



## **CATHOLIC MILITARY ASSOCIATION FUNDRAISING POLICY**

### **Policy Aim and Purpose**

- 1) This policy outlines the principles and procedures that the Catholic Military Association (hereafter known as “CMA”, “we”, “us” and “our”) follows to ensure that all fundraising activities are ethical, transparent, and compliant with the laws and regulations of England and Wales. The policy aims to protect the integrity of the CMA, safeguard the interests of our donors, and ensure that funds are raised in a manner consistent with our mission and objects.

### **Scope**

- 2) This policy applies to all trustees, staff, volunteers, and third parties involved in fundraising activities on behalf of the Charity.

### **Principles of Fundraising**

- 3) Ethical Standards
  - a) All fundraising activities must be conducted in a manner that upholds the dignity of our beneficiaries and protects their privacy and rights.
  - b) The CMA is committed to honest, transparent and respectful communication with donors, ensuring that all representations of our work and use of funds are accurate and truthful.
  - c) We will not engage in any fundraising practices that could be considered exploitative, coercive, or misleading.
  - d) We will not unfairly criticise other people or organisations.
- 4) Legal Compliance
  - a) All fundraising activities will comply with relevant legislation in Roman Catholic Canon Law, Military, and Civil Law, including but not limited to the Charities Act 2011 and data protection laws (GDPR), as well as the Fundraising Regulator’s Code of Fundraising Practice
  - b) The Charity will ensure that all necessary licenses and permissions are obtained for fundraising activities such as street collections, lotteries, and events.
  - c) Trustees take ultimate responsibility for fundraising compliance. Trustees are empowered or may delegate operational management to a fundraising team.
- 5) Donor Rights

- a) Donors have the right to be informed about the Charity's mission, how their donation will be used, and our capacity to use donations effectively.
  - b) Donors' personal data will be treated in accordance with GDPR, and relevant Defence protection of personal data policy, and donors will have the opportunity to opt out of future communications.
  - c) We will respect the wishes of donors who wish to remain anonymous and ensure their anonymity is maintained.
  - d) Donors have the right to be treated fairly, with respect and not feel unduly pressured. They have the right to request an end to an interaction at any time.
  - e) Donors will not be asked to change or cancel an existing donation to another organisation in favour of a donation to the CMA.
- 6) Purpose-Aligned Campaigning:
- a) We will ensure campaigns support our goals, are conducted respectfully and within regulatory bounds.
- 7) Transparent Fundraising:
- a) We will communicate clearly about the use of funds, adhering to the Code of Fundraising guidelines of the charity.

### **Charitable Funds**

- 8) Charitable Funds consist of but are not exclusively limited to:
- a) Money left in a legacy for the benefit of the CMA
  - b) Money which has been raised through fundraising events
  - c) Money which has been donated as a result of a fundraising appeal
  - d) Corporate sponsorship
  - e) Charitable foundation funds
  - f) Tangible personal property (gifts-in-kind)
  - g) Property
  - h) Shares or bonds
  - i) Pledges (for example Fixed Crowdfunding)
- 9) In deciding whether to accept or decline a donation or gift, as well as whether to solicit it, the CMA will consider the charity's best overall interest. The Trustees may review donations that may be in breach of the Object and ethics of the Association.
- 10) Additionally, the CMA will not work with companies or individuals who participate in activities which:
- a) could cause detriment to the charity's reputation
  - b) will disproportionately decrease the amount of donations to further the work of the charity
  - c) undermine our vision and values
  - d) are associated with unsuitable products, corporate or individual

- e) could be construed as personal gifts or benefits to CMA volunteers, which should be discouraged at all times
  - f) are from unknown sources of funding. The CMA will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal
  - g) potentially harm our relationships with other donors, service users, stakeholders or volunteers
  - h) expose us to undue adverse publicity or reputational risk
  - i) require unacceptable expenditure or additional charity resources
  - j) The decision on the above in the question of doubt rests with the Trustees and if appropriate the Ordinary.
- 11) There are certain organisations, Catholic or non-Catholic, which, for various reasons, the CMA does not wish to associate with or from which it does not wish to seek donations. This list will be made available to the fundraising team.
- 12) Overwhelming evidence shows that the most successful attempts at soliciting donations are from pre-existing personal contacts. There are certain contacts and organisations that various Trustees, the Friends of the CMA, or their relations have already established – this list will be made available to the fundraising team.
- 13) If supporters wish to make a donation to a specific area of CMA's work then they may make a specified donation by providing written instruction to this effect with their donation. The CMA will always respect this. If the CMA is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way, the CMA will refund the donation.
- 14) Refusals of donations or gifts
- a) If a donation is received which may not be acceptable under the terms of this policy the Trustees will be informed and take appropriate action.
  - b) The Trustees retain all legal responsibilities which include the prerogative to refuse donations and gifts.
- 15) 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).

### **Fundraising Practices**

- 16) Event Fundraising
- a) Fundraising events must be carefully planned and managed to ensure compliance with legal requirements, health and safety standards, and best practices in financial management.
  - b) A risk assessment will be conducted for all fundraising events in coordination with the Fundraising Team to mitigate potential risks to participants and the charity.
  - c) All fundraising by means of lotteries, e.g. raffles, etc. must comply with the required licensing arrangements.

- d) No CMA members shall be compelled to make a donation to the organisation. Exclusively spiritual events will not be ran at profit, although the Trustees reserve the right to hold a non-compulsory fundraising collection at any spiritual event.

