

## Frequently Asked Questions and Answers on Public Fund-Raising Disclosure Regime

S/N	Question	Answer
<b>Rationale for change</b>		
1	Why is the revised regime being implemented and how will this affect charities and the public?	<p>The Commissioner of Charities (COC) held a public consultation in May 2022 on a revised regulatory regime for fund-raising appeals conducted in Singapore.</p> <p>With a maturing charity landscape, the revised regime seeks a better balance between making it easier for bona fide charities and fund-raisers to raise funds by streamlining processes, and the appropriate transparency and accountability safeguards to help members of the public make informed decisions on their donations. These are in line with Singapore’s efforts to strengthen trust and promote good governance in the charity sector.</p> <p>With the introduction of the disclosure regime, administrative burden on charities will be reduced and allow them to fund-raise under more practical conditions. Collections for local registered or exempt charities under the Charities Act, and collections for foreign charitable purposes approved by the COC, will be regulated under the Charities Act only. There is no need for these entities to obtain a licence to conduct house to house or street collections after the new regime is implemented.</p> <p>The additional disclosure requirements serve to ensure that donors continue to have an avenue to verify legitimacy of collections for charities. Charities and Fund-Raising for Foreign Charitable Purposes (FRFCP) permit holders will have to provide details of their public fund-raising appeals via the Charity Portal before commencing such appeals, which includes disclosures for collections by third parties.</p> <p>The public is strongly encouraged to exercise their own due diligence to ensure that their donations are used for genuine charitable purposes. Through practising the steps of “Ask, Check, Give”, the public can protect themselves against common attack methods associated with charity donation scams.</p>
<b>Scope of Disclosure Regime</b>		
2	Who will the new disclosure regime apply to?	The regulatory requirements under the disclosure regime for public fund-raising appeals are applicable to (a) <i>registered or exempt charities</i> under the Charities Act 1994, and (b) <i>those with existing permits from the COC for donations to foreign charitable causes (i.e. FRFCP permit holders)</i> , that intend to conduct <i>public fund-raising appeals for collections of monies and/or other property</i> by means of visits from house to house or by soliciting

S/N	Question	Answer
		in the streets or other public places or by both such means. The regime also applies to collections by third parties for an entity mentioned under (a) or (b) above.
3	Will the new disclosure regime apply to all organisations (e.g. societies registered under the Societies Act 1966) conducting fund-raising via street or house to house collections?	House to house and street collections are still licensed by the Police under the House to House and Street Collections Act 1947 <u>except</u> for collections <u>by or for</u> the following groups which are exempted: (a) <i>registered or exempt charities</i> under the Charities Act 1994, and (b) <i>those with existing permits from the COC for donations to foreign charitable causes</i> . For the exempted groups, the regulatory requirements under the disclosure regime will apply instead.
4	Are all organisations no longer required to apply for a license from the Police or the National Council of Social Service (NCSS) for public fund-raising appeals once the disclosure regime is implemented?	Hence if your organisation is a registered society or company <u>but is not</u> (i) an entity mentioned under (a) or (b) above, or (ii) collecting for an entity mentioned under (a) or (b) above, a House to House and Street Collections (HHSC) licence from the Police <i>is still required</i> if the appeal is conducted by means of house to house visits, solicitation on the streets or other places, or a combination of both means. Police will continue to assess all applications received for house to house and street collections licenses on a case-by-case basis before deciding whether a licence may be granted.
5	Will the disclosure regime apply to collections of donations-in-kind or is it only limited to monetary donations?	The disclosure regime is applicable to collections of both monies and other property (e.g. donations-in-kind) by means of visits from house to house or by soliciting in the streets or other public places or by both such means.
6	Will the disclosure regime apply to online fund-raising campaigns?	The disclosure regime is applicable only to public fund-raising appeals conducted by means of visits from house to house or by soliciting in the streets or other public places or by both such means. It does not apply to other forms of fund-raising such as online or via the media.  Nevertheless, all fund-raising appeals conducted in Singapore, whether conducted online or face-to-face, for charitable, benevolent or philanthropic purposes are regulated by the COC under the Charities (Fund-Raising Appeals for Local and Foreign Charitable Purposes) Regulations 2012 (the Regulations). Fund-raisers are required to comply with the Regulations which include providing clear and accurate information to donors about the beneficiary and the purpose, proper usage and records of donations received and disbursed.

