



Bloody Good Period

# **Ethical Fundraising: ACCEPTANCE AND REFUSAL OF DONATIONS POLICY**

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Policy Author: Gabby Edlin

Last Reviewed by: Elysha Paige+Rachel Grocott

Signed off by: Ruby Bayley, August 2024

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### 1. INTRODUCTION

**1.1** This policy sets the standards for Bloody Good Period's commitment to ethical funding, in line with charity law, the Fundraising Regulator Code of Fundraising Practice, and our organisational values.

**1.2** This policy will be reviewed regularly and we are open to feedback from the people we work with and our supporters on the content.

### 2. WHO THIS POLICY APPLIES TO:

**2.1** All Bloody Good Period staff. Contractors, trustees and volunteers are required to have a thorough understanding of this policy and uphold it.

**2.2** It is the responsibility of the Chief Executive and the Trustees to ensure that staff, contractors, volunteers and other stakeholders as appropriate are aware of this policy.

### 3. DEFINITIONS

#### 3.1 Corporate Partnerships

'Corporation' means a body (other than a natural person) able to enter binding legal relationships and whose core business is to generate profit. Whole or partly owned subsidiaries are included in this definition. 'Corporate partnership' means any arrangement by which Bloody Good Period receives a benefit from a corporation for less than its fair market value (including pro bono), or a gift of money.

#### 3.2 Trusts and Foundations

'Trust/Foundation' means a charity which supports charitable objectives by making donations, rather than being a direct service provider. Most trusts and foundations derive their income from an endowment (a capital sum given to them by an individual, family or company). It provides a tax-exempt income, which funds the grant-giving. However, some trusts and foundations receive their income from sources such as gifts from a company's current profits.

#### 3.3 Government funding:

"Government funding" means grants made by national, state, local and international governments. For clarity, legislatures, judicial entities and embassies are all part of national governments.

Bloody Good Period will need to exercise common sense if funds are coming from an independent organisation that receives part of its funding from a government body.

Bloody Good Period and Bloody Good Employers Ltd, 167-169 Great Portland Street, 5th Floor, London, W1W 5PF • [hello@bloodygoodperiod.com](mailto:hello@bloodygoodperiod.com)

Bloody Good Employers is a subsidiary company of Bloody Good Period • Bloody Good Employers Limited (No. 13531960)

Bloody Good Period is a registered charity: 1195849 / Bloody Good Period Ltd Company Number 11801410

### **3.4 Acceptance / refusal:**

'Acceptance' refers to the ability to accept a contribution and the ability to proceed with solicitation of a contribution.

'Refusal' refers to the requirement to refuse a contribution and the requirement to cease the solicitation of a contribution.

### **3.5 Potential funder / funder / contribution:**

A 'potential funder' is an individual or organisation (trust, foundation, corporation, commercial participator, trade union, government funder, other charities) with the potential to / interest in giving support to Bloody Good Period, of either a financial nature or gift-in-kind including pro bono.

A 'funder' is an individual or organisation (trust, foundation, corporation, commercial participator, trade union, government funder, other charities) that has previously or is currently providing support to Bloody Good Period, of either a financial nature or gift-in-kind including pro bono.

A 'contribution' refers to a financial or pro bono gift given by a funder; in conjunction with a potential funder this refers to a potential contribution. It includes: individual donations, legacies, in memoriam donations, grants from trusts and foundations, government funding, corporate partnerships and donations, gifts-in-kind, shares or securities, tangible items, real estate.

Bloody Good Period staff and volunteers will use common sense when considering whether to accept an in-kind donation:

- Does the company offering the in-kind donation fall into any of the categories listed in section 4.3 or 4.4
- Is there any expectation to publicise the in-kind donation- is this acceptable and achievable?
- Is there any expectation around services in return for the donation? Is this acceptable or achievable?
- What could be the consequences of declining an in-kind donation?

### **3.6 'Known' and 'unknown' anonymous funders / potential funders / contributions:**

A 'known anonymous' contribution describes a contribution from a funder / potential funder that is known to Bloody Good Period, but requests that their contribution does not appear in any reports or other public documents.

