

## Growing Hope Fundraising and Supporter Engagement Policy

The Growing Hope Trustees at both the national and local charity level have responsibility and accountability for their respective charities, including supporter engagement and fundraising. This responsibility is delegated on a day- to- day basis to the Clinic Manager for each clinic and to the Director of Growth for the national charity.

The Director of Growth and the National Fundraising Manager play a key role in setting the charity's approach to engaging with supporters, raising funds and making sure that this approach is followed in practice and reflects the charity's values across the local Growing Hope charities. The network of national trustees also support local fundraising campaigns.

The Charity Commission expects charities that fundraise to do so in a way which protects the charity's reputation and encourages public trust and confidence in their charity. This includes following the law and recognised standards, protecting charities from undue risk, and showing respect for donors, supporters and the public.

The Charity Commission has produced [guidance for fundraising \(CC 20\)](#) and alongside this, this policy has been created to provide an understanding of Growing Hope's approach to fundraising and supporter engagement.

Growing Hope is an active member of the Fundraising Regulator.

Growing Hope fundraising can be split into two types:

1. Fundraising for Growing Hope's national charity is needed to fund the following:
  - Clinical supervision
  - Clinical training
  - Clinic set-up costs (first 3 months costs)
  - Data management
  - Insurance Policies (all clinics)
  - Centralised functions including finance, HR, operations, marketing and communications
  - Staffing costs for the running of the national charity
  - Centrally-based projects including, but not limited to Accessibility Training and Awards and training volunteer course and group facilitators
  - Distribution of funds to local clinics from consortium grants
2. Fundraising for Growing Hope's local clinics is needed to fund the following:
  - Staff salaries
  - Assessment costs
  - Equipment
  - Clinic running costs

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Each charity should have a trustee responsible for fundraising.

Each local Growing Hope charity should have a fundraising sub-committee consisting of at least two trustees, the Clinic Manager and at least two volunteers. This sub-committee should meet on a monthly basis

Growing Hope requests that in addition to the legal responsibilities of the trustees, Director of Growth and Fundraising Manager, each staff member and trustee plays their part in fundraising to enable Growing Hope to continue its work.

Operating effective control over the charity's fundraising is a vital part of the role of the Director of Growth, the Fundraising Manager and of trustees. Each has to ensure compliance with their legal duties<sup>1</sup>, four of which are particularly relevant to this policy:

- acting in the best interests of the charity.
- managing the charity's resources responsibly, which includes protecting and safeguarding its reputation.
- acting with reasonable care and skill.
- assessing for risks and assumptions, and suggesting mitigations and contingencies

Below is a summary of the principles which the Director of Growth, Fundraising Manager, Clinic Manager and trustee should follow to help meet their responsibility for the charity's fundraising.

## **Planning and Oversight of Fundraising**

Growing Hope will plan and oversee its fundraising activities in a way that is consistent with its charitable purposes, values, and legal obligations.

Fundraising activity must be:

- In the best interests of the charity
- Proportionate to the charity's size and resources
- Informed by appropriate consideration of risk, reputation, and impact on donors and the wider public

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<sup>1</sup> Various laws govern different aspects that impinge upon fundraising. These include:

Charities (Protection and Social Investment) Act 2016, Charities Act 2011, Data Protection Act 2018, General Data Protection Regulation (UK GDPR), Safeguarding Vulnerable Groups Act 2006, Equality Act 2010, Payment Card Industry Data Security Standards (PCI-DSS), Fundraising Regulator Code of Fundraising Practice, Chartered Institute of Fundraising Treating People Fairly Guidance, Gambling Act 2005, Mental Capacity Act 2005, Bribery Act 2010

Trustees and senior staff have a collective responsibility to ensure that appropriate arrangements are in place for the planning, monitoring, and review of fundraising activity, and that fundraising aligns with Growing Hope's values and charitable objectives.