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7	If fund-raising is done in conjunction with another event (e.g. sports tournament, run, conference, etc.), must details of the appeal be disclosed on the Charity Portal under the new regime?	<p>Under the disclosure regime, charities must disclose details of their public fund-raising appeals on the Charity Portal if the appeal is conducted by means of house to house visits, solicitation on the streets or other public places, or a combination of both means.</p> <p>If the fund-raising appeal is conducted at a publicly accessible location such that donations will be solicited from members of the public, the requirements under the disclosure regime will apply. Such fund-raising appeals include:</p> <ul style="list-style-type: none"> <li>• Appeals within retail outlets where retail staff may ask customers to contribute to a charity/charitable cause when they make payments for their purchases at the counter.</li> <li>• Appeals by way of donation boxes placed in public places (whether or not there is active solicitation by persons).</li> </ul>
8	If the fund-raising is done both online and offline (e.g. an on-site charity run which is publicised online and where registration is online but members of the public can also donate on-site), must details of the appeal be disclosed on the Charity Portal under the new regime?	<p>Under the disclosure regime, charities must disclose details of their public fund-raising appeals on the Charity Portal if the appeal is conducted by means of house to house visits, solicitation on the streets or other public places, or a combination of both means.</p> <p>If part of the fund-raising appeal is conducted at a publicly accessible location such that donations will be solicited from members of the public, the requirements under the disclosure regime will apply to that portion of the appeal or event.</p>
9	Will the disclosure regime apply to internal or private fund-raising events (e.g. at a closed company event, conducted within private premises, among family and friends)?	<p>Under the disclosure regime, charities must disclose details of their public fund-raising appeals on the Charity Portal if the appeal is conducted by means of house to house visits, solicitation on the streets or other public places, or a combination of both means.</p> <p>If the fund-raising appeal does not fall within the abovementioned modes, such as in the case of a private fund-raising event, the disclosure regime does not apply.</p>
10	Will the disclosure regime also apply to any corporate or business entity that wishes to raise funds for	In this scenario, <i>the charity</i> will be required to disclose details of the public fund-raising appeal on the Charity Portal if the appeal is conducted by means of house to house visits, solicitation on the streets or other public

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	a charity in a public setting under their CSR initiative?	places, or a combination of both means. This will include public appeals conducted by individuals, corporates or other organisations, for the benefit of a charity.
11	Will the disclosure regime also apply to any individual or group of individuals who wish to raise funds for a charity in a public setting?	
12	Will the disclosure regime apply if the charity is raising funds via unmanned donation boxes placed in public areas?	<p>The disclosure regime applies to all public fund-raising appeals by means of visits from house to house or by soliciting in the streets or other public places or by both such means for collections of both monies and other property which are conducted by or for (a) registered or exempt charities under the Charities Act 1994, and (b) those with existing permits from the COC for donations to foreign charitable causes (i.e. FRFCP permit holders).</p> <p>If the fund-raising appeal is conducted at a <i>publicly accessible location</i> such that donations will be solicited from members of the public, the requirements under the disclosure regime will apply. Such fund-raising appeals include appeals by way of donation boxes placed in public places, whether or not there is active solicitation by persons.</p>
<b>Operational Questions</b>		
13	Can charities and IPCs conduct street collections?	Yes, charities and IPCs may conduct fund-raising appeals via house to house visits or solicitation on the streets or other public places or a combination of both means. Please refer to the disclosure requirements under the new regime.
14	What information will the registered/exempt charities and FRFCP permit holders be required to disclose on the Charity Portal before commencing their public fund-raising appeal?	<p>Charities and FRFCP permit holders will have to disclose on the Charity Portal (and if they wish, on their own websites) the following information, which will be made publicly available, <u>at least 7 working days before</u> the appeal commences:</p> <ol style="list-style-type: none"> <li>a) Purpose, duration and method of collection (i.e. street collection or house to house visit);</li> <li>b) Location(s) where the collection will be conducted;</li> <li>c) Contact number and email address that the charity/FRFCP permit holder can be reached at should the public require any clarifications on the collection; and</li> <li>d) Where a third-party fund-raiser is involved: <ol style="list-style-type: none"> <li>i. Name of third-party fund-raiser conducting the collection;</li> </ol> </li> </ol>

