



Donations Policy

If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

Our Vision, Our Values, Our Strategic Objectives

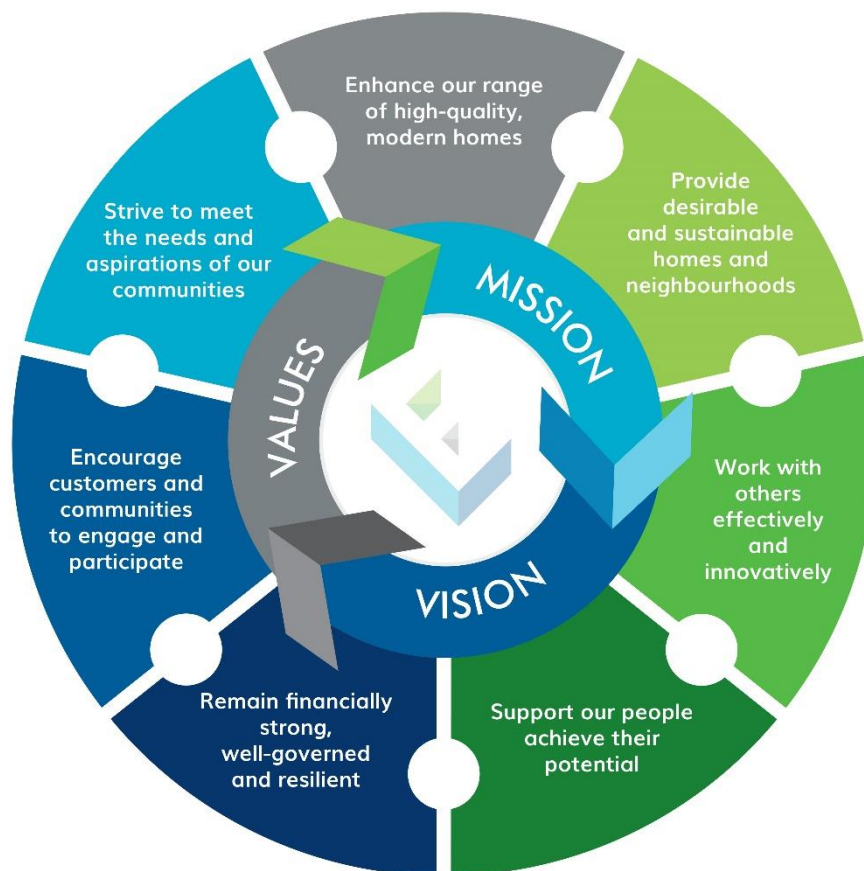
Our Vision

A vibrant neighbourhood where everyone can prosper.

Our Values

Caring, Reliable, Fair, Open and Adaptable

Our Strategic Objectives



Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

Executive Summary

Policy Author

The Chief Executive is responsible for the development of this Donations Policy.

Purpose of the Policy

The purpose of the Donations Policy is to provide clear guidance in relation to the donations that the association will make to relevant individuals, organisations or groups to support the local community and wider housing sector.

The Policy also outlines how, on the rare occasions this could occur, the association will deal with donations or legacies offered to Elderpark housing as a Registered Charity.

Aims and Objectives of the Policy

The aims and objectives of this policy are to:

- Assist in partnership working with community organisations which benefit our tenants and the wider local communities.
- Support fund raising initiatives which benefit tenants and residents within our communities.
- Play an active role within our communities and the wider Govan area to support the reduction in disadvantage experienced by individuals.
- Raise the profile of social housing and the importance of housing in people's lives.
- Support charity fundraising initiatives associated with the Register Social Landlord sector
- Support charitable endeavours by our people

Legislative and Regulatory Compliance

Section 79.1 of our rules states that *'The Committee shall set and review periodically its policy for the donation of funds to charities. Such donations must further the objects of the Association and the Committee shall report to the Members on such donations.'*

Section 47.8 of our rules state that amongst its most important powers, the committee can 'accept donations in support of the activities of the Association'.

The Scottish Housing Regulator's Regulatory Standards of Governance and Financial Management provide a template for how the association should manage its business affairs and the particular standards which are relevant to this policy are Standards 2, 3 and 5.