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## **Supervision and Delegation**

Growing Hope will ensure that all fundraising carried out on its behalf is subject to appropriate oversight and supervision.

This includes ensuring that:

- Fundraising responsibilities are delegated responsibly
- Staff, volunteers, and third parties understand what is expected of them
- Any person or organisation fundraising on behalf of Growing Hope acts in accordance with this policy and relevant legal and regulatory requirements

Where commercial partners or third-party fundraisers are engaged, arrangements must be demonstrably in the charity's best interests and comply with all applicable laws and recognised fundraising standards.

## **Protecting the charity's reputation, money and other assets:**

This means ensuring that there is strong management of the charity's assets and resources so that we can meet our legal duty to act in our charity's best interests and protect it from undue risk. It includes ensuring that there is adequate consideration of the impact of the charity's fundraising on its donors, supporters and the public, making sure that the charity receives all the money to which it is entitled, and taking steps to reduce risk of loss or fraud.

## **Identifying and ensuring compliance with the laws or regulations that apply specifically to the charity's fundraising:**

The legal rules that apply to various types of fundraising can be detailed and complex. They cover compliance in important areas such as with data protection law, licensing, and working with commercial partners. There are new rules in the Charities (Protection and Social Investment) Act 2016 which affect some charities that fundraise. Trustees should make sure that the charity has access to sufficient information and appropriate advice to ensure that its fundraising complies with all relevant legal rules.

## **Identifying and following any recognised standards that apply to the charity's fundraising:**

These are in the Fundraising Regulator's code of Fundraising Practice. The Code outlines both the legal rules that apply to fundraising and the standards designed to ensure that fundraising is open, honest and respectful. The Commission expects all charities that fundraise to fully comply with the Code. [www.fundraisingregulator.org.uk/code-of-fundraising-practice](http://www.fundraisingregulator.org.uk/code-of-fundraising-practice)

## **Being open and accountable:**

This includes complying with any relevant statutory accounting and reporting requirements on fundraising and using reporting to demonstrate that the charity is well run and effective. In our fundraising communications, it is about being able to effectively explain our fundraising work to members of the public and the charity's donors and supporters.

## **Ethical fundraising**

Growing Hope upholds a strict ethical fundraising standard and is committed to ensuring that all sources of funding align with our values. By adhering to this policy, we maintain our integrity, protect the well-being of those we serve, and ensure that our fundraising efforts reflect our commitment to positive social impact.

We reserve the right to refuse any donation, and to not pursue grants where accepting them could compromise our independence, conflict with our values or charitable purposes, or risk damaging the trust and confidence of the children, families, supporters and communities we serve.

The choice to decline a donation is subject to review by our leadership team to ensure compliance with this policy. When a donation is declined, we will communicate our decision respectfully and, where appropriate, suggest alternative ways for the donor to support our work. If necessary, Growing Hope leadership team will refer these decisions to the Chair of Trustees.

## **Fundraising from vulnerable adults**

We recognize that some donors may be vulnerable due to age, illness, disability, financial hardship, or other circumstances. Our approach to fundraising ensures that all individuals are treated with dignity and are not pressured or exploited in any way.

We will take reasonable steps to identify and protect individuals who may be vulnerable, ensuring they are fully informed and able to make independent decisions about giving.

We will not knowingly accept donations from individuals who lack the capacity to make an informed decision or who may be in distress at the time of giving.

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If concerns arise regarding a donation from a vulnerable individual, we will assess the situation carefully and, where appropriate, offer a refund.

## **Processing and managing donations**

All donations will be used for the purposes for which they were given, as designated by the donor, where applicable. Unrestricted donations will be allocated where they are most needed to advance our mission.

We maintain clear records of all donations and ensure compliance with legal, financial, and regulatory obligations.

We provide regular reports and updates to donors on how their contributions are making an impact.

Donors have the right to request information about how their donation has been used.

