



Bucks Council Charitable Collection Policy Consultation
Licencing Services
The Gateway
Gatehouse Road
Aylesbury, Bucks
HP19 8FF

1st June 2023

Dear Sir

Purely by chance as there has been no direct communication I have seen the proposed new rulings from the Council for charity collection at Christmas time.

The Two Rotary Clubs of Aylesbury have been sending out a Santa float for some 30 years now and bring great delight to the children of the town who fervently await Santa's arrival to their homes. They wait in groups with their parents, and we call on houses as we go, using teams from the charities who will benefit from the collections. Our own Rotary members guide and supervise the collection safety rules laid down in a risk assessment prepared each year. A licence is applied for in plenty of time before the start and we are fully insured for public liability under a Rotary countrywide block cover.

Looking at the proposed new rulings it would mean we could not cover the town and all the streets visited in both club's schedules within 14 days. We don't collect at weekends. Also, timing, it is important that we start at 6.00pm for the younger children who go to bed early and importantly to ensure that parents who are working are back home to supervise the older children and sometimes don't return until 7.00 pm. We finish without fail by 8.00pm. This has never been a problem and we have not had any adverse complaints other than from parents whose street we have not visited and want to know why! Cold calling notices are respected, and we will not knock on doors displaying such signs.

To implement these new rulings will severely affect the charities we collect for (every penny goes to charity, collections are not raided for administrative purposes).

They will badly restrict the route visits and disappoint hundreds of children.

Last year £6,000 was distributed to 6 different local charities and qualified as our largest fundraiser of the year. Rotary Clubs across the UK run similar floats and are well known and appreciated for the visiting Santas.

We must strongly object to any proposed changes in timing and calling that will badly affect this yearly event and cause loss of revenue to the charities. Frankly there is no reason for doing it.

Yours sincerely


Charles Chaney MCIM
President



From: [Rotary Treasurer](#)
To: [Licensing Mailbox](#)
Subject: [EXTERNAL] Buckinghamshire Council Charitable Collections Policy consultation
Date: 16 June 2023 09:56:31

Buckinghamshire Council Draft Charitable Collections Policy

As Treasurer, I am writing on behalf of The Rotary Club of Gerrards Cross and Chalfont St. Peter (Charity No. 1054714).

If the draft is approved as it stands it will significantly restrict the main annual collection that our Rotary Club does each December in Chalfont St. Peter, Gerrards Cross and Chalfont St.Giles.

It is our most significant fundraising event for the Club each year to enable us to donate to local charities and support local elderly people and schools. Each year the community in each of the areas expect to see us. The children wait for us to drive Santa and his sleigh along their street. The proposed rules would reduce the amount raised to well below half the amount we usually collect.

The proposed rules for House to House collections will impose the following restrictions;

1 Permitted times. We currently collect up to 20:30 each evening. The proposed policy would restrict this to 19:00.

This will preclude people who work normal office hours from volunteering to help with the collections.

2 Maximum number of days. We typically obtained licences from the beginning of December up to Christmas Eve (around 23 days). The proposed policy would restrict this to 14.

3 Number of licences. We currently apply for three house to house licences for December to cover the three areas we collect in. The proposed policy would restrict this to one.

This would reduce the amount we could collect by a further one-third.

The proposed rules for Street Collections will impose the following restriction.

For three Saturdays in the run up to Christmas we collect in Chalfont St. Giles, Gerrards Cross and Chalfont St. Peter. The proposed policy would restrict this to one.

It can be seen in the records kept by Buckinghamshire Council and previously by Chiltern and South Bucks District Councils that our Rotary Club has been collecting in December for many years and the proposed policy would all but bring an end to our fundraising and the expectations of the local community.

In summary:

Less time to collect
Less days to collect
Less sites
Not viable

Please will you change the draft policy to allow us to continue to support our community with the money we collect each Christmas.

Please confirm that the six licences already issued to the Club for next December will be valid.

Regards

David North
Hon. Treasurer
Gerrards Cross & Chalfont St Peter Rotary Club.

BUCKINGHAMSHIRE COUNCIL CONSULTATION ON CHARITY COLLECTION REGULATIONS (consultation ends 20th June 2023)

