

Octavia Foundation Fundraising Policy and Procedure

VERSION [1]

Version Control

Note: minor updates increase version number by 0.1, major updates increase version number by 1.0.

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1.0	Full Policy Drafted	21.10.2025	Chief Operating Officer

Document owner: Head of Communities, Fundraising and Resilience
Document author: Fundraising Manager

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1. Introduction

Octavia Foundation relies on voluntary donations, grants, and partnerships to fulfil its mission. This policy outlines the ethical principles and practical procedures for all fundraising activities, ensuring that they meet our strategic aims, uphold our values, and align with the latest standards set by the Fundraising Regulator's Code of Fundraising Practice (2025). Responsibility for ensuring compliance with this policy rests with the Head of Communities, Fundraising and Resilience, supported by the Leadership team and overseen by the Board of Trustees.

Principles

The Octavia Foundation's fundraising and partnerships will always be:

- Legal, Open, Honest and Respectful - All activities must comply with applicable laws and adhere to these four principles.
- Transparent and Accountable - We are open about how funds are used and ensure all stakeholders have access to relevant information.
- Fair and Non-Discriminatory - We do not discriminate against any person or group on the basis of protected characteristics under the Equality Act 2010. We also ensure our fundraising messages and materials are inclusive and avoid stereotypes, being mindful of areas of sensitivity relating to vulnerable service users.
- Proportionate and Informed - We carry out appropriate and proportionate due diligence for all fundraising and partnership activities.

2. This policy applies to:

- All staff, volunteers, and trustees of the Octavia Foundation.
- Relationships with individuals, charitable trusts, companies, community groups, corporate partners, cause related marketing, donations, sponsorship, volunteering, and gifts in kind.
- Third-party fundraisers who are brought in to support bid writing or other areas of our fundraising function.

3. Legal & Regulatory Framework

This policy has been drafted using the Fundraising Regulator Code of Practice framework, which has been updated as of 1 November 2025.

4. Related Policies

This policy links to The Fundraising Complaints Policy and Procedure.

5. Working with Vulnerable People

The Octavia Foundation is committed to protecting people in vulnerable circumstances, including those whose circumstances may mean they are unable to make fully informed decisions or could be at risk of exploitation. This policy should be read in conjunction with our Safeguarding Policy, which outlines our broader commitment to protecting children and young people, and adults at risk across all areas of our work.

We will:

- Recognise and respect vulnerability, including (but not limited to) those experiencing illness, disability, bereavement, financial hardship, or social isolation.
- Never accept donations if we believe it would be exploitative, harmful, or if the donor lacks capacity to give.
- Provide staff with training on recognising and supporting vulnerable people.
- Follow safeguarding best practices in all fundraising activities.

6. Complaints and Whistleblowing

The Octavia Foundation values feedback and takes concerns seriously. We have a clear, public **Fundraising Complaints Policy and Procedure**:

- **Public complaints** - Available on our website and accessible in all fundraising communications.
- **Process:**
 - All complaints are acknowledged promptly.
 - Investigations are conducted fairly, avoiding undue delay.
 - Learning from complaints is used to improve practices.
- **Internal reporting (Whistleblowing):**
 - Staff and volunteers can raise concerns confidentially as per the guidance in our Whistleblowing policy.
 - We protect whistleblowers from harassment or retaliation.
 - Concerns can be escalated to the Fundraising Regulator if internal resolution is not possible.
 - A summary of complaints and outcomes is shared with senior leadership and trustees annually to ensure learning and continuous improvement.

7. Protection of Fundraisers

The Octavia Foundation is committed to safeguarding not only supporters but also those who deliver our fundraising. All staff, volunteers, and third-party fundraisers must be treated with dignity and respect.

We will:

- Take steps to prevent harassment, discrimination, or abuse during fundraising activities.
- Provide safe and confidential reporting mechanisms for fundraisers experiencing harm or misconduct.
- Investigate and address any allegations of inappropriate behaviour towards fundraisers.
- Integrate fundraiser wellbeing and safety into our training, risk assessments, and review processes.

8. Accepting, Refusing, and Returning Donations

The Octavia Foundation may accept donations that align with its mission and do not compromise our integrity. Donations will be refused or returned only in exceptional circumstances, including when they:

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- Contradict our mission or values.
- Pose significant reputational risk.
- Originate from potentially illegal or unethical sources.
- We accept all forms of donations. This includes digital currency, on the basis these are not anonymous, and the origin of funds can be ascertained, to comply with our policy for refusal of illegal or unethical sources of funding.

Where necessary, we will seek Charity Commission authorisation to return donations (e.g. as an ex-gratia payment under section 106 of the Charities Act 2011).

The Octavia Foundation will engage constructively, openly, and in a timely manner with the Fundraising Regulator, Charity Commission, or other oversight bodies in the event of an enquiry or investigation.

9. Due Diligence and Risk Assessment (See appendix)

In all cases, The Octavia Foundation will prioritise:

- The wellbeing and safety of the people we serve.
- Transparency with staff and trustees.
- Community learning and accountability.

Concerns about oppressive behaviour should be:

1. Documented clearly and promptly.
2. Escalated to the Head of Communities, Fundraising and Resilience
3. Addressed through proportional action:
 - Dialogue and education.
 - Pause or end partnership.
 - Public response (where risk to trust or mission is high).