Equalities

The association will make donations which support the local community, enhance the wider housing sector and ensure that underrepresented groups are included within any donations we provide. The donations policy is developed to provide a template which allows for donations to any members of society and these will be made taking into account equalities at all times.

Privacy

This policy is made publically available on our website and accessible for all.

Related Policies

Policy Title	Location
Equality and Diversity Policy	V:\Elderpark Policy Suite\Governance Policies\G13 Equality and Diversity Policy.pdf
Entitlements, Payments and Benefits Policy	V:\Elderpark Policy Suite\Governance Policies\G16 Entitlements, Payments and Benefits Policy.pdf
Rules of the Association	V:\Elderpark Policy Suite\Governance Policies\Model Rules 2020.pdf

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1 Introduction

- 1.1 Like most organisations, Elderpark receives requests from charitable bodies, individuals and local community organisations for donations and sponsorship.
- 1.2 The objects of the Association are to *"provide for the relief of those in need by reason of age, ill-health, disability, financial hardship or other disadvantage through the provision, construction, improvement and management of land and accommodation and the provision of care..."* and the *"permitted activities and powers of the Association will include anything which is necessary or expedient to help the Association achieve these objects"*.
- 1.3 Section 79.1 of our rules states that *'The Committee shall set and review periodically its policy for the donation of funds to charities. Such donations must further the objects of the Association and the Committee shall report to the Members on such donations.'*
- 1.4 *Section 47.8 of our rules state that amongst its most important powers, the committee can 'accept donations in support of the activities of the Association'.*
- 1.5 This policy document covers donations to the Association and any requests for donations and sponsorship made to the Association.

2 Purpose of the Policy

- 2.1 The purpose of the policy is to ensure that the association is open, transparent and creates a clear framework for the distribution of donations and outlines the circumstances in when donations may be received.
- 2.2 The following principles govern the operation of this:
 - Any donations received or made, are compliant with applicable laws and the Rules of the Association.
 - Any donations received or made, are not made to influence or secure an improper business advantage.
 - Any donations made are to a properly established charity or other voluntary groups.
 - The purpose of any donation will be for promoting or improving the economic, social or environmental wellbeing of our residents or the area in which our houses are situated
 - Ensure that the Donations Policy is consistent with other current Elderpark Housing Policies including our Entitlements, Payment and Benefits policy, Code of Conduct for staff, Code of Conduct for Governing Body Members, Financial Regulations and Gift and Hospitality Policy.

- Ensure compliance with the Regulatory Standards of Governance and Financial Management with particular attention to;
 - **Standard 2** - The RSL is open and accountable for what it does. It understands and takes account of the need and priorities of its tenants, service users and stakeholders and its primary focus is the sustainable achievement of these priorities
 - **Standard 3** - The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay
 - **Standard 5** - The RSL conducts its affairs with honesty and integrity.

3 Aims and Objectives of the Policy

3.1 The aims and objectives of this policy are to:

- Assist in partnership working with community organisations which benefit our tenants and the wider local communities.
- Support fund raising initiatives which benefit tenants and residents within our communities.
- Play an active role within our communities and the wider Govan area to support the reduction in disadvantage experienced by individuals.
- Raise the profile of social housing and the importance of housing in people's lives
- Support charity fundraising initiatives associated with the Register Social Landlord sector
- Support charitable endeavours by our people

4 Donations Requests to the Association

4.1 Section 6 of this policy will cover donations received by the Association.

4.2 Elderpark Housing's Management Committee recognise that the majority of our income is generated through rents paid by our tenants. Our first priority is to serve Elderpark Housing's tenants and residents; tenants, applicants and local community.

4.3 The Management Committee set a budget to cover donation requests which will generally be no more than 0.1% of the annual turnover (currently circa £6m as at 2022).

4.4 The Management Committee will consider on an annual basis whether or not it is appropriate to set aside any additional funds for donations above the amount specified in section 4.3 to meet the objectives set out in Section 3.1 of this policy.

4.5 Separate funds may be agreed annually and allocated to specific projects / activities by the Management Committee and as part of the budgeting process to support wider community initiatives.