An 'unknown anonymous' contribution describes a contribution from a source unknown to Bloody Good Period (and so the source of any such contribution could also not be listed in any reports or other public documents).

## **4. POLICY STATEMENT**

**4.1** Bloody Good Period can and will only accept lawful donations. We cannot accept a donation where it is known that the donation comprises the proceeds of crime, including suspicion of money laundering.

**4.2** When considering whether to accept or reject a gift, Bloody Good Period will assess if the contribution will benefit our work without compromising or causing harm to the people we work with, and our wider objectives and purpose, independence, reputation and credibility.

**4.3** With this in mind, we list below some specific categories which under no circumstances should we accept funding from or partner with:

- Organisations who rely on precarious employment practices and do not uphold European labour standards. This includes organisations who do not pay a living wage.
- Arms, ammunition and defence
- Tobacco (including e-cigarettes and vaping)
- Extractive industries (specifically: gas, oil, mining, and fracking)
- Organisations unable to demonstrate a commitment to an ethical supply chain and environmental sustainability
- Media and communications organisations that facilitate division and hate
- Any organisation or individual who has promoted, encouraged, induced or assisted in discrimination based on race, sex, religion, gender identity, nationality, disability, sexual orientation or age.

**4.4** In addition to this list, there are several areas which we believe require special attention given the potential to compromise our wider mission, values, independence, reputation and credibility. These will be assessed on a case-by-case basis by Trustees.

- Pharmaceuticals
- Gambling and gaming
- Alcohol
- Banks and other financial services
- Fast fashion
- Mainstream period product companies.

## **Approach**

**4.5** In reaching its decision, Bloody Good Period will act reasonably and will consider sufficient factual evidence to enable it to do so. The volume of evidence assessed will be proportionate to the size of the proposed contribution and associated risk. The source, and size, of the contribution will also determine the decision-making process.

**4.6** Bloody Good Period recognises that some of the evidence it considers may be open to differing interpretations, but will document and be able to justify why a decision is reached.

**4.7** Where risk as per 4.3 & 4 is identified, remedial action taken by the organisation or individual will be taken into consideration as part of Bloody Good Period's decision.

**4.8** Any donation over £1000 will be subject to a top-line due diligence process to understand the source and how it aligns with the criteria listed above. Any donation over £5000 will be subject to a more in-depth due diligence check. These checks will be undertaken by the Fundraising Manager or a specialist freelancer, with final sign off from the CEO.

**4.9** If a funder / potential funder is known to Bloody Good Period but wishes for their contribution to remain anonymous (defined as 'known anonymous') in any published material, we will honour these wishes, on the basis that the contribution carries no significant reputational risk and the funder / potential funder has passed the gift screening process.

**4.10** In accordance with the requirements of the Charity Commission for England and Wales, we will notify the Commission of any unknown anonymous contributions with a value of £25,000 or over as a 'serious incident'.

**4.11** Where any risk is identified as part of due diligence checks, the CEO will escalate to the Trustees for deliberation and decision. This may be outside Board meetings by email or phone, particularly when a decision is required urgently, either to satisfy a funder or mitigate against any reputational risk arising from delaying a decision.

**4.12** Any contribution brought to the staff or Trustees attention that does not meet our criteria outlined above will be considered by the Board and where a concern is upheld by evidence, returned.

### **Refusal of contributions**

**4.13** Bloody Good Period will refuse a contribution if it does not adhere to the principles set out in this policy; the potential funder does not pass our due diligence process; if it would be unlawful to accept it; and if accepting it is judged to be detrimental to the achievement of the purposes of Bloody Good Period, as detailed in our governing documents.

**4.14** The CEO of Bloody Good Period should be responsible for communicating the decision to refuse a contribution, this may be delegated to fundraising staff in the case of smaller corporate donors. Whenever a decision is taken to refuse a donation, it is for the Board of Trustees to decide how much detail it gives to the funder / potential funder or other third parties about the reasons for the refusal.

