

The Phoenix Fellowship Fundraising and Donor Ethics Policy

Version: 1.0

Purpose and scope

This policy sets out the standards and rules that govern all fundraising undertaken by The Phoenix Fellowship. It explains the principles we follow, the responsibilities of trustees, staff and volunteers, the criteria we use when deciding whether to accept a donation, the safeguards we apply to protect people and the charity, and the rights of donors and supporters. It applies to all fundraising and stewardship activities, including individual and corporate giving, trusts and foundations, donor advised funds, legacies, gifts in kind, sponsorships, and digital campaigns. It covers any third parties who fundraise in our name and any volunteers who raise funds on our behalf.

Principles

We commit to the following principles in all fundraising. Integrity. We act honestly and keep our promises. Transparency. We are clear about who we are, why we are raising funds, and how funds will be used. Respect. We treat donors and the public with courtesy and we respect their preferences. Fairness. We never apply undue pressure. Accountability. We keep accurate records, report openly, and correct mistakes. Independence. Donations do not buy influence over grant decisions or governance.

Legal and regulatory framework

Our trustees are responsible for fundraising in line with charity law and recognised standards. We follow Charity Commission guidance on trustees and fundraising and we follow the UK Fundraising Regulator Code of Fundraising Practice. We comply with data protection law for supporter information and with tax law for Gift Aid and financial records.

Roles and responsibilities

Trustees set the fundraising strategy, approve this policy, and oversee compliance. Trustees decide on high risk or novel donations and on any proposed refusal or return of a donation. The senior lead for fundraising is responsible for day to day compliance, training, record keeping, due diligence, and reporting to trustees. All staff and volunteers must follow this policy, complete training that is relevant to their role, and raise concerns promptly. Any third party acting in our name must sign and follow this policy and any supplementary instructions.

Acceptance and refusal of donations

We welcome lawful donations that support our charitable purposes. We may refuse or return a donation if accepting it would be unlawful, would create a serious risk to

our reputation or independence, would be likely to deter beneficiaries or supporters, would impose conditions that conflict with our values or strategy, or would result in a net loss after necessary costs. Refusals and returns are documented with reasons. Significant cases are decided by trustees and the decision and rationale are minuted.

Ethical screening and due diligence

We carry out proportionate due diligence on significant donations and sponsors. Checks may include identity verification, source of funds, sanctions and watchlist checks, adverse media review, conflicts of interest, and alignment with our values. Higher risk donations receive enhanced checks and trustee sign off. We avoid accepting support where there is credible evidence of serious harm linked to the donor or the source of funds, including human rights abuses, hate or discriminatory practice, corruption, or serious environmental harm.

Exclusions and sensitive sectors

We do not accept donations that would require us to act contrary to our charitable purposes, our values, or the law. We will not accept support that requires endorsement of a product or political position. We will not accept funds that are known to be the proceeds of crime. Sectors that may require enhanced scrutiny include alcohol, gambling, adult content, fossil fuels, arms manufacture, surveillance technology, and any sector with a record of serious violations of human rights. Trustees decide on any proposed exceptions after a risk assessment.

Restricted and unrestricted funds

Donors may request that a gift is used for a specific purpose. We accept restrictions that are feasible and aligned with our strategy. We track restricted funds separately and we use them only for the agreed purpose. If we cannot use a restricted donation as intended, we will offer alternative options or, if necessary, we will return the donation. Unrestricted donations support our mission where the need is greatest and may be used for core costs.

Sponsorship and partnership

We welcome sponsorships that are consistent with our values. All sponsorship agreements set out benefits, recognition, editorial independence, data sharing controls, and termination rights. Sponsorship must not influence or appear to influence grant decisions or research priorities.

Recognition and anonymity

We thank donors appropriately and offer recognition that is proportionate to the gift. Naming rights for programmes or awards require trustee approval and a written agreement. Donors may give anonymously. We will still record the information we are legally required to hold for audit and due diligence, but we will not publish their name without consent.

Protecting people who may be in vulnerable circumstances

We take special care when engaging with people who may be in vulnerable circumstances. We do not accept donations where we believe the person lacks capacity to make an informed decision or is under undue pressure. We offer cooling off periods on request and we will refund a donation that is shown to have been made without valid consent. We train relevant staff and volunteers to recognise signs of vulnerability and to respond respectfully.

Use of supporter information and privacy

We process supporter information in line with our privacy policy. We only send marketing communications where the person has asked to receive them or where another lawful basis applies. We respect communication preferences and we do not sell personal data. Third party fundraisers acting for us must use supporter information only for the agreed purpose and must delete it when the purpose ends.

Methods we use and do not use

We may use the following methods. Online giving through reputable platforms. Direct giving by bank transfer. Payroll giving. Trust and foundation applications. Corporate sponsorships. Events that are appropriate for our mission. We do not currently use street collections, on street face to face sign ups, house to house collections, telephone cold calling, lotteries, or raffles. If we consider any of these methods in future, we will update this policy and put the necessary controls in place before we begin.

Gifts in kind and pro bono support

We welcome goods and services that help us deliver our mission. We assess gifts in kind using the same ethical screening that we apply to financial donations. We agree the scope, duration, and recognition in writing and we record the estimated value for reporting where appropriate.

Payment handling and anti-financial crime

We prefer donations by bank transfer or through approved online platforms. We set a low threshold for cash acceptance and we discourage large cash donations. We do not accept cryptocurrency at this time. Where a donation raises concerns we will pause acceptance while we complete checks and, if necessary, we will report suspicions in line with legal duties.

Conflicts of interest

We manage conflicts in line with our conflicts of interest policy. Trustees and staff must declare any personal connection to a donor or sponsor. A person who has a conflict does not take part in the decision to accept or refuse a donation. The register of interests is kept up to date and relevant discussions are recorded in minutes.

Complaints and whistleblowing

People can complain about our fundraising using the route set out in our complaints policy. If the matter concerns fundraising standards and we cannot resolve it, the complainant may contact the Fundraising Regulator. We protect whistleblowers who raise concerns in good faith and we investigate concerns promptly.

Stewardship and donor rights

We acknowledge donations promptly, we issue receipts where required, and we provide clear information about impact. Donors have the right to know how their gift will be used, to choose whether to receive updates, to change their preferences, to remain anonymous, and to have their data protected.

Record keeping and audit

We keep accurate records of donations, restrictions, acknowledgements, Gift Aid and due diligence. Records are kept for the periods set out in our retention schedule. We conduct periodic internal checks and we provide information needed for audit and regulatory returns.

Training and monitoring

We provide training that is proportionate to the role of each person involved in fundraising. We monitor compliance through spot checks and review meetings. Incidents and learning points are reported to trustees and actions are tracked to completion.

Contact

If you have any questions about this policy, please contact the Policy Lead using the policy@phoenixfellow.org email address.

Review

This policy is reviewed at least once a year and sooner if legal requirements or our operations change. The version number and effective date will be updated on publication.

Effective date

Effective from. 1st October 2025

Document owner. Policy Lead.

Next planned review. September 2026