



FUNDRAISING POLICY

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UCKG HELPCENTRE FUNDRAISING POLICY

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1. POLICY STATEMENT

The Universal Church of the Kingdom of God (also referred to in this policy as the UCKG HelpCentre, UCKG or the Charity) is a Christian organisation and registered charity in England and Wales, that aims to provide, in all its HelpCentres and related faith and outreach activities, an inclusive environment – in line with Biblical principles – where anyone can learn about and practice the Christian faith, and receive advice, guidance and practical assistance to life's problems.

The Charity promotes that beneficiaries and the general public contribute financially to support its work, which is essential to ensure its continuation and expansion, and educates congregants on the Christian practice of faith offerings to thank, praise, and challenge God on the fulfilment of His promises.

The Charity welcomes and is thankful for all donors and their generous contributions that support the critical work it does, and for the blossoming of faith relationships out of every expression of faith through faith offerings.

The Charity will ensure that fundraising is undertaken in accordance with its governing document, applicable law and regulatory requirements, and the Fundraising Regulator's Code of Fundraising Practice where applicable.

Where the Charity undertakes fundraising in England, Wales, Scotland, Northern Ireland, the Channel Islands or any other jurisdiction, it will comply with the legislation, licensing requirements, regulatory requirements and applicable local rules governing fundraising in that jurisdiction.

The Charity will ensure that its fundraising practices are ethical, legal, open, honest and respectful, and do not involve misleading representations, unreasonable intrusion, unreasonable persistence, undue pressure, exploitation of vulnerability or discriminatory conduct.

The Charity will use funds raised for the purposes for which they were raised, subject to applicable law, the Charity's governing document and the terms communicated to donors.

2. AIMS AND PURPOSE OF THIS POLICY

The UCKG has an unwavering commitment towards its objectives of advancing the Christian faith and implementing general charitable purposes, understanding and embracing the pressures and high expectations placed on faith organisations in modern society.

The Charity believes and is committed to ensuring that everyone should have the opportunity to support its work financially, and express their faith in God through faith offerings, and that both should be a positive and extremely rewarding experience for all.

The aim of this policy is to ensure that the Charity promotes the fundraising principles that lead to safe practices and an environment where fundraisers and donors alike can thrive.

The purpose of this policy is to establish the principles and governance standards that apply to fundraising undertaken by or on behalf of the Charity.

This policy, which focuses on the fundraising practices listed in section 7, lays out the commitments made by the Charity; to promote, inform and instruct trustees, ministerial staff, administrative staff, volunteers, and any other person that fundraises on behalf of the Charity

on their responsibilities in relation to fundraising, ensuring that it is always ethical, lawful, safe, well managed, and consistent with the Charity's Christian values, objectives, and reputation.

This policy is intended to provide the framework within which the fundraising practices listed in section 7 may be authorised and conducted. Detailed operational requirements are contained in the Charity's relevant fundraising procedures.

3. SCOPE OF THIS POLICY

This policy is for use and applies to all of the Charity's trustees, ministerial staff (that's bishops, bishops' wives, consecrated and non-consecrated pastors, pastors' wives, assistant pastors, universal biblical institute trainees, missionaries and any other ministerial staff in training), administrative staff (that's full-time employees, part-time employees, any freelancers, any administrative volunteers and anyone on work experience), and all levels of volunteers (that's anyone that volunteers at any church group, activity or event, any community outreach group, activity or event, any charitable or humanitarian activities or events, and fundraising), or any other person when undertaking fundraising on behalf of the Charity. And, relates to all aspects of the fundraising practices listed in section 7 of this policy, and associated administrative work, in the United Kingdom and the Channel Islands.

