



## Fundraising Policy

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### 1. Purpose and scope of this Policy

1.1 This Policy outlines World Animal Protection's approach to fundraising planning and activity.

1.2 The primary objectives of this Policy are to ensure that our fundraising is always:

- in line with applicable legal requirements
- honest
- open and respectful
- builds trust in our organisation and
- contributes to our ability to deliver our mission.

#### 1.3 Scope of policy

- It applies directly to World Animal Protection, including our branch and subsidiary members (Group) and all World Animal Protection employees, agency workers, consultants, self-employed contractors, volunteers and trustees undertaking fundraising activity for World Animal Protection.
- Group members should ensure the policy reflects local requirements in addition to the principles we set out.
- Our affiliate members will have their own fundraising policy and procedure monitored by their independent board and regulators. However, affiliate members are welcome to use all or part of this policy and procedure.
- Fundraising includes a range of activities designed to engage individuals and organisations and institutions (such as governments or other agencies) to start or continue giving ('giving a financial contribution or a service or item or property with a specified value that is independently evidenced to support audit requirements'). For instance, in the UK, that includes all activities covered by the [Code of Fundraising Practice](#).
- Figures used throughout this policy are in USD\$ and can be translated into the relevant local equivalent and where noted there is flexibility for offices to define market definitions.

### 2. Policy Statement

2.1 Our fundraising will reflect our values and behaviours, put our supporters (individuals, businesses and other organisations giving to us), and our mission for animals, at the heart of what we do. We will do this by always:

- making it clear what we are fundraising for
- using data in the way we said we would
- making sure we only use money for what we said we would

- putting our supporters at the heart of what we do - when we are developing strategy, creating communications, responding to and learning from complaints and evaluating our organisational performance and our impact for animals
- processing, recording, thanking and reporting on the impact of giving appropriately, in a way that reflects each donor's wishes, our commitments and the type and level of support received
- treating the public fairly and with respect. We will never pressurise anyone, especially those who might be more vulnerable.

## 2.2 We will protect vulnerable supporters by:

- being transparent and honest with our donors and we will treat them fairly, enabling them to make an informed decision about any donation
- enabling our employees (or suppliers engaged by us) to consider the needs of any potential donor who may be in vulnerable circumstances, or need additional support to make an informed decision
- ensuring we do not knowingly and intentionally exploit the apparent lack of knowledge, need for support or vulnerable circumstance of any donor
- providing guidance to ensure colleagues can recognise, and are sensitive, when they are engaging with vulnerable people, including the CARE model checklist (Comprehend; Assess; Retain; Evaluate). Our Safeguarding Policy which also references protecting vulnerable people can be found on Compass.

## 2.3. We will grow our income sustainably and securely by:

- fostering a fundraising culture, where every leader has a role to play in ensuring fundraising is valued and helping fundraising efforts is owned in the teams that they lead through to actively raising the profile of World Animal Protection in networks where potential and existing donors will see us through; meeting with donors and ensuring the effective use of their donation or grant and ensuring we have a balanced portfolio of mission delivery to drive growth and ultimately change for animals
- matching our mission goals and re-investing a proportion of the donations we receive to make sure we can deliver our animal protection work now and into the future.
- makes the most of opportunities, managing risk and maximising return when we re-invest donors' gifts into fundraising
- protecting and broadening our donor base and exploring new income opportunities
- approaching this in a collaborative and evidence-based way across our teams and network
- ensuring safe and secure donation handling to protect the organisation from fraud or theft and to assure donors that their donations and gifts are used for the purpose for which they were given
- aligning our income generation with who we are and the spirit of our strategy, both in the way that we acquire and retain new supporters and the type of supporters we engage

## 2.6 We take responsibility for our fundraising and we will:

- carefully consider our fundraising decisions, ensure that we have the right approvals internally and act in line with World Animal Protection's values, behaviours and brand.
- strive to achieve recognised best practice, working with relevant regulatory bodies, and we will work hard to build trust by being transparent about our fundraising and how donations are used to support our mission.

- ensure that our contracts and relationships with partners and suppliers support and comply with the principles in this Policy, and our policy framework, including our Procurement Policy.
- ensure if something does go wrong or a complaint is received, we will make sure we handle any concerns promptly and sensitively.

