or otherwise within 1 month of a prospective Donor to a Fundraiser/Trustee

- Receiving a gift, or cumulative gifts, of over £10k
- Receiving an anonymous gift of £5k or more<sup>2</sup>

---

<sup>1</sup> As revealed in *Corporate Reputation*, reputation recovery is perceived to take approximately three and a half years, with it taking 3.2 years in North America, 3.6 years in Europe and 3.5 years in Asia. With this in mind, AbleChildAfrica defines 'recently' as within the last 3.5 years.

<sup>2</sup> The Charity Commission expects Trustees to report a payment (or payments) totalling £25,000 or more, 3 January 2011: <https://www.gov.uk/government/collections/protecting-charities-from-harm-compliance-toolkit>

If a Donor is a charity, its registration and details will be checked with the relevant charity regulator, for example in the case of England and Wales, The Charity Commission.

If the Donor is a company, its details will be checked on the Companies House [website](#)<sup>3</sup>. The Business and Human Rights [online resource](#)<sup>4</sup> will also be used to conduct research into potential corporate partners. This lists articles, both positive and negative, for over 1000 leading companies.

An online check will also be conducted by carrying out a check on the organisation's website, using internet search engines to look at other written information. However, care should be taken to assess how reliable the information is, i.e. whether the information repeating allegations others have made, if they are proven and how old the information is.

If the Fundraiser considers there to be no serious conflict, they will proceed with their approach. If the Fundraiser is unsure, or considers there to be serious conflict and recommends refusal to assign a prospective Donor to a Fundraiser/Trustee for pursuit s/he will discuss the research conducted with the Executive Director, who will decide whether to refer the matter to the Resource Committee of the Board of Trustees.

If after an approach something subsequently comes to light, the Resource Committee will review the donation again through the same process.

The matter of judgement shall arise in those circumstances where an association with a Donor can be shown, as a consequence of their public reputation, to weaken AbleChildAfrica, perhaps by alienating other Donors, overseas partners, UK supporters, volunteers or potential volunteers. If, on balance, the acceptance of a donation would appear to weaken AbleChildAfrica more than the money would strengthen it, then the matter of whether funds should be declined shall be referred by the Executive Director to the Resources Committee of the Board of Trustees. With discretion of the Resource Sub-Committee it might be brought to the Board for a decision.

A risk assessment may be used by Trustees to help identify and assess risks associated with approaching new Donors and/or accepting donations. In this, Trustees must recognise different forms of association with different degrees of benefit to both AbleChildAfrica and Donors, including branding, events, location, length of relationship, size of donation and their implications. Trustees may also find a risk matrix useful when assessing areas of risk, for example when planning a new donation to be considered. In making this difficult decision, the level of risk should be measured by both the likelihood of something occurring and the severity of impact if it were to happen. The risk matrix can subsequently be used as a risk register for ongoing monitoring and reviews.

An example can be found below:

---

<sup>3</sup> Companies House: [www.companieshouse.gov.uk/](http://www.companieshouse.gov.uk/)

<sup>4</sup> Business and Human Rights: <http://business-humanrights.org/>

Areas	Risks	Likelihood	Impact	Controls
<b>Reputation</b>  i.e. real or perceived link or association between AbleChildAfrica and Donor	Alcohol at the Gala Dinner	<b>LOW</b>	<b>LOW</b>	Draw up detailed sponsorship agreements with explicit exclusions
	Tobacco company PR request for advertising on school bus	<b>MEDIUM</b>	<b>HIGH</b>	
<b>Financial / Criminal</b>	It surfaces a Donor has channelled their first donation with heavy exchange rate losses or gains	<b>MEDIUM</b>	<b>MEDIUM</b>	Implementing the AbleChildAfrica Fraud Policy  Monitor exchange rate losses or gains and review impact on expenditure and income
<b>Security</b>	Association with a contentious individual Donor poses risk to staff and/or partner organisations	<b>LOW</b>	<b>HIGH</b>	Risk assessment with Executive Director and Resource Committee of the Board of Trustees  Safety and security review

All due diligence research will be documented internally against the prospective Donors name or company name in AbleChildAfrica’s fundraising database, currently maintained in Raiser’s Edge.

If due diligence checks reveal evidence of crime, Trustees must report the matter to the appropriate authorities as directed in the Charity Commission’s guidance document ‘Reporting Serious Incidents - guidance for trustees’<sup>5</sup>. This also applies if information has been received that leads Trustees to believe or suspect that a serious incident has happened and there are reasonable grounds for the suspicion.

<sup>5</sup> Charity Commission ‘Reporting Serious Incidents - guidance for trustees’, December 2013, [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/375979/Reporting\\_Serious\\_Incidents\\_LowInk.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/375979/Reporting_Serious_Incidents_LowInk.pdf)

## **Commitment and Enforcement**

Adherence to the Policy will be expected required from all members of AbleChildAfrica, whether they are employed full or part-time, on a consultancy basis, sit on the Board of Trustees or act as volunteers; and all members are accountable for enforcing these policies.

All members of AbleChildAfrica shall be made aware of the policy, whilst it shall be introduced to new employees as part of the induction process. Staff will be reminded of its importance in select meetings, where reminder communications could include examples of actions taken and simulated ethical dilemmas.

At all times, all AbleChildAfrica members should ensure that any concerns raised are based on conflict with the values of AbleChildAfrica rather than personally held views.

Ethical fundraising is an ongoing process and will be a standing item on the agenda of all Resource Committee Meetings. The Executive Director will seek assurance from the Fundraiser/s that risk/conflict is being monitored and that action being taken as agreed in this policy.

This policy will be reviewed by the Resources Sub-Committee of the Board annually and will be updated regularly as needed.

*Version 5; Presented to the Board of Trustees 08/09/2016*

*Last updated: 10/01/2017*