4. PRINCIPLES OF THIS POLICY

The practices within this policy are based on the principles contained in applicable UK and Channel Islands legislation and relevant guidance issued by the Charity Commission for England and Wales and the Fundraising Regulator, and, where applicable, specifically takes the following into consideration (in alphabetical order):

- Adult Support and Protection (Scotland) Act 2007
- Charities Act 2011
- Charities (Jersey) Law 2014
- Code of Fundraising Practice
- Data Protection Act 2018
- Data Protection (Jersey) Law 2018
- Data Protection (Registration and Charges) (Jersey) Regulations 2018
- Equality Act 2010
- Human Rights Act 1998
- Mental Capacity Act 2005
- Safeguarding Board Act (Northern Ireland) 2011
- Safeguarding Vulnerable Groups (Northern Ireland) Order 2007

This policy operates in conjunction with the following policies from the Charity, which within themselves might operate in conjunction with other policies and related procedures:

- Complaints Policy
- Faith Offerings Policy
- Health and Safety Policy
- Privacy Policy
- Safeguarding Policy
- Trading and Merchandise Policy
- Whistleblowing Policy

5. **LEGAL AND REGULATORY COMPLIANCE**

The UCKG is registered with the Fundraising Regulator, committed to its Fundraising Promise and follows its Code of Fundraising Practice. The code sets out the standards that apply to fundraising carried out by any charitable institutions and third party fundraisers in the UK.

The Charity will comply with all applicable legislation, regulatory requirements and recognised standards relevant to its fundraising practices.

This includes, where applicable:

- charity law and the Charity Commission's requirements;
- the Fundraising Regulator's Code of Fundraising Practice;
- data protection and electronic communications requirements;
- equality and non-discrimination law;
- safeguarding requirements;
- mental capacity requirements;
- consumer protection requirements;
- licensing and collection requirements;
- gambling and lottery requirements;
- tax and Gift Aid requirements;
- requirements applicable to fundraising involving third parties or commercial organisations; and
- applicable requirements in the jurisdictions where the Charity operates.

Where a particular fundraising practice is subject to additional legal, regulatory, licensing or registration requirements, those requirements will be satisfied before the practice commences.

The Charity's Fundraising Department ensures that all trustees, ministerial and administrative staff, volunteers, and any other person engaging in fundraising for the Charity are aware of the Code of Fundraising Practice and any updates, and provides adequate training that ensures these know how to comply with the code in all of the Charity's fundraising practices, as well as all other applicable legislation, regulatory requirements and recognised standards relevant to each fundraising practice.

6. **FUNDRAISING AUTHORISATION**

Fundraising practices undertaken on behalf of the Charity will have been risk assessed, considered and authorised in advance by the appropriate person within the Charity. These will be consistent with the Charity's objectives, this policy and all applicable legal and regulatory requirements.

No trustee, ministerial or administrative staff, volunteer, or any other person will be permitted to organise, commence or represent themselves as fundraising on behalf of the Charity without appropriate authorisation.

The level of authorisation required will be proportionate to the nature, scale, financial value and potential risks associated with each fundraising practice.

Where a proposed fundraising practice presents significant legal, financial, safeguarding, reputational or other risks, it will be escalated for the consideration of senior management and, where appropriate, the trustees before it is approved.

The Charity will maintain appropriate records of fundraising approvals and will periodically review fundraising practices to ensure that they remain lawful, appropriate and consistent with this policy.

7. FUNDRAISING PRACTICES COVERED BY THIS POLICY

This policy covers and focuses on the following fundraising practices:

- **Bag Packing** – this is where shops allow the Charity’s fundraisers to help their customers pack their shopping bags in exchange for voluntary undetermined donations to support the Charity’s general work or a specific fundraising campaign.
- **Business Collections** – this is where the Charity’s fundraisers contact businesses they work with or business owners they know asking for their voluntary undetermined donations to support the Charity’s general work or a specific fundraising campaign.
- **Designated Envelope** – this is where, during prayer services, congregants are given an envelope for a voluntary undetermined donation to support the Charity’s ongoing costs and bills with its HelpCentres or a specific purpose.
- **Door-to-Door** – this is where, subject to the required licences/permissions, the Charity’s fundraisers call at residential properties asking for a voluntary undetermined donation to support the Charity’s general work or a specific fundraising campaign.
- **Event Sponsorship** – this is where individuals and businesses are asked for voluntary undetermined donations to sponsor an event being organised by the Charity or where the Charity has agreed to participate.
- **Foods** – this is a form of in-kind fundraising practice where individuals and businesses are asked to donate foods to be distributed to people in need at the Charity’s food banks, soup kitchens, and night angels, and in certain appeals where it is sent for distribution at locations nationwide and internationally where the Charity might work with sister churches and other charities.
- **Goods** – this is a form of in-kind fundraising practice where individuals and businesses are asked to donate a variety of goods (like toys, clothes, blankets, etc...) that the Charity distributes to people in need through its HelpCentres, or night angels, hospitals, care homes, women’s refuges outreach, and in certain appeals where it is sent for distribution at locations nationwide and internationally where the Charity might work with sister churches and other charities.
- **Grants** – this is where the Charity applies for grants that support the Charity’s general work or specific projects.
- **Legacies** – this is where individuals leave a will where the Charity is named as a beneficiary.
- **Online Fundraising Platforms** – this is where individuals donate or are asked to donate via online fundraising platforms.
- **Private Collections** – this is where Charity fundraisers contact people they know asking for their voluntary undetermined donations to support the Charity’s general work or a specific fundraising campaign.
- **Private Site Collections** – this is where shops allow the Charity’s fundraisers to conduct fundraising on their site for voluntary undetermined donations to support the Charity’s general work or a specific fundraising campaign.
- **Project Sponsorship** – this is where individuals and businesses are asked for voluntary undetermined donations to sponsor a specific project of the Charity.
- **Publications** – this is where individuals are asked for voluntary undetermined donations to sponsor a publication that has or is being created by the Charity for distribution to the general public as a form of evangelism.
- **Raffles and Prize Draws** – this is where, on its own or as part of an event, course, campaign, etc., individuals are asked to buy a raffle or enter into a prize draw.

- **Services** – this is a form of in-kind fundraising practice where Church members and Charity volunteers assist the Charity with their services.
- **Sponsored Activities** – this is where Charity fundraisers take part of activities (like walks, runs, marathons, breakfasts, etc...) to raise funds for the Charity and invite people to donate.
- **Street Collections** – this is where, subject to the required licences/permissions, the Charity's fundraisers take to the streets (including carol singing) asking for voluntary undetermined donations to support the Charity's general work or a specific fundraising campaign.
- **Ticketed Fundraising Events** – this is where individuals purchase a ticket for a fundraising event organised by the Charity.
- **Tin Collections** – this is where Charity fundraisers take a collection tin with them and contact people they know asking for their voluntary undetermined donations to support the Charity's general work or a specific fundraising campaign.

There are additional practices that raise funds for the Charity and that are connected with the donors' practice of the Christian principles of faith promoted by the Charity. These practices and their compliance with all applicable legislation and regulatory requirements are covered in the Charity's Faith Offerings Policy, accessible via uckg.org/faith-offerings-policy/.

Similarly, commercial practices that also raise funds for the Charity are covered in the Charity's Trading and Merchandise Policy, accessible via uckg.org/trading-merchandise-policy/.

8. FUNDRAISING MATERIALS

The Charity's Fundraising Department, under the direction of senior management, is responsible for the creation, production, and provision of fundraising materials for all of the Charity's fundraising campaigns and practices. Ensuring that the same are fully compliant with all applicable legal and regulatory requirements.

The Charity's fundraisers will only use fundraising materials, statements, communications, and any other promotional tools that have been preapproved through the Charity's relevant internal processes and provided by its Fundraising Department.

9. DEFINING FUNDRAISERS

For the purpose of this policy, the term 'fundraiser' or 'fundraisers' refers to all of the Charity's trustees, ministerial staff (that's bishops, bishops' wives, consecrated and non-consecrated pastors, pastors' wives, assistant pastors, universal biblical institute trainees, missionaries and any other ministerial staff in training), administrative staff (that's full-time employees, part-time employees, any freelancers, any administrative volunteers and anyone on work experience), all levels of volunteers (that's anyone that volunteers at any church group, activity or event, any community outreach group, activity or event, any charitable or humanitarian activities or events, and fundraising), and any other person on behalf of the Charity when these are engaged in the fundraising practices listed in section 7 of this policy, and associated administrative work, in the United Kingdom and the Channel Islands.

