



## **Global Fundraising Guidelines Appendices**

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# Appendix 1

## Acceptable Fundraising Practices

The following is intended to provide Amnesty entities with guidance on acceptable fundraising practices. Compliance with local legislation and regulations **takes precedence over the practices detailed below.**

### Asking for a Gift

- All our fundraising activities will be legal, open, honest and respectful.
- When fundraising AI entities should take particular care to avoid causing offence on the grounds of race, age, religion, sex, sexual orientation or disability. This will vary according to the context, medium, audience, product and prevailing standards of decency.
- Where known, AI entities should communicate appropriately with vulnerable people, who could include, but are not limited to: service users and client groups and people with learning difficulties and/or disabilities.
- Fundraisers should not pressurize donors or potential donors, but may use reasonable persuasion.
- AI entities should be able to justify the frequency of contact, balancing the desire to communicate with not overwhelming/bombarding recipients.
- AI entities should respect donor's requests around the frequency of contact, and make it easy to communicate these requests.

### Using Case Studies

- When using donor or beneficiary information in a case study or any other type of publicity, AI entities must comply with any duties of confidentiality that they have and comply with data protection law if publishing a case study that includes information that could identify a donor or beneficiary.
- Even if not required by law, AI entities should obtain permission to use case studies, where practical.
- Before circulation, fundraisers should ensure that there is evidence to prove all claims, whether direct or implied, are capable of objective substantiation.
- If AI entities change elements of case studies or use real examples to inspire a case study, this should be made clear and AI entities should be able to prove that the case study is representative.

### Fundraising Communications Materials

- AI entities must not send a communication that is indecent or grossly offensive and that is intended to cause distress or anxiety.
- AI entities must ensure that all materials adhere to copyright laws and that permission is obtained from the rights holders for the use of images, logos etc.

- AI entities must ensure literature includes all legally required information for example, registered charity status or number, full company name and registered office if applicable.
- Fundraising communications should not mislead, or be clearly likely to mislead, by inaccuracy, ambiguity, exaggeration, omission or otherwise.
- If AI entities are fundraising in partnership with one or more other organisations, AI entities should state how monies will be allocated between the respective organisations
- AI entities should be able to justify the use of potentially shocking images, and give warnings of such material.
- If an AI entity uses a professional fundraiser (an agency, consultant or freelance fundraiser who solicits donations or promises of donations for charitable purposes), the supplier must have a written agreement with the section.
- Agreements with professional fundraisers must include details of the payment/expenses paid to the professional fundraiser.
- All materials should reflect the brand global identity guidelines.

### **Direct Marketing**

- “Direct marketing” is defined as the communication of advertising or marketing materials to particular individuals and includes the sale of goods and services and the promotion of an organization’s aims and ideals.
- AI entities should ensure the names on cold mailing lists (lists of *prospective* donors not currently supporting the section) that are on an official opt-out register are not to be contacted by mail.
- Amnesty International’s organizational preference is not to engage in reciprocal mailings or list swaps. However it is recognized that several sections have conducted the practice for many years. All AI entities engaging in reciprocal mailings or list swaps should ensure they protect their supporters’ rights to privacy and must observe the provisions of data protection legislation, including those around permissions to pass on donors’ data.
- All returned ‘non-deliverable’ items and information concerning changes to the supporter file should be passed back promptly to the list owner for file maintenance purposes.

### **Telemarketing**

- This section will cover all fundraising calls that are made to solicit both financial and other forms of donations, but will not cover administrative/informative or “thank you” calls (although these standards may be used as guidance for those calls). Fundraising calls will also include any voicemails left to potential donors.
- The following categories of potential telephone recipients must be excluded from fundraising calls:

- All those who have registered with an official opt-out register not to be contacted by telemarketing calls, unless the person has notified the section they consent to receiving calls.
- Any individual who, on a previous occasion, has registered an objection to the use of the telephone for soliciting gifts or support for that particular fundraising organization.
- Any person who has written to the section to ask it not to use their contact details for marketing purposes or has otherwise asked not to be called.
- A person must not be called using a predictive dialling system (i.e. a predictive dialling system anticipates how many callers you have live at any one time, when they will be available and dials however many lines it thinks callers will need. This leads to silent calls as it is effectively dialling more lines than it needs) unless the person has consented to this. A predictive dialling system anticipates how many callers you have live at any one time, when they will be available and dials however many lines it thinks callers will need. This leads to silent calls as it is effectively dialling more lines than it needs.
- Any person known to be under the age of 18 should not be called.
- Administrative calls differ from fundraising calls in that they are not made with the specific purpose of soliciting a donation. Marketing calls under the guise of administrative calls should not to be made.

