



Vita Fundraising Policy

Date: March 2022
To: Fundraising and Communications Sub Committee
Subject: **Volunteer Policy**
Signed: Neil Munday/Ciara Feehely

Objectives of Update

This policy outlines how Vita conducts all Fundraising. This includes fundraising third party fundraisers 'on behalf of' and 'in aid of' Vita. This will ensure that all fundraising from the public is carried out in an open, transparent, honest, respectful, and transparent manner.

The policy is aligned with the guidance given by the Charities Regulator in its *Guidelines for Charitable Organisations on Fundraising from the Public, Charities Governance Code Toolkit, Sample Volunteer Recruitment Policy, and Sample Volunteer Code of Conduct*¹ and in line with s14(1) of the Charities Act to encourage and facilitate the better administration and management of charities.

The Policy will be reviewed at intervals not exceeding 2 two years by the Communications & Fundraising subcommittee, sooner if legislation, best practice, or other circumstances indicate that this is necessary.

Version Control

Version no.:	Date	By (Name, Position)	Details of changes	Reviewed and approved by: (name and Position)
1	November 2021	Guidelines issued by Ciara Feehely (Head of Communications and Fundraising)	n/a	FR&C SC Dec '21
2	March 2022	Neil Munday (Head of Finance and Governance)	Reviewed and updated policy to incorporate all current guidance from Charities Regulator and to ensure policy meets the requirements of Charities Governance Code Principles	Approved By Board 31/03/2022
3	Jan 2024			

¹ <https://www.charitiesregulator.ie/en/information-for-charities/guidance-for-charities>



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Introduction:

Vita, formerly Refugee Trust International, was founded in 1989 by the late Fr. Kevin Doheny. His aim was to bring help and hope to refugees in Africa and other stricken areas of the world where people had been displaced, disadvantaged, and damaged by war, conflict, flood, famine, and all manner of man-made and natural disasters.

That work survives him, and today Vita is an Irish international development agency, with field offices in Ethiopia and Eritrea. Our vision is to forge long-term global partnerships which bring an end to extreme poverty, reduce vulnerability, and create permanent independence by building sustainable livelihoods.

Vita is a registered charity (No.20024192), and a company limited by guarantee which is governed by a voluntary board of directors.

Occasionally, third parties offer to fundraise for Vita, for which we are very grateful. However, when anyone collects money on our behalf, using our name and logo, it is essential that the highest standards are employed. A poor representation of Vita has the potential to damage our brand and impact on our programme delivery. Therefore, all third party fundraisers must adhere to this policy.

Purpose:

The purpose of this Fundraising Policy is to outline the principles that need to be followed when fundraising on behalf of and in aid of Vita, demonstrating that Vita always acts properly in the pursuit of its mission and that all fundraising from the public is carried out in an open, transparent, honest, respectful, and transparent manner.

Scope

This policy applies to all fundraising carried out 'on behalf of' and 'in aid of' Vita.

Definition of Fundraising

Fundraising from the public is an essential and valuable source of revenue for Vita.

In the policy, there will be conditions and procedures that 'must' be followed – these are mandatory and are required either from law or a duty that must be complied with. Where the policy states 'should', Vita is following good practice which is expected in the sector in compliance with the Charity Regulator Guidelines.

Vita's policy sets out how it aims to comply with the Charity Regulator '*Guidelines for Charitable Organisations on Fundraising from the Public*'. This policy applies to all who

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fundraise from the public which will include any third parties who are fundraising on behalf of Vita or by any person using Vita's name in its advertising.

Fundraising 'on behalf of' Vita occurs when the organisers have been appointed by the charity to act on its behalf or have notified Vita in advance or will use Vita's name and/or logo in its advertising. Vita will have a deeper relationship with this type of volunteer/organisation and so will have more control over the way the fundraising is undertaken.

Fundraising 'in aid of' Vita occurs when volunteers/organisations act independently and without the prior knowledge of Vita.

Principles underpinning this policy

The principles² underpinning the Fundraising Policy are detailed below:

- Respect:
- Honesty and Integrity
- Transparency and Accountability

These are outlined in the Donor Charter – see appendix 2

Donors

Vita will take all steps to ensure that donors are treated fairly, enabling donors to make informed decisions on any donation.

If, where a donation has been received, and where there are any reasonable grounds for believing that an individual lacks capacity to make an informed decision to donate, Vita commits not to accept such donations and such donations will be returned.

Donations

When asking for donations, Vita will ensure that:

- the purpose of any fundraising is described,
- donations received will be used to further Vita's charitable purpose and
- where donations are made for a specific purpose, the donor's request is honoured and treated as a restricted donation.