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		<ul style="list-style-type: none"> <li>ii. Percentage of the total gross receipts from the collection that is expected as payment for the expenses incurred for the conduct of the collection; and</li> <li>iii. Declaration by the charity or FRFCP permit holder that (A) a written agreement has been established with the third-party fund-raiser as required under the Regulations; and (B) the charity or FRFCP permit holder has conducted its due diligence and ascertained that the third-party fund-raiser is fit and proper.</li> </ul>
15	Which contact number and email address should the charity disclose on the Charity Portal in relation to the appeal?	Charities should provide the contact number and email address which members of the public can easily reach the charity at when the appeals are being conducted on the ground. This is intended to allow the public to be able to seek clarification from the charity directly on the appeal if needed. The public should therefore be able to obtain a response quickly via the contact number and email address provided.
16	What conduct should fund-raisers adhere to when conducting appeals?	<p>Fund-raisers must be able to provide accurate information on the appeal (e.g. beneficiary) and intended purpose(s) of the funds when soliciting. In addition, fund-raisers conducting a collection for a charity must not –</p> <ul style="list-style-type: none"> <li>• cause annoyance to any person or remain at the door of or in any premises, if requested by an occupant of the premises to leave; or</li> <li>• solicit at locations other than the locations indicated in the disclosures submitted via the Charity Portal in respect of the collection;</li> <li>• act in any way that might reasonably cause members of the public to become alarmed or anxious;</li> <li>• act in a fraudulent or dishonest manner;</li> <li>• behave in a manipulative manner or deliberately seek to make a member of the public feel guilty;</li> <li>• exert undue pressure on members of the public to donate;</li> <li>• exploit their position for personal gain;</li> <li>• engage in any other behaviour that may harm the reputation of the charity;</li> <li>• block the public right of way or obstruct a member of the public.</li> </ul>
17	The new regime requires fund-raisers to carry the letter from the charity containing details of the	<p>Yes, please refer to the available templates on the Charity Portal:</p> <ul style="list-style-type: none"> <li>• <a href="#">Official Letter Template A</a> (Where third-party fund-raiser is engaged)</li> <li>• <a href="#">Official Letter Template B</a> (Where no third-party fund-raiser is engaged)</li> </ul>

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	appeal. Is there a template that charities can refer to for the letter?	
18	For issuance of letter to fund-raisers from a charity, can it be issued via digital format?	Yes, the letters from the charity containing details of the appeal which are to be carried by the fund-raisers when conducting appeals on the ground, may be in either hardcopy or electronic form. Fund-raisers must be able to produce the letter to the donor at point of solicitation to allow the donor to verify the legitimacy of the appeal. Charities should put in place relevant safeguards to ensure authenticity of the letters.
19	Under the HHSC regime, charities were required to submit audited accounts relating to the appeal 2 months after the event. With the change of regime, is the charity still required to submit the said audited accounts?	Under the disclosure regime, a separate audited report on the accounts relating to the fund-raising appeal will <i>not</i> be required to be submitted.
<b>Operational Questions – Submission of Disclosures</b>		
20	By when must disclosures on public appeals be submitted via the Charity Portal?	Charities and FRFCP permit holders should submit the relevant disclosures on the Charity Portal <u>at least 7 working days before</u> the appeal commences. Disclosures may also be submitted earlier.
21	How many days in advance should disclosures be made on the Charity Portal?	Charities should build in sufficient buffer and submit the disclosures early. This is especially so at the start of the new regime where charities may be relatively unfamiliar with the new requirements, face technical issues, and may need more time for the submission. There will also be regular system maintenance for the Charity Portal during which the system will not be accessible.
22	Can charities submit disclosures via the Charity Portal less than 7 days before the appeal commences?	Early disclosures will provide charities with more time to prepare their fund-raising materials.
23	How can charities submit the disclosures on public appeals via the Charity Portal?	For guidance on how to submit the disclosures on your charity's public fund-raising appeals on the Charity Portal, you may refer to the <a href="#">Charity Portal e-Services Guide – Update Charity Basic Profile</a> (see section on 'Public Fund-Raising Appeals') or <a href="#">video tutorial</a> that is available on the Charity Portal.

