



Grants and Fundraising Policy

1. Purpose of the Policy

- 1.1. Made-well CIC is a registered community interest company and relies on income from fundraising to secure its business activities.
- 1.2. We must ensure that by undertaking fundraising activities we uphold any legal, statutory or regulatory requirements, and maintain our reputation and adherence to our company values.
- 1.3. This Policy provides guidance on how fundraising at Made-well CIC will be managed to ensure that we maintain these standards and provide reassurance and transparency to our donors and sponsors of our processes.
- 1.4. The purpose of this document is to identify Made-well's position on fundraising practice and to document the standards expected in raising funds from the community.
- 1.5. This Policy will be reviewed every three years or more frequently as legislation, guidance from official bodies or industry best practice changes.
- 1.6. This policy applies to the Trustees, SMT, casual, permanent and contract staff and volunteers.

2. Policy

- 2.1. Made-well's guiding fundraising principle is a simple one – we will only use techniques that we would be happy to be used on ourselves or those close to us.
- 2.2. In doing so, Made-well will adhere to the following standards:
 - 2.2.1. Fundraising activities carried out by Made-well will comply with all relevant laws.
 - 2.2.2. Fundraising activities will only be conducted in locations where Made-well is permitted by law to conduct those activities.
 - 2.2.3. Any communications to the public made in the course of carrying out a fundraising activity shall be truthful and not deceptive or misleading.
- 2.3. Fundraising activities will be undertaken in a manner that affords care and respect to the people that the funds are intended to assist. Conduct that will ensure this standard is met includes, but is not limited to:
 - 2.3.1. seeking permission for the use of beneficiary images and/or personal information.
 - 2.3.2. consultation with beneficiaries to ensure they are being represented as they wish to be.
- 2.4. Conduct that will be avoided in order to ensure this standard is met includes, but is not limited to:
 - 2.4.1. highlighting or focusing on the impairment, dependency or disability of a beneficiary.
 - 2.4.2. the use of disparaging language or imagery regarding the beneficiary.



2.4.3. stating or implying a falsehood regarding a beneficiary.

2.5. Fundraising material will clearly state the purpose for which the fundraising appeal is being conducted and will include a statement that, if the funds raised exceed the amount needed for the stated purpose, those funds will be applied in accordance with Made-well's stated mission and purpose.

2.6. All monies raised via fundraising activities will be applied in accordance with the statements included in fundraising material.

2.7. Any restriction placed by a donor on the use of donated funds will be respected, or the donation returned.

2.8. Prior to acceptance of any grant or funding awards the Standard Terms and Conditions of the grant agreement / contract will be reviewed to ensure:

2.8.1. That the grant award terms and conditions can be adhered to.

2.8.2. What additional measures may need to be implemented in order to be compliant with specified terms and conditions.

2.9. Made-well will report to its members, stakeholders, and donors on the outcomes of fundraising activities and on the expenditure of these funds.

2.10. All personal information collected by Made-well is confidential, is not for sale or to be given away or disclosed to any third party without consent, and will otherwise be handled in accordance with applicable law.

2.11. Anyone directly or indirectly employed by or volunteering with Made-well is not permitted to accept any commission, bonus or payment for fundraising activities on behalf of Made-well.

2.12. Fundraising activities should not be undertaken if they may be detrimental to the good name or community standing of Made-well.

2.13. Financial contributions from companies, organisations and individuals that the Trustees have reason to consider unethical will not be accepted.

2.14. Any employee or volunteer breaching these standards shall be subject to applicable sanctions.

3. Definitions

3.1. Made-well CIC fundraises through the following means:

3.1.1. "Sponsorship" is where a business provides money in order to secure the marketing and promotion of its business name, products, services or image. Sponsorship may also include the giving of services or goods for the same in return. It is usually a taxable supply (see VAT appendix).

3.1.2. A "donation" is a gift for which no direct benefit is sought. A donation may take various forms including cash, services or goods and can be from an individual or an organisation. A donor's name or list of donors may be on display or included in publicity if Made-well CIC



chooses to do so by way of thanks. It must be made clear to the donor that any decision to display or include the donor's name is at the sole discretion of Made-well CIC.

