

# IMPRESS: The Independent Monitor for the Press CIC Fundraising Policy

Agreed by the IMPRESS Board on 23 April 2015

1. The aim of this policy is for IMPRESS to be confident that any funds it receives have been raised legally and ethically, and that any risks to the organisation are noted and mitigated.
2. The Institute of Fundraising (IoF) offers guidance for organisations which generate income through fundraising in its Code of Fundraising Practice.<sup>1</sup>
3. The IoF defines a major donor as ‘an individual or family with the potential to make or procure a gift which would have a significant impact on the work of the organisation.’<sup>2</sup> Their guidance notes the importance of undertaking ‘due diligence on both the financial and reputational dealings of potential partners before donations are accepted.’
4. The Charity Commission provides detailed guidance on fundraising from major donors, with a series of questions which a charity should ask when soliciting or considering any gift which would have a significant impact on the work of the organisation.<sup>3</sup>
5. IMPRESS incorporates the following questions, derived from the Charity Commission’s Compliance Toolkit, in its fundraising policy. These questions are not intended to be asked in respect of each donor. However, the Board may consider them depending on the risk, including the size and nature of the donation, and whether it appears to have any suspicious characteristics.

5.1. Who are the donors?

5.2. What is known about them?

5.3. Does the organisation have a well-established relationship with them?

5.4. Do any additional identity checks need to be made?

5.5. In what form is the money being received? Cash, cheque, bank transfer?

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<sup>1</sup> <http://www.institute-of-fundraising.org.uk/guidance/code-of-fundraising-practice/>.

<sup>2</sup> <http://www.institute-of-fundraising.org.uk/guidance/code-of-fundraising-practice/guidance/major-donor-guidance/>.

<sup>3</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/340421/CT-2-T6.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/340421/CT-2-T6.pdf).

- 5.6.** Have any public concerns been raised about the donors or their activities? If so, what was the nature of the concerns and how long ago were they raised? Did the police or a regulator investigate the concerns? What was the outcome?
- 5.7.** Would any adverse publicity about the donor have a damaging effect on the organisation?
- 5.8.** How big is the donation?
- 5.9.** Is it a single donation, or one of a number of regular donations, or the first of multiple future donations?
- 5.10.** Is the donation one of a series of interest-free loans from sources that cannot be identified or checked by the organisation?
- 5.11.** Are there unusual or substantial one-off donations?
- 5.12.** Does the donation come with any conditions attached? What are they? Are they reasonable?
- 5.13.** Is there a condition that funds are only to be retained by the organisation for a period and then returned to the donor, with the organisation retaining the interest?
- 5.14.** Is the donation conditional on particular organisations or individuals being used to apply the funds?
- 5.15.** Is the donation conditional on being applied to benefit particular individuals either directly or indirectly?
- 5.16.** Is there a suggestion that the organisation is being used as a conduit for funds to a third party?
- 5.17.** Is the donation in sterling or another currency, perhaps with a requirement that the donation be returned in a different currency?
- 5.18.** Are any of the donors based, or does the money originate, outside the UK? If so, from which country? Does this country/area pose any specific risks?
- 5.19.** Are donations received from unknown bodies or international sources where financial regulation or the legal framework is not rigorous?

- 5.20.** Is the donation received from a known donor but through an unknown party or an unusual payment mechanism where this would not be a typical method of payment?
- 5.21.** Is anything else unusual or strange about the donation?
- 6.** Based on the responses to these questions, the Board will consider whether it is legal, ethical and in the best interests of the organisation to solicit or accept a gift from a particular donor.