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24	How should charities fill up the disclosure fields on the Charity Portal? How much details should be disclosed?	Please refer to the <a href="#">sample submission</a> for guidance on how to fill up the disclosure fields.
25	How soon will disclosures be published on the Charity Portal after submission?	<p>To ensure that the disclosures submitted are processed and published on the Charity Portal within an hour of the submission, your <u>charity should only submit updates under the 'Public Fund-Raising Appeals' section of the 'Update Charity Basic Profile' module</u>. Your charity should refrain from making changes to other sections of the form, such as the 'Objectives' or 'Vision and Mission' fields, as this would require longer processing time.</p> <p>In the event that your charity had submitted information in other sections of the 'Update Charity Basic Profile' module, the Commissioner of Charities' Office will endeavour to process the submission as soon as possible. If there is any urgency in the charity's submission, please contact us at <a href="mailto:MCCY_charities@mccy.gov.sg">MCCY_charities@mccy.gov.sg</a> citing the charity's name, UEN, submission number and explanations for the urgency.</p>
26	How can Fund-Raising for Foreign Charitable Purposes (FRFCP) permit holders submit the required disclosures via the Charity Portal if they wish to fund-raise via house to house visits or by soliciting on the streets?	<p>The required disclosures are to be made as part of the application for a FRFCP permit which is to be submitted via <a href="#">GoBusiness Licensing</a>. Details of the disclosures are to be included under the field 'Information for Public Display' within section 2 'Details of Fund-raising Appeal' of the online application form. An example of how the disclosures can be made is appended.</p> <div style="border: 1px solid black; padding: 5px;"> <p>[Information for Public Display]  Purpose: To fund-raise for relief efforts in Country X  Nature and mode of collection: Street collection, Donation Boxes and forms  Location(s): Orchard Road, Dhoby Ghaut, Waterloo Street  Third-party fund-raiser: ABC Pte Ltd  Percentage of total gross receipts from appeal expected to be used to pay for expenses for the appeal: 20%  Permit holder has written agreement established with third-party fund-raiser: Yes  Permit holder has conducted its due diligence on third-party fund-raiser: Yes  Contact for queries: <a href="mailto:xyz@abc.org">xyz@abc.org</a>; 61234567</p> </div>

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27	Can my charity edit disclosures which have already been submitted e.g. due to errors or change in plans?	Your charity will be able to edit existing records of disclosures submitted so long as the appeal start date has not started. Once the appeal has started, your charity will not be able to amend the 'Start and End Date of Collection Period' and 'Purpose of the Fund Raising Appeal' fields.
28	Can my charity extend the end date of appeal for an existing record/disclosure which had been earlier submitted?	Your charity can make a new submission for the extended period.  For example, your charity had submitted a disclosure for an appeal for Charitable Project X from 1 Aug 2023 to 31 Aug 2023. If your charity wishes to extend the end date of appeal, it can submit a new disclosure for an appeal for Charitable Project X from 1 Sep 2023 to 30 Sep 2023.
<b>Operational Questions – Viewing Disclosures Submitted</b>		
29	How will donors be able to view disclosures on public fund-raising appeals submitted by Charities via the Charity Portal?	Once your charity submits the required disclosures via the Charity Portal (by submitting updates under the 'Public Fund-Raising Appeals' section of the 'Update Charity Basic Profile' module) and the submission is processed, your charity can download a QR Code under Charity Portal e-Services – View Charity Profile => 'Public Fund-Raising Appeals' tab.
30	If the disclosures are submitted 7 working days in advance, will a QR code be issued immediately to my charity so that we can prepare the fund-raising materials?	The QR Code is exclusive to the charity and must be incorporated in the charity's relevant fund-raising appeal materials. When fund-raising appeals are being conducted on the ground, collectors will show the QR Code to potential donors for them to scan the said Code. This will lead the donor directly to the charity's public fund-raising appeal disclosures on the Charity Portal and allow the donor to verify the legitimacy of the appeal against information submitted via the Charity Portal.  Your charity should submit the disclosures via the Charity Portal more than 7 working days in advance if it requires more lead time for logistical purposes.  For guidance on how to submit the disclosures on your charity's public fund-raising appeals on the Charity Portal, you may refer to the <a href="#">Charity Portal e-Services Guide – Update Charity Basic Profile</a> (see section on 'Public Fund-Raising Appeals') or <a href="#">video tutorial</a> that is available on the Charity Portal.
31	Does the QR code change for each disclosure submitted?	No. The QR Code is tagged to the UEN of the charity.



