



ETHICAL FUNDRAISING POLICY

SNAPS YORKSHIRE CIO

July 2026

Background

This policy seeks to cover the ethical issues and social responsibility within fundraising. All SNAPS' employees involved in fundraising have a responsibility to be aware and have a thorough understanding of this policy.

SNAPS is committed to observing and promoting ethical principles and values with respect to all relationships, communications and transactions. It is the aim of SNAPS that we will act in accordance with the five ethical principles of conduct stated below:

- 1) *Honesty*: All activity shall always be carried out honestly and truthfully so that the public trust is protected and donors and beneficiaries are not misled.
- 2) *Respect*: Employees and volunteers shall always act with respect for the dignity of their profession and their organisation and with respect for the dignity of donors and beneficiaries.
- 3) *Integrity*: Employees and volunteers will act openly and with regard to their responsibility for public trust. They shall disclose all actual or potential conflicts of interest and avoid any appearance of personal or professional misconduct.
- 4) *Empathy*: Employees and volunteers will work in a way that promotes their purpose and encourage others to use the same professional standards and engagement. They shall value individual privacy, freedom of choice, and diversity in all forms.
- 5) *Transparency*: Employees and volunteers stimulate clear reports about the work they do, for example the way donations are managed and disbursed, and costs and expenses, in an accurate and comprehensible manner.

(These five principles are drawn from International Statement of Ethical Principles in Fundraising October 2006)

SNAPS adopts policies, procedures and processes which allow us to build on the above and we would always seek to evaluate any long-term consequences of our behaviour. At times we may also be willing to make short term sacrifices to realise long term aims.

SNAPS is registered with the Fundraising Regulator which demonstrates our commitment to fundraise in a way that is legal, open, honest and respectful, in line with the [Code of Fundraising Practice](#).



Procedure

Actions, transactions and associations occur in most areas of SNAPS' work. As well as adhering to the five principles outlined above, it is also our responsibility to ensure that we are not working with or promoting any individual or organisation that falls into one of the four ethical challenge areas:

- Does not aim to work to the same principles
- Carries out business that is not appropriate to the nature of our work or is engaged or associated with any form of illegal activity
- Is associated with any form of scandal that may be harmful to the purpose or outcomes of SNAPS

It is recognised that this list is not exhaustive. It is further recognised that categorisation of individuals and/or organisation on this list can be highly subjective. Such subjectivity is recognised and acknowledged and deemed to be the responsibility of the Board of Trustees.

Should any association and/or transaction occur or potentially occur that may offer challenge to the five ethical principles of conduct and/or the four ethical challenge areas, then this should be drawn to the attention of the Chief Executive, who will draw up a report for consideration by the Board of Trustees. Such consideration would normally be carried out as part of the ordinary business but may be conducted by conference call and/or e-mail should the timeframe be an issue.

The trustees will decide as to whether such association/transactions should take place and/or continue. Any decision taken by the trustees has no right of appeal. As these decisions are taken and recorded, precedents will be set that should be taken into consideration to ensure consistency of approach.

Exceptions to this Policy

Fundraising activity not covered by this policy:

- Fundraisers claiming to fundraise on behalf of SNAPS but who are not registered with us
- Matters relating to organisational finances, including governance
- Any other matter not defined as fundraising activity by The Code of Fundraising



Definitions

In this policy:

- 'Fundraising' refers to the engagement of individuals and organisations in their financial support for SNAPS, as well as some commercial activities SNAPS carries out in order to generate income
- 'Code of Fundraising Practice' – means the mandatory standards set out by the Fundraising Regulator
- 'Fundraising Regulator' – means the independent regulator of charitable fundraising
- 'Chartered Institute of Fundraising' – means the professional membership body for UK fundraising

Aims

We aim to ensure that our fundraising is legal, open, honest and respectful. The key legislation that our fundraising activity must comply with includes, but is not limited to:

- Charities Act 2011
- Data Protection Act 2018
- Privacy and Electronic Communications Act 2003
- Health and Safety at work Act 1974
- Proceeds of Crime Act 2002
- Gambling Act 2005

This Policy is consistent with [the Charity Commission's](#) guidance, other relevant legislation and local government by-laws.

In addition to these legal and regulatory responsibilities, our fundraising activity should also be conducted in line with our current policies, guidelines and procedures.

Fundraising should always be undertaken in line with this policy, and all our other organisational guidelines.

These comply with relevant UK laws and regulation, including those related to privacy. We respect our supporters' privacy and right to decide how and if we contact them. Only our team have direct access to our database and beneficiaries. We do not sell or swap supporters details and do not share your details with any other charities or third parties for their own purposes. You can opt out of marketing communications from us at any time. More details around our approach to privacy and marketing communications can be found in our [Privacy Statement](#).