2.7 This Policy is a framework to guide colleagues developing plans for fundraising and to support colleagues who fundraise or provide support for or oversight of our fundraising.

### 3. Organisational Roles

#### 3.1 Role of the Board and trustees

Trustees must comply with the applicable fundraising rules and regulations, including [Charity fundraising: a guide to trustee duties \(CC20\)](#). Trustees must therefore:

- Plan effectively.
- Comply with fundraising law.
- Follow recognised standards.
- Supervise the organisation's fundraisers.
- Protect World Animal Protection's reputation and other assets.
- Be open and accountable.

The Board sets the risk appetite in relation to fundraising and take reasonable actions to support growth.

#### 3.2 Role of the CEO and Senior Leadership Team (SLT)

3.2.1 The role of the CEO and SLT is to model behaviours in line with this policy and play a role in line fundraising in accordance with this Policy. Every leader has a role to play in ensuring a fundraising culture.

#### 3.3 Risk owner

3.3.1 The risk owner is the GLT Director of Fundraising & Engagement who is ultimately accountable for ensuring strategic risk in Fundraising & Engagement is managed effectively and in line with the parameters set by the Board, including the opportunity to grow our income is optimised.

#### 3.4 Role of employees implementing the Policy

3.7.1 Employees should abide by this Policy and undertake or support fundraising in a way that is relevant to their role

3.7.2 Undertaking training if reasonable, as agreed with their manager

### 4. Procedures for Fundraising

#### 4.1. Accountability to donors

World Animal Protection will:

- 4.1.1 understand our donors, and respond to their motivations and expectations, so they understand who we are, what we do and how it changes animals' lives forever, with compelling fundraising propositions, content and approaches.
- 4.1.2 deliver communications that ensure donors experience the variety of our work for animals, taking them on an engagement journey with interactions that benefit our shared mission to create forever change for animals, and give donors the best opportunity to be advocates and campaign supporters, and vice versa.
- 4.1.3 ensure every fundraising communication journey, most critically those with a financial ask (and before that ask is made), clearly communicates the lasting change we are working towards for animals through tackling the root causes of animal suffering. Further guidance and examples will be available on our Fundraising section in Compass.
- 4.1.4 deliver effectively on our reporting commitments.
- 4.1.5 recognise the value of our internal and external volunteer fundraisers and each office will ensure they have guidance and support for them.
- 4.1.6 monitor, record and act on feedback, queries and complaints in each office, so that we provide a relevant and a positive experience to donors.
- 4.1.7 Any World Animal Protection member organisation (office) may use examples of other World Animal Protection member organisation's (office) work for fundraising (unrestricted giving), even if that particular World Animal Protection member organisation (office) does not directly or indirectly pay for or directly participate in that specific project or campaign. People give to World Animal Protection to protect animals, wherever that may be in the world.

## 4.2 Fundraising effectiveness

World Animal Protection will:

- 4.2.1 make sure our funds, brand and resources are used professionally, ethically and efficiently in the interest of our organisation and our goals and vision.
- 4.2.2 prioritise and invest in opportunities to test, evaluate, optimise and diversify our fundraising.
- 4.2.3 ensure that our fundraising programmes have adequate capacity to effectively manage fundraising.
- 4.2.4 develop strategies and guidelines for fundraising, based on suitable consultation. These will include approval levels and quality checking developed by each office led by the FR Leader and Country Director (or equivalent).
- 4.2.5 make sure that introducing a new fundraising programme in a World Animal Protection entity that does not currently fundraise will be led by the country director, with support from International Fundraising and other functions, including legal & governance, and will be reflected in business planning.
- 4.2.6 unsolicited donations in a country without a fundraising programme should be processed in line with our policies and local laws. If that is not possible, donors can be directed to the most appropriate World Animal Protection entity's website or our World Animal Protection International Partnership Giving team (for larger gifts).
- 4.2.7 In principle, remote fundraising across borders can be undertaken by International where there is no existing World Animal Protection entity and when the following conditions are satisfied:
  - o relevant national laws and regulations can be met
  - o an adequate strategic rationale
  - o resources can be allocated to ensure fundraising is delivered and managed and donors are stewarded effectively
  - o reasonable return on investment in the short-term; medium-term and long-term can be evidenced / planned for.