10. FUNDRAISERS CONDUCT

The Charity is committed to ensuring that fundraising is undertaken in a manner that protects donors, fundraisers and the wider public, including those who may be in vulnerable circumstances. Its fundraisers will not engage in undue pressure, unreasonable persistence, misleading conduct or any other inappropriate fundraising practice.

The Charity will ensure that its fundraisers behave respectfully, in line with the Charity's Christian values and principles, and conduct themselves professionally, always observing and complying with this policy, related procedures and codes of conduct, and applicable training as well as any other of the Charity's relevant policies and procedures.

Whilst undertaking fundraising on behalf of the Charity, fundraisers will be identifiable by the Charity's fundraising badge and high-visibility vest where required for the relevant fundraising practice. The Charity will ensure that identification and clothing requirements comply with the terms of applicable fundraising permissions, licences and regulatory requirements.

11. FUNDRAISERS SELECTION AND TRAINING

The Charity will assess each individual that wishes to engage in fundraising on behalf of the Charity to establish the candidate's suitability for the proposed role and related fundraising practice. Candidates' vetting will include safeguarding checks, where appropriate.

The Charity's vetting of candidates will not be discriminatory against specific personal characteristics like age, gender, race, or disability or any other protected characteristic. Vetting will be on a case by case basis, where the requirements of the proposed role and specific fundraising practices will prevail and set the criteria.

The Charity will ensure that no candidate will become an authorised fundraiser and undertake fundraising practices on behalf of the Charity for which they have not been assessed and vetted, and received appropriate training, instruction, and/or authorisation.

The Charity will take reasonable steps to ensure that its fundraisers have the knowledge and skills necessary to undertake their responsibilities safely, lawfully and effectively when fundraising on behalf of the Charity.

Training will be proportionate to the individual's role and the nature and risk of the fundraising practice. As appropriate, fundraising training will cover:

- the Charity's objectives, values, and fundraising principles;
- the requirements of this Fundraising Policy and related procedures;
- the Fundraising Regulator's Code of Fundraising Practice;
- appropriate fundraising conduct;
- preventing undue pressure, misleading communications and unreasonable persistence;
- identifying and responding appropriately to vulnerable donors;
- informed decision-making and mental capacity;
- safeguarding;
- handling donations and fundraised income;
- Gift Aid;
- data protection and donor privacy;
- complaints and concerns;
- whistleblowing and escalation arrangements; and
- any legal, licensing or regulatory requirements relevant to the particular fundraising practice.

Where fundraising practices, legislation, regulatory requirements or Charity procedures change, relevant training and guidance will be updated as appropriate.

The Charity will maintain appropriate records of fundraising training and will consider refresher training where required.

The Charity's Fundraising Department will monitor compliance with training requirements and take appropriate action where an individual does not meet the required standard.

12. **SAFEGUARDING FUNDRAISERS**

The Charity is committed to protecting its fundraisers from harm, abuse, exploitation, harassment, discrimination and undue pressure in connection with fundraising. And, will take all necessary steps to explore all available legal avenues to ensure that offenders are held accountable for their actions to the full extent of the law.

The Charity will ensure that appropriate guidance and training is provided to fundraisers, taking account of the fundraising practices they undertake and the level of risk associated with those practices.

Any concern involving a child or adult at risk will be dealt with in accordance with the Charity's Safeguarding Policy, accessible via uckg.org/safeguarding-policy/. Nothing in this policy prevents or delays an appropriate safeguarding referral or other action required to protect an individual from harm.

13. **SAFEGUARDING DONORS**

The Charity is committed to protecting donors from harm, abuse, exploitation, harassment, discrimination and undue pressure in connection with its fundraising practices. Where a donor indicates that they do not wish to continue an interaction, the Charity's fundraisers will respect that decision and immediately end the interaction.

The Charity recognises that it is unavoidable that it will engage with donors that are vulnerable or in vulnerable circumstances, and that may require additional support to make sound and informed decisions. That existing or future donors may at some stage in their lives face vulnerable circumstances or become vulnerable and that this could impact their decision making and overall experience in financially supporting the Charity.