We treat people equally and fairly and we have a clear procedure in place for how we protect and engage with supporters who are children and young people, or who may be in vulnerable circumstances, or an adult at risk. If a fundraiser or volunteer has concerns about a donor, a donation or commitment to fundraising may not be taken.

Why We Need to Raise Funds

SNAPS receives no statutory funding for our services, and we are driven by an ambitious plan to continue to provide services for children with additional needs and their families within the communities we serve. To deliver this plan, we need funds. As a charity that relies solely on financial contributions from individuals, companies, trusts and foundations and organisations to be able to deliver services, it is vital that our fundraising activity continues.

In seeking to raise these funds, we will share our vision, our plan of work and our impact and will seek to engage as many supporters as possible. Raising funds does not drive the work we do; it drives our ability to deliver our work. The work we do is driven by the needs of the families we serve.

In donating and raising funds, our supporters are directly making a difference to the children and families we support.

Where Our Funds Come From

We are an impartial and independent organisation, and we ensure that our fundraising and communications respect and protect this.

Our primary source of funding is donations from trusts and foundations. However, we will seek to generate income and donations from a diverse range of sources to ensure we maintain our sustainability, and do not become dependent on any single source of income.

We actively seek funding in pursuit of our charitable and strategic objectives. We ensure that projects for which we raise funds reflect our vision and aims, and that neither the funding opportunities we pursue nor the requirements of funders, will deflect us from our vision.

We accept donations from a range of organisations – trusts, foundations, companies and commercial organisations– where there will be a benefit to our work, without compromising our vision and aims, independence and credibility. We will not solicit or accept gifts from individuals, the public sector or organisations where association would negatively affect our reputation. We can only accept donations that are lawfully made and have been lawfully raised.



We operate the Charity Commissions' (['Know Your Donor' principle](#)) and will make reasonable and appropriate attempts to identify any individual or organisation that gives us financial support, particularly where significant sums are being donated, or the circumstances of the donation give rise to notable risk.

These will be assessed prior to acceptance by the Chief Executive and where appropriate the Board of Trustees. As part of their duty to the Charity Commission they must demonstrate that they have acted in the best interests of the charity and that association with any particular donor does not compromise SNAPS' position, harm our reputation or put future funding at risk. This applies to all types of donation - cash, donations in kind, shares, legacies, pro-bono work and sponsorship. The Chartered Institute of Fundraising [Accepting, Refusing and Returning donations guide](#) states that when deciding whether to accept or reject a donation careful consideration should be given to the extent to which the charity is likely to be harmed by accepting a donation. A donation should only be refused if to accept it would be more detrimental to the charity being able to achieve its objectives than rejecting it. Making this decision should involve a careful analysis of the risks of accepting a donation, balancing this against the benefit that will be obtained. These matters should be decided on a case-by-case basis and in making this decision we will comply with all relevant legislation including money laundering regulations, the Bribery Act and Charity Commission guidance, including terrorism and political activity.

We will not accept funding where the donation:

- Is known to be directly associated with criminal sources
- Would help a donor's personal or business objectives which conflict with those of SNAPS
- Would lead to a net decline for SNAPS and so risk a decline in the resources available to fund our work
- Would otherwise significantly damage our reputation
- Would be detrimental to the achievement of our organisational purposes

If we turn down a gift or offer of support, we will explain why, where it is appropriate.

We may accept anonymous individual, corporate or trust donations where there has been a rigorous due diligence process, to confirm that we are not at risk. If a supporter makes themselves known to us but wishes their gift to remain anonymous, we will honour these wishes, on the basis that the donation carries no significant reputational risk.



Special consideration will be given to all truly anonymous donations (i.e. where we have no idea of the source) and any anonymous donations over £5,000 should be referred directly to the Chief Executive/Board of Trustees due to the potential risk of money laundering. Anonymous donations over £25,000 need to be reported to the Charity Commission.

Our Fundraising Activities

Fundraising activities currently undertaken by us include but are not limited to:

- Trusts and Grants
- Donations from individuals
- Regular Giving Schemes
- Event Fundraising
- Third-party Challenge and Community Events
- Companies/Business Fundraising
- Legacies
- Major Donor Fundraising
- Raffle Fundraising
- In Memory Donations
- Collections
- Donation Boxes
- Telephone Fundraising

Responsible Fundraising

We recognise and respect that when we invest in fundraising activity, we do so with funds donated to us. Any investment in fundraising must have the potential to raise additional funds.

We strive to be as cost-effective as possible. We are accountable to our supporters and make sure we put our supporters' donations to work as quickly as we can and do this wisely and responsibly. To support this, we operate a Reserves Policy, in line with Charity Commission guidance, which aims to ensure as much as possible can be spent to support the families we are supporting today whilst setting enough aside so that current services could continue in the event of a significant drop in funding.