### **Street Fundraising & Door-to-door Fundraising**

- If a license is required to street fundraise, the section must obtain this from the relevant authority before fundraising commences.
- When a collection involves a commercial participator or professional fundraising agency, appropriate statements to the donor must be made in line with local regulations or legislation.
- Where a collector is a paid charity employee, the collector must make a statement to the effect they are being paid to carry out the collection in line with local regulations or legislation.
- All entities should not undertake fundraising activity using third parties without instigating a training and briefing program for all fundraisers.
- Fundraisers should:
  - Immediately terminate an engagement if a person clearly and obviously indicates that they do not wish to be engaged by a fundraiser
  - Make legally compliant solicitation statements
  - Wear clearly visible branded clothing and legally compliant ID badges (when appropriate)
- Fundraisers should not:
  - Deliberately obstruct members of the public.

- Behave in any way that might reasonably cause members of the public to be or become excessively startled or anxious
- Behave dishonestly, manipulatively or deliberately use guilt
- Behave in any other way that a reasonable person might judge brings AI into disrepute
- Knowingly sign up any person under 18 years of age, except with the expressed and demonstrable consent of a parent, guardian or carer physically present at the time.
- Knowingly sign up any person at any time who they reasonably conclude is or may be incapable of informed consent for any reason
- Pursue of a member of the public
- Intentionally approach members of the public who are 'identifiably on duty' and going about their business, such as: uniformed officials, tour guides, street vendors etc.
- Approach members of the public who are seated in the outdoor seating area of a private business
- Position themselves so as to block shop doorway, a pedestrian crossing, an ATM/cashpoint machine, a station entrance or street traders

### **Digital Media including Websites and Email**

- AI entities should ensure that a contact number and/or an email address are easy to locate on their websites
- AI entities must notify website users about the website's use of cookies, and in particular must do so in a suitably prominent and understandable manner to ensure that the user's consent to the use of cookies is informed.
- AI entities must ensure their websites comply with relevant electronic communications legislation and accessibility and usability regulations.
- Requests to unsubscribe should be addressed in a timely fashion by AI entities.
- Organizations should clearly explain data capture and use, for example through a privacy policy or statement.
- All information about data capture and use should be easily accessible from the website homepage and any page which collects personal data.

### **Online Trading, Trading Subsidiaries and E-commerce**

- AI entities must only trade if their governing documents allow it.
- AI entities must comply with local legislation that covers the sale of goods and services via the internet.
- If merchandise sales or fundraising events (such as challenge events) are carried out through a trading subsidiary, AI entities must make this clear on relevant communications or web pages.
- AI entities must ensure that descriptions and images of goods are sufficiently accurate that donors are not misled about what they are buying.

- AI entities should ensure that they have clear delivery, refund and return policies that set out processes and timings for potential customers.

### **Mobile Devices**

- Mobile may consist of separate platforms/channels or simply using a mobile device to access a version of an organization's website. Mobile devices may include but are not limited to smartphones, tablets, Personal Digital Assistant (PDA) and gaming consoles.
- AI entities must only send marketing messages to individuals' mobile phones where those individuals have previously notified the organizations that they consent to receiving such communications.
- AI entities must make the registration process for messaging clear on all forms of relevant documentation including websites and must include procedures for unsubscribing on all marketing messages.
- AI entities must make the cost of premium rate messages clear to donors and should explain to donors how and when they will be billed.
- Reply by SMS should be an option for opting-out and be clear in all communications. Donors should be able to exercise their opt-out choice from any message, free of charge.
- AI entities should comply with the requirements of local data protection legislation and must not disclose information obtained in situations where a legal duty to keep information confidential arises.
- AI entities must provide a valid email address for opt-out requests.

### **Raffles and Lotteries**

- This area is one of the most heavily regulated fundraising activities, but also very popular for fundraisers. Raffles and lotteries can be very strictly regulated and AI entities must ensure they comply with all legislative requirements within their own country.

