



COMMUNITY CREATIONS

Ethical Fundraising Framework

Policy Name	Ethical Fundraising Framework	Policy Number	FP05
Effective Date	11th Sept 2021	Owner	BOD
Related Policies	FP01 Financial Control Policy / FP01 FP03 Gifts Policy / FP03 FP04 Procurement Policy / FP04		
Next Review Date	March 2023		

Version History		
Version	Description of Change(s)	Approval Date
A	Implementation	11th Sept 2021
B	Document Control Update	March 2023

Purpose

The purpose of this framework is to clearly identify Community Creations' approach to deciding on fundraising partnerships, and to document the standards we expect to be upheld in the decision-making process of receiving funds from any external source.

Scope

This framework concerns all external funders and donors who wish to engage in funding partnerships with Community Creations.

Introduction

Community Creations CLG is a registered charity which accepts donations from the public in order to further its overall aims and the purposes of its projects. The executive is empowered to pursue fundraising activities within the overall strategy determined by the Board of Directors through the Audit, Finance and Fundraising Sub-Committee.

We may also accept funding from private corporate entities and not-for-profit entities, or enter into funder relationships with same. However, it is the policy of the Board of Directors that any such funding relationships are subject to the terms of the Ethical Fundraising Framework as set out in this document.

A “funding relationship” here means any arrangement by which an entity provides funding or benefit-in-kind to Community Creations on either a one-off or recurring basis.

This document may be used to assess individual donations in circumstances where accepting the proposed donation would involve publicly identifying an association with the individual in question. In these circumstances, all references to “the Organisation” should be taken to refer to the individual in question.

Community Creations’ funding relationship with the State through the Exchequer is a competency of the Board of Directors and not covered by this framework.

Process

Prior to any funding relationship being approved, the following questionnaire is to be completed by no fewer than three members of the Community Creations executive.

These individuals will be appointed by the Leadership Team, and will report back to the Leadership Team with their agreed recommendation within a clear timeframe. If the group is unable to produce a single agreed recommendation, this should also be reported back to the Leadership Team.

Upon receiving the recommendation(s) of the group, the Leadership Team may accept or reject the recommendation(s). If deemed necessary and appropriate by the Leadership Team, consideration of the recommendation(s) may be passed to the Board of Directors.

An anonymised copy of the recommendation and resulting decision will be held on file by Community Creations. This copy is to record the reasoning behind the funding decision and should not identify the opinions or conclusions of any named individuals

If an organisation is turned down for a funding relationship under this framework, they may be reconsidered at a later date under a new proposal.

All funding relationships arising from this process should be reviewed at least once every three years.

Ethical Fundraising Questionnaire

Proceed through each of the four sections below.

PLEASE NOTE: This document is strictly internal to Community Creations CLG. No copy of this document or the information contained within is intended to be supplied to any Organisation under consideration for a funding relationship. The questionnaire should be filled out solely by Community Creations staff based on the information they can obtain through due diligence - the questionnaire will never be sent directly to the Organisation under consideration.

Section One - Primary Requirements

An organisation under consideration (“the Organisation”) must “pass” each of the following questions to be considered for a fundraising relationship with Community Creations.

1. Can the existence of the Organisation and of its Directors be verified?
 - a) Yes - proceed
 - b) No - do not proceed

2. Is the Organisation a shell company, i.e. an incorporated company that possesses no significant assets and performs no significant operations of its own?
 - a) No - proceed
 - b) Yes - do not proceed (identify the Beneficial Owner, i.e. the entity which controls the shell company, and begin the process again)

3. Does the Organisation have current Tax Clearance status?
 - a) Yes - proceed
 - b) Not applicable (explain why) - proceed
 - c) No - do not proceed

4. Is there a fundamental conflict of interest between the aims of Community Creations CLG and the aims of this Organisation?
 - a) No - proceed
 - b) Yes - do not proceed

5. Does any decision-maker within Community Creations have a conflict of interest or loyalty in terms of this Organisation?

- a) No - proceed
- b) No, because the individual(s) in question have recused themselves - proceed
- c) Yes - do not proceed

Section Two - Risk Identification

6. How well does the Organisation align with Community Creations' organisational values as set out in our strategy documents, annual reports, and publicly on our websites?

- a) Very well
- b) Well
- c) Neutral
- d) Poorly
- e) Very poorly

7. Has the Organisation been subject to any statutory investigations or inquiries that could impact on our reputation?

- a) Yes, recently
- b) Yes, more than 3 years ago
- c) Yes, more than 10 years ago
- d) No
- e) Unknown

8. Has the Organisation been subject to any negative press that could impact on our reputation?

- a) Yes, recently
- b) Yes, more than 3 years ago
- c) Yes, more than 10 years ago
- d) No
- e) Unknown

9. Is the Organisation responsible for, or directly profiting from, a negative impact on the environment?

- a) Yes, a direct impact
- b) Yes, an indirect impact
- c) No
- d) Unknown

10. Is the Organisation responsible for, or directly profiting from practises relating to a negative impact on mental or physical health and wellbeing, particularly on young or vulnerable people?

- a) Yes, a serious impact
- b) Yes, a minor impact
- c) No
- d) Unknown

11. Is the Organisation responsible for, or directly profiting from practices relating to a negative impact on human rights, including by involvement in the Direct Provision system?

- a) Yes, a serious impact
- b) Yes, a minor impact
- c) No
- d) Unknown

12. What level of risk is there that the Organisation may be involved in money laundering, the funding of terrorist activities or any other illegal activity?

- a) A low risk
- b) A moderate or high risk
- c) Unknown

13. Are there any other relevant considerations arising at this time?

- a) No
- b) Yes (explain)

Section Three: Mitigation

If the answers to any of the above questions are neutral or negative; what (if any) mitigating factors exist or can be put in place by Community Creations to mitigate this?

Potential examples of mitigating factors (non-exhaustive list):

- We can make a positive difference by engaging with this Organisation
- We can better reach our target audience by engaging with this Organisation
- We can secure funding through this Organisation that will prevent serious reductions in the services provided by Community Creations
- We have a pre-existing positive relationship with this Organisation that has advanced our vision and values
- Any other factors which may be deemed relevant

Section Four: Approval

Based on the above assessment, what is the recommendation?

- a) The funding relationship with this Organisation should be proceeded with
- b) The funding relationship with this Organisation should be proceeded with, subject to certain conditions (explain)
- c) The funding relationship with this Organisation should be considered by the Board of Directors
- d) The funding relationship with this Organisation should not be proceeded with