Defining Vulnerable Donors

For the purpose of this policy, the Charity makes the distinction between a donor lacking the capacity to make a decision (legislated through the *Mental Capacity Act 2005* and all subsequent amendments) and someone that has the capacity to make a decision but may be vulnerable at the particular moment of making a donation.

The Charity recognises that it can be difficult to make a clear cut decision as to whether or not someone falls into one of the categories described above. The Charity will not identify vulnerable donors based on specific personal characteristics like age, gender, race, or disability or any other protected characteristic but on a case by case basis, where a precautionary approach and best judgement must prevail.

The following non-exhaustive lists are for indicators or behaviours that could signal someone may be in vulnerable circumstances or lack mental capacity.

Indicators of individuals that could be in vulnerable circumstances or lack mental capacity to make a decision may include:

- Financial vulnerability;
- Times of stress or anxiety;
- A long-term or temporary disability or limiting illness;

- A long-term or temporary mental health condition;
- Influence of alcohol or drugs.

Behaviours of individuals that could lack mental capacity to make a decision may include:

- Asking irrelevant and unrelated questions;
- Responding in an irrational way to simple questions;
- Asking for questions or information to be continually repeated;
- Taking a long time or displaying difficulty in responding to simple questions or requests for information;
- Displaying signs of confusion and forgetfulness;
- Indicating in any way they are feeling rushed, flustered, or experiencing a stressful situation.

Engaging Vulnerable Donors

The Charity rarely engages with existing or potential donors directly to solicit donations. Indeed, the Charity mainly makes public appeals to beneficiaries and the general public for the financial support of its work, and educates congregants on faith offerings during its public prayer services.

Where the Charity was informed, identified or someone declared themselves as being vulnerable, it will respond to the vulnerable individual's needs and/or circumstances and adapt its approach to suit those needs and the context, which may include:

- Using simpler and clear language;
- Being patient and compassionate;
- Repeating information where needed;
- Asking if they would like to speak to someone else before making a decision;
- Checking their understanding throughout the conversation;
- Sending information for them to review in their own time before deciding.

The Charity will not accept or retain a donation if it is known or there is good reason to believe that a vulnerable individual lacks capacity to make a decision to donate, or is in vulnerable circumstances that means they may not be able to make an informed decision.

In cases where the Charity has the confidence that a donor in vulnerable circumstances has capacity to make an informed decision, their donation will be accepted or retained, with the relevant considerations and decision process recorded so that it can be reviewed or reassessed as appropriate.

14. HIGH VALUED DONATIONS DUE DILIGENCE

The Charity will apply a proportionate, risk-based approach to due diligence on donations, taking account of the value, source, conditions, circumstances and potential risks associated with the donation.

The Charity has established an internal threshold of £2,500 for enhanced due diligence. Donations in excess of £2,500 will be subject to appropriate enhanced security, proportionate to the circumstances and potential risks involved, including consideration of any relevant safeguarding or donor vulnerability concerns.

The Charity receives many smaller donations that, due to capacity, will not trigger the same level of research and scrutiny as this would not be practicable, proportionate or reasonable.

15. **ACCEPTING AND REFUSING DONATIONS**

The Charity will normally seek to accept donations that are lawfully offered and that support its objectives of advancing the Christian faith and implementing general charitable purposes.

The Charity will not accept or retain a donation where doing so would be unlawful, outside the Charity's powers, inconsistent with its objectives, or otherwise contrary to applicable legal or regulatory obligations.

The Charity will take a proportionate and risk-based approach when considering whether to accept or refuse a donation, having regard to the source, value, conditions, circumstances and potential risks associated with the donation.

The Charity will have regard to whether:

- the donor has the capacity to make an informed decision to donate;
- the circumstances surrounding the donation may affect the donor's ability to make an informed decision;
- the source of the donation is lawful and appropriate;
- the donor has the legal right to give the funds or property;
- any conditions or restrictions attached to the donation can lawfully and practically be fulfilled;
- the donation is consistent with the Charity's objectives and powers; and
- accepting or retaining the donation would create an unacceptable legal, financial, safeguarding, operational or reputational risk.

