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Name of policy	GOV COMM Ethical fundraising policy
Last updated/reviewed	12 January 2022
Update interval	Every three years
Authorised sign-off	BMS Board of Trustees



BMS Ethical Fundraising Policy

This policy sets out the guidelines for raising financial support and accepting donations for BMS World Mission, to ensure that these activities are carried out in an open, responsible, accountable and ethical way.

1 Donors

BMS will treat its donors with respect, recognising their partnership role in achieving BMS' mission activities.

Donors are entitled to know how BMS spends the money given. Timely information will be provided on how contributions are used honouring donor wishes. An Annual Report will be published and additional requests for information are welcomed.

Donors' details will be held securely and confidentially by BMS and will not be passed on to third parties **unless we are legally required to**. Donors have the right to view their record and to challenge its accuracy. BMS will adhere to its Data Protection and Privacy Policy.

BMS will make every effort to honour donor requests in relation to receipt of solicitations and printed material concerning BMS.

Donors and prospective donors are entitled to know, upon request, whether an individual soliciting funds on behalf of BMS is an employee, volunteer, or other stakeholder.

Donor requests to remain anonymous will be respected as far as is legally, practically and ethically possible. The Head of Finance and the Supporter Engagement Team Leader will be informed of the names of all donors, but otherwise names will not be shared beyond those with a direct involvement in the solicitation, approval, processing, stewardship and auditing of the gift.

2 Fundraising Regulator registration

BMS is registered with the Fundraising Regulator and as such:

- Fully endorses the Fundraising Regulator promise (Appendix)
- Pledges to raise funds in accordance with the Code of Fundraising Practice

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- Has drawn up a Complaints Policy and a Complaint Procedure which is published on the BMS website. Where a donor believes that this policy has not been followed, a complaint according to the Complaints Policy can be made.

3 Acceptance and refusal of donations

It is the responsibility of those supporting the fundraising function within BMS to maximise income in order to support BMS' mission activities. Any charitable donations received by BMS must be for exclusively charitable purposes and in furtherance of its objects and shall not improperly influence any decisions or actions made by or on behalf of BMS.

In addition, mission personnel may receive personal gifts of up to £200 per worker per donor or church per year. These are directly passed on to the worker. Any amount over £200 will be retained by BMS and put towards the mission worker's salary, expenses or grants for their work. However, donations will be refused if:

- a) There is any reason to suspect that the gift has derived in whole or in part from illegal or unethical activity, unethical as defined by BMS' Ethical Investment Policy, or is part of a money laundering chain.
- b) The reason for which the money is given is either opposed to BMS' charitable objectives, for any reason does not align with BMS' strategy or cannot be used by BMS for the purpose given
- c) The gift has the potential to create unacceptable conflicts of interest
- d) There is reason to believe that a supporter is in a vulnerable position and lacks capacity to make a decision to donate. If a donation has already been made, and BMS receives evidence of a vulnerable position afterward, the gift will be return.
- e) Acceptance of the donation would not be in the best interests of the charity. For example, if a donation were made by a company or organisation whose objects were contrary to those of BMS. A donation may be refused if there were strong reasons to believe that, by accepting the donation, the reputation of BMS would be harmed and lead to a decline in support, which in turn would lead to a fall in resources available to those BMS supports.

If a gift is refused, BMS keeps a record of its decision and the reasons for it.

4 Process for handling donations

When accepting donations, BMS complies with relevant legislation and organisational policies, including money laundering rules, the Bribery Act and Charity Commission guidance. Day to day responsibility for the acceptance of donations lies with the Supporter Engagement Team Leader who may refer certain decisions to the Director of Communications and Funding who may, in the case of doubt, refer to the Director of

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Finance and Corporate Services and General Director. In cases of potential serious implications for BMS, the issue may be referred to the BMS Board of Trustees, which has ultimate responsibility for the acceptance of donations, and advice may be sought from the Charity Commission.

Donations are received and administered by the Supporters Services Team within the Finance and Corporate Services department and records are held on BMS' database, Raiser's Edge. Any donations received where the donor is known are formally acknowledged with a receipt. If the team has any doubts about accepting a gift, they should contact the Head of Finance and Supporter Engagement Team Leader.

All gifts from individuals of £5,000 and above should be referred to the Supporter Engagement Team Leader to initiate or oversee an appropriate process of due diligence. The Supporter Engagement Team Leader should also review annually all supporters who give £5,000 or more during a period of 12 months.

In any cases of concern, and for gifts of or more than £50,000, that are not legacies, the Supporter Engagement Team Leader will seek additional guidance from the Director of Communications and Funding and the Director of Finance and Corporate Services after completing the process of due diligence, detail below. At any time, they may also seek any other advice that will enable them to reach a decision regarding the acceptance of a gift and its conditions.

BMS can accept anonymous donations, while the Supporter Engagement Team Leader will look out for suspicious circumstances.

Staff should seek advice and support from the Supporter Engagement Team Leader before soliciting a philanthropic donation or accepting other than a token gift. The primary contact is the Supporter Engagement Team Leader, or in their absence the Director of Communications and Funding.

5 Use of donations

Whenever possible, BMS will appeal for unrestricted gifts i.e., donations that can be used to support any area of BMS' activity. When a gift is given exclusively for a specific purpose and is in line with BMS' strategy, that gift will be treated as restricted giving and will be accounted for separately.

Donations will be used for the purpose given. If BMS has accepted a gift but cannot use the donation for the original purpose given, BMS will get advice from legal advisers or the Charity Commission and contact the donor to request permission to use the donation for a different purpose. If permission is not given, the donation will be returned to the donor. If BMS is fundraising for a particular purpose, fundraising material will include a statement

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saying what would happen to received funds if the total amount raised is not enough to reach or is more than the target.