### **Suspicious contributions**

**4.15** Unsolicited contributions might be suspicious, especially if Bloody Good Period staff/volunteers have been unable to satisfy themselves about the credentials of the people involved or the propriety of the donation.

**4.16** Contributions may take forms other than money, for example shares or goods.

**4.17** The Charity Commission for England and Wales identify the following types of donations as potentially indicating risk:

- unusual or substantial one-off donations or a series of smaller donations or interest-free loans from sources that cannot be identified or checked

- if conditions attached to a donation mean that Bloody Good Period would merely be a vehicle for transferring funds from one individual or organisation to another without the Trustees being able to satisfy themselves about the appropriateness of their use and that they have been used as intended
- where a donation is made, Bloody Good Period is told it can keep it for a certain period of time, perhaps with the attraction of being able to keep any interest earned whilst holding the money, but the principal sum is to be returned at the end of a specified, short, period
- where contributions are made in a foreign currency, and again unusual conditions are attached about their use, including a requirement that the original sum is to be returned to the donor in a different currency
- where contributions are conditional on individuals or organisations being used to do work for Bloody Good Period where the Trustees have concerns about those individuals or organisations
- where Bloody Good Period is asked to act as a conduit for the passing of a contribution to a second body which may or may not be another charity
- where Bloody Good Period is asked to provide services or benefits on favourable terms to the funder or a person nominated by the funder

**4.18** It is not Bloody Good Period's responsibility to work out if a contribution is illegal or if it may be asked to use it for illegal purposes. However, staff and volunteers should carry out good due diligence and report concerns and suspicious activities to the Board of Trustees.

**4.19** Where there is a cause for concern about a donation:

- The CEO will check the funder against the consolidated lists of financial sanctions targets and proscribed organisations - an updated list of these can be found here: <https://www.gov.uk/government/publications/financialsanctions-consolidated-list-of-targets/consolidated-list-of-targets>
- The Board of Trustees will be alerted immediately, and will consider whether to accept or refuse the contribution.
- If a decision is taken to refuse a contribution on suspicious grounds the Board of Trustees will inform the Charity Commission.
- If the Trustees suspect that the purpose of the donation may be to facilitate criminal activity, they will notify the police and the Charity Commission of these suspicions.
- If the Trustees have reasonable cause to suspect that a donation is related to terrorist financing or money laundering, they are under specific legal duties under criminal law to report it.

## Restricted funding

**4.20** Restricted funding involves a third party (usually the funder/potential funder) determining the activities to be funded. This may vary from an expressed preference to an explicit instruction about how the contribution should be spent.

**4.21** Restricted funding could take various forms from co-financing a portion of a project or a broader programme of work, to entirely funding a defined project or set of activities and will often specify a period and may specify a geographic location.

**4.22** If in the unlikely circumstance restricted funding cannot be used for its intended purpose, Bloody Good Period will consult with the donor before a decision is made to allocate it to other projects.

**4.21** Under all circumstances, Bloody Good Period should ensure restricted gifts do not deflect the organisation from its strategic aims. This includes ensuring that donors do not have undue influence over Bloody Good Period's activities.

## **5. ASSURANCE OF THIS POLICY**

**5.1** All of our staff, volunteers, contractors and trustees are required to read and commit to this policy.

**5.2** The policy is available on our website.

**5.3** We have clear governance and management controls in place for us to deliver transparent, ethical and responsible fundraising. It is important to note that accountability for all decisions, even where decision-making has been delegated to staff or volunteers, rests with the Trustees of Bloody Good Period.

**5.4** The Trustees (and their delegates, i.e. Bloody Good Period staff and volunteers) must take all decisions relating to the acceptance/refusal of contributions in the best interests of Bloody Good Period.

**5.5** The Trustees (or their delegates) have a duty to consider carefully, based on the evidence available to them, whether accepting or refusing the contribution will better serve Bloody Good Period's interests and to act accordingly. In making these judgments, Trustees (and/or their delegates) must not allow individual or collective personal, political, commercial interests or views which are not directly related to the interests of Bloody Good Period, to affect their judgement. It is a further requirement that Trustees (and/or their delegates) declare all and any conflicts of interest.