

Fundraising Policy

1. Purpose of the Policy

Cambridge Live is a registered charity and relies on income from fundraising to secure its business activities.

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.

This Policy provides guidance on how fundraising at Cambridge Live will be managed to ensure that we maintain these standards, and provide reassurance and transparency to our donors and sponsors of our processes.

We are registered with the Fundraising Regulator and are committed to maintaining good practice in fundraising.

This Policy will be reviewed every three years or more frequently as legislation, guidance from official bodies or industry best practise changes.

2. Definitions

Cambridge Live fundraises through the following means:

“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).

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 the Cambridge Live 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 the Cambridge Live. Cambridge Live is entitled to claim Gift Aid on donations from individuals where a Gift Aid Declaration is made that confirms that the individual is tax resident in the UK and has paid tax during the period in which the donation is made. Donations are not subject to VAT.

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. The value of the benefits given must not outweigh the value of the membership. If the value of the benefits is less than the total value of the membership, then the membership may be divided into a donation and a payment for VAT purposes.

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. Grants are not subject to VAT, unless we are providing goods or services in return.

3. Requirements

Cambridge Live will only accept funds if they meet the following requirements:

- **Benefit:** there are strong grounds for believing it will result in benefit to Cambridge Live. The benefit sought should be viewed as good value for the level of support given and the resource required to secure it.
- **Integrity:** the company, organisation, partnership or activity will not bring Cambridge Live into disrepute, damage our reputation or integrity, or be likely to result in loss of income for example through
 - **Strategic fit:** partnerships, activities and the objectives of companies or organisations we work with, do not contradict Cambridge Live's mission, aims and objectives.
 - **Independence:** donations, partnerships or activities do not compromise our independent status.
 - **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. All funding must operate within the requirements of Cambridge Live's Hospitality & Anti-Bribery Policy.
 - **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.
 - **Codes of Practice:** acceptance of donations, partnerships and activities must comply with the Fundraising Regulator Code of Fundraising Practice and the Fundraising Promise.
 - **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. The role of Trustees

Final responsibility for actions under this Policy and our Fundraising Strategy rests with Cambridge Live's trustees, who will be able to demonstrate they act in 'the best interests of the charity'. This means trustees will not be influenced by personal moral perspectives or judgements, or derive any personal benefit from funding to the charity.

Trustees will declare a conflict of interest where it exists.

5. Consideration of opportunities

Some companies, organisations or donors will require special consideration before funding can be accepted from them.

Funders that may be considered contentious should be discussed with the EMT and the Revenue Development Committee before being approached.

Examples include funders that:

- may have unethical practices with regard to the manufacture of their products e.g. animal welfare, human rights;
- promote or are involved in tobacco, pornography, weaponry or similar activities;
- are interested in supporting City Council owned events but that may have a conflict of interest with Council Policy or objectives e.g. developers;
- is in financial or legal conflict with Cambridge Live;
- as far as Cambridge Live is aware, does not uphold the same values of our Equality & Diversity Policy.

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

5. Authority to proceed

All gifts (including sponsorships) should be channelled through the Development team to ensure they are documented and handled in line with this Policy & company procedures.

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	= Manager approval
Gifts above £5,000 until £25,000	= Director approval
Gifts above £25,000 until £75,000	= Managing Director approval
Gifts above £75,000	= Full Board approval

All gifts above £75,000 should be discussed with the Revenue Development Committee before being brought to the Board for approval.

6. Alcohol sponsorship

Organisations which produce and promote alcohol may sponsor our events, provided that the sponsorship adheres to the Portman Code of Practice on Alcohol Sponsorship available from: <http://www.portmangroup.org.uk>

This stipulates that all alcohol companies must abide by the code & anyone representing alcohol brands. The code does not apply to pouring rights agreements in their pure form, but to sponsorship benefits offered to an alcohol partner.

The code requires that alcohol companies demonstrate responsibility in promoting their products and ensure their products are only promoted to those over 18 years (therefore their brand cannot appear on anything specifically targeted at under 18, or where more than 25% of audience is under 18 years).

They must also comply with relevant licensing legislation where sampling or sale takes place.

The guide includes a complaints procedure and provides a free advisory service by contacting advice@portmangroup.org.uk if a sponsorship needs to be discussed before acceptance.

7. Transparency

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

8. Process for managing Corporate Sponsorship

Before a sponsorship can be secured, the following steps must be undertaken:

- **Research:** businesses approached should be researched to ensure a best fit in line with this policy.
- **Valuation:** benefits to be offered to a sponsor must be valued to ensure proposals are fair and reasonably priced.
- **Benefits:** all crediting & branding permitted must be agreed in advance based on the valuation.
- **Invoicing:** full payment should be received before the activity sponsored takes place.
- **Contracting:** all sponsorships over £1,000 should be documented with a written contract.
- **Evaluation:** sponsors should be provided with an evaluation demonstrating return on investment after the activity.
- **Review:** sponsors should not be contracted for longer than 3 years without consideration of whether the partnership still presents best value for Cambridge Live.

All sponsorship is unrestricted income to the charity as a service provided in return for payment.

All sponsorships should be recorded on the Spektrix system.

9. Process for managing Donations & Grants

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

- Clarify where the donation or grant will be spent and whether it should be treated as unrestricted or restricted funds.
- 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.
- 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.
- If the gift is being made by a UK resident tax payer, undertake full documentation for possible Gift Aid claim purposes.

Cambridge Live needs to know source of funds to ensure it complies with this policy.

All donations should be recorded on the Spektrix system.

10. Handling Memberships

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.

All memberships should therefore be valued against the cost of benefits and may be split into a taxable benefit value and a donation value if the total value of the benefits is less than the cost of the membership. If a donation does form part of the membership, then this should be documented so that any applicable Gift Aid may be reclaimed on any part of a membership that is not a taxable benefit.

All memberships should be recorded using the Spektrix system.

11. Data Protection

Cambridge Live will administer all fundraising in line with its Data Protection Policy.

Funders will never be given direct access to mailing lists or data held by Cambridge Live, unless it has the express permission of the data subject.

All funders have a right to request access to their data and may obtain this by contacting a member of the Development team.

Cambridge Live acknowledges the donor's right to privacy and will uphold the values of the Fundraising Regulator's Fundraising Promise.

Should any funder or donor wish to make a complaint about fundraising, then they may do so under the Cambridge Live Complaints and Compliments Policy.

12. Gift Aid

We will seek to maximise all donations by claiming gift aid from HMRC wherever possible. Donors will be asked for a gift aid declaration, which will be stored through our Spektrix fundraising system.

Claims will be made to HMRC in line with the requirements of current legislation.

13. Use of agencies & third parties

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.

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.

External reference materials:

Fundraising Regulator: <https://www.fundraisingregulator.org.uk/>

- Fundraising Code of Practice
- Fundraising Promise

Wood Green Animal Shelter's Fundraising Policy

Portman Code of Practice on Alcohol Sponsorship: <http://www.portmangroup.org.uk>

Charity Commission Guidance: <https://www.gov.uk/government/organisations/charity-commission>

- Guide to Trustee Duties (C220)
- Charities and commercial partners (RS2)

Last reviewed: November 2017