- o In most cases this would be led by International Fundraising, with plans approved by Global Fundraising Director and MDDG.  
In exceptional cases, this could extend to a country director, where the collaboration agreement covers more than one country.

### 4.3 Types of funding

- 4.3.1 World Animal Protection benefits from diversity of income, as each type of funding brings different advantages, so those colleagues developing fundraising programmes should aim to make them balanced across a mix of income streams in a way that's appropriate to their market. For example, we value:
- o unrestricted income, which brings us the greatest flexibility to use funds wherever we need them most to secure change for animals. Most of this type of income is contributed by our individual givers, legators and sometimes by major donors or partners.
  - o restricted income, which can help ensure we are accountable and focused on impact in different parts of our mission delivery. Major gifts are often restricted in some way, usually give us a higher return on our investment of resources, which means we can accelerate change for animals.
- 4.3.2 Fundraising communications, including appeals, emergency appeals and promoting legacy giving, must normally only encourage *unrestricted* funds whilst connecting donors with examples of our work and our campaigns and the lasting impact for animals we will achieve.
- 4.3.3 Unrestricted funding communications must include wording so donors understand their unrestricted nature and that their donation will be used across our work in language that is appropriate to each market.
- 4.3.4 Restricted funding should only be *pro-actively* sought when:
- o the gift is a major donation
    - o as this is often a requirement or expectation of the donor
    - o although over time if we build trust with a donor and they feel confident in our mission delivery then asking the donor to consider an unrestricted gift or a less restricted grant should be considered as it enables us to connect donors with the widest impact as a result of their gift, across our campaign/s
    - o for work in our organisational strategy and forming part of our approved budget and plans
  - o *there is a compelling reason for individual giving activity to be restricted to support campaign mobilisation*
    - o *This restriction can only be to national activity that does not cross-borders AND that is in our organisational strategy and forming part of our approved budget and plans*
    - o *manages the risk of over-funding planned national activity*
    - o *the restriction and its rationale is with the specific agreement of the country director*
    - o *for example a compelling reason is crowd-funding for a national advocacy or mobilisation activity*
    - o individual giving restrictions for tangible work like direct animal protection work and some research or publications may be attractive to other funders and donors in the wider network should normally be avoided and these should only be approved by the country director where there is an *exceptional* rationale.

- You can find out more [Crowdfunding or similar restricted Individual Giving in support of campaign mobilisation – guidance](#)

Sometimes individual giving donors or legators/bequesters may make restricted giving requirements on donations already sent or bequests already received by us (although the restriction was not requested by World Animal Protection). In these circumstances colleagues can work to respect the donor's wishes, if possible.

4.3.5 So that we can better connect donors with the impact they are making for animals, and can secure and use funds in the most effective way for animals:

- donors who generously give a major gift (defined as c.£25k/\$30k+, varies by currency and national programme definition) can give:
  - an unrestricted gift
  - to a **national** restricted funding project (approving what is included in this restricted funding project and any grant agreement would reflect the delegated authorities of the office). This is for funding and mission delivery work contained within the office's own plans (i.e. US funder funding US campaign project; UK donor funding a UK campaign project) and managed locally.
  - to **cross-border / global work** via *in the following ways*:
    - *thematically* to a programme area (e.g. Wildlife) using the existing restricted code
    - campaign (e.g. Global Tourism) using the existing restricted code
    - restricted cross-border project (e.g. Global Tourism: Elephants) via a ready-made proposal using the using the Ready-made proposal restricted code. Ready-made proposals and associated restricted funding codes are available for major donors with an annual grant value of between \$1k – less than \$100k (a ready-made proposal is one proposal/one restricted code available to multiple major donors)
    - custom-made proposals (one proposal/one code for one donor) and associated restricted funding codes are only available for major donors:
      - with an annual grant value of at least \$100k or more
      - and/or a qualified Global Priority Funder (GPF). A GPF is a funder with the capacity and interest to give multi-year 6-figure or 7 figure (i.e. an annual value of more than \$100k), qualified (researched and evidenced as able and reasonably likely to give at that level) on our GPF pipeline) giving a gift at a lower-level (likely a funder giving a smaller tester gift to see how WAP delivers progress and outcomes)
      - custom-made proposals and associated restricted funding codes are only available for major donors who:
        - an annual grant value of at least \$100k or more
        - are a qualified Global Priority Funder (a funder with capacity and interest to give multi-year 6-figure or 7 figure (i.e. an annual value of more than \$100k), who is a prospect who is qualified (researched and evidenced as able and reasonably likely to give at that level) ) on our pipeline (one proposal/one code for one donor).

