

From: DEEKS, Nerissa
Sent: 29 January 2018 10:39
To: Licensing Unit
Subject: Draft policy consultation

We have no objections to most of this draft policy as it seems fair and clear for both charities and the public. However there is one area where it seems bureaucracy could undermine individual support of charities, namely 3.5 and 3.6 concerning collection from the sale of items.

We sometimes receive donations from individuals who have sold items at car boot sales or from outside their own houses and I think if people knew they had to apply for a licence to do so they probably wouldn't bother, so it could have a small adverse impact on our fundraising.

Regards,

Nerissa Deeks
Manager, GUTS Fighting Bowel Cancer

Sent: 29 January 2018 20:54

To: Licensing Unit

Subject: Consultation on the Draft Guildford Borough Council Charity Collection Policy

Dear Mr Smith,

Thank you for your letter advising me of the consultation. Having read the document I would comment that it is a fair Policy which will ensure maximum benefit for Charities whilst protecting the public.

The only question I have from experience of carrying out collections is whether the identification labels for each collector are necessary if charities already have identifying tabards or clothing? If so could the labels be upgraded as the current ones do not stick on anything for very long.

Please also note that I received two letters notifying of the consultation - one as Miss T Fox and one as Miss T F Fox. Perhaps you could update your records so I don't receive duplicate mailings in the future.

Thank you once again for your correspondence.

Yours sincerely,

Miss T Fox

From: Margaret Murray

Sent: 06 February 2018 11:14

To: Licensing Unit

Subject: Re: Consultation on the Draft Guildford Borough Council Charity Collection Policy [UNC]

Good morning,

I have read the draft GBC charity collection policy, all looks very sensible to me.

Margaret Murray

From: Barry Williams

Sent: 06 February 2018 09:46

To: Licensing Unit

Subject: Consolation on the Draft Borough Council Charity Collection Policy

Hello

Thank you for your letter dated 22 January inviting comment on this draft policy. I have now read through this document and have no questions or concerns nor have my predecessors in this post.

From my experience to date I only have one comment that your downloadable pdf documents do not easily lend themselves to completion on a computer. Hence, I have always completed by hand. A form that was easier for computer completion or could be filled in on-line would be good.

Barry Williams - Voluntary Fundraiser Citizens Advice Guildford.

Anonymous feedback via the website on 9 February 2018:

As a long term street collector for two local charities, I would like a restriction to one charity a day. Also it would be helpful if all licenced collectors were told not to shout and harrass people walking up the high street. We often stand quietly whilst big issue sellers do as they like!

From: Bob & Marilyn Jarrett

Sent: 17 February 2018 16:57

To: Licensing Unit

Subject: Views on the draft policy for street collections for charity

Dear Sir/Madam,

I would just like to send my approval of the Council's proposed Charity Collections Policy.

Thank you for giving me the opportunity of giving my views as part of your consultation,

Yours faithfully,

Marilyn Jarrett (Secretary of Amnesty International Guildford Group)

-----Original Message-----

From: Manny Kemp

Sent: 19 February 2018 14:15

To: Licensing Unit

Subject: Feedback to consultation on draft street collection policy

Hello,

I am emailing to give some feedback to the consultation I was kindly invited to participate in. As a non-resident of Guildford acting over the years for a range of different charities I greatly appreciate being asked to take part in the process.

Overall I think the general move to limit collections to one per area per day is a good one and in line with what I've experienced with other local authorities. Although this is presented in terms of not exposing the public to an excessive number of collectors I would add that as a collection organiser it can be very challenging to share a location with another simultaneous collection, especially if the other collection is more successful with volunteer recruitment. This is therefore a good measure for ensuring that individual collections have a fair chance at being successful.

I think not having tacit approval is a good idea - I've seen a number of local authorities use tacit approval, and I've seen even more local authorities miss the occasional communication and not reply to something in error - a recipe for trouble if they also use a tacit approval arrangement.