We respect donor privacy and handle personal information in compliance with data protection laws.

Donors have the right to remain anonymous and to opt out of communications at any time.

## **Electronic Communications and Marketing**

Growing Hope is committed to communicating with supporters in a lawful, transparent and respectful manner. We will comply with all applicable data protection and electronic marketing legislation, including the UK General Data Protection Regulation (UK GDPR) and the Privacy and Electronic Communications Regulations (PECR).

Where permitted by law, Growing Hope may contact individuals by email, text message or other electronic means to provide information about our work, fundraising activities, events and opportunities to support our charitable purposes. This may include circumstances in which the law permits charities to rely on a "soft opt-in" rather than explicit consent, provided the relevant legal requirements are met. In all cases, individuals will be provided with a clear and simple opportunity to opt out of receiving future communications, and Growing Hope will respect those preferences promptly and fully.

This section of the policy should be read in tandem with the Growing Hope [Data Protection Policy](#)

## Complaints about Fundraising and Communications

### Purpose

Growing Hope is committed to ethical, transparent, and supporter-friendly fundraising. We welcome complaints about our fundraising or communications as an opportunity to improve our practices and maintain trust with our supporters.

### Scope

This sub-section covers complaints from supporters, donors, volunteers, or members of the public regarding:

2. Fundraising activities, including events, appeals, campaigns, and online fundraising
3. Communications such as emails, letters, social media messages, newsletters, and telephone contact
4. Volunteer or staff conduct in relation to supporter engagement

Exclusions:

- Complaints about delivery of Growing Hope services such as therapy or training
- Complaints already covered by statutory procedures, such as safeguarding concerns or data protection breaches, are handled separately.

### Definition of a Complaint

For fundraising and communications, a complaint is any expression of dissatisfaction where the complainant:

- Believes that fundraising activity or communication has been inappropriate, misleading, or distressing
- Seeks a response or resolution from Growing Hope

### Examples include:

- Receiving fundraising communications after opting out
- Feeling misled by a donation appeal or promotional material
- Poor conduct by a staff member or volunteer during fundraising activities

### Threshold for Formal Investigation

A complaint will be formally investigated if it:

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1. Involves potential breach of the Fundraising Regulator's Code of Fundraising Practice
2. Could result in a change to our fundraising or communications procedures
3. Remains unresolved after initial informal resolution attempts
4. Is escalated by a supporter requesting a formal written response

Minor issues, questions, or clarifications may be addressed informally at first contact but will still be logged.

## **Complaints Procedure**

### **Step 1: Acknowledgment**

- Complaints are acknowledged within 5 working days, confirming receipt and outlining the next steps.
- If the complainant is satisfied with the response, the matter will be logged and closed.
- If the complainant is dissatisfied, the investigation procedure is initiated.

### **Step 2: Investigation**

- A designated staff member or trustee investigates, reviewing relevant communications, materials, and interactions.
- Aim to resolve within 20 working days; if delays occur, complainants are updated.

### **Step 3: Response**

- Complainants receive a written response detailing:
  - Findings
  - Actions taken or planned
  - Any changes to procedures or practices

### **Step 4: Review / Appeal**

- If dissatisfied, the complainant may request a review by the Director of Growth or a senior trustee.
- Fundraising complaints can also be escalated to the Fundraising Regulator if the complainant remains unsatisfied.

## **Recording and Learning**

- All fundraising and communications complaints are logged and reviewed regularly, even if they do not proceed to the investigation stage.
- Patterns or trends inform updates to policies, supporter engagement practices, and staff training.

## **Confidentiality**

- Complaints are treated sensitively and shared only with staff or trustees involved in resolving the issue.
- Personal data is handled in line with GDPR and Growing Hope's Data Protection Policy.

Date Adopted: **Feb 2018**

Date Reviewed: **June 2026**

This policy should be read alongside other Growing Hope policies.

# GROWING HOPE

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