Fundraisers:

As part of fundraising activities, Vita invites individuals from corporations and organisations to participate in events such as the Great Ethiopian Run to fundraise 'on behalf of' Vita. All volunteers are bound by this policy and Code of Conduct while representing Vita during fundraising activities while in Ireland or in country participating in an event.

² Guidelines for Charitable Organisations on Fundraising from the Public – Charity Regulator

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Vita will ensure that fundraisers raising funds on behalf of Vita will:

- Carry clearly visible identification, including the name of the individual fundraising, Vita's logo, and name, contact details and the Registered Charity Number (RCN): 20024192.
- Be able to state the purpose for which funds being collected will be used
- Have a general knowledge about the aims and objectives of Vita and be able to inform donors of where they can find supplementary information
- Not knowingly or recklessly disseminate false or misleading information nor permit others to do so
- Not unreasonably intrude on the privacy of those from whom donations are being solicited
- Not exploit any relationship with a donor, volunteer or employee for personal benefit or misuse their position for personal gain
- Be clear, so that donors are aware whether fundraisers are employees of Vita, third party agents or volunteers – see Appendix 4.
- Be clear that, if not all proceeds are to go to Vita, that the fundraiser is aware and clear on where the balance is going.

Fundraising 'in aid of' Vita

Fundraising 'in aid of' Vita occurs when volunteers/organisations act independently and without the prior knowledge of Vita.

In these instances, Vita will follow up and encourage them to ensure that Vita is aware of future fundraising events so that they can be supported and help ensure that fundraising guidelines are being followed.

Third Party Fundraisers

- All third party fundraising must comply with this policy and conform with Irish law.
- Fundraising by third party agents will be subject to a written contract, where the contract terms will be clear and specific as to costs of fundraising and the amount of each donation that goes towards the charitable purpose.
- Vita will not enter a contract which is intended to deliver more private benefit to third party fundraisers than it does to Vita.
- VITA does not purchase advertising to promote third-party events.

Events 'on behalf of' Vita

- The use of Vita's name, logo or mission may not be used in any way without written approval from Vita's Head of Communications & Fundraising.

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- All fund raising event/promotions for the benefit of Vita must be approved in advance. A proposal of the event must be completed and submitted to Vita no less than 21 days prior to the proposed promotion or event start date before approval can be granted.
- Fundraisers which benefit Vita must reflect positively on its mission.
- Vita reserves the right to decline any fundraising proposal that is not in line with our mission.
- Event organisers are responsible for obtaining all permits, licenses, and insurance certificates. Please note that raffles, drawings, and other games of chance are governed by the [Betting \(Amendment\) Act 2015](#). If you are holding a raffle, drawing or other game of chance at your event, please be aware that such an activity may need special permits and allow extra time for these to be obtained.
- Vita assumes no legal or financial liability associated with third-party events.
- Fundraisers must fully and truthfully state the portion of the proceeds which will be donated to Vita in all advertising, promotions and in all contact with donors, sponsors, and participants. If less than 100% of the net proceeds will be donated, the “portion of proceeds” may be stated as a percentage of net proceeds, a portion of a product price or a fixed amount per sale/transaction that is to benefit Vita.

Communication Guidelines:

- Participants may not use the copyrighted information, logos, or photos on the Vita website or associated social media channels without the express written consent of Vita.
- All promotional materials should clearly state the event is sponsored by you or your organisation and if net proceeds going to Vita. If a specific percentage of event proceeds are coming to Vita, this must be stated in your materials.
- Vita cannot be used as an event title but may be identified as the beneficiary of the event/promotion. For example, an event may not be referred to as “Vita Bake Sale.” Instead, it should be promoted as “XYZ Bake Sale to Benefit Vita.”

Financial Guidelines

- Vita must be able to provide a full account of each fundraising event. This includes the gross amount of funds raised, the associated cost of fundraising and to which charitable purpose the proceeds are to be allocated. Vita follows the Charity Regulator’s *Guidelines on Internal Financial Controls for charities*.
- Vita will not incur third-party expenses or provide any funds for third-party events or promotions.
- No bank accounts or holding accounts may be established under the VITA name.
- Event procedures should be in place to ensure that cash is counted and recorded by a minimum of two unrelated individuals (whenever possible), in a secure environment,

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should be placed in a secure location, never left unattended, and banked as soon as is practicable.