- 4.6 All requests and proposals for donations or sponsorship will initially be channelled through the Community Regeneration Officer or the Chief Executive. Where the Community Regeneration Officer receives the donation request they will consider the request and provide a recommendation to the Chief Executive taking account of the how the donation request fits our policy aims and objectives.
- 4.7 The Chief Executive (or in their absence the Director of Finance and Corporate Services) having received the donation request either directly or from the Community Regeneration Officer then has the final decision on whether to approve / reject a donation request based on its relevance to the policy principles approved by the Management Committee. Given that the overall value of our donations budget represents no more than 0.1% of our annual turnover it is not considered material in monetary terms.
- 4.8 In most cases we will seek to limit the donations granted to any single charity or registered group per annum with more than one donation granted only exceptional circumstances.
- 4.9 On an annual basis the Governance and Compliance Manager will provide the Management Committee with a copy of the Donations Register which will show all donations provided over the course of the particular financial year.
- 4.10 Where a member of our Staff, our Management Committee, or one of our people as defined within the Entitlement, Payments & Benefits Policy has any connection with the individual or organisation applying for a donation, they should declare this and they should not take part in either the consideration of or any decision on the application. All declarations of interest must be recorded in the Entitlement, Payments & Benefits Policy register whether a donation is agreed or not.
- 4.11 Applications should generally be made in writing, ideally using the form provided by us (Appendix 1) however it is recognised that in a number of cases requests will be made via email or written communication by the organisation / individual seeking the donation and this should be considered an acceptable method of requesting a donation. The application / request for funding must demonstrate that the criteria set by the Association has been met in line with section 3.1.
- 4.12 Where the Association makes a donation, we reserve the right to publicise the donation as part of our communications plan using local and trade media, social media, newsletters and our website.
- 4.13 A report on donations made will be included in our Annual Accounts, Annual Report and publicised on our website;

4.14 The maximum single donation will be £500. In exceptional circumstances this may be higher and any donation granted above £500 will be reported to the Management Committee at the next available meeting.

4.15 Where donations are made to our people (staff or committee) carrying out charitable endeavours these will be limited to a £50 maximum donation.

5 Principles for Considering Donations

5.1 Consideration will be given to a donation on receipt of a request from an individual organisation/charity or one of our people. As such our key policy principles are as follows:

- Donations may be made to events where local tenants and residents could gain direct or indirect benefit
- No funds will be provided to individuals which could be seen as a benefit solely for that individual and their needs
- Sponsorship should primarily be about promoting Elderpark Housing, the Registered Social Landlord sector or the wider Govan area

5.2 Examples of donations include:

- Donation to support local youth sporting / health and wellbeing groups
- Donations to local organisations dealing with particular needs which support the alleviation of social challenges for example the reduction of poverty, eradicating domestic violence, youth activities, homelessness or employability initiatives.
- Donations to charitable organisations operating within the local area
- Donations to charitable organisations affiliated with the wider housing sector
- Requests from partner organisations to support a particular charity which links with our overall aims
- Donations to larger national charities or representative bodies where there has been an ongoing and identifiable relationship
- Donations to Staff/Committee who are undertaking a particular challenge to raise money for a charitable purpose associated with our aims

This list is not prescriptive and each request for a donation will be viewed on its own merits determining the benefit which would be gained from the donation, the value of the donation requested and how it aligns with the associations Business Plan.

5.3 In order to ensure transparency and when making a decision regarding approving a donation the following will be considered

- Is this organisation a registered charity?
- Do they operate within the Govan or City of Glasgow area (this will not preclude requests from other organisations)? Do the activities they undertake provide a particular benefit to our local residents?
- Can the Association justify making a donation under the terms of our policy?

- Does the request link with our aims as a local housing provider, Community Anchor organisation and Registered Social Landlord?
- 5.4 Having determined that the request from the organisation / individual seeking a donation has been approved the agreement on the value will consider the following factors:
- What is the relative value of the donation in comparison to the size of the organisation requesting it?
 - Those organisations within our local area should generally receive the highest level of donations?
 - Particular focus will be aimed at supporting younger persons, local community organisations with limited funds, those supporting individuals with physical or mental health issues, those which support underrepresented groups and anything which may provide an indirect benefit to the Association in terms of the services we provide.
 - What percentage of our Donations Budget would be utilised for this particular donation and is it reflective of the benefits to be obtained from it?
- 5.5 As a general principle we will ensure consistency by reviewing donations annually to assess the types or organisations we have supported. Furthermore each donation will only be for the particular year it is provided and those wishing ongoing support will be required to make a request on an annual basis.