- 3.1.3. A "membership" scheme is where a donor makes a gift to a charity in return for a limited programme of benefits e.g. priority booking, exclusive content.
- 3.1.4. A "grant" is cash given to an individual or an organisation for a specific purpose. There is an obligation to fulfil any criteria the funding body may place upon the grant i.e. to ensure the project that is funded satisfies their aims and objectives and proceeds as outlined during the grant application process. Funding bodies usually require some level of profile in return for their grant and this should be in proportion to the size of grant and agreed in writing before accepting the grant. This is usually in the form of a logo or line credit with agreed wording in publicity. Grants should always be documented in some form of written agreement between the parties.

4. Requirements

4.1. Made-well CIC will only accept funds if they meet the following requirements:

- 4.1.1. Benefit: there are strong grounds for believing it will result in benefit to Made-well CIC. The benefit sought should be viewed as good value for the level of support given and the resource required to secure it.
- 4.1.2. Integrity: the company, organisation, partnership or activity will not bring Made-well CIC into disrepute, damage our reputation or integrity, or be likely to result in loss of income for example through:-
 - 4.1.2.1. Strategic fit: partnerships, activities and the objectives of companies or organisations we work with, do not contradict Made-well CIC's mission, aims and objectives.
 - 4.1.2.2. Independence: donations, partnerships or activities do not compromise our independent status.
 - 4.1.2.3. Influence: there is no attempt on the part of the partner, donor, company or organisation to influence our policy or actions either explicitly or implicitly.
 - 4.1.2.4. Legality: partnerships, activities and the wider business activities of partner companies or organisations must be, as far as we can ascertain, wholly legal under applicable law.
 - 4.1.2.5. Standards: the partnership, company or organisation and activity must meet any appropriate and associated national or international standards, and abide by any relevant regulations.
- 4.2. 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 and damage our reputation. In terms of donations, we will ensure that any gift is safe to accept and, doing so, would be in the best interests of your charity. We will also consider issues, such as suspicious donations, or managing large anonymous gifts, or those from vulnerable individuals.



4.3. In deciding whether to accept or decline a donation the SMT will consider the Community Interest Company's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.

5. Financial compliance

5.1. Financial records must be kept so that:

- 5.1.1. The organisation meets its legal and other statutory obligations, such as Charity Acts, Community Interest Company regulator, His Majesty's Revenue & Customs and common law.
- 5.1.2. The SMT and trustees have proper financial control of the organisation.
- 5.1.3. The organisation meets the contractual obligations and requirements of funders.

5.2. Grants and funding consists of:

- 5.2.1. Money donated to the Community Interest Company
- 5.2.2. Money left in a legacy for the benefit of the Community Interest Company (or a certain part of the organisation)
- 5.2.3. Money which has been raised through fundraising events
- 5.2.4. Money which has been donated as a result of a fundraising appeal
- 5.2.5. Money that has been awarded as a result of Grant applications

5.3. These funds have to be accounted for in a different way from other mainstream funding. The control and management of these funds is the responsibility of the Trustees, who delegate responsibility to SMT.

5.4. The organisation will hold the grant in a UK based bank or building society account that requires at least two unconnected people to approve all transactions and withdrawals.

- 5.4.1. The bank mandate (list of signatories / authorisers on the organisations behalf) will always be approved and minuted by the trustees as will any changes to it.
- 5.4.2. The organisation will reconcile the bank statements on the accounts management software at least every six months.

5.5. It shall be the responsibility of the Business Development and Funding Manager and other senior staff to inform the finance team when funds are received and what it is to be allocated to. The finance team is responsible for allocating the donation to the appropriate fund.

5.6. The SMT will meet twice-yearly to reconcile the accounting records and identify any errors/omissions.

5.7. Handling of Cash Donations

- 5.7.1. Made-well CIC will adhere to the good practice when handling cash donations resulting from face-to-face activities. Cash handling guidance is important for three main reasons:
 - 5.7.1.1. to protect the organisation from fraud, theft or embezzlement



- 5.7.1.2. to protect staff or volunteers from accusations of dishonesty or the temptation to commit fraud
- 5.7.1.3. to assure sponsors that their donations and gifts are used for the purpose for which they were given.

6. The role of Trustees

- 6.1. Final responsibility for actions under this Policy and our Fundraising Strategy rests with Made-well's trustees, who will be able to demonstrate they act in 'the best interests of the Community Interest Company'. This means trustees will not be influenced by personal moral perspectives or judgements, or derive any personal benefit from funding to the Community Interest Company.
- 6.2. Trustees will declare a conflict of interest where it exists.

7. Consideration of opportunities

- 7.1. Some companies, organisations or donors will require special consideration before funding can be accepted from them.
- 7.2. Funders that may be considered contentious should be discussed with the SMT before being approached.