- The not-for-profit tax exempt status of VITA may not be used by the host organisation to purchase items and materials with which to conduct the activity.
- Event organiser shall not retain any portion of event proceeds as personal profit or compensation. No fees, commissions or salaries may be retained from event proceeds by your organisation or its members.
- The organiser agrees to minimise expenses related to the event and to provide Vita with an event plan and budget if requested. A cheque/transfer for the third party event's gross proceeds must be transferred by EFT, posted, or presented in person to VITA within 60 days of the event's conclusion.
- Fundraisers' reimbursement of reasonable expenses will be made through vouched claims in line with the Expenses Policy.
- Vita implements a zero tolerance policy towards theft and fraud in line with Vita's Fraud Policy. Any suspicions relating to such matters are raised by Vita with An Garda Síochána.

Charitable Giving Guidelines:

- For a receipt to be issued, Vita must be provided with the donor's name, address, and phone number.
- Any cheques made payable to Vita must be forwarded to Vita for processing and deposit.
- Such donations will be receipted by Vita.
- In certain jurisdictions such as the USA or Canada, certain donations are tax deductible and Vita will provide the appropriate receipt.
- Tax claim forms will be processed for donations that fulfil the criteria set out by Revenue.

Event Request Submission & Approval Process

- If the event is approved; you are solely responsible for complying with all applicable laws and regulations, including, but not limited to, those related to gaming, raffles, sweepstakes, and fundraisers.
- By approving this event, Vita is in no way liable for the foregoing obligations or the promotion, conduct or staging of the function.
- Once approved, an email will be sent to you for your records

If you have any questions not answered by this policy of guidelines, please contact Vita at info@Vita.ie

Code of Conduct

Vita is committed to ensuring that a person's involvement with the organisation is a positive and pleasant experience. Vita therefore asks all volunteers/fundraisers/organisations to commit to a Code of Conduct that promotes a positive environment. Where fundraisers operate outside these codes of conduct, they may be asked to discontinue fundraising for the organisation.

- The Volunteer Code of Conduct is included below as Appendix 1.

Confidentiality and GDPR adherence

Vita respects the right to privacy and confidentiality of our fundraisers. Vita may from time to time while administering its business and exercising its legal rights and performing its legal obligations in connection relation to the fundraiser, need to process both personal data and special categories of personal data. Vita will process such data in accordance with the applicable data protection legislation including the General Data Protection Regulation and implementing legislation. Such data will be collected and processed fairly and lawfully and will include such measures as ensuring that Vita retains accurate and up-to-date data, retained only for as long as is necessary for the purpose for which it was collected, deletes, or amends a fundraiser's details upon request of the fundraiser and will prevent unauthorised access to or disclosure of such data. Further details in relation to what personal data is collected in relation to fundraisers or prospective fundraisers, and the purposes for which such data may be used are set out in Vita's Data Protection Policy, (which may be amended or updated from time to time).

Any confidential information that a fundraiser becomes aware of through their fundraising with Vita should remain confidential. All fundraisers are subject to the same requirements under data protection regarding personal and/or sensitive information.

Photographs can be a valuable tool for recording fundraising activities. Vita will ensure permission is sought before publishing any images containing fundraisers and store images securely in compliance with the applicable data protection legislation including the General Data Protection Regulation.

Complaints and feedback

Vita is committed to ensuring all fundraising is conducted in an honest, open, and ethical manner, and in compliance with the law. The Vita Complaints Policy sets out steps to enable people to safely raise a concern, give feedback, or make a complaint in respect of our fundraising and to be assured that appropriate action will be taken.

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The Complaints Policy describes how Vita receives, deals with, and responds to complaints. The policy sets out the scope and parameters of the complaints that Vita responds to and the complaints handling process. The policy provides practical guidance in implementing basic mechanisms for handling and responding to complaints.

Compliance with this policy:

Vita is fully committed to achieving the standards contained within the *Statement of Guiding Principles for Fundraising*, *Charities Regulator Guidelines for Charitable Organisations on Fundraising from the Public* and the *Dóchas Code of Conduct on Images and Messaging*. The supervising member of the Executive/ Vita contact person for individual fundraisers will brief the fundraisers on the relevant documents and ensure that they have access to the texts.

This Policy should also be read in conjunction with the following associated Vita policies:

- Protected Disclosures (Whistleblowing) Policy
- Safeguarding Policy
- Fraud Policy
- Complaints Policy
- Conflict of Interest Policy
- Expenses Policy
- Health & Safety Policy
- Data Protection Policy
- Volunteer Policy

For questions about this policy, please contact a member of staff.

Thank you:

Vita highly values the commitment and dedication of fundraisers who give up their time and expertise to help achieve Vita's mission. Thank you for your valuable contribution to our work.

