



ALEXANDRA PARK AND PALACE CHARITABLE TRUST BOARD
Agenda Item 8

3rd November 2025

Report Title: Fundraising Policy

Report of: Katherine Harding, Head of Fundraising

Purpose: To gain Trustees approval for updates to APPCT's Fundraising Policy

Local Government (Access to Information) Act 1985 - N/A

1. **Recommendations:** For the Trustees to approve the contents of this report

2. **Introduction**

2.1 APPCT is registered with the Fundraising Regulator – the independent regulator of charitable fundraising – and a signatory to the Regulator's Code of Fundraising Practice. Ahead of the publication of a new Code of Fundraising Practice in November 2025, the Fundraising Team have undertaken a review of fundraising processes and related policies.

2.2 Among other changes, the new Code places a greater duty on charities to keep accurate records of fundraising decision-making. Following review, the Fundraising Team recommend changes to the Alexandra Park and Palace Charitable Trust Fundraising Policy, focused on decisions to accept and refuse donations. Changes are recommended following benchmarking against due diligence processes within other charities of both similar turnover and fundraising income.

2.3 The full policy is included under 'Appendices' below for approval by the Board. Key changes are summarised below.

3. **Key changes to Fundraising Policy**

3.1 Clear criteria, set out in Appendix 2, for the acceptance and refusal of donations, to be followed by both staff and Trustees involved in due diligence assessments. These include:

- Establishing the need for due diligence to assess potential conflicts with the charity's mission, purpose, goals and reputation or where there are legal concerns about the donation
- Increase to the income threshold for due diligence to £20,000 from £10,000
- Criteria on the renewal period for due diligence by the Fundraising Team

- 3.2 Increased detail, set out in Appendix 3, on the Due Diligence Process carried out by the Fundraising Team to assess donations for potential conflicts or risks
- 3.3 Removal of duty for trustees to declare conflicts of interest on all new donations, retaining only for donations escalated to the Board. Potential conflicts of interest on new donations will otherwise be assessed by the Fundraising Team during due diligence.
- 3.4 Removal of the Fundraising Policy from the website, directing customers instead to the Fundraising Regulator's more accessible 'Code of Fundraising Practice' and 'Fundraising Promise', which set our policy.

8. Legal Implications

The Council's Director of Legal & Governance has been consulted in the preparation of this report and has no comment.

9. Financial implications

The Council's Chief Financial Officer has been consulted in the preparation and has no comments

10. Appendices

Alexandra Park and Palace Charitable Trust Fundraising Policy

Introduction

- 1.1 Alexandra Park & Palace Charitable Trust (APPCT) is a registered charity (England and Wales, 281991) that asks for donations and support from members of the public, charitable foundations and companies in support of its charitable objectives:
- 1.2 "To uphold, maintain and repair the Palace and to maintain the Park and Palace as a place of public resort and recreation and for other public purposes"
- 1.3 APPCT has a separate Sponsorship Policy to reflect that Fundraising is a different activity with different aims and different accounting rules.
- 1.4 APPCT is registered with the Fundraising Regulator. The Fundraising Regulator is the independent regulator of charitable fundraising. It was established in 2016 to strengthen the system of charity regulation.
- 1.5 This policy has been created following review of the Fundraising Regulator's [Fundraising Code of Fundraising Practice](#), November 2025. The policy also has reference to the Charity Commission's [Protecting Charities from Harm: Compliance Toolkit](#) as well as relevant internal policies and procedures. This policy and process conforms with the ['Know Your Donor'](#) principles set out by the Charity Commission

1. Purpose

The purpose of this policy is to set out the basis on which we ask for and process any such support.

2. Fundraising policy

By registering with the Fundraising Regulator, APPCT agrees to abide by standards set out in the Fundraising Regulator's [Code of Fundraising Practice](#) which is summarised in the '[Fundraising Promise](#)',

In summary in undertaking fundraising activities Alexandra Palace it is our policy that;

- 1) All fundraising activities undertaken by APPCT (or those representing us) will be legal, open, honest and respectful.
- 2) The trustees of APPCT (and their delegates) will act in the best interests of the Charity when deciding to accept or refuse a particular donation. The principles guiding whether a donation can be accepted or refused are attached at Appendix 2.
- 3) All funds raised for a particular cause will be used for that cause and intended use of donation income will be clearly indicated at the point of giving
- 4) We will never use coercive tactics or place undue pressure on any individual to make a donation.
- 5) We will never make an unreasonable intrusion on a person's privacy.
- 6) Our approach to fundraising activities will be set out in our Annual Report, and we will declare any complaints or failure to comply with a scheme or standard cited.
- 7) We will set out our complaints procedure on our website and will respond to any complaints in a timely, respectful, open and honest way.
- 8) We will comply with duties of confidentiality and data protection law at all times.
- 9) We will publish our commitment to the Fundraising Code of Practice and the Fundraising Promise on our website.

3. Policy Review

We will review this policy every 3 years or in response to changes to our fundraising practice or to the Fundraising Code made by the regulator.

4. Status of policy

This procedure is a statement of current Alexandra Palace policy. Alexandra Palace therefore reserves the right to amend the procedure as necessary to meet any changing requirements.

