

FHPKG Ethical Fundraising Policy

The Friends of Hyde Park & Kensington Gardens endeavours to promote the conservation, protection, and improvement of the physical and natural environment in Hyde Park and Kensington Gardens. As such one key activity is to raise donations to support the Parks. The ethical fundraising policy has been put in place to ensure that any funds raised from donors meet ethical standards approved by the Trustees.

Donations made to FHP&KG are, in general, gratefully accepted by the Trust. However there can be circumstances when the Trust may need to refuse to accept a donation or work with certain donors. In order to ensure that donors/donations meet the standards required, the FHP&KG has implemented a review process to identify any inappropriate donors/donations that then will be refused.

The policy below should be used as guidance.

- **The basis on which the FHP&KG can refuse a donation are:**

- a. That it would be unlawful to accept it (e.g. the organisation knows that the gift comprises the proceeds of crime or is believed to be money laundering); or
- b. That accepting the donation would be detrimental to the achievement of the purposes of the FHP&KG, as set out in the constitution:

The objects of the FHP&KG are

“To promote for the benefit of the public the conservation, protection, and improvement of the physical and natural environment in Hyde Park and Kensington Gardens with particular reference but not limited to:

- i. peace and beauty;
- ii. historic layout, buildings, monuments and facilities;
- iii. trees, plant birds and animal life;
- iv. the parks as a unique resource for the public.”

There may be some donors whose activities are clearly detrimental to the FHP&KG’s objects and to accept a donation might assist in giving respectability to the donor and help promote the continuance of those detrimental activities. The FHP&KG needs to have at least a reasonable expectation of the detriment arising before taking it into account in assessing whether a donation should be accepted or refused. It must be established that:

- a. Those values and ethics are relevant to the objects of the organisation as set out in its constitution;
- b. It is reasonable to conclude that acceptance would be detrimental to achievement of the objects; and
- c. It is reasonable to conclude that such detriment is likely to be greater than the benefit to be obtained by accepting the donation.

Although ethics and values will be important in reaching the decision, these cannot be the decisive factors. The FHP&KG needs to be able to demonstrate that acceptance of the donation would be detrimental to the achievement of its purposes (Objects).

- **Donors from whom the Trust would not wish to accept donations:**

- Any organisation that is not supportive of the wellbeing of the parks.

- Any organisation that is interested in using the parks for their own gain that does not provide a net benefit to the Royal Parks..

While these are very vague concepts it is impossible to identify all possible organisations that could be at odds with the Foundations objects so that these overall concepts need to be applied when reviewing any donor/donation.

- **The review of donors/donations**

It will be a rare occurrence for a donor/donation to come into question and need to be reviewed to ensure they are not counter-productive for achieving the Objectives of the FHP&KG. The points below provide guidance as to whether a donation may need further review by one of the Trustees to confirm the acceptability which if still in question should be referred to the Chairman or Board of Trustees for determination.

Normally not requiring review

1. Regular subscriptions.
2. One-off donations under £1,000 per year should normally be considered too small to warrant a review.

Donors/donations for which a review or action must/should be considered:

1. Donations from entities/activities that run counter to the objectives of the FHP&KG.
2. Donations over £1,000. Donations over £100,000 may also be considered for referral to the Charities commission in unclear circumstances. The amount should include all kinds of donation: E.g. cash, donations in kind, shares, legacies, pro bono work, sponsorship, corporate donations.
3. Restricted donations should be reviewed to determine that the restriction can be adhered to and the cost of adhering to the restriction is not greater than the donation.
4. Donations from suppliers to the Royal Parks should be reviewed for appropriateness and separation from the commercial relationship.
5. Donations from people related to otherwise reviewable donors should be reviewed for the closeness/separation from the reviewable donor.
6. Truly anonymous donations must be reviewed (particularly for money laundering or other criminal activity and if a value of over £25,000 reported to the Charity Commission as a serious incident.)
7. If there is any indication that a donation is from a vulnerable person, it needs to be reviewed to ensure the Trust is not accepting money from vulnerable people with impaired judgement.
8. This policy applies to both solicited and unsolicited donations.
9. Repeat donors should fall under guidance for review for any subsequent donations when they occur.

Any donation that is considered inappropriate for the Friends to accept must be documented for the rationale and the donor advised of the refusal. Any future relations with the donor should be reviewed to see if the same rationale exists. A list of all donations referred for review should be kept.