

# Good Things Foundation – Fundraising Policy

Version: 3

Effective Date: November 2025

Next Review Date: November 2026

## **1. Introduction**

1.1 This policy sets out how Good Things Foundation raises, manages, and accounts for charitable funds.

1.2 It ensures compliance with the Fundraising Regulator’s Code of Fundraising Practice (2025), relevant legislation, and sector standards.

1.3 It applies to all staff, trustees, volunteers, and any external parties fundraising on behalf of, or in partnership with, Good Things Foundation.

1.4 We are committed to fundraising that is:

- a) **Legal:** meeting all relevant laws and regulations;
- b) **Open:** transparent about our processes and willing to explain them;
- c) **Honest:** accurate in our claims and respectful in our dealings;
- d) **Respectful:** considerate of people, their circumstances, and the communities we engage with.

1.5 **Important context:** Good Things Foundation does not undertake high-risk public fundraising methods such as street collections, door-to-door appeals, mass public appeals, or telephone solicitation. We do, however, receive public contributions via online platforms (for example, our website donate function, JustGiving, and campaign pages such as Get Online Week). These activities are managed in line with this policy and relevant sections of the Code. Should the organisation decide to introduce other forms of public fundraising in future, further provisions of the Code will apply in full.

## **2. Legal and Regulatory Framework**

2.1 This policy is aligned with the Fundraising Regulator’s Code of Fundraising Practice (2025) and relevant legal requirements, including (but not limited to):

- a) Charities Act 2011;
- b) Charities (Protection and Social Investment) Act 2016;
- c) Data Protection Act 2018 & UK GDPR;

- d) Equality Act 2010;
- e) Safeguarding Vulnerable Groups Act 2006;
- f) Mental Capacity Act 2005;
- g) Bribery Act 2010;
- h) PCI-DSS standards;
- i) HMRC Gift Aid provisions; and
- j) Applicable regulations in Scotland and Northern Ireland.

### **3. Scope**

3.1 This policy covers all fundraising and income generation activities that are or may be carried out by Good Things Foundation, including:

- a) Competitive grants from trusts, foundations, and statutory bodies;
- b) Government and public sector contract income;
- c) Corporate sponsorships and donations;
- d) Individual giving (including major donors and legacies);
- e) Gifts in kind.

### **4. Fundraising Approach**

4.1 Our approach is relationship-based, strategic, and impact-focused. We do not engage in:

- a) Door-to-door or street fundraising;
- b) Telephone or unsolicited appeals to the general public;
- c) Commission-based or third-party fundraisers without written contracts;
- d) Targeting individuals in vulnerable circumstances.

4.2 If we engage a third party for fundraising in future, they must:

- a) Comply fully with this policy and the Code;
- b) Enter into a written agreement;
- c) Undergo proportionate due diligence; and
- d) Be monitored for ongoing compliance.

### **5. Core Behaviour Standards**

5.1 Fundraising by or for Good Things Foundation must:

- a) Avoid undue pressure - no unreasonable persistence or intrusion into privacy;
- b) End interactions promptly when requested;
- c) Treat all donors fairly, enabling informed decisions;
- d) Avoid unfair criticism of other organisations;

- e) Substantiate claims – all factual statements (impact data, use of funds, or costs) must be evidence-based;
- f) State secondary purposes – if funds for a specific purpose may be used differently if targets are unmet or exceeded, this must be explained in advance.

## 6. Governance and Authorisation

6.1 Ultimate oversight rests with the Board of Trustees.

6.2 Approval requirements:

Donation value	Authorisation level	Documentation required
≤ £1,000	No additional approval	-
£1,001-£500,000 (no operational impact)	Two-factor: Partnerships & Fundraising + another senior colleague	'Know Your Donor' due diligence assessment
£1,001-£500,000 (with operational impact)	Portfolio Board; escalation to SMT if required	'Know Your Donor' due diligence + Bid Scope
£500,001-£1,000,000	Group CEO or Director of Business Development; Trustees notified	'Know Your Donor' due diligence + Bid Scope
> £1,000,000	UK Board of Trustees	'Know Your Donor' due diligence, enhanced risk assessment + Bid Scope

6.3 Delegations apply in absence of key individuals, in line with the Foundation's governance protocols.

## 7. Due Diligence, Acceptance and Refusal

7.1 Due diligence must be proportionate to the size, nature, and source of the donation. Enhanced checks are required for large, unusual, or high-risk donations.