One observation about the draft policy section 4.9 is that the requirement to wear badges issued by the local authority is not one I have seen in most other local authorities. I don't know how much of a problem this might cause small volunteer groups with limited resources e.g. for stationery (lanyards, plastic badge holders etc.).

I would also add that the range of qualified persons permitted under the current regulations to countersign a statement of return is very limited and calls for a level of qualification that, given the simplicity of the return paperwork, is analogous to using a sledgehammer to crack a nut.

Full ACA/ACCA qualification or equivalent seems to be the norm - I don't know if the Council has any flexibility on this if it comes from the national regulations, but the list of qualifications needed to conduct independent examination for larger charities seems like a relevant reference, as IE is much more complex but this list is far more permissive:

<https://www.gov.uk/government/publications/independent-examination-of-charity-accounts-trustees-cc31/independent-examination-of-charity-accounts-trustees#how-to-select-your-examiner>

Best regards,
Immanuel Kemp

From: Mike and Chris Evans
Sent: 23 February 2018 15:20
To: Licensing Unit
Subject: Consultation on the Draft Borough Council Collection Policy

Thank you for the opportunity to comment on the draft policy. I have collected for Guildford Sea Cadets for 15+ years and also for Seafarers UK more recently, and assisted with Macmillan Nurses Appeal.

Comments/observations based on my experience:

- a. The current process of applying is easy, well set out and well administered and with no undue delays.
- b. Guildford is clearly seen as a soft touch or pocket of money as there are several charities who collect here which are neither national nor local – an example might be for ex greyhounds etc.
- c. There appears to be little due diligence done by GBC on some of the charities before giving them the right to collect. For example I saw a while ago 2 miniature Shetland ponies being used as a “prop” for collecting money and on my return home I looked up the charity’s accounts to discover that the horses were kept over 100 miles from Guildford and that the money raised appeared to be used mostly for the upkeep of the horses, or for travelling to fundraising venues – in other words there appeared to be little that passed the public benefit test! The accounts on Charity Commission website should be a mandatory check by GBC: it only takes a couple of minutes.
- d. The rules about collectors standing together and then the distance between the next collector/collectors being 25 metres is often ignored and amongst the worst offenders are the Salvation Army Band or any of the choirs that collect in the Tunsgate/Guildhall area making it a running the gauntlet experience. I should add that I have nothing against the Salvation Army and have supported their work by a monthly direct debit for 20+ years but I dislike seeing well set out and sensible rules so flagrantly ignored!
- e. Checking of permits/enforcement of rules seems extremely lax. I have been asked for my permit twice (by the same PCSO) in 15+ years of collecting. Perhaps there is a role for the Town Wardens?
- f. Also on the subject of enforcement one thing that seems to blight Guildford is the appearance of collectors bearing an ID issued elsewhere (usually London) who collect in the Friary/White Lion Walk area of North Street. They look kosher, are probably collecting for a good cause but are on commission and they have not been authorised by GBC as they don’t have GBC permits and witness the fact that authorised collectors with a GBC permit might well be in the vicinity. Again perhaps a role for Town Wardens? They can also be quite aggressive when challenged about their legitimacy and I suspect that their location in the town at the bottom of North Street is to facilitate a quick get a way if challenged.

Regards

Mike Evans

From: Carole Olive
Sent: 27 February 2018 12:22
To: Licensing Unit
Subject: Consultation on the Draft Guildford Borough Council Charity Collection Policy

Good afternoon

The consultation of the Draft Guildford Borough Council Charity Collection Policy was considered by Ash Parish Council's Amenities Finance and Administration Committee at the meeting held on 26 February 2018.

The Committee had no observations to make.

