



Registered Charity No. 1077787

ETHICAL FUNDRAISING POLICY

SNAP is committed to its charitable aims and fundraises in order to provide support to Essex families with children and young people with additional needs and disabilities. We are registered with the Fundraising Regulator and concur to be legal, open, honest, fair, reasonable, accountable, responsible and respectful.

This policy covers fundraising activities and events on behalf of SNAP undertaken by staff, volunteers, and Trustees.

Legislation and Fundraising Regulator Code of Practice

At SNAP we always aim to be open, honest, and fair and to operate in a way that meets the law, fundraising regulations, and best practices, including the Fundraising Regulator Code of Practice, which outlines the standards expected of all charitable fundraising organisations. All fundraising conducted on behalf of SNAP, whether by staff, volunteers, or trustees, must comply with the Fundraising Regulator Code of Practice and all relevant legislation, including but not limited to:

Charities Act 2011 • Licensing Act 2003 • The Charitable Institutions (Fund-Raising) Regulations 1994 • Gambling Act 2005
Data Protection Act 2018 • Safeguarding Vulnerable Groups Act 2006
Health & Safety at Work Act 1974 • Equality Act 2010
Management of Health & Safety at Work Regulations 2006

Staff or volunteers fundraising for SNAP must also comply with the charity's policies and procedures pertaining to fundraising.

Fundraising Enquiries

The SNAP fundraising team should be aware of all fundraising.

In the first instance all fundraising enquiries should be handled by the SNAP fundraising team. If this isn't possible, SNAP staff and trustees should pass on the details to a member of the fundraising team as soon as possible verbally or by emailing fundraising@snapcharity.org.

Fundraising in aid of SNAP

The fundraising team must make sure everyone raising funds for SNAP is aware of the SNAP Fundraising Guidelines which are available on the SNAP website and in hardcopy at The SNAP Centre. Any fundraising in aid of SNAP should use the specified logos (either in aid of / in partnership with) for this purpose – NO ONE is to use or send SNAP's original logo without discussion and permission from Senior Management.

Anyone fundraising in aid of SNAP who has not first notified SNAP will be deemed to be acting independently of SNAP and, as such, the charity takes no responsibility for their actions.

Vulnerable People

When responding to a supporter or member of the public in vulnerable circumstances, staff must take all necessary steps to understand if the supporter is able to make an informed decision about donating to SNAP and respond appropriately. If a supporter is deemed unable to make an informed decision the member of staff must not accept the donation.

Handling of Donations and Funds Raised

Funds raised for SNAP belong to the charity and once collected, must be passed to the SNAP fundraising team in a timely manner.

In the first instance all funds delivered to The SNAP Centre should be handled by the SNAP fundraising team. If this is not possible, SNAP staff should pass on the funds to a member of the fundraising team as soon as possible.

The following information must also be provided:

- Exact amount of the donation or funds raised
- How the funds have been received (e.g., cash, cheque)
- The full name, postal address including postcode, telephone, and email address of the donor/event organiser
- Details of the fundraising event or activity undertaken, including dates

Any personal data collected in this way may only be used in SNAP's legitimate interest in the administration of such a donation. Separate and specific consent is required before the data may be used for the purposes of marketing (Events/Fundraising) to the individual[s] concerned.

All donations and funds raised must be recorded on SNAP's database on the day of receipt. A thank you letter, or email will be issued to the donor or fundraiser by the Fundraising team within 7 working days of receipt of funds, unless the individual has expressly asked not to be contacted. If donations are eligible for Gift Aid, a Gift Aid declaration form will be sent out by the fundraising team with the thank you letter.

Applications for Funding or Support

SNAP staff wishing to contact organisations to apply for funding, request volunteers support for fundraising events or support in kind, should contact the Fundraising team before doing so and wait for authorisation to proceed. In addition, SNAP will always adhere to the following key principles when using AI, maintaining trust and integrity in the process:

- *Transparency:* Donors should understand how AI is using their data and the processes involved
- *Equity:* Systems must reflect and respect the full diversity of communities served, ensuring that AI does not perpetuate bias
- *Human-Centred:* AI should amplify, not replace, authentic human relationships with donors
- *Privacy:* Donor data must stay confidential and be handled with care and consent
- *Mission-Aligned:* Technology must serve the purpose of doing good, aligning with the mission of the fundraising organisation
- *Accountability:* AI systems should be held accountable for their actions and the impact they have on donors and communities
- *Continuous Learning:* AI should be continuously updated and improved to ensure it remains ethical and effective

Use of AI in Fundraising

Any use of AI for fundraising purposes will be under strict scrutiny and need to be approved and signed off by the CEO. Any AI used will need to have human checking and intervention before being used.

Publicity and Branding

All fundraising material must follow SNAP's branding guidelines, including SNAP sponsorship forms and posters. Any documentation produced relating to fundraising must display the charity registration number.