### **Events**

- When identifying a suitable venue/location for an event where fundraising will take place, AI entities:
  - Must consider issues of equal access for all, even if an event is being targeted at a specific group of people
  - Must ensure the venue complies with legal requirements for health and safety
  - Should be able to justify any environmental impact the event may have

- If any specialist equipment is required or recommended (i.e.: for challenge events), a list should be given to each participant/team far enough in advance for them to borrow/purchase any necessary items, making clear who is responsible for the kit and its suitability.
- AI entities running events where employees will be fundraising must carry out a sufficient and suitable risk assessment before undertaking the event.
- Any compulsory insurance policies must be in place. AI entities should ensure there is sufficient third party public liability cover in place and should consider if other insurance cover should be taken out.
- AI entities planning an event must ensure that any required permissions or licenses are obtained from the local authority or other relevant bodies.
- All promotional materials supplied to potential participants and particularly, material sent to them as part of 'fundraising packs' must indicate clearly if any part of the funds raised by the participant in AI's name are to be used towards the participant's expenses or otherwise to benefit the participant.
- Recruitment materials designed to attract potential participants must not mislead readers into believing that their commitment would be limited to any minimum personal registration fee. AI entities should ensure participants are aware of the fundraising targets they are expected to meet.
- Sponsorship forms must be clear about whether sponsorship money is given subject to any conditions (e.g. that the participant will complete a marathon). If money is given on this basis and a sponsored event is cancelled, or a participant is unable or unwilling to take part or complete the event for any reason, the participant must contact donors and ask if they are still happy for sponsorship monies to go to the organization. If not, the donation must be refunded to the relevant donors. If sponsorship money is given without conditions it automatically belongs to AI regardless of whether or not an activity is completed.
- When organizing a challenge event and drafting data collection statements AI entities must clarify with the third party supplier who will be collecting the data and for what purposes the data will be collected and held.
- If selling products at an event, AI entities must ensure they are eligible to trade or that the trade fits within trading exemptions.

## **Legacies**

- A fundraiser must not exert undue influence on a potential legator. AI entities should ensure that all legacy fundraising activity is done whilst considering:
  - The duty of trustees to optimize the benefit to the fundraising organization
  - The potential legator's freedom to provide for her/his family and others
  - The sensitivities of the potential legator and his/her family and friends.

- AI entities should ensure fundraisers do not provide legal advice. AI entities should make it clear that the contents of written legacy marketing materials are not intended to constitute legal advice by the organization and that potential legators should seek their own professional advice.
- If organizations provide potential legators with suggested wording for legacies to the organization to be included in their Wills, they should ensure that the suggested wording is accurate (which may involve seeking legal advice) and that the organization is clearly identified (which will depend by jurisdiction, but will usually mean providing the organization's full name, address and the registered office address if it is a company and registered charity number, if applicable).
- AI entities must not draft or be directly involved in drafting Wills in favour of the organization.
- Witnesses to a will under which an organization benefits should be independent of the AI entity, including staff and volunteers to avoid any risk of "undue influence" which could affect the validity of the legacy
- Close relationships can develop between a fundraiser and a potential legator. This can sometimes favour the fundraiser rather than the organization, and a legacy may be left to the individual in their personal capacity, rather than to the organization.
- If a legacy is offered in a personal capacity, fundraisers should explain that, should the legator wish to give a legacy to him/her personally, then the fundraiser must disclose the gift to his/her line manager at the organization.
- Fundraisers must not take advantage of their employment by the organization to solicit a personal legacy.
- If an AI entity considers that a fundraiser has abused his/her position and has solicited a personal legacy, the organization must follow disciplinary procedures for dealing with such situations
- AI entities must respect the wishes of the legator if they want no further marketing communications (which would include any fundraising requests) from the organization or, wherever possible, if they request a certain level of contact.
- If a legacy is left on condition or subject to a binding obligation that it must be used for a particular purpose or project AI entities must contact the administrator/executor if the conditions cannot be fulfilled before accepting the legacy or, otherwise, if the conditions can be fulfilled and the legacy is accepted, the organization must follow those conditions.

## Appendix 2

### Comparing the Old and New Assessment Systems

#### Example: Old Assessment System

Old Assessment Model							
	Section > 1m threshold			30.00%			
	<b>For the Section</b>						
		Y1	Y2	Y3	Y4	Y5	5 Yr Total
	Assumed ROI per year	0.3	0.5	0.5	0.4	0.4	
<b>Loan flows</b>	Loan cash inflow	200,000					
	Loan repayment					-200,000	
<b>Income</b>	Incremental income from loan	60,000	100,000	100,000	80,000	70,000	410,000
	<b>Total Assumed Income</b>	<b>60,000</b>	<b>100,000</b>	<b>100,000</b>	<b>80,000</b>	<b>70,000</b>	<b>410,000</b>
<b>Expenditure</b>	Fundraising spend	200,000					200,000
	Loan Interest	5,000	5,000	5,000	5,000	0	20,000
	Assessment			18,000	30,000	30,000	78,000
	<b>Total Assumed Expenditure</b>	<b>205,000</b>	<b>5,000</b>	<b>23,000</b>	<b>35,000</b>	<b>30,000</b>	<b>298,000</b>
	<b>Surplus/Deficit</b>	-145,000	95,000	77,000	45,000	40,000	112,000
	Cumulated surplus deficit	-145,000	-50,000	27,000	72,000	112,000	
	End year cash position	55,000	150,000	227,000	272,000	112,000	