Date	Version	Author	Amendments
July 2017	V1	James Atkinson	First created
Sept 2019	V2	James Atkinson	Replaced 'has applied' with 'is registered' with Funding Regulator (1.4)
July 2023	V3	Katherine Harding	All references to 'Director of Fundraising' replaced with 'Head of Fundraising'
Sept 2025	V4	Katherine Harding	Replaced commitment to publish this policy with published commitment to Code of Fundraising Practice and Fundraising Promise. Addition of 'Linked APPCT Policies' Removal of 'Appendix 1. Fundraising Promise', replaced by a link to the promise on the Fundraising Regulator's website Creation of 'Appendix 1. Principles for acceptance and refusal of donations', 'Appendix 2. Due Diligence Thresholds' and 'Appendix 3. Due Diligence process'

Linked APPCT policies
Safeguarding policy
GDPR policy
Whistleblowing policy
Lone working policy
Volunteer agreement

Complaints policy
Gifts and hospitality policy
Declaration of Interests policy
Sponsorship Policy

Appendices

Appendix 1 – Principles for acceptance and refusal of donations

Appendix 2 – Due Diligence thresholds

Appendix 2 – Due Diligence process

Appendix 1 – Principles for acceptance and refusal of donations

The purpose of this document is to allow trustees and the fundraisers who support them to make clear and consistent decisions regarding the solicitation, acceptance and stewardship of donations, in order to protect APPCT from both reputational and legal risks (including fraud, money laundering and other financial crime)

Trustees have overall responsibility for fundraising, even though this responsibility is delegated to staff. Trustees' decisions will be informed by the charity's Due Diligence Process, outlined in Appendix 3. The law requires Trustees, in deciding whether to accept a particular donation, to consider which course will, taking an overall view, be in the charity's best interests.

There may be occasions when the charity will have to turn down opportunities of external funding, including gifts in kind and objects, where Trustees believe that acceptance could have a significant detrimental effect on its mission, purpose, goals and reputation or where there are legal concerns about the donation:

- APPCT will not accept donations, sponsorship or grants made anonymously through an intermediary who is not prepared to identify the donor to our charity, which could conceal a conflict of interest or that raise other ethical concerns.
- APPCT will not accept donations where the donor has acted, or believed to have acted, illegally in the acquisition of funds or where there are concerns of fraud, money laundering or other financial crime. The CEO or Head of Fundraising will report all serious incidents (both actual or alleged) to the Charity Commission, police, National Fraud Authority or HMRC as required.
- APPCT will not seek or accept donations, sponsorship or grants where acceptance of these funds would:
 - Harm APPCT's duty to other donors, partners, visitors or stakeholders;
 - Create conflict of interest with our mission, staff or board;
 - Materially damage the reputation, independence or integrity of APPCT;
 - Impact APPCT's ability to fulfil its mission in any way

Appendix 2. Due Diligence Thresholds

It is our policy to assess all donations to the charity and undertake due diligence on individuals and organisations that give money to us or whom we plan to ask for donations:

- A due diligence assessment will apply to all donations over £20,000.
- We will undertake due diligence ahead of soliciting donations to the charity, which are anticipated to be above the £20,000 threshold, and following receipt of unsolicited donations above this level. The threshold applies to both single donations at £20,000 and multiple donations totalling above this level over three years.
- We will also carry out proportionate due diligence checks when certain additional risk factors are identified relating to donations, including:
 - Unusual unsolicited donations, such as those that are unusually large from the donor
 - Anonymous donations or those made through an intermediary
 - Donations with unusual, unreasonable or potentially illegal conditions or restrictions.
 - Donations associated with complex banking or tax arrangements.

- Time-limited donations
- Donations in the form of loans
- Donations from foreign sources or made in a foreign currency
- For donations exceeding £20,000 annually, due diligence is valid for a period of 12 months. For donations under £20,000 annually, due diligence is valid for a period of three years.
- Repeat donations made after this period require a review of due diligence ahead of accepting new gifts, including annual grant awards within a multi-year grant agreement

Appendix 3. Due Diligence Process

1. Due Diligence check

Responsibility for Due Diligence checks sits with the Development Team and includes:

- Initial screening through a search of publicly available material designed to highlight potential areas of controversy or concern. This will normally include combination of adverse news searches on the internet, a registry check such as Companies House data, Charity Commission registration, as appropriate.
- Screening against conflicts of interest with APPCT Executive Team and Trustees
- Record findings, sources and decisions made using a Due Diligence template

2. Internal Authorisation

- First review is to be undertaken by the Head of Fundraising
- The procedure for accepting uncontentious donations will then follow the standard financial authorisation levels of APPCT
- Potentially contentious or suspicious donations will undergo further screening by Director of Finance, then the CEO, considering whether further review is needed at Board level.

3. Board Review

The CEO will

- ensure that the Board are informed of suspicious and contentious donations
- put forward recommendations to the board for acceptance or refusal
- identify if any contentious or suspicious donations needing to be flagged to the Charity Commission.

The Board of Trustees will

- review Due Diligence submitted by the CEO
- declare any conflicts of interest with donors to the charity escalated to the Board through screening
- always act in the best interests of the charity, and avoid any conflict of interest
- provide written explanations for refusing a donation
- make the final decision if there is differing opinion within the organisation
- instruct the CEO to apply to the Charity Commission for an order authorising the decision if it is felt the refusal of a donation will cause a dispute or negative publicity.

11. Background Papers

None