

Ethical Fundraising Policy
(Including Use of AI Bots)
Created September 2026

Babigloo is.....

a project which delivers therapeutic music-led sessions to parents and children 0-12 months at a child's most vulnerable age. Each baby is accompanied by an adult/parent or carer; and if necessary, support from someone.

The first priority of Babigloo must always be the safety and welfare of participants and team

The very nature of the work of Babigloo music for Babies is that every baby and their family should have access to the formative and transformative qualities of music in our lives. **Babigloo includes its fundraising activities as part of its safeguarding and health and safety responsibilities.**

This document should be read in conjunction with Babigloo's other relevant policies:

- SAFEGUARDING
- IDEAS (INCLUSION, DIVERSITY, EQUITY AND ACCESS)
- HEALTH AND SAFETY
- GDPR
- ENVIRONMENTAL

Babigloo's Designated lead for our Fundraising Policy is

Jenny Gordon (Co-Director)

Tel: 077515 25200

Email: jenny@babigloo.co.uk

If Jenny is unavailable or implicated in a concern you should contact:

Colin Phillimore, Co Director

Email: colin@babigloo.co.uk

Tel: 07885 535676

This document is for everyone:

- Babies as active co-creators
- Parents attending Babigloo sessions,
- Babigloo Music Leaders,
- Babigloo Guest musicians,
- Babigloo Directors
- Administrator
- Organisation Partners
- Commissioned companies



The Co-Directors will monitor any fundraising activities and discuss any concerns or complaints, seeking advice from the Community Interest Company (CiC) Regulator, our Accountants and Insurance providers where necessary.

REMEMBER: *Safeguarding is a continuous process throughout our organisation - Significant changes in the working environment requires a re-assessment of the work*

created September 2026

Review Date: This policy will be reviewed once a year:
January 2028

*The Aim of our Guidelines and Procedures is to protect everyone
involved in Babigloo from harm*

Definitions

*We are committed to anti-discriminatory practice to promote INCLUSION, DIVERSITY,
EQUITY AND ACCESS for all children and families.*

Overall policy statement

This policy sets out how we manage the ethical issues and social responsibility within fundraising. Specifically, we aim at all times to be open, honest, fair and to operate in a legal way that meets not only the law, but also fundraising regulation and best practice, including the Code of Fundraising Practice. We will take all reasonable steps to make sure our fundraising is carried out in a way that reflects positively on fundraising in general, including not unreasonably intruding on a person's privacy, not putting undue pressure on a person to donate, not using unreasonably persistent approaches and accepting a request to end an interaction.

Everyone who is involved in fundraising has a responsibility to be aware of and comply with the ethical issues and procedures in this policy.

People And Organisations

Directors

The Directors are aware of and will comply with the Community Interest Company (CiC) Regulator's guidelines, regarding Directors responsibilities, particularly in relation to always acting in the CiC's best interests and managing any conflicts of interest.

The Directors are also aware of and follow the 6 principles in CiC Commission 20 (CiC Fundraising: a guide to Directors duties), and comply with the guidance issued by other relevant regulators.

We will always be honest about what we can achieve when asking for funds, submit realistic budgets, use the funds for the purpose intended and ensure that we provide any reports required, on time.

We will ensure that everyone is aware of and consistently complies with the regulatory guidance on fundraising behaviours and respond promptly and effectively to any fundraising complaints.

Supporters

Supporters have a right to expect us to provide clear, truthful information on our work, including reporting on how we spend the funding we are given and managing donors' information responsibly.

We will comply with the guidance issued by the CiC guidelines, Regulators and UK law, including in respect of openness and honesty with our supporters and members of the public.

We will respect the privacy and contact preferences of our donors. We will respond promptly to requests to cease contacts or complaints and act to address their causes.

Beneficiaries

How we represent our beneficiaries, in our communications, is always respectful of them and portrays them in the way they would wish to be seen. We will only use personal information that they have given consent for and for the purposes they have agreed and will not disclose anything that might put them at risk, particularly children and vulnerable people.

Donors

We will ensure that there is not:

- Unreasonable intrusion on privacy.
- Unreasonably persistent fundraising.
- Undue pressure to donate.

And we will not accept a donation that is not in the CiC's best interests. We will also ensure that we do not mislead existing or potential donors, including by leaving out information, giving inaccurate or unclear information or exaggerating details.

We will take all reasonable steps to treat existing or potential donors fairly, so that they can make an informed decision about any donation.

We take all reasonable steps to avoid asking for regular donations (for example, by direct debit) from anyone aged under 18.

We will inform donors when AI is used in fundraising communications where there is a risk of misunderstanding or inadvertently misleading them, in line with the Fundraising Regulator's guidance.