#### Assumptions

- Assessment rate based on incremental income is in the >€1m band
- ROI based on organisational averages
- Loan interest rate is 2.5%
- Assessment calculated on income 2 years prior excluding loan flow
- Surplus/deficit = Total Income – Total Expenditure
- Cash Position = Loan flow – Surplus/Deficit

### Example: New Assessment System

New Assessment Model							
	Section > 1m threshold			62.50%			
		Y1	Y2	Y3	Y4	Y5	5 Yr Total
	Assumed ROI per year	0.3	0.5	0.5	0.4	0.4	
<b>Income</b>	Grant income (not assessable)	200,000					200,000
	Incremental income from grant	60,000	100,000	100,000	80,000	70,000	410,000
	<b>Total Assumed Income</b>	<b>260,000</b>	<b>100,000</b>	<b>100,000</b>	<b>80,000</b>	<b>70,000</b>	<b>610,000</b>
<b>Expenditure</b>	Fundraising spend	200,000					200,000
	Assessment	37,500	62,500	62,500	50,000	43,750	256,250
	<b>Total Assumed Expenditure</b>	<b>237,500</b>	<b>62,500</b>	<b>62,500</b>	<b>50,000</b>	<b>43,750</b>	<b>456,250</b>
	<b>Surplus/Deficit</b>	22,500	37,500	37,500	30,000	26,250	153,750
	Cumulated surplus deficit	22,500	60,000	97,500	127,500	153,750	

### Assumptions

- Assessment rate based on incremental income is in the >€1m band
- ROI based on organisational averages
- Assessment calculated from year 1 income onwards
- Surplus/deficit = Total Income – Total Expenditure

### Example: Old and New Assessment Systems Compared

Old Assessment Model						
	Cumulated surplus deficit	-145,000	-50,000	27,000	72,000	112,000

  

New Assessment Model						
	Cumulated surplus deficit	22,500	60,000	97,500	127,500	153,750

- In the example the section would be €41,750 better off using the new assessment model
- If the loan/grant was for €1m then the section would be better off by approx. €208,000

## Appendix 3

### Online Screening Research Sources

- [www.sourcewatch.org](http://www.sourcewatch.org) - a collaborative resource of documented information about corporations, industries and people trying to influence public policy and public opinion. Focuses on the for-profit corporations, non-profit corporate front groups and PR teams.
- [www.eiris.org](http://www.eiris.org) - a leading global provider of independent research into the environmental, social, governance (ESG) and ethical performance of companies.
- [www.oneworldtrust.org](http://www.oneworldtrust.org) - an independent think tank that conducts research, develops recommendations and advocates for reform to make policy and decision-making processes in global governance more accountable to the people they affect
- [www.corporatecritic.org](http://www.corporatecritic.org) - a corporate critic that indexes and rates the corporate social responsibility records of over 25,000 companies, using primary civil society data.
- [www.corpwatch.org](http://www.corpwatch.org) - counters corporate-led globalization through education, network-building and activism
- [www.sweatshopwatch.org](http://www.sweatshopwatch.org) - serves low-wage workers nationally and globally, with a focus on eliminating sweatshop exploitation in California's garment industry
- <http://business-ethics.com> - a corporate responsibility magazine See especially their listing of 100 best corporate citizens
- <http://www.aflcio.org> - American Union Movement
- <http://www.seiu.org> - Service Employees International Union
- [http://www.calvert.com/sri\\_calvertindex.asp](http://www.calvert.com/sri_calvertindex.asp) - advises on investment products and services, including socially responsible mutual funds. The Calvert Social Index is a benchmark for measuring the performance of large, US-based socially responsible companies
- [www.responsibleshopper.org/](http://www.responsibleshopper.org/)
- [www.greenpeace.org/international](http://www.greenpeace.org/international) - searching Greenpeace websites may produce references to companies considered suitable for their corporate fundraising
- [www.peta.org](http://www.peta.org) - People for the Ethical Treatment of Animals
- [www.cafod.org](http://www.cafod.org) - Catholic Agency for Overseas Development
- [www.un.org/partners/business/index.asp](http://www.un.org/partners/business/index.asp) - United Nations and business site
- [www.business-humanrights.org](http://www.business-humanrights.org) - an independent organisation in relationship with Amnesty International Business Groups and academic institutions
- [www.corporateresponsibility.org](http://www.corporateresponsibility.org)
- [www.csrwire.com](http://www.csrwire.com) - corporate social responsibility newswire service
- [www.iccr.org/shareholder/proxy\\_book04/04statuschart.php](http://www.iccr.org/shareholder/proxy_book04/04statuschart.php) - the Interfaith Centre on Corporate Responsibility list of resolutions on companies