- o are making a gift of less than <\$100k where there is a compelling rationale in support of the strategy to make an exception. This rationale and exception should be agreed with the relevant country directors and the Global Director of Fundraising.
  - o staff costs should be included in restricted project budgets and funding proposals, although if there is a compelling rationale to exclude staff costs then an exception may be approved by:
    - o the country director for national activity
    - o the Global Director of Fundraising for cross-border activity
  - o a contribution towards our fundraising and mission enablement costs to ensure we are sustainable (indirect costs) should *also* be included in funding proposals (usually included at 1.5%), although the rate at which this is included in national-only or custom-made proposals can reflect the level to which the donor will fund.
  - o For more guidance see our [Partnership Giving Proposals Toolkit](#)
- 4.3.6 Gifts-in-kind should not normally be accepted for programme work (e.g. food, veterinary expertise, veterinary treatment, etc), unless in exceptional circumstances (pre-agreed with the relevant programme director *and* country director/s). Gifts-in-kind for services, media or events can be accepted. Gifts-in-kind are subject to the same requirements as monetary gifts.
- 4.3.7 Grant agreements to receive funding to deliver work and associated reporting requirements should be approved by the:
- country director (or their delegate) for national-only grants
  - GLT FR & Engagement Director for cross-border custom-made proposals of \$250k+
  - Global Fundraising Director for cross-border custom-made proposals of less than \$250k
- 4.3.8 We will endeavour to facilitate donations of any type that help us to achieve our mission for animals, subject to the same due diligence that we would apply in accepting contributions from any donor. We will sell, as quickly as reasonably possible, any assets that have been donated which are not in our operational currencies, so that those resources are available to use in furthering our mission. We will not hold or trade any such assets in a speculative way in order to profit from potential changes in their market value. These assets include gifts of:
- o shares, where an individual, business or estate has the option to sell the shares and give an equivalent amount or give these directly and whilst the *donor or funding partner* is subject to appropriate checks against our policies and frameworks the shares themselves are not (i.e. donations of shares are not subject to our Investment Policy or Approach to the Private Sector framework).
  - o cryptocurrency\* donations, and will work towards being able to do so efficiently and so where for practical reasons we are not yet able to these will need to be exchanged by the donor into a currency that can be accepted. (\*a form of digital or electronic currency which uses secure technology to record the transaction history and for making payments between users. It is made possible by use of blockchain technology, a ledger for transactions that is owned and maintained by all the users of the system rather than being controlled by a single authority)
  - o real estate or other property

#### 4.4 Acceptance and refusal of donations

- 4.4.1 World Animal Protection will 'know our donor' including the source and destination of donations, ensuring the specific source of **high-value / substantial donations** is known (defined as \$10K or more in this policy, although country directors and national boards can set a lower value to reflect the national market and regulations & laws. This includes **major donations**)
- 4.4.2 We will only refuse a donation if accepting it would be more detrimental to our organisation being able to achieve its objectives than rejecting it.
- 4.4.3 When making this decision World Animal Protection will undertake a system of balance and checks to provide careful analysis of the risks of accepting a donation.
- 4.4.4 This will be decided on a case-by-case basis (and as a UK-registered entity in line with UK Charity Commission and UK Chartered Institute of Fundraising guidance, which states that donations may only be rejected in exceptional circumstances). We have a clear definition and description of when we will refuse support, including where our checks, show:
- o accepting the gift would likely harm our reputation and therefore our support and ability to partner or be an ally with other organisations
  - o accepting the gift would likely harm our effectiveness (including where the demands of the funder are not proportionate to the size or type of gift or creates unacceptable future liabilities or other conflict of interest or legal reasons)
  - o using the gift would go beyond the approved plan and budget and our mission
  - a donation would likely affect our independence.
  - o funds are offered in suspicious circumstances, which include:
    - complex banking arrangements, currency exchange rate provision; pay interest; process the money as a loan in part or full or other mechanisms that could result in some money flowing back to the donor (not normally accepted because of associated risks, including money-laundering).
    - requirements to pass on to a specific beneficiary or project that does not form part of our strategy and plans
    - monies are connected to or as a result of criminal / illegal activity; terrorism-funding or government sanctions (such as government sanctions on Russian assets)
- 4.4.5 Individuals and non-private sector organisations making a donation or partnership with a financial contribution are subject to a check based on the criteria outlined in 4.4.4
- 4.4.6 If checks reveal evidence of (or reasonable cause to suspect) a crime; terrorism connection or area covered by government sanction this should be:
- escalated to the chair of the national board via the country director (in the UK to chair of International Board (or Finance & Audit Committee) via GLT Director of FR & Engagement).
  - The Chair (supported by Governance Officer or Country Director) must report the matter to the police and/or other appropriate authorities (note that there may be specific requirements by different national governments, for example in the UK if the Board have reasonable cause to suspect that a donation is related to terrorist financing, they are under specific legal duties under the Counter-Terrorism Act)
- 4.4.7 Although it is important to 'know our donor', anonymous donations (where we World Animal Protection does not know the specific source of the donation) can still be accepted, where there are no suspicious circumstances:
- o Unsolicited anonymous donations with a value of below **high-value / substantial donations** which are not obviously made in the suspicious circumstances outlined can be accepted