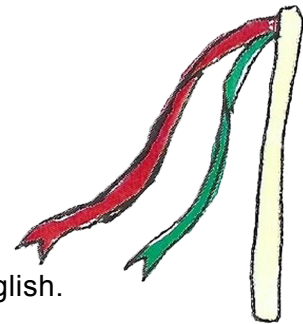
Vulnerable Individuals

In communicating we will be mindful of indicators that may suggest an individual may be vulnerable, using REAL:

- **Retain** - and repeat the information you give them?
 - Do you have to repeat what you have said over and over again?
- **Explain** - able to properly explain or communicate the decision they have made?
 - Are they joining in the discussion or just agreeing with what you are saying?
 - Are they asking questions that aren't related to what you are saying?
- **Able** - to understand what they are being told?
- **Listen** – able to listen, follow and understand the discussion taking place, or are they just repeating what you say?

If an individual shows signs of possible vulnerability, we will:

- Consider communication preferences.
- Not make assumptions about him/her.
- Ask him/her what they need and how you can help them better.
- Empathise and sympathise with him/her.
- Try asking questions in a different way.
- Summarise anything that has been decided or agreed in plain English.



We:

- Will not place any undue pressure on individuals to donate.
- Do not either solicit nor accept donations from anyone whom we know, or think may not be competent to make their own decisions.
- Are sensitive to any particular need that a donor may have.

Staff and Volunteers

We have zero tolerance for abuse, including discrimination, bullying and sexual harassment, not only for fundraising staff and volunteers, but for anyone who is involved with our CiC. We will maintain a culture of respect and equality, will ensure that there are processes to raise concerns that everyone is aware of and is confident to use and we will deal with any allegations of abuse promptly and sensitively.

We will ensure that we take reasonable steps to protect people involved in fundraising from harm and harassment while fundraising. We do this through.

- Effective due diligence and planning of our activities
- By maintaining an open, positive culture where everyone feels able to speak up
- With a suite of relevant policies, such as Safeguarding
- IDEAS (inclusion, diversity, equity and access), Health and Safety, GDPR, Environmental policies.

When carrying out risk assessments we include relevant risks to fundraisers and others. For example, lone working, high-risk locations or times, safeguarding vulnerable individuals (such as minority groups, women, and young people), health and safety concerns, activities that involve alcohol and any occasions where our work touches on emotive/contentious issues.

Commercial Partners

We will not partner with any organisation that produces goods/services or acts in a way that is contrary to our charitable objects, or values.

We will ensure that any commercial agreement represents a fair deal for the CiC and:

- Clearly establishes what we expect to gain from it, prior to entering into an agreement.
- Set up appropriate systems to monitor and review the partnership.
- Take appropriate steps to identify and manage any risks.
- Ensure from the outset that the expectations of both the CiC and the company have been agreed and.
- Can be managed effectively and appropriately.

We will disclose any commercial partnerships in our Annual Report.

Where third-party fundraisers use AI on our behalf, we will ensure they comply with this policy and the Fundraising Regulator's guidance.

Systems And Procedures

Donations

If supporters wish their donation(s) to be used in a specific way, or for a specific purpose, they may make a restricted donation by providing written instructions with their donation. We will always respect this.

Refusals

We abide by the law which requires us, in deciding whether to accept or refuse a donation, to consider which action is in the CiC's best overall interest. We have adopted a Refusals & Acceptance of Donations policy, which covers this in detail.

Due Diligence

We will undertake reasonable due diligence of donors, to ensure they don't hold views or are involved in activities that might be incompatible with our role and damage our reputation. In terms of donations, we will ensure that any gift is safe to accept and, doing so, would be in the best interests of your CiC. We will also consider issues, such suspicious donations, or managing large anonymous gifts, or those from vulnerable individuals.

AI Imagery

Babigloo uses original graphics by local artists and designers, we only use AI for strategy and funding purposes where funders expect us to use it.

If we use AI generated, stock or digitally enhanced imagery, particularly where the subject may be emotive or challenging, we will ensure that the way in which we do so is not reasonably likely to mislead and, potentially, influence people. For example, we may make our policy on its use publicly available and use watermarks, alt text and/or footnotes and/or explain this in content text. We may not do so where its context and/or content is unlikely to mislead or influence. For example, an image of intergalactic war or use of a stock image on a post about opening hours.

We recognise that AI deep fakes can be difficult to identify but those using our social media will be made aware of the risk. We will not like, share or support in the comments any imagery or content that we reasonably suspect to be fake. We will ensure that our use of AI and any other imagery, is ethical.

AI Ethics & Safety (see Appendix)

We will attend training, adopt and comply with the Charity AI Ethics & Governance Framework. Before adopting any AI tool for fundraising, we will carry out a proportionate risk assessment, considering the intended use, potential risks (including bias and hallucination), and the platform.

