



Festival Medical Services FMS Ethical Fundraising Policy

1. Purpose

This ethical fundraising policy sets out how we manage the ethical issues within fundraising.

Specifically, we aim at all times to be open, honest, fair and to operate in a legal way that meets not only the law, but also fundraising regulation and best practice, including the [Code of Fundraising Practice](#).

Everyone who is involved in fundraising has a responsibility to be aware of and comply with the ethical issues and procedures in this policy.

2. Fundraising – involved groups

2.1. Ethical Fundraising - Members And Donors

Members have a right to expect us to provide clear, truthful information on our work, including reporting on how we spend the funding we are given and managing donors' information responsibly.

We will always be honest about what we can achieve when asking for funds, submit realistic budgets, use the funds for the purpose intended and ensure that we provide any reports required, on time.

We will comply with the guidance issued by the Charity Regulators and UK law, including in respect of openness and honesty with our supporters and members of the public.

We will respect the privacy and contact preferences of our donors. We will respond promptly to requests to cease contacts or complaints and act to address their causes.

2.2. Ethical Fundraising - Vulnerable Donors

In seeking donations, if an individual shows signs of possible vulnerability, we will:

- Consider communication preferences.
- Not make assumptions about him/her.
- Ask him/her what they need and how you can help them better.
- Empathise and sympathise with him/her.



- Try asking questions in a different way.
- Summarise anything that has been decided or agreed in plain English.

We:

- Will not place any undue pressure on individuals to donate.
- Will not either solicit nor accept donations from anyone whom we know, or think may not be competent to make their own decisions.
- Will be sensitive to any particular need that a donor may have.
- Ethical Fundraising - Charity Beneficiaries

How we represent our beneficiaries, in our communications, is always respectful of them and portrays them in the way they would wish to be seen. We will only use personal information that they have given consent for and for the purposes they have agreed and will not disclose anything that might put them at risk, particularly children and vulnerable people.

2.3. Ethical Fundraising - Staff And Volunteers

We have zero tolerance for abuse, including discrimination, bullying and sexual harassment, not only for fundraising staff and volunteers, but for anyone who is involved with our charity. We will maintain a culture of respect and equality, will ensure that there are processes to raise concerns that everyone is aware of and is confident to use and we will deal with any allegations of abuse promptly and sensitively.

3. Fundraising governance

3.1. Fundraising Due Diligence

- We will undertake reasonable due diligence of donors, to ensure they don't hold views or are involved in activities that might be incompatible with our role ethos and damage our reputation. In terms of donations, we will ensure that any gift is safe to accept and that doing so would be in the best interests of your charity. Festival Medical Services. We will also consider issues, such suspicious donations, or managing large anonymous gifts, or those from vulnerable individuals.
- Fundraising Donations Policy
- We abide by the law which requires us, in deciding whether to accept or refuse a donation, to consider which action is in the charity's best overall interest. We have adopted an Acceptance and Refusal of Donations policy, which covers this in detail.

3.2. Fundraising Commercial Partners

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.

We are aware of and comply with the Charity Commission [RS2 – Charities and Commercial Partners](#). We will ensure that any commercial agreement represents a fair deal for the charity and.

- Clearly establishes what we expect to contribute to and gain from it, prior to entering into an agreement.



- 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.

We will disclose any commercial partnerships in our Annual Report.

3.3. Restricted Donations

If supporters wish their donation(s) to be used in a specific way, or for a specific purpose, they may make a restricted donation by providing written instructions with their donation. We will always respect this.

3.4. Fundraising Regulations - Trustees

The trustees are aware of and will comply with Charity Commission guidance [CC3a](#), regarding trustees' responsibilities, particularly in relation to always acting in the charity's best interests and managing any conflicts of interest. The trustees are also aware of and follow the 6 principles in Charity Commission 20 ([Charity Fundraising: a guide to trustees duties](#)).

We will ensure that everyone is aware of and consistently complies with the Fundraising Regulator [guidance on fundraising behaviours](#) and respond promptly and effectively to any [fundraising complaints](#).

3.5. Acceptance and refusal of donations

We have put in place procedures to ensure that decisions are not taken on an ad-hoc basis but are in support of FMS's strategy and objectives and aligned to our values.

This procedure has been designed to provide clear and objective standards against which FMS's actions can be judged in cases of potential or actual dispute to protect FMS's reputation against adverse public reaction.

4. Obligations and principles

4.1 Trustees' obligations

The Trustees take overall legal responsibility for decisions relating to whether a donation is accepted or refused and must always be able to demonstrate that they have acted in the best interest of FMS. They have a duty to consider carefully, based on the evidence made available to them, whether FMS's interests will be better served by accepting or refusing the donation and to act accordingly.

- These judgments must not promote any Trustee or employee's personal moral agenda or interest and must be directly related to the interests of FMS.
- Trustees must derive no personal benefit (individually or collectively) from donations, loans or other material support offered to FMS.

4.2. Procedures

A committee of the Board of Trustees will have oversight of all donations received. In line with the policy the sub committee will make the decision to accept or refuse donations. The Board of Trustees will be informed of the number and



value of donations received and the reasons for any refusals to accept.

4.3. Guiding principles

To establish whether donations or categories of donation are in the best interest of FMS, they will be evaluated against these factors:

The donation should contribute towards FMS's overall strategy and plans. FMS should be able to successfully deliver any agreed activity and advance its mission and strategic direction under the conditions tied to any donation.

The donor's objectives or activities must not appear to be incompatible with FMS's vision, mission and values.

4.4. FMS will refuse donations:

- From companies or individuals whose wealth is known to result from illegal activities or where there are indications of corruption and related economic crime.
- From individuals who are vulnerable and may have been subject to coercion.
- Where the activities of a donor are directly contrary to the objectives or agreed policies of FMS or where accepting the donation might damage the reputation of FMS.
- Where FMS suspects that the gift has been donated to facilitate money laundering or other criminal activity.
- Where it can be clearly shown that the cost to FMS of accepting a donation will be greater than the value of the donation itself, including the cost of reporting on grant-funded activities that are not part of the charity's strategy.

Where the support, whilst reflecting FMS's objectives, is:

- Untenable (for example, if FMS does not have the resources to maintain the running costs associated with the donation.)
- Consists of goods, services or property which FMS cannot lawfully use, convert, exchange or sell in direct support of its charitable objectives.
- Dependent upon the fulfilment of certain conditions and those conditions are contrary to the objectives of FMS; require unreasonable levels of support from FMS; or will divert FMS and its staff from pursuing its current objectives, policies, or work priorities.

In the event that FMS decides not to accept a donation, the committee will record both the decision and the reason.



5. Compliance checklist

Checklist for consideration (will be refined in practice)	
1. Clear, truthful communication for our teams	
2. Have we considered vulnerability of donors	
3. Have we maintained a culture of respect and equality	
4. Have we undertaken suitable due diligence	
5. Have we considered the status of a donor re Commercial Partners	
6. Is the donation restricted	
7. Have the trustees been reminded of their obligations laid out by the Charity Commission	
8. Have we assessed the donation against FMS standards (whether accept or decline donation). Are the donor's objectives or activities incompatible with FMS's vision, mission and values.	