The Charity may accept anonymous donations where lawful and appropriate, having regard to applicable legal and regulatory requirements and any relevant risks.

Where donations are subject to conditions or restrictions, the Charity will ensure that those conditions or restrictions are appropriately considered and complied with.

Where a concern arises regarding the source, circumstances, conditions or other characteristics of a donation, the Charity will ensure that the donation is subject to an appropriate level of review before a decision is made.

Where a concern arises after a donation has been accepted, the Charity will consider whether the donation should be retained or returned in accordance with the Charity's governing document, trustees duties, applicable law and relevant regulatory guidance.

The Charity will maintain appropriate records of significant decisions concerning the acceptance or refusal of donations, including the reasons for those decisions.

Where necessary, the Charity will obtain appropriate legal, financial or regulatory advice in relation to the acceptance or refusal of a donation.

16. RETURNING DONATIONS

The Charity recognises that donors may, in some circumstances, request the return of a donation.

Where a donor simply changes their mind, the Charity will normally consider a request for the return of a donation where the request is made within 30 days of the date of the donation.

The 30-day period is an internal policy timeframe and does not constitute a statutory right to cancel or withdraw a charitable donation. Requests made outside this period may be considered where there are exceptional circumstances or where the Charity has a legal or regulatory obligation, or an appropriate legal power, to return the donation.

Material to any and all requests for the return of a donation is that the donation in question can be traced and that the same can be connected to the individual making the request. If the Charity cannot trace the donation and/or if the same cannot be connected to the individual requesting its return, the Charity will not be able to process the request any further.

The Charity will comply with applicable payment-service, card-scheme, Direct Debit, fraud-prevention and other relevant requirements when processing refunds. Where applicable, refunds will not be made until the Charity has received cleared funds, using an appropriate and secure payment method and, where practicable, to the original payment method.

The nature of anonymous donations means the Charity will not know who the donor was. As such, unless the individual making the request for a return can provide irrefutable evidence that proves said individual was the anonymous donor, the Charity will not be able to process the request.

In considering a request for the return of a donation, the Charity may have regard to the length of time since the donation was made, the amount involved, the circumstances of the request, whether the donation has already been spent, applied or committed towards the Charity's objectives, and whether returning the donation would affect the Charity's ability to meet its objectives. The fact that a donation has been spent, applied or committed will not prevent the Charity from returning a donation where it is required to do so by law or applicable regulation.

Before approving a discretionary return, the Charity's board of trustees will ensure that:

- it has the legal power to return the donation;
- the decision is consistent with the Charity's governing document and trustee duties;
- trustees have sufficient information to make an informed decision;
- relevant factors have been considered and irrelevant factors disregarded;
- any conflicts of interest have been properly identified and managed; and
- the decision is in the best interests of the Charity.

The Charity will maintain appropriate records of significant decisions concerning requests for the return of donations and will ensure that such decisions are made in accordance with its governing document, trustees duties, including the reasons for the decision, and applicable legal and regulatory requirements.

Where necessary, the Charity will obtain appropriate legal, financial or regulatory advice in relation to a request for the return of a donation.

17. HANDLING DONATIONS AND FUNDRAISED INCOME

The Charity will ensure that all donations and fundraised income will be handled securely, honestly and transparently and are properly recorded and accounted for.

The Charity will maintain appropriate financial controls to minimise the risk of loss, theft, fraud, error or misuse of funds. The controls applied will be proportionate to the nature and value of the funds and the fundraising practice.

Where practicable, the Charity will apply appropriate separation of duties so that responsibility for collecting, counting, recording, reconciling and authorising the use of funds is not unnecessarily concentrated in one individual.

Funds raised for a particular purpose will be used for that purpose, subject to the applicable law, the terms communicated to donors and the Charity's powers, including where the appeal raises more or less than the amount required. Where circumstances mean that funds cannot be used exactly as originally intended, the Charity will take appropriate steps to determine how the funds may lawfully be applied.

All fundraising income will be supported by appropriate records. Records will be retained for the period required by applicable law, regulation and the Charity's record-retention procedures.

Where third parties, fundraising platforms, contractors or other organisations handle funds on behalf of the Charity, the Charity will take reasonable steps to ensure that appropriate arrangements, controls and reporting requirements are in place.

