



## FUNDRAISING POLICY

The Board adopted Civil Rights Defenders' Fundraising Policy on 24 September 2014.  
It was revised and approved by the Board on 8 December 2015.

### 1. Introduction

Civil Rights Defenders fundraising is done with respect for the individual donor. It must be carried out ethically, honestly and transparently.

Civil Rights Defenders has a 90-account and is working according to guidelines from the Swedish Fundraising Control. They review Swedish based NGO's and the requirement that no more than 25 per cent of total revenue goes to fundraising costs and administration.

Civil Rights Defenders is a member of Frivilligorganisationernas Insamlingsråd (FRIL). FRIL promotes ethical and professional fundraising and is working for a favourable climate for volunteering and for the collection of the public in Sweden. FRIL:s mission is to enhance the ability of members to raise funds in a trustworthy manner.

### 2. Background

A gift received is always voluntary, and Civil Rights Defenders comply with current laws, rules and guidelines in this area, as defined by the Swedish Fundraising Control and the FRIL.

Fundraising is done via 90-account and bank transfers, which means that the Swedish Fundraising Control verifies that donations are used for the purpose stated and that the limits for allowable administrative and fundraising costs do not exceed 25% of the funds raised.

Civil Rights Defenders follows the Personal Data Act (PDA), which means that donors' personal information is used only for our own administration purposes and to manage receipt of gifts.

Civil Rights Defenders operates at all times to protect the integrity of the individual donor and does not disclose information to third parties. We never give out information regarding donated amounts from individual donors.

The data is stored in a database without external access and protected with a separate login that only staff members and attributed persons have access to. The organisation is open to new fundraising methods as long as they strictly comply with our policy.

Civil Rights Defenders only engages in fundraising that is in line with the above-mentioned principles.

### **3. Fundraising Channels**

Primary channels and activities for fundraising include:

- Fundraising Letters
- Direct Debits
- Wills
- Website ([www.civilrightsdefenders.org](http://www.civilrightsdefenders.org) )
- External web channels (ex: Facebook, Twitter, LinkedIn)
- Newsletters
- Mobile
- International intermediary in the U.S.

### **4. Contributors**

Civil Rights Defenders receives donations from its members, but also from other individuals, companies and institutions.

### **5. Corporate Donors**

Civil Rights Defenders is a member of the UN Global Compact and strives to only accept donations from or establish strategic partnerships with companies that are either members of the UN Global Compact or has established policies in line with the UN Guiding Principles on Business and Human Rights or similar.

The final decision on whether a gift from a corporate donor should be accepted or a strategic corporate partnership should be established lies with the Executive Director.

Civil Rights Defenders has, according to the UN Guiding Principles on Business and Human Rights, a responsibility to influence corporate partners in order to prevent and address the risk of adverse human rights impacts linked to the donor's business activity.

Civil Rights Defenders will encourage corporate partners to utilize the knowledge that can be provided by the organisation or its network regarding the human rights situation in the countries where the corporate partner operate.

Civil Rights Defenders will always reserve the right to critically review and criticize corporate partners.

### **6. Non-Contributors**

Civil Rights Defenders will decline gifts from stakeholders that have values that are in conflict with the Civil Rights Defenders' Code of Conduct, policies and/or if there is reason to suspect that the funds are related to criminal actions. Civil Rights Defenders will also decline gifts in the event that the donor's wishes cannot be met.

Civil Rights Defenders does not seek request for gifts from persons who have declined communication with the organisation.

### **7. Information and Feedback**

Civil Rights Defenders reports back to all donors and members regularly via newsletter, website, annual report and through fundraising letters. In the communication there is always information on how to contact Civil Rights Defenders.

## **8. Questions and Complaints**

Civil Rights Defenders responds to all questions and complaints from donors in a respectful, friendly and accommodating manner.

Questions and complaints via telephone or direct contact will be answered to the best of Civil Rights Defenders' ability with immediate effect.

Questions and complaints that are received in writing, for example by letter or e-mail, are answered as soon as possible.

Civil Rights Defenders' goal is to respond to each recipient within a 48-hour time frame.

## **9. Fundraising objectives - the ability to "earmark" funds**

Civil Rights Defenders primarily receives earmarked funds from institutional donors and to special projects such as the Emergency Fund, Natalia Project and Defenders' Days. Only in exceptional cases, are earmarked donations accepted from corporate donors and individuals.

In circumstances where Civil Rights Defenders cannot satisfy a specific request, unless other agreements can be made, the donation will not be accepted.

## **10. Repayment of Donations**

Civil Rights Defenders repays donations at the donor's request, provided this is done within a reasonable time frame (except donations received through international intermediaries). If it is clear that a received donation clearly has been made to the wrong account (judged by the text on the payment slip) Civil Rights Defenders will repay the donation. Civil Rights Defenders also repays gifts when the donor has special requirements to which the organisation cannot accommodate. If there is suspicion that the donor was not aware of his actions (for example if a person is suffering from dementia) this is taken into particular consideration and the donation will be immediately reimbursed.

## **11. Images and Text**

All images posted on Civil Rights Defenders' communication platforms must comply with current laws and regulations. Civil Rights Defenders does not use or publish pictures and/or texts that are taken out of context, nor images that puts individuals' security at risk or are clearly degrading. Furthermore, images that Civil Rights Defenders does not own the rights to are not published without the owner having been consulted and their full consent given in writing.

## **12. Thank You Procedures**

Donors that have not actively chosen to decline to receive a thank-you note will according to Civil Rights Defenders thank you procedures, receive an acknowledgment at least once a year through fundraising letters.

## **13. Donated Assets**

Property, shares and other securities that are donated are left for professional sales and sold at market price.

## **14. Minors in Fundraising**

No fundraising campaigns target children below 18 years of age.

## **15. Donor Communication**

Donors are contacted between 4-8 times per year.

**16. Wills and Disputes**

Civil Rights Defenders' general position regarding testaments is that the testator's last will expressed should always be followed. If the will is contested, Civil Rights Defenders shall cooperate with a lawyer to sort out the legal aspects. Each dispute is handled separately.

**17. Treatment of Donors**

All donors are treated equally, regardless of donation size.

**18. Responsiveness towards donors**

The donors who do not wish to receive donor letters, newsletters, etc. can at any time contact Civil Rights Defenders. Civil Rights Defenders will ensure that their request is registered in the database and these requests are always respected. Civil Rights Defenders has an obligation to be responsive to the donors.

**19. Income and expense reporting**

Civil Rights Defenders reports its total costs and revenues in an annual report.

**20. The Fundraising Department**

Fundraising is one of Civil Rights Defenders support functions. Civil Rights Defenders sees great future development in fundraising and the aim is to become financially independent from state funding.