We regularly review our fundraising activity, seeking new opportunities where possible, whilst adhering to the principles clearly stated in the Code of Practice. Our procedures around fundraising activities are robust to ensure we foster trust and present the need for funds and support in an authentic way. We never put undue pressure on anyone to support us. If you do not want to give or wish to cease giving, we will respect your decision.



We thank our supporters for their contributions in a timely and appropriate manner, and we keep our supporters updated on the impact of their support.

How to Make Sure Your Donation Makes The Most Difference

We encourage all supporters to give financial support as general, unrestricted funds. This allows us the freedom to use funds where and when they are needed most, including responding to changes in demand and need or unexpected opportunities to create positive change. However, we also respect the donor's right to make a donation to a specific area of our work and will support individuals and organisations to do this through a restricted donation.

Occasionally we may ask our supporters to fund specific projects, campaigns or areas of work. We will use any donations raised in this way for the designated purpose for which they were provided and in line with our procedure for restricted funds, if that is what is agreed.

In the event of any restricted fundraising campaigns, we will follow advice from the CIOF and include a statement similar to - *"In the event that we don't raise enough money for this XXXXX, the money raised will go towards our general charitable activities."* Which will allow us to use the funds elsewhere.

Should excess funds for such initiatives be collected, the supporter's agreement will be sought for transferring the gift to other specific projects or our general activities.

Ethical Purchasing and Use of Services

When we purchase products and services to support our efforts to raise funds, we will endeavour to ensure that we source materials, products and agencies' services for the best possible value while protecting our reputation, maintaining our independence, managing any risks and ultimately aiming to work with organisations that reflect our own values and ethical standards. We may enter into commercial agreements with third party organisations for the purposes of raising funds, but to maintain our independence we do not endorse any third-party products, treatments or companies.

Third Party Fundraising

We do not currently outsource our fundraising activities to third party agencies, such as telephone and face to face fundraising agencies. We do however on occasion employ the use of consultants to support our work. We may also work with our corporate partners to support our activity on a voluntary basis.



Monitoring Fundraising Partners

Should we work with a fundraising partner to support our work, we must ensure:

- Formal agreements with fundraising partners are in place and they must include provisions for performance monitoring and compliance with the Code.
- Fundraising activity is monitored. Monitoring methods may include site visits, call listening, mystery shopping, and review of complaints logs.
- A designated person must be responsible for overseeing partner compliance and addressing any breaches promptly.

Our Fundraising Team

SNAPS strive to provide the best support for the children and families we work with and therefore investing in the people to deliver our services is a priority for us. Once we find the right people to deliver our services and support our sessions, we want them to be able to spend as much quality time with our families and the children we support as possible. To make sure this can happen we need a strong support team to take care of as many of the administration, management and funding challenges as possible.

As SNAPS receives no statutory funding, we rely completely on voluntary income and, in support of our funding requirements, the increasingly challenging regulatory requirements and the current turbulent funding environment, we employ highly trained and skilled paid employees to support this activity. We also work very hard to make the most of volunteers who kindly offer their time to us.

We have a small but dedicated fundraising team with the skills required to ensure we meet our income targets. This work is essential if we are to continue providing our vital services. Nobody directly or indirectly employed by or volunteering for us shall accept commissions, bonuses or payments for fundraising activities on behalf of the organisation.

Fundraising Enquiries and Registration of Fundraising Activities

All fundraising activity we are made aware of should be recorded on our supporter database and undertaken in line with this policy and other relevant procedures.

Anyone fundraising on our behalf who has not notified the organisation of their activities will be deemed to be acting independently and as such we take no responsibility for their actions.



Due Diligence

- Fundraising activities must include proportionate due diligence checks on donors, donations, and fundraising partners.
- Records of due diligence must be maintained to demonstrate compliance with the Code of Fundraising Practice.
- Due diligence checks should assess financial and reputational risks, and ensure donations are not from prohibited sources.

Documenting Fundraising Decisions

- All significant fundraising decisions must be documented, including rationale, risk assessments, and conflicts of interest.
- Meeting minutes should record decisions, discussions, and any abstentions or dissenting views.
- Documentation must be retained in accordance with legal and regulatory requirements and be accessible for review.

Handling of Donations/Funds Raised

Any funds raised for us should be given to the fundraising team as soon as possible and once received, donations should be handled in accordance with donation management procedures. Accurate records of all donations must be kept, and we aim to collect the following information when funds are received:

- Amount of donation
- Title, name and address of donor including postcode
- Telephone and or e-mail address of donor
- Date of birth of donor
- Specific additional information should the donation be restricted
- The type of activity from which funds were raised
- How funds are received e.g. cash/cheque
- Gift aid information
- Any in memory links/tribute information

Where possible receipts must be provided to donors at the point of donation and anyone accepting a donation must thank the donor on behalf of the organisation. An official 'thank you' communication will then be sent by the organisation within the agreed timeframe and, where possible and applicable, Gift Aid will be encouraged and claimed.