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32	Will the details of the third-party fund-raiser appear on the Charity Portal?	<p>Under the disclosure regime, charities will need to disclose details of the third-party fund-raiser engaged for the conduct of the public appeal. This includes name of the fund-raiser and percentage of the total gross receipts from the fund-raising appeal that is expected as payment for the expenses incurred for the appeal.</p> <p>The details of third-party fund-raiser will appear on the Charity Portal under the disclosures submitted by the charity in relation to the appeal. The disclosures may be accessed via the Advanced Search function on the Charity Portal for fund-raising appeals.</p>
<b>Operational Questions – Technical Issues</b>		
33	Who can charities contact for assistance?	<p>If charities require any further clarifications on the disclosure regime, please contact your Sector Administrator directly. The contact details of your Sector Administrator can be found on the Charity Portal website under “Contact Us”.</p> <p>For technical issues, please email details and append screenshots of the technical error to <a href="mailto:mccy_charities@mccy.gov.sg">mccy_charities@mccy.gov.sg</a>.</p>
<b>Operational Questions – Engaging third-party fund-raisers</b>		
34	When charities engage third-party fund-raisers, what is the level of due diligence needed on these third-party fund-raisers?	<p>The appropriate level of due diligence charities should conduct would vary depending on the case and type of third-party fund-raiser involved. Examples of due diligence checks that charities can do, especially if the third-party fund-raiser is a commercial fund-raiser, are:</p> <ul style="list-style-type: none"> <li>• check for the third-party fund-raiser’s track record;</li> <li>• check that the third-party fund-raiser is a legitimate organisation or entity;</li> <li>• check if the third-party fund-raiser has adequate processes in place to train and brief its staff and/or volunteers on the appropriate behaviour when fund-raising (i.e. no aggressive fund-raising) and the information to provide to donors;</li> <li>• ask for declaration by the third-party fund-raiser that it has not been convicted of any offence involving dishonesty or has not been prohibited by the COC from conducting fund-raising appeals.</li> </ul> <p>The above are non-exhaustive examples and charities can adopt other forms of checks as appropriate.</p>
35	How can charities check that the third-party fund-raiser is fit and proper?	

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36	Under the new regime, charities are required to disclose that the charity has entered into a written agreement with the third-party fund-raiser. What if the charity does not have such a written agreement?	Under regulation 14 of the Charities (Fund-Raising Appeals for Local and Foreign Charitable Purposes) Regulations 2012, it is unlawful for a commercial fund-raiser, commercial participator, or other person to solicit money or other property for the benefit of a charity unless there is a written agreement with the charity on the proposed appeal. The Regulations spell out the details that are required to be included in the written agreement. This is intended to ensure that the charity is agreeable to the details and terms of the appeal that is being conducted on its behalf. Charities should ensure compliance with this requirement.
37	Is there a template for the written agreement that charities can refer to?	We do not have a sample template as the details to be included in the agreement will depend on the individual circumstances of the case. That said, regulation 14 of the Charities (Fund-Raising Appeals for Local and Foreign Charitable Purposes) Regulations 2012 spells out the details (e.g. location, date and method of appeal, remuneration of fund-raiser, etc.) that should be included in the agreement.
<b>Enforcement</b>		
38	What happens if charities do not comply with the new disclosure regime?	The Commissioner of Charities (COC) will review the disclosures submitted on the Charity Portal on a sampling basis. These reviews will be conducted more often at the start of the new regime to ensure that charities and FRFCP permit holders are making disclosures that are accurate and provide sufficient information to the public.
39	What happens if charities wilfully provide inaccurate disclosures under the new regime?	Enforcement action, where necessary, may be taken by the COC against improper appeals, failure to comply with the new disclosure and identification requirements and/or wilfully providing inaccurate disclosures.
40	What if the charity's fund raiser does not carry the letter from the charity containing information on the fund-raising appeal, as required under the new regime?	We encourage the public, including charities, to report suspicious charitable fund-raising activities to the COC. If fraud or scams are suspected, the public should file a Police report immediately. Police will investigate if there are criminal offences disclosed.
41	Will COC be conducting checks to ensure charities adhere to the revised regime (e.g. conduct spot checks)?	