- [www.bc.edu/offices/careers/jobs/strategies/identify/responsible/](http://www.bc.edu/offices/careers/jobs/strategies/identify/responsible/) - Boston College list of socially responsible companies
- [www.bsr.org](http://www.bsr.org) - Business for Social Responsibility, a membership organisation advising and training companies on ethical business practices
- <http://www.ethicalperformance.com> - an independent global newsletter for socially responsible business
- [www.transfairusa.org](http://www.transfairusa.org) - Fair Trade certification agency for the USA
- [www.citizen.org](http://www.citizen.org) - American national non-profit public interest organisation
- [www.publicintegrity.org/default.aspx](http://www.publicintegrity.org/default.aspx) - the Centre for Public Integrity carries out investigative journalism in the public interest
- [www.caat.org.uk](http://www.caat.org.uk) - Campaign Against Arms Trade
- [www.corporate-responsibility.org/](http://www.corporate-responsibility.org/) - a corporate responsibility coalition representing over 130 charities and campaigning organisations including AIUK
- [www.corporatewatch.org](http://www.corporatewatch.org) - a research group supporting anti corporate campaigns
- [www.hoovers.com/free](http://www.hoovers.com/free) - provides company, industry, and market economic information
- [www.labourstart.org](http://www.labourstart.org) - an online trade unionist resource
- [www.realizingrights.org](http://www.realizingrights.org) - an ethical globalisation initiative
- [www.forbes.com](http://www.forbes.com) - Forbes business magazine enables searching of individual companies and may information on broader sectors and markets

## Appendix 4

### Reference Documentation

#### Internal

Reference	Title
FIN21/03/99	Revised Proposed Guidelines for the Acceptance of Funds and Fundraising by Amnesty International
ORG 20/001/2008	Policy Governing Corporate Relationships that benefit Amnesty International
Australia, Sweden, UK, USA	Corporate Engagement Guidelines
2015	The Big Yellow Book
UK	Donation Acceptance and Refusal Policy
FIN 21/001/2013	A Guide to Corporate Relationships: Policy, Guidelines, Best Practice and Examples
FIN 10/004/2005	Earmarked Fundraising Guidelines
FIN 21/004/2001	Procedures and Criteria for approval of HRE Fundraising from Government organisations
FIN 21/005/2003	Managing to Protect AI's Image
August 2011	International Secretariat Corporate Relationships Advisory Group: Role and operating procedure
FIN 21 004 2001	Protecting impartiality - Procedures and Criteria for Approval of HRE fundraising from Government Organisations
ORG 20/IEC/01/2008	Secretary General's Report on Significant corporate relationships
Oct 2014	Organizing Amnesty International Globally for Greater Human Rights Impact
Oct 2006	Code of Ethics

#### External

Organisation	Title
BOND	Fundraising from Trusts, Foundations and Companies
Ethical Screening	Profile Questionnaire and Sample Screens
The Good Corporation	Due Diligence Screening Service
United Nations	Guiding Principles on Business and Human Rights: Implementing the UN Protect, Respect and Remedy Framework
Institute of Fundraising UK	Code of Practice
Greenpeace, World Animal Protection, Plan International	Various Fundraising Policies
Target Analytics	Why You Need Gift Acceptance Policies
London School of Economics	Ethical Screening of Donations

University of Nottingham	Gift Acceptance Policy and Ethical Fundraising Practice
University of Aberdeen	Gift Acceptance Policy

## Appendix 5

### List of Abbreviations

AI	Amnesty International
BERN	Business and Economic Relations Network
CRAG	Corporate Relationships Advisory Group
HRE	Human Rights Education
IB	International Board
IB	International Executive Committee
IS	International Secretariat
SG	Secretary General