7.2 Donations may only be refused or returned in exceptional circumstances, including where they originate from unlawful sources, conflict with our mission, create significant reputational or operational risk, or include unreasonable conditions. Donations must also be refunded if a donor correctly exercises their legal right to a refund. All refunds must be made in line with the organisation's powers and policies. Where there is uncertainty about whether a refund is appropriate, legal advice should be sought. All acceptance, refusal, or refund decisions must be documented.

## **8. Anonymous Donations**

8.1 We will not accept anonymous donations of £25,000 or more without investigation.

8.2 Appropriate reporting (including to the Charity Commission) will be made where required.

8.3 Smaller anonymous donations are reviewed regularly for unusual patterns.

## **9. Safeguarding and Vulnerable Individuals**

9.1 We will not accept a donation if we know, or have reason to believe, the donor lacks capacity to give.

9.2 Fundraisers must not exploit trust, lack of knowledge, or vulnerable circumstances.

9.3 All fundraising staff, trustees, and volunteers must follow safeguarding procedures, which include:

- a) Recognising potential vulnerability;
- b) Seeking guidance from safeguarding professionals where needed;
- c) Acting to protect donors, beneficiaries, and colleagues.

For children:

- a) Parental/guardian permission is required for engagement under 18;
- b) Additional data protection and photography permissions apply for under 13s.

## **10. Donor Communication**

10.1 Fundraising communications must be:

- a) Clear, accurate, and truthful;
- b) Respectful of donor preferences;
- c) Honest about how funds are used - restricted gifts must have stated fallback purposes;
- d) Absent of unjust criticism toward other organisations.

10.2 Acknowledgements should be timely and appropriate.

## **11. Processing Donations**

11.1 We do not generally handle public cash donations, but should donations ever be received through events, corporate partner activities, or other non-public channels in future, we will:

- a) Securely store and promptly bank any physical donations;
- b) Process cheques/vouchers without delay, ensuring they have cleared before refunds;
- c) Process card/online payments in compliance with PCI-DSS standards;
- d) Claim Gift Aid only where a valid declaration exists and donor eligibility is confirmed.

## **12. Complaints Handling**

12.1 The organisation maintains a publicly available complaints procedure.

12.2 Complaints will be investigated fairly, responded to promptly, and used to improve practice.

## **13. Monitoring and Review**

13.1 The Director of Business Development will report quarterly to the Board on income, forecasts, risks, and significant developments.

13.2 This policy will be reviewed annually, or sooner if legislative or regulatory changes require it.

## **14. Internal Concern Reporting**

14.1 Staff, trustees, and volunteers may raise concerns about fundraising practice through the whistleblowing procedure.

14.2 This procedure provides protection from victimisation.

14.3 Concerns may be reported directly to the Fundraising Regulator if internal resolution is not possible.

## **15. Conflicts of Interest**

15.1 All individuals involved in fundraising must declare actual or potential conflicts. Conflicted parties must recuse themselves from relevant decisions.

15.2 Conflicts must be recorded, monitored, and managed under organisational policy. Where conflicts cannot be resolved, the donation may be declined.