Examples include funders that:

- 7.2.1. may have unethical practices with regard to the manufacture of their products e.g. animal welfare, human rights;
- 7.2.2. promote or are involved in unethical practices or similar activities;
- 7.2.3. are interested in supporting Local Authority / NHS events but that may have a conflict of interest with Government Policy or objectives e.g. developers;
- 7.2.4. is in financial or legal conflict with Made-well CIC;
- 7.2.5. as far as Made-well CIC is aware, does not uphold the same values of our Equality & Diversity Policy.

The above list is not exhaustive and Made-well CIC retains the right to decline funding from any funder, which Made-well CIC in its sole discretion considers inappropriate.

8. Protecting vulnerable donors

- 8.1. In communicating with potential or existing donors we will be mindful of indicators that may suggest an individual may be vulnerable, using [REAL](#):

Retain - and repeat the information you give him/her?

Do you have to repeat what you have said over and over again?

Explain - able to properly explain or communicate the decision they have made?

Are they joining in the discussion or just agreeing with what you are saying?

Are they asking questions that aren't related to what you are saying?

Able - to understand what they are being told?

Listen – able to listen, follow and understand the discussion taking place, or are they just repeating what you say?



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.

Do not either solicit nor accept donations from anyone whom we know, or think may not be competent to make their own decisions.

We will be sensitive to any particular need that a donor may have.

9. Authority to proceed

9.1. The Fundraising Manager will ensure that detailed information about all gifts (including sponsorships) is kept to ensure they are documented and handled in line with this Policy & company procedures.

9.2. Gifts can only be accepted providing that appropriate authority for approval has been secured.

The thresholds for approval are as follows:

Gifts up to £5,000 = Fundraising Manager approval

Gifts above £5,000 until £25,000 = General / Assistant General Manager approval

Gifts above £25,000 until £75,000 = Director approval

Gifts above £75,000 = Full Trustees approval

All gifts above £75,000 should be discussed with the SMT before being brought to the Trustees for approval.

10. Transparency

10.1. A copy of this policy will be displayed on our website and given to any third parties who undertake any fundraising on our behalf.

11. Process for managing Donations & Grants

11.1. When a donation or a grant is received, staff should ensure the following:

11.1.1. Clarify where the donation or grant will be spent and whether it should be treated as unrestricted or restricted funds.

11.1.2. Document the gift and log any relevant details agreed such as management of the gift and activity funded, decision making for any changes to the activity supported, payment schedule etc.

11.1.3. Procedure for thanking the funder, ensuring that benefits of significant financial value are not given that will conflict with this policy or significantly off-set the value of the gift.

11.2. Made-well CIC needs to know source of funds to ensure it complies with this policy.

12. Handling Memberships



- 12.1. Membership schemes for corporate or individual supporters are a useful fundraising mechanism but must be handled appropriately to ensure that the value of any benefits does not outweigh the value of the membership.

13. Data Protection

- 13.1. Made-well CIC will administer all fundraising in line with its Data Protection Policy.
- 13.2. Funders will never be given direct access to mailing lists or data held by Made-well CIC, unless it has the express permission of the data subject.
- 13.3. All funders have a right to request access to their data and may obtain this by contacting a member of the Development team.
- 13.4. Made-well CIC acknowledges the donor's right to privacy.
- 13.5. Should any funder or donor wish to make a complaint about fundraising, then they may do so under Made-well CIC Complaints and Compliments Policy.

14. Use of agencies & third parties

- 14.1. On occasion, we may work with third parties, sponsorship agencies, consultants and partners on our fundraising. Where such parties are engaged, they must also adhere to this policy.
- 14.2. The use of their services must be communicated to prospective donors and the value of their use must be assessed to ensure that significant ROI on is obtained.

15. Responsibilities

- 15.1. The SMT is responsible for the implementation and review of this policy.
- 15.2. All Trustees, SMT members, casual, permanent and contract staff and volunteers are responsible for adhering to this policy.

16. Processes

- 16.1. A Fundraising Sub-Committee may be formed to oversee the major fundraising tasks. The Fundraising Sub-Committee will report regularly to the SMT, including tabling of meeting minutes at SMT meetings.
- 16.2. All fundraising activities must have the prior approval of the SMT, as recorded in SMT meeting minutes.
- 16.3. A statement estimating income and expenses will be prepared prior to the commencement of any new fundraising activity that may present a financial risk to Made-well. Fundraising activities should not be undertaken if they will expose the organisation to significant financial risk.