Assessment and Action

These considerations are integrated into the tools in Appendices 1-3: the RAG Rating Table, Due Diligence Profile, and Ethics Assessment, and inform decisions at the point of:

- Approaching new funders.
- Entering or renewing funding agreements.
- Managing incidents or concerns during partnerships.

Must-Haves (baseline expectations for ethical partnership):

- An agreement in writing, designating the purpose of funding, the source and timelines. If this is satisfactory, this will be signed and approved by a member of Octavia Foundation's Senior Leadership prior to receiving funds
- Respect for the voices and leadership of marginalised groups.
- Willingness to adapt practice in response to feedback.
- Transparency around source of funds and partnership expectations.

Red Lines

Red Lines (grounds for refusal or ending a relationship):

- Evidence of discriminatory or harmful practices by a funder or their affiliated entities.
- Requirements that force The Octavia Foundation to act against its values or cause harm to communities.
- Refusal to listen, reflect, or change following a concern being raised.

Examples of Oppressive Behaviour from Funders

Oppression in fundraising can include (but is not limited to):

- Conditional funding that requires harmful narratives or reinforces stereotypes.
- Tokenising marginalised people without sharing power or decision-making.
- Dismissal of lived experience or values-based feedback from The Octavia Foundation.
- Invasive or dehumanising donor demands.
- Funding sources tied to harmful industries or policies.

Guiding Principles

Fundraising should always:

- Centre the dignity of communities we serve, particularly vulnerable older or young people.
- Avoid reinforcing systems of oppression (racism, ableism, classism, sexism, etc.).
- Uphold equity, humility, and transparency in all donor relationships.
- Reject power-hoarding or extractive practices from funders.

10. Addressing oppressive behaviours in fundraising partnerships

The Octavia Foundation conducts due diligence on donations and partnerships to balance funding benefits with potential risks. We take a proportionate approach based on the size and nature of the donation or partnership:

- **Low risk:** Basic checks (e.g., online and media searches).
- **Medium risk:** Full due diligence, including checks on legal status, financial stability, and potential conflicts.
- **High risk:** In-depth review by Leadership and Trustees.

Where the assessment raises concerns that do not meet red line criteria but indicate reputational or ethical tension, the partnership may be approved with caution, subject to additional safeguards or monitoring.

Key criteria considered:

- Alignment with The Octavia Foundation's mission and values.
- Risk of reputational damage.
- Donor's financial or ethical background.
- Potential for misuse or misrepresentation of funds.

A record of the assessment, decision, and rationale will be stored securely. The outcome of each assessment will be recorded using the Ethics Assessment Table (Appendix 3), with a clear recommendation to proceed, proceed with caution, or not proceed.

11. Solicitation Statements and Donor Communications

The Octavia Foundation does not offer commission-based fundraising or incentives. When staff, officers, or trustees are paid to fundraise (or when required by law), the Octavia Foundation will:

- Provide clear, accurate solicitation statements before accepting any financial details.
- Charity representatives who are paid staff members will clearly state that they work for the Octavia Foundation and are paid to fundraise on behalf of the charity.
- Ensure donors understand how their funds will be used and any related conditions.
- Fundraising materials and direct conversations will always explain the purpose of donations, any restrictions, and how funds contribute to the Octavia Foundation's mission.
- Design our online fundraising content to be accessible, respectful, and transparent. We avoid manipulative techniques or excessive emotional appeals and ensure opt-out options are always clear.

All fundraising messages and materials will:

- Use respectful, inclusive, and accurate language.
- Avoid emotional manipulation or reinforcing harmful stereotypes.
- Be available in accessible formats where possible (e.g. large print, plain language).
- Offer clear opt-out options and manage contact frequency in line with supporter preferences.
- Ensure any case studies or stories of lived experience are shared with consent and dignity.

We commit to reviewing fundraising materials regularly to uphold these standards and ensure we do not exploit the people we serve.

Convenience Giving and Unstaffed Donations

When using unstaffed donation mechanisms (e.g. tap-to-donate, digital kiosks, collection boxes, or online platforms), the Octavia Foundation will:

- Clearly display our charity name, number, and purpose of the appeal.
- State any fees or third-party deductions before donation.
- Ensure donors have access to relevant terms and can contact us for more information.

These methods will be reviewed regularly for accuracy, accessibility, and security.

12. Use of Funds

All donations will be used for the purposes specified by the donor, in line with the Octavia Foundation's charitable objectives. We will:

- Respect any conditions or restrictions attached to donations.
- Maintain accurate records of donations and their use.
- Seek guidance before changing the use of restricted funds.

13. Monitoring and Review of the Policy

The Head of Communities, Fundraising and Resilience alongside Trustees will:

- Regularly review this policy to ensure alignment with best practice and legislation.

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- Monitor implementation and ensure compliance by staff, volunteers, and third-party fundraisers.
- Take corrective action in response to concerns or breach.
- All complaints and partnership decisions, including risk assessments and refusal of donations, will be documented and reviewed periodically to inform best practice.

Equality Impact Analysis

See attached appendix for full Equality Impact Assessment. Of the 10 protected categories, 7 were found to have no impact as a result of the policy and procedure and 3 categories were positively impacted.

Appendices

- **Appendix 1:** RAG rating pre partnership
- **Appendix 2:** Due Diligence Profile Template (ensuring consistent research and record-keeping).
- **Appendix 3:** Ethics checklist for fundraisers (ensuring due diligence).
- **Appendix 4:** Fundraising Policy Equality Impact Assessment