Appendix 1: Vita Volunteer Code of Conduct

Vita is committed to ensuring that a person's involvement with the organisation is a positive and pleasant experience. Vita therefore asks all volunteers to commit to a Code of Conduct that promotes a positive environment.

Where a volunteer is found to be in breach of the standards outlined in this Code of Conduct or any of Vita's other policies and procedures this may result in the volunteer's position being terminated. Notwithstanding the foregoing, volunteers should note that Vita may terminate a volunteer's position without cause. Volunteers acknowledge that no employment relationship is created in the context of their role with Vita.

Volunteers should maintain the highest standards of behaviour in the performance of their duties by:

- Fulfilling their role as outlined in their written **volunteer role description** to a satisfactory standard
- Acting honestly, responsibly and with integrity, treating others with fairness, equality, dignity, and respect
- Performing their role to the best of their ability in a safe, efficient, and competent way and that their actions always enhance the charitable purpose and reputation of Vita
- Acting in a way that is in line with the purpose and values of the charity and that enhances the work of the charity
- Following the charity's policies and procedures as well as any instructions or directions reasonably given to them
- Disclosing that they are volunteering with Vita (when asked or approached on Vita business) so that they can distinguish themselves from an employee or a third party agent with respect to the knowledge base.
- Have a general knowledge about the aims and objectives of the charity and be able to inform donors/enquiries of where supplementary information can be found, advise donors of the purposes that funds are being raised, and whenever in doubt to directing any questions to the volunteer's supervisor. Queries regarding Vita's policies, procedures, support, or supervision should be directed to the volunteer's supervisor
- Raising concerns about possible wrongdoing witnessed by the volunteer during the volunteer's role with Vita via the Protected Disclosures Policy
- Meeting time and task commitments and providing sufficient notice when they will not be available so that alternative arrangements can be made
- Always communicating respectfully and honestly
- Observing safety procedures, including any obligations concerning the safety, health, and welfare of other people in line with training provided to volunteers
- Reporting any health and safety concerns

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- Addressing any issues or difficulties about any aspect of their role or how they are managed in line with Vita’s grievance procedures
- Declaring any interests that may conflict with their role or the work of the charity (e.g., business interests or employment). If any doubt arises as to what constitutes a conflict of interest, volunteers may seek guidance from Vita’s Head of Finance and Governance
- Keeping confidential matters confidential
- Exercising caution and care with any documents, material, or devices, containing confidential information and at the end of their involvement with Vita returning any such documents, material in their possession
- Seeking authorisation before communicating externally on behalf of Vita
- Disclosing the fact that they have been charged with or convicted of a criminal offence by prosecuting authorities (or given the benefit of the Probation of Offenders Act 1907 as amended) to Vita’s Head of Finance and Governance.³ For the avoidance of doubt, volunteers are not required to disclose the fact or details of ‘spent convictions’ under the Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016 (as amended) to Vita.

Volunteers are expected NOT to:

- Bring the charity into disrepute (including using email, social media, and other internet sites, engaging with media etc.)
- Seek or accept any gifts, rewards, benefits, or hospitality during their role
- Engage in any activity that may cause physical or mental harm or distress to another person (such as verbal abuse, physical abuse, assault, bullying, or discrimination or harassment on the grounds of gender, civil status, family status, sexual orientation, religion, age, disability, race, or membership of the Traveller community) or exploit any relationship with a donor, another volunteer or employee for personal benefit or misuse their position for personal gain
- Be affected by alcohol, drugs, or medication which will affect their abilities to carry out their duties and responsibilities while volunteering

³ In seeking information from volunteers about criminal convictions (or the fact that they have been charged with an offence or given the benefit of the Probation of Offenders Act 1907 (as amended)) charities should comply with data protection law and be aware of the limitations on the circumstances in which it is possible to process such information (e.g.: see section 55 of the Data Protection Act 2018). It is also important that charities have due regard to the provisions of the Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016 (as amended). If a charity has any doubt about its rights and responsibilities in this regard, it should obtain legal advice.



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- Provide a false or misleading statement, declaration, document, record or claim in respect of Vita, its volunteers, employees, or charity trustees or permit others to do so.
- Engage in any activity that may damage property
- Act in a manner which is inconsistent with these are other charitable guidelines.
- Take unauthorised possession of property that does not belong to them
- Engage in illegal activity while carrying out their role
- Improperly disclose, during or after their involvement with Vita ends, confidential information gained during their role with Vita

The board of charity trustees will review the Code of Conduct for Volunteers at an interval of not more than 2-years or as appropriate. The Head of Fundraising and Communications is responsible for ensuring that this policy is implemented effectively. All other staff and volunteers, including charity trustees, are expected to facilitate this process.