BMS is committed to keeping administration costs to a minimum, in order to maximise resources for BMS mission activities. The cost of fundraising activities will be carefully monitored to ensure these produce a good return on investment.

6 Fundraising material

In producing fundraising and other promotional material, BMS will ensure that:

- All fundraising solicitations will disclose BMS' name and purpose for which the funds are requested. Written solicitations will also include BMS' registered address, its charity and company number, and other contact information.
- The stories featured are real-life stories which are accurate and do not exaggerate the claims made.
- The images used to illustrate stories will give a realistic portrayal of the situation, respect the dignity of individuals featured in the images and are gained with informed consent.
- A claim or image that some people may find shocking are not used merely to attract attention. If such images are used that some people may find shocking, BMS will give warnings about this material.

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BMS' Due Diligence procedure

The Supporter Engagement Team Leader is responsible to oversee BMS' due diligence procedure.

To manage the balance between the need to know and the right to privacy, the Supporter Engagement Team Leader will typically focus on reviewing and noting only information that is relevant to the funds or donor and that is in the public domain or on BMS' database. Care will be taken to assess how reliable any information in the public domain is. The due diligence checklist below will be used.

Due diligence checklist

With best practice guidance in mind, the following due diligence checks are conducted of individual gifts of £5,000 and gifts adding up to £5,000 and more during one year.

Gift from individual	Optional	Essential	True?
Donor is known to BMS	x		
There isn't any negative press that could raise the suspicion of money laundering or unethically achieved income (ethical as defined by BMS' Ethical Investment Policy)		x	
Donor is not on the UK sanctions list		x	
Gift from an organisation (trusts/foundations/other charities)			
Organisation is known to BMS	x		
<p>Organisation is based in the UK: Organisation is registered on the relevant charity regulator's website and no problems with the organisation are visible.</p> <p>Organisation is not based in the UK: Organisation is recognised by and sends audited accounts to a national regulatory body, and no problems with the organisation are visible.</p>		x	

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The organisation's purpose does not raise any questions on whether it is appropriate for BMS to be involved or linked with that organisation		x	
There is no indication that the organisation's income has been achieved through money laundering or in any other unethically way (ethical as defined by BMS' Ethical Investment Policy)		x	
There is no negative press that could raise the suspicion of money laundering or unethically achieved income		x	
Organisation is not on the UK sanctions list		x	
Gift from a company			
The company is known to BMS	x		
Company is based in the UK: The company is registered with Companies House and no problems with the organisation are visible. Company is not based in the UK: The company is recognised by and sends audited accounts to a national regulatory body, and no problems with the organisation are visible.		x	
The company's business has been reviewed on their website, Companies House' website or other credible resources		x	
The company's business is in line with BMS' ethical values as defined by BMS' Ethical Investment Policy		x	
It is appropriate for BMS to be involved or linked with the company		x	
The company is not on the UK sanctions list		x	



Our fundraising promise

This promise outlines the commitment made to donors and the public by fundraising organisations which register with the Fundraising Regulator. Those who register with the regulator agree to ensure their fundraising is legal, open, honest and respectful. The standards for fundraising are set out in the Code of Fundraising Practice.

WE WILL COMMIT TO HIGH STANDARDS

- We will adhere to the Fundraising Code of Practice.
- We will monitor fundraisers, volunteers and third parties working with us to raise funds, to ensure that they comply with the Code of Fundraising Practice and with this Promise.
- We will comply with the law as it applies to charities and fundraising.
- We will display the Fundraising Regulator badge on our fundraising material to show we are committed to good practice.

WE WILL BE CLEAR, HONEST AND OPEN

- We will tell the truth and we will not exaggerate.
- We will do what we say we are going to do with donations we receive.
- We will be clear about who we are and what we do.
- We will give a clear explanation of how you can make a gift and change a regular donation.
- Where we ask a third party to fundraise on our behalf, we will make this relationship and the financial arrangement transparent.
- We will be able to explain our fundraising costs and show how they are in the best interests of our cause if challenged.
- We will ensure our complaints process is clear and easily accessible.
- We will provide clear and evidence based reasons for our decisions on complaints.

WE WILL BE RESPECTFUL

- We will respect your rights and privacy.
- We will not put undue pressure on you to make a gift. If you do not want to give or wish to cease giving, we will respect your decision.
- We will have a procedure for dealing with people in vulnerable circumstances and it will be available on request.
- Where the law requires, we will get your consent before we contact you to fundraise.

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- If you tell us that you don't want us to contact you in a particular way we will not do so. We will work with the Telephone, Mail and Fundraising Preference Services to ensure that those who choose not to receive specific types of communication don't have to.

WE WILL BE FAIR AND REASONABLE

- We will treat donors and the public fairly, showing sensitivity and adapting our approach depending on your needs.
- We will take care not to use any images or words that intentionally cause distress or anxiety.
- We will take care not to cause nuisance or disruption to the public.

WE WILL BE ACCOUNTABLE AND RESPONSIBLE

- We will manage our resources responsibly and consider the impact of our fundraising on our donors, supporters and the wider public.
- If you are unhappy with anything we've done whilst fundraising, you can contact us to make a complaint. We will listen to feedback and respond appropriately to compliments and criticism we receive.
- We will have a complaints procedure, a copy of which will be available on our website or available on request.
- Our complaints procedure will let you know how to contact the Fundraising Regulator in the event that you feel our response is unsatisfactory.
- We will monitor and record the number of complaints we receive each year and share this data with the Fundraising Regulator on request.