Guidelines for Corporate Partners

In general, we apply the following conditions to each of our corporate partnerships:

- Participation in a specific corporate arrangement does not in any way imply SNAP's approval or endorsement of any corporate policies, nor does it imply that SNAP will advocate on behalf of any corporate entity
- SNAP's name should not be used in a manner that would express or imply SNAP's endorsement of the corporation or its policies
- SNAP retains equal editorial control over any information produced as part of a corporate arrangement in which SNAP is quoted or our logo displayed. In such cases, all materials in print, broadcast, or electronic media prepared by the corporate partner must be submitted to SNAP for approval in writing prior to release, unless it conforms to a pre-agreed form of wording (as specified in corporate agreement). At

no time can the SNAP's logo be used without express written permission for every occasion it is used

- SNAP is not required to make an up-front payment to the corporate partner
- In the event of any matter arising which could significantly adversely affect the standing of the partner in the reasonable opinion of the partner, the partner must inform the Fund as soon as reasonably practical. SNAP also has a duty to keep the partner informed of relevant information. SNAP reserves the right to take appropriate action to ensure its reputation is not adversely affected in anyway as a result of such incidents
- A formal collaboration is considered a business arrangement; therefore, all aspects must be clear and explicit to all parties involved. All agreements are exchanged in writing and partners are required to endorse and abide by this policy and any agreements

Conflicts of Interest

When establishing a new collaboration, both parties should endeavour to ensure that there are no conflicts of interest that cannot be safely managed.

- SNAP will not allow direct access to its Families / Service Users and contacts by third parties (other than those generated directly by collaboration).
- SNAP will not allow partners to link or imply direct material benefits for their products through an association with the Fund.
- The decision as to whether or not to work with a potential partner, whether they are an organisation or an individual, should not be based on the personal beliefs of individual Board or staff members. It should instead be determined by whether the organisation's mission is affected by association with that partner

Acceptance, refusal and return of donations

We have a responsibility to act in the best interests of the charity, therefore SNAP reserves the right to refuse or return a donation for any reason. SNAP will only accept donations that are consistent with the charity's mission and strategies. In addition to unauthorised activities outlined by the Fundraising Regulator Code of Practice, the following activities are not permitted by SNAP:

- **Collections** - It is the policy of SNAP not to engage in house-to-house collections, busking or street fundraising commonly known as 'chugging'
- **Environmental Issues** - It is the policy of SNAP not to engage in any activities that are harmful to the environment, including balloon releases or the release of sky/Chinese lanterns. SNAP does not condone activities with excessive plastic waste
- **Inappropriate Activities** – Any activity that SNAP deems to be unacceptable or could cause detriment to SNAP's reputation. This will be decided on a case-by-case basis
- SNAP will not partner with any organisation that produces goods/services or acts in a way that is contrary to our charitable objects or values nor any who are opposed in word or deed to our values.

This list is not exhaustive.

All anonymous donations of £25,000 or more will be reported to The Charity Commission as a serious incident (in line with current Charity Commission guidelines).

If a donation is received which may not be acceptable under the terms of this policy, the Fundraising Manager will alert the CEO at the earliest opportunity. This will be researched further, and the matter will be referred to the board with the necessary information regarding the donation.

SNAP emphasises that by accepting a donation it does not imply endorsement of the donor.

Tainted Donations

SNAP should make supporters aware that 'tainted donations' are not eligible for higher rate tax relief and that SNAP would not be able to claim gift aid on any tainted donation. HMRC defines Tainted Donations to be those that fulfil all of the following three criteria:

- The donation to the charity and arrangements entered into by the donor are connected
- The main purpose of entering into the arrangements is for the donor, or someone connected to the donor, to receive a financial advantage directly or indirectly from the charity
- The donation is not made by a qualifying charity-owned company or relevant housing provider linked with the charity to which the donation is made

Please refer to HMRC guidelines if in doubt.

How to make a Complaint Regarding Fundraising

Anyone wishing to make a complaint regarding fundraising in connection with SNAP should follow SNAP's 'Compliments, Comments and Complaints Policy and Procedure.'

Donor Stewardship

SNAP adheres to the following principles in its donor stewardship efforts:

- *Respect:* Treat all donors with respect and appreciation for their contributions, regardless of size or type
- *Transparency:* Ensure donors understand how their gifts are used and the impact they have on SNAP's priorities
- *Recognition:* Acknowledge donors in ways that align with their preferences and celebrate their generosity appropriately
- *Accountability:* Maintain accurate records of donations and report on their use to foster trust and integrity

Donor Rights

Donor privacy will be respected. All recorded donors will be kept by the Data Protection Act (2018). Donors have the right to view their donor records. Donors have the right to determine how their contributions are recognised and communicated.

In communicating with potential or existing donors, we will be mindful of indicators that suggest an individual may be vulnerable and engage with them accordingly.

In all instances, we will follow our Privacy and Data Protection policies.

SNAP will ensure our accounting and accountability comply with the highest legal, accounting, and ethical standards and be fully transparent.

Enforcement

Failure to comply with this policy by SNAP staff could result in disciplinary action being taken.

Evaluated and updated annually by the CEO and Financial Controller		
All policies approved by Trustees annually and circulated to all staff during training/appraisals.		
Managers are responsible for ensuring effective implementation.		
Version	Date approved by Trustees	Date circulated to all staff
September 2025	September 2025	September 2025