#### 17) Fundraising Platforms

- a) The CMA has registered with certain fundraising platforms like Just Giving. Before engaging these platforms, the CMA will conduct due diligence to ensure that these partners adhere to our ethical standards and legal requirements. Fees involved must be agreed with clear understanding of charges for the services and reporting requirements.

#### 18) Community Fundraising

- a) The members of the CMA may from choose to raise funds on behalf of the Charity. When any such fund-raiser is organised in the name of the Charity, the member concerned will approach the fundraising team providing details of the fund-raiser, including the name of the fundraising platform, period of the fund-raiser activity, particular purpose for utilisation and seek approval from the Trustees.
- b) The fund-raiser in all such cases should be preferably through our registered fund-raiser platforms. Use of the Charity's logo, or any marketing material can be done only after written permission to do so has been obtained from the Trustees. The phrase 'in-aid-of' must be used in their publications and it is best practice to specify the pious work for which funds are being raised. All proceeds of the fund-raiser must be transferred to the Charity as soon as possible after the event. The concerned sponsor will also encourage to make GiftAid declarations, wherever applicable.
- c) The Charity will ensure that all fundraising communications, including appeals and marketing materials, are clear, accurate, and not misleading. The member concerned in sponsoring the fund-raiser must ensure that all regulations are adhered to, including the privacy of the concerned donors.
- d) Fund-raising activities must provide their own insurance if relevant, unless specifically agreed.

#### 19) Solicitation of charitable trusts and corporates

- a) The CMA will not directly endorse products, treatments or companies. Sponsorship arrangements (for example of events) will be clearly publicised and conflicts of interest considered as part of event risk management.

#### 20) Fundraising Collections

- a) The CMA will ensure that all fundraising collection is carried out sensitively to protect the organisation's reputation in the mind of the public.
- b) The CMA will ensure that adequate permission for a static collection is obtained, and can evidence this sufficiently where required; and that all collectors can be clearly identified.

#### 21) Handling of Cash Donations

- a) The CMA will adhere to the following good practice when handling cash donations resulting from face-to-face activities:

- i) Cash must be collected, counted and recorded by two unrelated individuals and counted in a secure environment, wherever possible. (Collection boxes must only be examined and opened by two unrelated individuals).
- ii) Unsecured cash must never be left unattended or in an unattended environment and must be banked as soon as is practical. Cash not banked immediately must be placed in a safe or other secure location and the Fundraising Team must be notified.
- iii) At the earliest possible date, reconciliation must be made between cash banked and income summaries. Where practical, this must be undertaken by a person independent of the counting and cashing up of the money
- iv) A receipt must be issued when taking a cash donation not made using a sealed collection box.

22) The CMA will consider the safety of its fundraisers at all times.

### **Use of Donations**

23) All donations will be used solely for the purposes for which they were given, unless the donor has agreed to a reallocation of funds.

24) Restricted funds will be accounted for separately and will only be used for their designated purpose.

25) Donor recognition.

- a) Donor recognition may take the form of a non-monetary gesture of thanks, for example, donor names may be published by the CMA in gratitude or given a Holy Card etc.
- b) The CMA is a membership organisation by and for serving personnel, veterans, and their families, for which there is no membership fee or 'special membership'. Favours cannot and should not be obtained through monetary donation.
- c) For a payment to qualify as a donation (and thus be eligible for Gift Aid), it must be freely given, and not a compulsory payment for an event or service.

26) The CMA will be clear and transparent with donors about how their funds will be used and any associated benefits.

### **Strategy and Financial Transparency**

27) Annual Planning. Before the beginning of a financial year, the Trustees will plan the schedule of fundraising activities and the sources of funding them. This will be aligned to the Fundraising Strategy of the Charity.

28) Accounting and Reporting.

- a) The Charity will maintain accurate records of all fundraising income and expenditure.
- b) Annual reports may include detailed information on fundraising activities, including income generated, expenditure, and how funds have been used.

### **Donor Research**

29) Research on donors and prospects is an acceptable and intrinsic part of fundraising. Data surrounding individuals and companies who wish to be associated with Charitable Funds will be stored in a sensitive and appropriate GDPR compliant manner.

### **Complaints and Feedback**

30) Handling Complaints.

a) All complaints must be submitted in line with the CMA's Complaints Policy. Complaints will be taken seriously and investigated promptly, with appropriate action taken to address any issues raised.

31) Feedback.

- a) Feedback from donors and the public is welcomed and will be used to improve our fundraising practices.
- b) We will regularly review and update our fundraising policy and practices in response to feedback and changes in the regulatory environment.

### **Exclusions**

32) The following exclusions should be noted.

- a) This policy does not apply to the CMA Online Shop, which is run as a pious work of its own account, for which products may be advertised, and which is distinct from the exclusive purpose of fundraising – to maximize income to fund a pious work.
- b) The CMA has always benefitted from both members and external supporters making small regular electronic payments. These should be encouraged by trustees and the fundraising team if someone asks 'how can I help the association' in a generic way.

### **Governance and Review**

33) Trustees' Oversight

- a) The Trustees will have overall responsibility for the governance of fundraising activities and ensure compliance with this policy.
- b) Quarterly reports on fundraising activities will be presented to the Trustees by the Link Trustee at the quarterly board meetings, including any issues or risks that have arisen.
- c) Any conflicts in interest must be declared by trustees and volunteers.