Signed: _____

Date: _____

Last Review Date: March 2022 Next Review Date: January 2024

Appendix 2 - Donor Charter

Trustee Resolution regarding the Guidelines for Charitable Organisations on Fundraising from the Public.

The Board/governing body resolves to adopt the Guidelines for Charitable Organisations on Fundraising from the Public and confirms that is committed to complying with the Guidelines and will endeavour to:

1. Adhere to the core principles of respect, honesty and integrity, transparency, and accountability by:

- 1.1 Respecting the rights, dignity and privacy of supporters, clients, and beneficiaries.
- 1.2 Answering reasonable questions about fundraising activity and fundraising costs honestly.
- 1.3 Making information about our purpose, activities, and governance available to the public.

2. Demonstrate its commitment to donors by:

- 2.1 Agreeing and making known a Donor's Charter consistent with the Guidelines for Charitable Organisations on Fundraising from the Public containing commitments regarding the causes for which the charity is fundraising, the use of donations, and disclosures regarding the status and authority of those soliciting donations.
- 2.2 Operating a complaints and feedback procedure.

3. Ensure high standards of fundraising practice by:

- 3.1 Ensuring fundraisers are committed to the highest standards of good practice by providing information and training on the Guidelines for Charitable Organisations on Fundraising from the Public.
- 3.2 Ensuring that fundraising activities are respectful, honest, open and legal and in accordance with the Guidelines for Charitable Organisations on Fundraising from the Public; and that images and messages are chosen and used in keeping with best practice.
- 3.3 Having a policy in place regarding the management of volunteer fundraisers.

4. Be financially accountable by:

- 4.1 Publishing an annual report and statement of annual accounts, which includes a statement on compliance with the Guidelines for Charitable Organisations on Fundraising from the Public.
- 4.2 Making sure that there are appropriate internal financial and management controls in place.
- 4.3 Making sure that all donations are recorded and that both financial records and personal data records comply with data protection legislation.

5. Ensure that the Board and senior management take responsibility for implementing and adhering to the Guidelines for Charitable Organisations on Fundraising from the Public by:

- 5.1 Identifying any risks that may arise and ensuring appropriate mechanisms are in place given the size and complexity of the organisation to manage and deal with those risks.

Director/Trustee

Director/Trustee

Dated:

day of 2022

Appendix 3 - Public Compliance Statement

As a charity seeking donations from the public, Vita (RTI) aims to comply with the Guidelines for Charitable Organisations on Fundraising from the Public:

- Vita is committed to complying with the Guidelines for Charitable Organisations on Fundraising from the Public and has formally discussed and adopted the Guidelines at a meeting of the governing body.
- Vita confirms its commitment to the principles set out in the Guidelines for Charitable Organisations on Fundraising from the Public by a statement to that effect in its annual report.
- Vita has a Donor Charter which is consistent with the Guidelines for Charitable Organisations on Fundraising from the Public.
- Vita regularly monitors compliance with the Guidelines for Charitable Organisations on Fundraising from the Public and compliance reports are received regularly by the governing body.
- Vita considers the Guidelines for Charitable Organisations on Fundraising from the Public when planning all fundraising activity.
- Vita provides honest, open, accountable, and transparent disclosure when fundraising from the public.
- Vita has appointed a member of the governing body and/or a senior member of staff to be responsible for compliance with the Guidelines for Charitable Organisations on Fundraising from the Public.
- Vita ensures that fundraising staff are provided with information and training on the Guidelines for Charitable Organisations on Fundraising from the Public and its implementation.
- Vita has a feedback and complaints procedure consistent with the Guidelines for Charitable Organisations on Fundraising from the Public. Feedback is recorded for review by relevant staff including the CEO and governing body. Feedback is responded to promptly and appropriately.
- Vita prepares financial reports consistent with the requirements of the Charities Act 2009 and the Charities Regulator which include a statement concerning the extent to which control of the organisation is independent of its funding sources.
- Vita ensures that all donations are tracked and recorded and complies with data protection requirements.
- Vita is accessible to the public through several readily available contact options.

Appendix 4 – Donor disclosure statement

When introducing yourself to a member of the public, as a fundraiser, it is important that the member of the public understands your position in the charity so that the expectation of the level of knowledge of a charity can be managed. As such, when introducing yourself, please introduce yourself as follows (depending on your status):

- I am a staff member...
- I am a volunteer for Vita...
- I am a third party agent working on behalf of Vita...