18. GIFT AID

Where the Charity claims Gift Aid in respect of eligible donations, it will comply with the requirements of HM Revenue & Customs and all applicable legislation and guidance.

Gift Aid will only be claimed where the Charity has sufficient evidence that the donation is eligible and that the donor has made an appropriate declaration or otherwise provided the information required for a valid claim.

The Charity will maintain appropriate records of Gift Aid declarations, donations and claims and will ensure that claims are made accurately and only in respect of eligible donations.

The Charity will not knowingly submit a false, inaccurate or unsupported Gift Aid claim.

Gift Aid information will be handled securely and in accordance with the Charity's Privacy Policy and applicable data protection requirements.

19. DATA PROTECTION AND DONOR PRIVACY

The Charity respects the privacy of donors, potential donors, beneficiaries, staff, volunteers and members of the public and will process personal data in accordance with applicable data protection legislation, including the UK GDPR and Data Protection Act 2018, as applicable, and the Charity's Privacy Policy, accessible via uckg.org/privacy-policy/.

Personal data collected or used for fundraising purposes will be processed lawfully, fairly and transparently and only for specified, explicit and legitimate purposes.

Where fundraising communications constitute direct marketing, the Charity will comply with applicable data protection and electronic communications requirements. The Charity will

respect applicable preferences and objections to receiving fundraising communications and will provide appropriate opportunities for individuals to opt out where required.

The Charity will only share donor information with staff, volunteers, contractors, fundraising platforms or other third parties where there is an appropriate lawful basis and where the disclosure is necessary and proportionate.

Where applicable, the Charity will respect requests made through the Fundraising Preference Service (FPS) and will ensure that fundraising communications are managed in accordance with applicable requirements, data protection legislation and the Charity's Privacy Policy.

The Charity will maintain appropriate records of FPS requests and any resulting suppression of fundraising communications. Such information will be processed securely and in accordance with applicable data protection legislation and the Charity's Privacy Policy.

The FPS does not replace the Charity's wider obligations regarding fundraising communications, and the Charity will continue to respect applicable objections, opt-outs and communication preferences through its own processes.

20. COMPLAINTS

The Charity expects the highest standards of conduct and behaviour from all its fundraisers at all times.

In the event where such high standards can be seen to not be met, or where any fundraising practice on behalf of the Charity raises concerns, the Charity urges the affected parties to make a complaint.

Concerns or complaints regarding the Charity's fundraising or involving its fundraisers are handled through the Charity's Complaints Policy accessible via uckg.org/complaints-policy/. Anyone needing to raise a concern or make a complaint will need to consider the terms of the Charity's Complaints Policy and follow the steps therein on how to make a complaint.

The Charity takes every complaint seriously, and is committed to ensuring that all complaints, concerns and issues raised are properly investigated in an unbiased, non-judgemental, transparent, timely and appropriate manner.

21. WHISTLEBLOWING

If any of the Charity's fundraisers, or any of its trustees, ministerial staff, administrative staff, and all levels of volunteers that are not involved in fundraising, know or suspect that there is some form of wrongdoing occurring within the Charity's fundraising work and want to disclose a concern and alert the Charity, these will need to refer to the Charity's Whistleblowing Policy accessible via the Charity's HR software or in locations duly disclosed to all applicable individuals.

22. RESPONSIBILITY

The Charity's board of trustees has overall responsibility for the approval and oversight of this policy.

Responsibility for the implementation and adherence to this policy is delegated to the senior management (that's the bishop in charge and the general manager) of the Charity.

23. **REVIEWING THIS POLICY**

This policy is approved and endorsed by the Charity's board of trustees and will be reviewed annually, within the first quarter of the year, or whenever there is a learning experience or regulatory changes that makes it mandatory to amend/update the policy. All reviews for any given year will be listed in the Version Control Sheet on page 16. The Fundraising Department is responsible for reviewing and updating this policy.

VERSION CONTROL SHEET

Version	Approved by	Valid from	Expired on
01 for the year 2026	Board of Trustees	Wed 30 Sep 2026	-