Kind regards

Carole Olive

Carole Olive
Clerk to the Council
Ash Parish Council

From: Canon Peter Bruinvels
Sent: 29 March 2018 18:02
To: Licensing Unit
Subject: Draft Charity Collection Policy

Dear Mr Smith

Thank you for alerting me about the above and your consultation I have read the draft Charity Collections Policy and find myself strongly in favour of its aims As the Regional Fundraiser for ABF The Soldiers' Charity Surrey, I have an especial interest in it I have undertaken a number of charity collections in Guildford It does work very well and I am very grateful for the professional advice that I receive from your team of Officers I therefore write now formally to support the revised policy on behalf of myself and that of my charity - ABF The Soldiers' Charity Surrey With kind regards Canon Peter Bruinvels

Canon Peter Bruinvels CC
Governor of The Church Commissioners

Regional Fundraiser Surrey
ABF The Soldiers' Charity

Armed Forces Champion 11 Infantry Brigade SE and aHQ

Surrey and Kent CC Civilian-Military Liaison Adviser

From: richard myers

Sent: 24 March 2018 17:24

To: Licensing Unit

Subject: consultation on the draft Guildford BC charity collection policy

1. The requirement for application 28 days before date of the collection: does it have to be 'special circumstances' for this to be waived - could it not be waived simply at the discretion of GBC, for example if there is ample time to process the application?
2. 28 days for this are stated in 4.1 but Appendix B says a month.
3. We often have a table with leaflets and a collection box at each end of the table, often with a 'collector' standing at each end handing out leaflets. Not sure this set up is covered in the policy; the need for 25m between collectors does not seem applicable.
4. cannot apply more than 6 months in advance: it is quite nice to fix collections for the full year often; any special reason for the 6 months limit? Make it 12 months?
5. the need to publish the total collected in a paper; unlikely to apply to us as we have never got anywhere near £150; but how is the decision of GBC to be communicated on this; can we just have a blanket waiver if it is under £150?
6. would have been useful to have a list of main changes from the existing policy
7. I am not quite clear if having a collection licence allows you to sell e.g. Xmas cards in the street - sorry if I have missed this somewhere.
8. We do not do house-to-house collections so I have not read those sections.

Thanks

Richard Myers

Compassion in World Farming - Surrey Group Co-ordinator

From: Jan Chapman
Sent: 19 April 2018 22:31
To: Licensing Unit
Subject: Consultation on Draft Guildford BC Charity Collection Policy

Dear Sir/Madam,

Thank you for inviting me to comment on the draft Charity Collection Policy.

I am commenting as a private individual although I have in the past made applications on behalf of the West Surrey WaterAid Group.

I support the objectives of the draft policy but have the following comments on the detail.

3.2

Whilst agreeing that the public should not be exposed to an excessive number of collections it would be helpful if the policy gave a clear idea of what constitutes an 'area' for these purposes. The examples given are 'Guildford town centre' and the Friary. So, for this purpose, are the Tunsgate Quarter and White Lyon Walk separate areas or part of the 'town centre'.

In my view the Railway Station and supermarkets such as Tesco or Sainsbury's at Burpham should be regarded as separate areas.

3.3

I strongly support the inclusion of appeals for direct debit pledges as well as cash.

3.6

I hope that where a licence has been granted for a street collection in the 'town centre' area this would not prevent a licence being granted for an event benefitting a different charity to be held in a town centre location such as Holy Trinity Church or the Guildhall.

It appears from the draft that the organisers of events rather than stall holders will be responsible for obtaining the licence. The position should be made explicit. The policy should also make clear in the case of events raising funds for a number of charities whether one or several licences will be required. I hope the latter is not the case - it would be extremely onerous for organisers.

As this is a new provision I hope that reasonable steps will be taken to make event organisers aware of it before implementation.

These new provisions will cover a large number of events. Has a calculation been made of the extra staff hours required to process them within a reasonable period?

4.4 and 5.0

The explicit inclusion of Direct Debit and Commercial Clothing Collections in house to house fundraising activity is to be welcomed.

6.2 and 6.3

I agree with these provisions although I hope the 80% will be the normal minimum.

Thank you for inviting me to give my view.

Jan Chapman