Support in your Fundraising Activities

Anyone undertaking fundraising on our behalf should be supported by the fundraising team and provided with guidance and support on fundraising best practice.



All fundraising undertaken on our behalf must be appropriately branded in line with our brand guidelines and any materials created must include the following details:

SNAPS Yorkshire CIO
Registered Charity Number 1171244
Registered address: 17a Earlswood Avenue, Roundhay, Leeds, LS8 2AF

Feedback

In our fundraising, we strive to give our supporters the best experience we can, so that together we can do more to promote and provide SNAPS' services in our community. We recognise that although our supporters may share our values, they may not always agree with everything we say or do for the families we support, or in raising funds.

In accordance with our Complaints policy we respond to questions and feedback from supporters promptly and consider fully the points of view expressed.

Complaints

It is our aim that everyone who fundraises or donates to us has a positive experience, but we understand that sometimes this may not happen, and supporters may not be happy with their experience. If this happens complaints should be reported in line with the complaints policy. If we get things wrong, we will be open and transparent about our mistakes and take swift action and learn from them.

Concerns

Should employees or volunteers have any serious concerns around any fundraising activity being undertaken, these concerns should be raised with the Head of Fundraising as soon as possible or should be highlighted via our whistleblowing policy. Examples of the types of concern that may arise are:

- Criminal offences
- Breach of legal or profession obligations
- Breach of the Code of Fundraising Practice

If for any reason a member of the team has concerns and internal communication is not possible, concerns should be raised directly with the Fundraising Regulator.



Safeguarding Supporters

Our Safeguarding Children policy identifies the key elements of safeguarding to support those using our services. Fundraising employees and volunteers should be aware of the Safeguarding children policy and use/refer to the policy where appropriate.

By extension, we do not take donations if we know, or have good reason to believe, that a person lacks capacity to make a decision to donate or is in vulnerable circumstances which mean they may not be able to make an informed decision. Among other things, you should consider:

- Any physical or mental-health condition the person may have
- Any disability the person may have
- Any learning difficulties the person may have
- Whether the person is facing times of stress or anxiety
- Whether a donation is likely to affect the person's ability to sufficiently care for themselves or leave them in financial hardship
- How well the person can speak and understand English
- Whether the person is under the influence of alcohol or drugs
- The person's age

If a donor makes a donation while they do not have the capacity to make an informed decision, SNAPS must return the money to them.

More information can be found within the Fundraising with vulnerable people and CYP policy.

We also do not pro-actively market to children and young people under the age of 18.

Awareness, Monitoring and Reporting

It is the responsibility of the Fundraising Team to ensure that all employees, volunteers and suppliers are aware of this policy, its principles and associated guidelines.

Fundraising employees must also ensure they equip individuals and groups fundraising for us with the guidance they need to act in a manner which is consistent with this policy. In addition, this document forms our agreement with our supporters in how we will undertake our fundraising activities.

As fundraisers it is also vital that accurate financial records are always kept allowing for transparency and continuity.



All fundraising activity is monitored closely by the Fundraising Team, ensuring compliance with current legislation, this policy and related procedures. If mistakes are made, employees and volunteers are expected to be open and honest and swift action will be taken to rectify any errors. This team regularly report on fundraising activities and financial performance both internally and externally, in full compliance with current regulations.

Quality and Assurance

We will monitor both the effectiveness and efficiency of our fundraising activities and most importantly learn from this information. We will endeavour to:

- Share any learning from complaints across the relevant parts of the organisation
- Use information gathered to contribute towards future income generation planning

We have clear governance and management controls in place for us to deliver transparent, ethical and responsible fundraising. Reports are regularly submitted for scrutiny to the Chief Executive and Board of Trustees who use the framework set out in the Charity Commission's guidance for trustees, [Charity Fundraising - a guide to Trustees Duties](#) to ensure best practice.

Equal Opportunities

In line with our Equal Opportunities policy SNAPS recognises that it is essential to provide equal opportunities to all persons without discrimination. We have given due regard to the need to eliminate discrimination, harassment and victimisation, to advance equality of opportunity, and to foster good relations between people who share a relevant protected characteristic (as cited in the Equality Act 2010) and those who do not share it.

Compliance and Review

Compliance with the policy and procedures laid down in this document will be monitored by the Fundraising team and audited periodically. The Head of Fundraising is responsible for the monitoring, revision and updating of this document. This policy will be kept under review in light of operational experience and national guidance.

Where to go if you need more information about our fundraising activities;

You can contact the fundraising team by emailing fundraising@snapsyorkshire.org

You can also get more guidance from the Institute of Fundraising or the Fundraising Regulator.



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