Approved by: UK Board of Trustees

Date: 30 October 2025

## Annex A – Mapping to the Fundraising Regulator’s Code of Fundraising Practice (2025)

<b>Policy Clause</b>	<b>Relevant Code Section(s)</b>	<b>Notes on Alignment</b>
<b>1. Introduction</b>	1.1 <i>Key Principles</i> ; 1.2 <i>Legal and Regulatory Requirements</i>	Establishes scope, commitment to legal, open, honest, and respectful fundraising.
<b>1.5 Important Context</b>	2.0 <i>Scope of the Code</i> ; 4.0 <i>Working with Third Parties</i>	Clarifies exclusion of direct public fundraising; sets requirements for any future third-party fundraising.
<b>2. Legal and Regulatory Framework</b>	1.2 <i>Legal and Regulatory Requirements</i>	Lists statutory and regulatory obligations in full.
<b>3. Scope</b>	2.0 <i>Scope of the Code</i>	Defines fundraising covered, including grants, contracts, corporate and individual giving, gifts in kind, and crowdfunding.
<b>4. Fundraising Approach</b>	1.1 <i>Key Principles</i> ; 4.0 <i>Working with Third Parties</i> ; 8.0 <i>Treating Donors Fairly</i>	States prohibited practices (e.g., street/door-to-door); sets contractual, due diligence, and monitoring requirements for third parties.
<b>5. Core Behaviour Standards</b>	1.1 <i>Key Principles</i> ; 8.0 <i>Treating Donors Fairly</i> ; 7.0 <i>Communicating with Donors</i>	Covers undue pressure, fairness, truthful representation, evidence-based claims, and secondary purpose disclosures.
<b>6. Governance and Authorisation</b>	3.0 <i>Governance, Oversight and Control</i>	Establishes Board oversight, authorisation thresholds, due diligence requirements, and governance protocols.
<b>7. Due Diligence, Acceptance and Refusal</b>	3.2 <i>Due Diligence on Donations</i> ; 3.3 <i>Refusing and Returning Donations</i>	Sets proportionality principle for checks, enhanced checks for high-risk donations, and refusal criteria.

<b>8. Anonymous Donations</b>	3.2.6 <i>Anonymous Donations</i>	Sets threshold for investigation and potential reporting to Charity Commission.
<b>9. Safeguarding and Vulnerable Individuals</b>	8.0 <i>Treating Donors Fairly</i> ; 8.3 <i>Vulnerable Circumstances</i>	Prohibits acceptance from those lacking capacity; outlines safeguarding procedures for adults and children.
<b>10. Donor Communication</b>	7.0 <i>Communicating with Donors</i>	Requires clarity, accuracy, respect for preferences, and avoidance of unjust criticism.
<b>11. Processing Donations</b>	5.0 <i>Processing Donations</i> ; 5.2 <i>Handling Cash</i> ; 5.3 <i>Handling Cheques and Vouchers</i> ; 5.4 <i>Card and Online Payments</i> ; 5.5 <i>Gift Aid</i>	Sets requirements for secure handling, prompt processing, PCI-DSS compliance, and lawful Gift Aid claims.
<b>12. Complaints Handling</b>	6.0 <i>Complaints and Disputes</i>	Maintains public procedure for fair and prompt handling of complaints.
<b>13. Monitoring and Review</b>	3.0 <i>Governance, Oversight and Control</i>	Details regular Board reporting and policy review requirements.
<b>14. Internal Concern Reporting</b>	6.2 <i>Whistleblowing</i>	Protects those raising concerns and provides for escalation to the Regulator.
<b>15. Conflicts of Interest</b>	3.1 <i>Managing Conflicts of Interest</i>	Requires declaration, management, and potential refusal where conflicts remain unresolved.

## Annex B – Code Provisions Not Applicable to Good Things Foundation

<b>Code Section</b>	<b>Reason for Non-Applicability</b>
<b>4.1 Face-to-Face Fundraising in Public Places</b>	Good Things Foundation does not carry out street collections, on-street fundraising, or similar activities.
<b>4.2 Door-to-Door Fundraising</b>	No house-to-house fundraising is undertaken by the organisation.
<b>4.3 Fundraising in Private Venues</b>	Good Things Foundation does not fundraise through private site agreements or venue-based solicitation.
<b>4.4 Fundraising by Telephone</b>	No telephone solicitation or telemarketing is conducted.
<b>5.1 Lotteries, Prize Draws, and Raffles</b>	Good Things Foundation does not operate any lottery, raffle, or similar prize-based fundraising.
<b>5.6 Digital Crowdfunding to the General Public</b>	While crowdfunding is in scope where conducted via partners or targeted networks, Good Things Foundation does not currently run mass public digital crowdfunding campaigns.
<b>7.2 Direct Marketing by Post</b>	Good Things Foundation does not conduct postal mailshots to the public.
<b>7.3 Direct Marketing by Email/SMS to the Public</b>	Good Things Foundation does not send mass marketing communications to the public for fundraising purposes.
<b>9.0 Legacy Marketing to the Public</b>	Good Things Foundation does not conduct mass-market legacy marketing campaigns.
<b>11.0 Events Fundraising</b>	Good Things Foundation does not run ticketed fundraising events aimed at the general public.