If using AI with any Customer Relationship Management (CRM), we have carried out a data protection impact assessment and updated our data protection policy and procedures to reflect this.

If using AI to draft fundraising content, such as funding bids, these are always reviewed by a human for tone/style/spelling, and to ensure factual accuracy and that all relevant information

has been included. For funding bids, we also ensure compliance with any funder instructions relating to AI.

If using AI bots to fundraise, we will ensure there are built in safety systems to identify and respond appropriately to potentially vulnerable people, and reporting and oversight systems, to ensure they are not subject to exploitation or other harm by the AI. We have created a set of detailed guidance at the Appendix below.

Bullying And Abuse

The Directors have zero tolerance for abuse, including discrimination, bullying and sexual harassment, not only for fundraising staff and volunteers, but for anyone who is involved with our CiC. We will maintain a culture of respect and equality, will ensure that there are processes to raise concerns that everyone is aware of and is confident to use and we will deal with any allegations of abuse promptly, sensitively and in accordance with employment and any other laws.

Complaints

We have a clear and publicly available complaints procedure which also applies to third-party fundraisers. We ensure that those involved in fundraising are aware of this and able to advise members of the public about it. Any complaint would be investigated thoroughly and fairly to find out the facts of the case, avoiding unnecessary delay and we would always respond to complaints fairly and in a way that is proportionate.

Action required

During 2027 Directors will attend training, adopt and comply with the Charity AI Ethics & Governance Framework.

Date.....

Signature (Co-Director)

.....

Signature (Co-Director)

.....



Appendix: Use of AI Bots in Fundraising

If using AI to draft fundraising content, these are always reviewed by a human for tone/style/spelling, to ensure factual accuracy and all relevant information has been included. For funding bids, we also ensure compliance with any funder instructions relating to AI.

When commissioning or building bots, we will carry out formal risk assessment to ensure that potential harms are anticipated, prevented, and mitigated across the entire lifecycle, from design and training through deployment and ongoing operation, rather than addressed after problems occur.

When buying a bot, we will ensure that it meets these standards.

When we use AI bots to help with fundraising, we will make sure they are safe and fair for everyone, especially people who might be vulnerable and/or not fully competent to make decisions. For example, younger and older people, those with learning disabilities, low educational attainment or in digital poverty.

We will ensure that the bot:

- **Is safe and secure:** We will choose a system that is secure, fully data protection compliant, does not store donor information overseas or share/sell information to 3rd parties.
- **Is easy to use and understand:** We will choose a system that is easy for everyone to use, particularly, those who may struggle with digital/AI systems, including providing information in plain English and/or other accessible formats.
- **Spot signs of vulnerability:** The AI bot's personality will include the need to safeguard vulnerable individuals and it will be trained to look for clues that someone may be struggling to understand, is confused, or is just agreeing without really joining in. For example, if someone keeps asking the same questions, repeats what the bot says, or seems unable to explain their choices, the bot will recognise this as a possible sign of vulnerability/lack of competence.
- **Respond with care:** If the bot notices these signs, it will slow down, use simpler language, and offer to explain things again. It will never pressure anyone to donate and will always give people the chance to ask for help or to speak to a real person.
- **Respect preferences and needs:** The bot will ask how it can help and what the person needs, rather than making assumptions. It will summarise any decisions or agreements in plain English.
- **No undue pressure:** We will not write into the bot personality or train it in a way that might encourage it to apply undue pressure, such as the following.
 - Asking for an amount that individuals might not reasonably wish or be able to give.
 - Repeatedly asking someone to donate after they have said no or not respecting a person's request to stop the conversation or to be left alone.
 - Using emotional pressure, such as suggesting that not donating will have negative consequences for others.
 - Making it hard to say no - for example by hiding the "no thanks" option or making it much easier to donate than to decline.
 - Rushing the person or saying they must decide immediately
- If the bot thinks someone may not fully understand or may not be able to make their own decisions, it will not ask for or accept a donation.
- **Easy reporting and oversight:** There will be a clear and simple way for anyone to report concerns about the bot's behaviour. All bot conversations will be checked regularly by staff to make sure the bot is acting safely and respectfully.
- **Staff training and review:** Staff and volunteers will be trained to understand how the bot works, how to spot signs of vulnerability, and what to do if something goes wrong. We will keep records of how the bot is used and review these often to spot any issues early.
- **Act quickly if there's a problem:** If we believe that someone has inadvertently been harmed or exploited, we will act immediately to put things right and report it to our board and any others who may need to be informed. We will also review and improve our systems to prevent it from happening again.
- **Support Privacy Management:** Whenever possible, we will ensure that bots empower their users to manage their own privacy.