6 Donations or Legacies Made to the Association

- 6.1 In line with the association's rules and as a Registered Charity there may be occasional circumstances when an individual or organisation would seek to provide a donation to the organisation. This is not something which happens on many occasions throughout the sector however the process below ensures that in the unlikely event a donation is made to the association how this will be managed.
- 6.2 The Association will accept donations however we will not actively solicit, attract or seek donations through advertising in newspapers.
- 6.3 The Association will respond to potential donor requests for information and will offer guidance accordingly. However, where a potential donor wishes to leave a legacy in a will the Association will liaise, if possible, with the donor through an independent body or person – for example a solicitor, doctor, or family member.
- 6.4 Where a legacy or donation is made towards the running costs of the Association, without any restriction as to its use, the Association will determine how best to utilise it with particular consideration on where the donation has been received from and their reasoning for providing the donation.

- 6.5 In respect of fixed asset donations then the Association will arrange for the asset's legal title to be transferred to the Association at its cost.
- 6.6 The Association will not accept a donation of fixed assets which run counter to the Association's legal, ethical and moral objectives, for example that a property is left to the Association for the sole use of accommodating one section of society precluding all others.
- 6.7 The Association may choose not to accept the donation of a fixed assets or properties whose condition is considered to be unacceptably poor warranting remedial work.
- 6.8 The Association may also choose not to accept fixed assets or properties which have restrictive covenants in place regarding change of use or development/improvement to meet modern housing standards and this would include listed buildings.
- 6.9 The Association may choose to dispose of a donated fixed asset or property subject to the price realised being applied according to the Association's objectives. Restrictive covenants preventing disposals may lead to a donation being declined.
- 6.10 The donation of antiques or items of other value not used in the business operations of the Association may be retained or disposed of at a value and at a time of the Association's choosing subject to the price realised being applied according to the Association's objectives.
- 6.11 Where the Association receives cash donations, it will adhere to the following procedures:
- Only the Chief Executive or Director of Finance and Corporate Services will be permitted to take receipt of cash donations.
 - Upon receiving a cash donation, the Chief Executive or Director of Finance and Corporate Services will issue a receipt and put the cash donation in the Associations safe or if of high value be banked at the earliest juncture.
- 6.12 The Association will keep a register of all donations and legacies, which register will comprise:
- The name of the donor [and all relevant details]
 - Whether the donation or legacy is to be publicised or kept anonymous
 - The amount of the donation or legacy
 - Whether the legacy is 'Restricted' or not and the type of restriction

- Whether the donation or legacy was in cash, assets, equities, antiques / items or kind
- The conditions, if any, (for example anonymity etc.) attached to the donation or legacy

7 Complaints About the Policy

- 7.1 This policy sets out Elderpark's policy on Donations, however should anyone wish to make a complaint about the policy; they can do so through our Complaints' Handling Procedure, which is available from the Association.
- 7.2 Any alleged breach of this policy should be reported to the Chairperson and/or Chief Executive in the first instance and any potential breach will be managed in line with the Code of Conduct for Committee Member and Employees.
- 7.3 Any case involving such breaches will be subject to investigation in line with our disciplinary procedures and the Code of Conduct. The outcome will be reported to the Management Committee which will decide whether further action should be taken.

8 Monitoring of the Policy

- 8.1 The Governance and Compliance Manager will ensure that a register of all application is maintained detailing which of those are approved or declined.
- 8.2 The Register of Donations will be monitored by the Governance and Compliance Manager and the Management Committee will receive a copy of the register annually outlining any donations and sponsorship made throughout the year (normally at the end of the financial year).

9 Review of the Policy

- 9.1 This policy will be reviewed every 3 years, with the next review being due in January 2026.
- 9.2 An interim review may take place in the event of changes to good practice, or regulatory requirements.

Appendix 1

Application for a Donation from Elderpark Housing

Details of the Person making the donation request	
Name:	
Address:	
Contact details:	
In what way are you involved with the charity/group for which you are requesting a donation	
Declaration of interest	
Please provide details of any connection you (or anyone else involved in the charity/group that you know of) may have to anyone who is a Committee Member or employee of the Association.*	
*please note that this does not mean that your application will receive either favourable or detrimental treatment but will help us to recognise and manage the process in an open and accountable manner	
Details of Charity/Group you are requesting a donation for:	
Name:	
Charity number (if applicable):	
Application Criteria	
Please describe briefly how this Charity/Group proposed to use a donation from Elderpark Housing, in particular to our key principles (please refer to Section 3.1 of this policy).	
Please outline how Elderpark Housing's tenants, residents or prospective tenants would receive as direct benefit from the donation:	
Please outline what the money will be used for:	

I understand that details of any donation from Elderpark Housing may be made available to the public either on request or may be promoted through the press, social media or on Elderpark Housing's website.

Signed:

Date:

Please provide details of charity/registered group's Bank**	
Account name:	
Sort code:	
Account number:	
Bank Name and Address	

**Please note that Elderpark Housing may contact the charity/registered group to confirm bank account details.

Please complete and Return this form via email to corporate@elderpark.org to:

Elderpark Housing
65 Golspie Street
Govan
G51 3AX

For Office Use only

Application consider by:

Date:

Donation approved: Yes/No

Amount:

Appendix 2 - Equality Impact Assessment

Name of Policy to be assessed	Donations Policy	New policy or revision of existing?	Revision of Existing
Person(s) responsible for assessment		Chief Executive	
1. Briefly describe the aims, objectives and purpose of the policy.	<p>The policy sets out the individuals, organisations or groups which may receive donations from the association providing clear guidance on the process and decision making.</p> <p>The policy also covers how the association will deal with donations to the association in the unlikely event this should occur.</p>		
2. Who is intended to benefit from the policy? (e.g. applicants, tenants, staff, contractors)	The policy provides the potential to give a benefit to the local community, wider Govan area, the housing sector as a whole and other organisations which benefit from the receipt of donations in supporting the aims and objectives of the association.		
3. What outcomes are wanted from this policy? (e.g. the measurable changes or benefits to members/ tenants / staff)	The policy primarily allows for the community to be provided with support via donations which can assist in the delivery of projects and activities which benefit our tenants and the wider community.		
4. Which groups could be affected by the policy? (note all that apply)			
Age	X	Disability	X
Gender reassignment	X	Marriage and Civil Partnership	X
Pregnancy and Maternity	X	Race	X
Religion or Belief	X	Sex	X
Sexual Orientation	X		
5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.			
6. Have those affected by the policy / decision been involved?			
The Donations Policy has been developed taking into account the community in which we operate and considers that recent surveys from our tenants have indicated an expectation that we act as a participant in the community beyond the core housing role.			
7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.	Positive Impact(s)		Negative Impact(s)
	Provision of activities and services by partners, individuals and stakeholder.		No negative impacts identified

8. What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)

No particular actions required.

Signed:

Gary Dalziel

Dated:

20th November 2022

Appendix 3 - GDPR Impact Assessment

Name of Policy to be assessed	Donations Policy	New policy or revision of existing?	Revision of Existing
Person(s) responsible for assessment		Chief Executive	
1. Briefly describe the aims, objectives and purpose of the policy.	<p>The policy sets out the individuals, organisations or groups which may receive donations from the association providing clear guidance on the process and decision making.</p> <p>The policy also covers how the association will deal with donations to the association in the unlikely event this should occur.</p>		
2. Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)	The provision of donations to relevant individuals, groups or organisations should not require to use any personal data.		
3. What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)	Supporting the local community, wider Govan area and the RSL sector in the provision of donations which align with our aims and objectives.		
4. Which groups could be affected by the policy? (note all that apply)			
Tenants	X	Committee	X
Employees	X	Contractors	X
If the policy is not relevant to any of the data groups listed above, state why and end the process here.			
5. Have those affected by the policy / decision been involved?			
No particular involvement in this organisational policy			
6. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.	Positive Impact(s)		Negative Impact(s)
	Provision of activities and services by partners, individuals and stakeholder.		No negative impacts identified
7. What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)	No particular actions required.		

Signed:	Gary Dalziel
Dated:	20/11/2022