without additional review (but any office can choose to review any donation irrespective of size).

- o Donations above **high-value** level and below **major donations** should be reviewed by FR Leader and Country Director and Finance Lead to ensure there are no suspicious circumstances or potential risks.
  - o **Major donations** that are anonymous should be escalated to Chair of the relevant national Board via the country director (in the UK to chair of International Board via GLT Director of FR & Engagement), with a recommendation to accept (with rationale, if no suspicious circumstances) or refuse & return (with rationale outlining suspicious circumstances) and in the UK In line with guidance from the Charity Commission, donations over £25,000 where World Animal Protection cannot identify the donor are reported to the Charity Commission as a Serious Incident.
- See our [Finance Policy on Compass](#) for further details on returning / refunding monies

#### 4.5 Fundraising Standards

- 4.5.1 We will adhere to the highest standards of fundraising practice and all fundraising and data protection regulations. There is a requirement to publish the number and type of fundraising complaints or any fundraising investigation in some markets, including our UK / Group annual report and accounts.
- 4.5.2 We will ensure that our contractual arrangements and relationships with partners and suppliers related to fundraising support and comply with the principles in this Policy, and our Policy Framework and wider fundraising standards.

#### 4.6 Reporting

- 4.6.1 Fundraising planning is undertaken as part of organisational 3-year business planning and one year delivery plans, which is supported by more detailed operational fundraising plans in each office and team.
- 4.6.2 Targets and milestones set out in these plans are designed to deliver against World Animal Protection's strategy and we report against different aspects of these regularly. World Animal Protection raises money in a range of currencies and reports in these and in USD.
- 4.6.3 GLT makes regular reports to the International Board and relevant committees on fundraising performance, and risks are reflected in the Strategic Risk Register. Trustees can (and do) request a deeper dive report into specific aspects of fundraising to better understand its performance.

#### 4.7 Assurance

- 4.7.1 We will assure ourselves that this fundraising policy is being applied across the parts of the network where it is relevant
- 4.7.2 Each relevant SLT Director will provide a report to the Risk Owner annually focused on summarising the office's fundraising compliance and quality control frameworks used to monitor behaviour, including of partners and suppliers. This report will be an interim measure and replaced by the risk reporting in the revised risk framework (expected to be implemented from Q4 2023 lead by Finance & Resources). Depending on the fundraising activities examples of how an office can assure themselves that
  - a **partner / supplier** is following our policy and best practise include: procurement due diligence; clear briefing of the supplier and agreed approval processes; regular training sessions with the

supplier; shadowing; mystery shopping; site visits; call listening; quality control calls; monitoring of outcomes; complaints and remedial actions; direct checks on fundraising materials.

OR

- **our own employees understand/feel confident in how to deliver fundraising** within the parameters of the Fundraising Policy, in a way that is appropriate to their role, the relevant SLT Director could summarise experience of speaking to a selection employees involved in fundraising to gauge their understanding / confidence or use a survey approach. The SLT director could also consider direct checks on fundraising materials.

4.7.3 Risk Owner provides a report to the Audit & Finance Committee annually.