



Fundraising Policy

1. Purpose

This policy sets out the principles, standards, and procedures governing **all** fundraising undertaken by Wishing Well Music for Health (WWMFH). It ensures that our fundraising is conducted ethically, legally, transparently, and in the best interests of our beneficiaries, donors, and the charity itself.

It applies to trustees, staff, volunteers, contractors, and third-party representatives acting on behalf of the charity.

2. Our Fundraising Principles

We commit to fundraising that reflects our values of **respect, honesty, accountability, creativity, and inclusivity**. All fundraising conducted by WWMFH will:

- Comply with the Fundraising Regulator's [Code of Fundraising Practice \(2025\)](#).
- Follow [Charity Commission](#) guidance, including *Know Your Donor* principles.
- Be legal, ethical, and aligned with our charitable objects.
- Delivered via methods appropriate to the WWMFH's mission and audience.
- Avoid undue pressure, misleading statements, unreasonable persistence or aggressive tactics.
- Respect donor autonomy, privacy, and contact preferences.
- Reflect the WWMFH's need for external charitable support in a positive way.

3. Ethical Fundraising Standards

3.1 Communications

All fundraising communications will be:

- Clear, accurate, and truthful.
- Transparent about how donations will be used.
- Appropriate to the audience and sensitive to vulnerable individuals.
- Respectful in terms of representation of our beneficiaries, only using personal information with consent and for the purposes they have agreed to.

3.2 Donor Care

We will:

- Treat donors with respect and protect personal data under [GDPR and other current UK data protection legislation](#).
- Offer anonymity where requested and permitted by law.

- Respond promptly to queries, concerns, or complaints.
- Ensure donors are informed about the impact of their support and that formal reporting requirements are met.
- Communicate in line with donors' known contact preferences.
- Respect donor wishes regarding restricted donations (supported by written instructions), where permitted by law.

4. Accepting and Refusing Gifts

4.1 Acceptance Criteria

Before accepting a donation, WWMFH will consider:

- The source and nature of the gift.
- Any conditions or restrictions attached.
- Alignment with our mission, values, and strategic priorities.
- Reputational, ethical, or operational risks, including potential impact on beneficiaries and operations
- Compliance with sanctions, anti-money laundering, and other legal requirements.

4.2 Grounds for Refusal

We may refuse donations that:

- Conflict with our mission or values.
- Could damage public trust or the charity's reputation.
- Come with conditions that compromise independence or beneficiary welfare.
- Are suspected to be linked to illegal activity or lack transparency.
- Involve donors who may lack capacity or be in vulnerable circumstances.

4.3 Decision-Making

- Decisions will be documented with clear rationale.
- High-risk or high-value donations will be escalated to the board of trustees.
- A **Gift Acceptance Register** will record due diligence outcomes and decisions.
- Decisions will be communicated respectfully to the donor, maintaining transparency and professionalism.

5. Donor Due Diligence

Donor due diligence is the process of assessing the legitimacy, credibility, and ethical practices of organisations and individuals to ensure that the donation complies with legal and ethical standards. We will carry out appropriate and proportionate due diligence on potential donors and donations (especially for significant and unusual gifts), including checks relating to:

- Legitimacy of the donor and source of funds.
- Reputational risk or past controversies.

- Ethical alignment (e.g., avoiding greenwashing or virtue signalling).
- Financial stability for multi-year pledges.
- [Sanctions](#), proscribed organisations, or tainted donations.
- Suspicious or unusual donation patterns (e.g., large cash gifts, overseas transfers, crypto assets).

We will not accept donations where risks outweigh benefits.

5.1 Anonymous Donations

We will respect any donor's requests for anonymity where permissible by law. Donors who elect to remain anonymous will not be identified in any public-facing communications, publications, or recognition materials, unless explicit consent is provided by the donor. Internally, donor information will be handled on a strict need-to-know basis and in accordance with UK data protection legislation and charity regulations.

Anonymity cannot override our approach to due diligence outlined above and if a donor refuses to provide sufficient identifying information, we will decline the gift (see clause 4.2).

5.2 Partners and Third-Party Fundraisers

We will conduct due diligence on corporate and community partners and ensure partnership activities comply with the Fundraising Regulator's [Code of Fundraising Practice \(2025\)](#). We will also conduct due diligence on third-party fundraisers prior to any services commissioned.

5.3 Incident Reporting

Where due diligence identifies significant concerns, we will report to:

- [The Charity Commission](#) (serious incident reporting).
- [The Fundraising Regulator](#), [Office of Financial Sanctions Implementation](#) (OFSI), or Police where appropriate.

6. Donation Refunds

Under charity law, donations cannot normally be refunded except in specific circumstances. We may refund donations only when:

- Terms and conditions explicitly allow it;
- The law requires it;
- An **ex-gratia payment** is justified by a compelling moral obligation and approved by the Charity Commission;
- A donation was made in error (e.g., incorrect amount, unintended repeat donation);
- The donor lacked capacity or acted under misinformation;
- Fraud or misuse of payment details is suspected.

6.1 Fundraising Campaigns

If a fundraising campaign:

- Raises insufficient funds, donors may be entitled to refunds.

- Exceeds its target, Charity Commission approval may be required to repurpose surplus funds.

Donors will be contacted to communicate how under- or over-funding will be managed if the situation arises.

6.2 Decision-Making & Appeals

- Decisions not to refund will be communicated in writing.
- Donors may appeal to the Chair of Trustees within 28 days.
- Trustee decisions are final.
- All refund decisions will be recorded and retained for audit purposes.

7. Governance, Training & Oversight

- Trustees will oversee compliance with this policy and review it annually.
- Staff and volunteers involved in fundraising will receive appropriate training and will be required to comply with the contents of this policy.
- All fundraising partners must comply with this policy and the Fundraising Code.
- Trustees and the CEO will take responsibility for the maintenance of the Gift Acceptance Register.

8. Transparency & Accountability

We will:

- Publish clear information about fundraising activities, financial performance and impact.
- Include fundraising statements in annual reports and ensure our annual reports are made available to the public.
- Maintain accurate, accessible records of decisions, due diligence, and incidents.

9. Review & Version Control

This policy will be reviewed every 2 years or following:

- A significant incident;
- Changes in legislation or regulatory guidance;
- Material changes in fundraising practice.

Policy adopted: 19th October 2026

Policy reviewed: