

Sightsavers - Global Fundraising & Donation Acceptance Policy

February 2016

Objectives

The objectives of this policy are to:

- Provide guidance and clarity for staff, trustees and other volunteers
- Ensure compliance with the law and Charity Commission guidance
- Protect the reputation of Sightsavers
- Clarify who has authority to take decisions in regard to donation acceptance
- Ensure that decisions are consistent and based on the needs of the organisation

Membership status

We are members of the appropriate regulatory bodies in all the countries we fundraise in and abide by the relevant fundraising codes in all of our activities.

These memberships include:

- **UK:** Fundraising Standards Board (FRSB), Direct Marketing Association (DMA), Institute of Fundraising (IOF)
- **Ireland:** Dóchas, Fundraising Ireland, Irish Charities Tax Reform Group (ICTR), Charities Regulation Authority
- **Sweden:** Svensk Insamlingskontroll (90 Konto); Frivilligorganisationernas Insamlingsrad (FRII) (these are the equivalent of the UK Charity Commission and Institute of Fundraising)
- **Norway:** No membership necessary for the test phase. Looking to join next year if we roll out activity. Both the voluntary regulator and the IOF equivalent have been contacted.
- **Italy:** There are no regulatory fundraising bodies.
- **India:** Registered Under Bombay Public Trust Act and member of Credibility Alliance (a charity consortium committed to enhancing accountability and transparency),
- **US:** There are no regulatory fundraising bodies. Compliance is required via the Internal Revenue Service which we abide by.

Fundraising Practice

- We don't share or sell supporter data
- We don't do cold telephone calls to members of the public (eg. People not on our database) in the UK, Ireland or Italy. In the UK we won't contact anyone registered with the Telephone Preference Service, unless we have their permission to do so. In India we don't call people who have opted for the "Do Not Disturb" option.
- We follow European law regarding data protection, including only emailing people when we have express permission and giving opportunity for donors to opt out of mailings. In India, where data protection law is less robust, we follow industry best practice.
- We follow donors instructions on when and how we contact them

- We monitor our call centres and our suppliers to make sure that they uphold our high standards and are members of the relevant associations in markets where they exist.
- We follow the provisions set out in the UK Institute of Fundraising codes of practice with regards to dealing with vulnerable people, and follow similar approaches in other countries
- We may communicate with donors about cause-related marketing campaigns with corporate partners, but we do not endorse or approve any products or services to donors or beneficiaries

Donations Acceptance Policy

Types of donations we accept

Donations will generally be accepted without review up to a value of £10,000¹ (level for other currencies is the equivalent value), or as per the fundraising country's norms (for example, in India we are required to get the Permanent Account Number (PAN) for any donations above 10,000 Rupees). This includes:

- a) cash (cheques, bank transfers, standing orders, direct debits etc)
- b) donations in kind e.g. property, art etc
- c) stocks and shares (our policy is to sell shares immediately on receipt)
- d) legacies
- e) pro bono work

Exceptions

We will seek legal advice on certain types of donations, regardless of value, as follows:

- a) Donations of shares that are subject to restrictions or buy-sell agreements.
- b) Donations requiring Sightsavers to assume financial or other obligations e.g. as executor of an estate.
- c) Donations of property which may be subject to environmental or other regulatory restrictions

We will not accept any donation from companies whose business is primarily based on the sale of tobacco products, as there is evidence that smoking can contribute to age-related macular degeneration, and WHO policy about partnerships with tobacco companies would make accepting donations extremely problematic. If an unsolicited donation is offered by a company with investments in tobacco as part of a highly diversified portfolio of businesses, this will be referred to the Donation Review Committee (see below) for assessment.

¹ £10k selected because auditing donations below this level would be disproportionately burdensome.

Policy Guidelines

Our policy covers all donations from third parties and applies in all conditions. Once a donor's contribution to Sightsavers exceeds the £10,000 threshold, either in a single donation or cumulatively over the preceding 12 month period, they become subject to these policy guidelines.

Donations to charities can, and should, only be rejected in exceptional circumstances and these are outlined below.

The only bases on which Sightsavers will refuse a donation are:

1. That it would be unlawful to accept it (e.g. the organisation knows that the donation comprises the proceeds of crime); or

2. That accepting the donation would be detrimental to the achievement of the purposes of the organisation, as set out in its charter. Such anticipated detriment has to be set against the benefit of having the funds from the donor, which enable the organisation to pursue its purposes. Detrimental factors include:
 - a) **Contrary to mission**— acceptance of the donation impacts negatively on the mission of Sightsavers
 - b) **Reputational risk**— acceptance of the donation damages Sightsavers' reputation and credibility in a significant way, or leads to inability to work within a particularly country or region
 - c) **Incompatibility**— the intent of the donor and Sightsavers' desired use of the donation are incompatible, including unreasonable conditions associated with the donation being imposed upon Sightsavers (E.g. requirement to work with a specific partner or supplier, or to fund work in which Sightsavers does not wish to engage)
 - d) **Form of Donation** — the donation is offered in a form that Sightsavers cannot use without incurring substantial expense or difficulty
 - e) **Effect on Future Giving**— acceptance of the donation leads to the loss of current donors/supporters or discourages future donations from other donors, to an extent where such loss exceeds the value of the donation in question

Process for managing donations with identified risk

The best way to avoid the situations described above is to have a clear process for actively managing such risks. All decisions to solicit and/or accept potentially controversial donations will be made to go through the following process:

- 1) The management team will refer for assessment the soliciting of donations flagged with 'identified risk' by the prospect research team, and unsolicited donations flagged by fundraisers, to an internal Donation Review Committee (see below for

details), in cases where the management team feels that the level of risk may outweigh the benefit of accepting the donation or conversely that turning down the donation may be unusually controversial. Committee members are expected to feed back their decision within a period of 4 working days. All decision-making discussions can be completed via email and a majority decision will rule, excepting circumstances where both Trustee members are in the minority, in which case the donation will be referred to the Board of Trustees for decision.

- 2) Solicited or unsolicited donations of £100,000 or greater, which a majority of the Committee feels warrant further discussion, will also be presented to the Board of Trustees for decision.

Donation Review Committee:

Composition: At least 2 Trustees from the Board, relevant Director(s) representing Fundraising, Programmes and Institutional Fundraising, and the Director of News. The committee will form an odd number to make sure majority rule is possible, subject to the point in 1) above.

Solicited donations

When actively soliciting donations above £10,000 fundraising staff should ensure that all prospects (whether individuals, corporates, or trusts) have been through a process of due diligence. The initial desk review is undertaken by the Prospect Research Manager to establish whether the potential donor carries associated risks (as outlined above), including the risk of corruption and money laundering (see Anti-fraud and corruption policy for additional information).

Unsolicited donations

If Sightsavers receives an unsolicited donation over £10,000, this should be reported immediately to the Director of Major Giving or Director of Institutional Funding as appropriate. These Directors will refer what is known of the source to the Prospect Research Manager to conduct due diligence. Process will then follow, as above, with referral to the Donation Review Committee if a risk is identified.

Intermediary donors

This policy acknowledges the intermediary donor as the main donor in this circumstance. Examples here are the likes of Geneva Fund, End Fund, Givewell Foundation, who manage and distribute donations through their organisations to partner organisations, and perform due diligence on our behalf. We therefore rely on their due diligence processes for the sourcing of funds they distribute to Sightsavers.

Anonymous donations²

All donations of £25,000 or higher received from UK donors who are anonymous must be reported to the Charity Commission.

This policy will be reviewed every two years by the Trustees.

² Definition of anonymous for the purpose of this policy document is a donation which has no information attached to its origin and donors who refuse to make themselves known to the organisation.