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42	What actions will be taken for fund raisers that are not legitimate?	
<b>Safer Giving</b>		
43	Will the revised regime make donors more vulnerable to scams and frauds, especially when we see scams getting more sophisticated and harder to detect? What measures are MCCY putting in place to minimise this risk?	<p>The Commissioner of Charities (COC) is committed to ensuring that the public's trust in Singapore's charity sector is upheld and that donors continue to have avenues to give safely to causes they support.</p> <p>House to house and street collections are still licensed by the Police under the House to House and Street Collections Act except for collections for the following groups which are exempted: (i) registered or exempt charities, and (ii) those with existing permits from the COC for donations to foreign charitable causes. The COC will continue to regulate charities to ensure accountability and good governance.</p>
44	How can the public be certain that they are donating to a legitimate cause?	<p>These changes aim to allow bona fide charities to fund-raise under more practical conditions, even as we put in place safeguards to protect and help donors give safely.</p> <p>Under the disclosure regime, charities are required by law to provide additional disclosures on their public fund-raising activities on the Charity Portal that the public can easily access to verify the legitimacy of collections. There are also SMS and hotline verification services provided by the COC. Collectors for charities will also need to carry clear identification during collections.</p>
45	What can the public do if they suspect fund-raising activities that are not legitimate?	<p>These changes have incorporated earlier feedback from the public and charities during a public consultation in May 2022.</p> <p>To avoid scams and donate with peace of mind, do observe the 3 simple steps of "Ask, Check, Give":</p> <ul style="list-style-type: none"> <li>○ Ask questions such as who the beneficiary is, what their donations will be used for, and how you can receive updates about the beneficiary.</li> <li>○ Check via the Charity Portal (<a href="http://www.charities.gov.sg">www.charities.gov.sg</a>) to verify if the beneficiary is a registered charity or a Fund-Raising for Foreign Charitable Purposes (FRFCP) permit holder. Under the new regime, donors should also verify the public fund-raising appeal against details published on the Charity Portal.</li> </ul>

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		<ul style="list-style-type: none"> <li>○ Give with peace of mind once assured that the donations are to a genuine cause.</li> </ul> <p>We encourage the public to report suspicious charitable fund-raising activities to the COC at <a href="mailto:mccy_charities@mccy.gov.sg">mccy_charities@mccy.gov.sg</a>. If fraud or scams are suspected, the public should file a Police report immediately. Wrongdoers will be taken to task in accordance with the law.</p>
46	<p>What if there are fake fund-raisers impersonating a charity, or the fund-raisers on the ground are unable to produce relevant documents to allow donors to verify the appeal (e.g. no letter from charity containing information on the appeal)?</p>	<p>Donors can verify the appeals against the Charity Portal. If they are unable to verify (e.g. disclosures are not found on the Charity Portal, QR code leads to a different website other than Charity Portal), donors should call the Police or file a Police report if fraud or scams are suspected. Donors should not feel pressured to give if they have doubts or are concerned that the appeal for donations is not legitimate. Suspicious charitable fundraising activities should be reported to the Commissioner of Charities at <a href="mailto:mccy_charities@mccy.gov.sg">mccy_charities@mccy.gov.sg</a>.</p>