MISBOURNE MATINS ROTARY CLUB RESPONSE

- 1 My name is Anthony Shinner ([REDACTED]) and I have been a member of Misbourne Matins Rotary Club since its founding in 1997. It is based principally in Gerrards Cross and Chalfont Peter For the last 12 or so years I have applied for and held charity collection permits on behalf of the club, and I am authorised by the club to make this response on their behalf
- 2 The club is a registered charity 1094635 affiliated to Rotary International, A significant mission of Rotary is supporting 'charitable causes' in the community. Much of the funding for this derives from traditional Christmas collections which take place from about 2nd to about 24th December annually
- 3 From time to time the club has made other fund raising collections with specific aims such as disaster fund-raising for Tsunami victims, earthquake, flooding and other catastrophic events worldwide. Most recently the club made a collection for Ukraine support. A particular advantage of collections made by Rotary clubs is that they often attract match funding from the worldwide Rotary Foundation. As a general rule Misbourne Matins do not deduct expenses which are usually+ funded by the members of the club
- 4 Throughout the history of the club, collections at Christmas have been a mix of Street and House to House (H2H) collections, and pre covid the club ran 20 such collections, down currently to about 14. The Christmas collections have also included 'pub' collections where the landlord has expressly permitted them (and a strict protocol sets the procedure for these). The sums from pub collections have always been included in the H2H returns (see also para 19 below)
- 5 Practice in recent years has been to split the Christmas collection four ways, ¼ to Rennie Hospice, ¼ to Thames Valley Air Ambulance, ¼ to Scanappeal and the remainder to the club's charity account towards the club's other donations, including eg schools, youth clubs and the like
- 6 Whilst other fund raising activities take place in a typical club year the Christmas collection is important both to the club and to the charities referred to at para 5 above for whom our Christmas collection can generate between £1500-2000 each every year

HOUSE TO HOUSE (H2H) collections

- 7 **'require a licence for collecting direct debit information house to house'**- Does this mean a separate and additional licence to House to House licence/permit?
- 8 **Cut off times for H2H collections** in December (the 'Santa collections;') needs to be later than 7pm. We generally curtail collections at around 8pm but lots of residents often return from work well after 6pm. We suggest an absolute cut off at 9pm.with an advisory that collections do not go on beyond 6pm We have always collected specific routes. The combined Santa & Christmas carols is a significant event for lots of the children; when they hear the collecting float on its way many families are outside waiting for the Christmas float to arrive
- 9 December 'santa permits' need to be for 24 days. !4 days will merely involve more paperwork and more work for your officers
- 10 What is meant by **'council wards'**? Is it Buckinghamshire Council or Town and Parish councils? Wards can be widespread in some parts of the county. This restriction needs to be clearer. We go to some lengths to check with the known charities (eg other rotary clubs, round table etc) to ensure we do not clash

STREET COLLECTIONS

- 11 In Dec.2022 we made five different collections in Denham which itself is a segmented location (eg Denham village, Denham Green, Higher Denham). The existing forms of application do not sit comfortably with the need to identify an area. Perhaps rather than ***'all areas'*** applicants should state specific areas within the 14 days suggested in your draft
- 12 BUT an all areas permit in December needs to be for 24 days
- 13 ***'one H2H licence per quarter...'*** will not work for December 'santa' collections. We do not recall ever having made a H2H collection outside December
- 14 Need to define **'one area'** eg we have collected annually at the BP petrol station Oxford Rd Gerrards Cross, which is 'out of town' but your current list of streets does not provide for this
- 15 Restrict to **town and village centres** – why? Collections at eg BP garage (above) and Tesco Express on the A413 are well outside the town/village centres (they are technically on private property but see para 18 below)
- 16 'one street collection per charity per quarter' is too restrictive and would decimate the value of the 'santa' collections

Other issues

- 17 The current system of application is both awkward and time consuming. Why should a charity not be able to submit a single application instead of eight or so separate but near identical applications for street permits. The proposed collections can be scheduled to the permit or licence. This would surely simplify the process not just for applicant(s) but for your officers as well
- 18 we would welcome a definitive statement on what is considered 'private property'. In past years we have been told variously we did not need a permit for eg a Tesco supermarket where access was on its own land but another year told it was required
- 19 Similarly with public houses we have been told previously by your officers that the landlord's permission only is required. We have only ever collected at pubs after getting that permission – were we to need permits it could be a very long list!

Summary

- 20 We fear that strict application of the proposed changes as drafted will have a serious impact not least on funding for the 3 charities referred to at para 5 above. We have been able to make them donations of c£1500-2000 each as a result of the Christmas collections

(approved by members of Misbourne Matins Rotary Club on 14.06.2023)

From: [Mervyn Edwards](#)
To: [Licensing Mailbox](#)
Subject: [EXTERNAL] Buckinghamshire Council Charitable Collections Policy Consultation
Date: 20 June 2023 12:47:52

Subject: Bucks consultation document on House to House and Street collections

Good morning

I am writing to you on behalf of the Rotary Club of Chesham and outlining the concerns we have regarding the Rotary Christmas Float and Sleigh if these proposals are accepted and implemented. The Rotary Club has been responsible for the Christmas Sleigh in Chesham town and surrounding area for the past 9 years. One of my roles in all that time is to apply for the one Licence and two Permits which are required for us to operate the Sleigh in and around the Chesham area throughout December every year.

The proposals are in two parts, House to House Collections and Street Collections.

Dealing with House to House Collections first. The proposal is to restrict house to house collections to finish by 7.00pm and to grant licences for a maximum of 14 days. The house to house Licence allows us to travel to almost every street in Chesham and call on houses to collect money for local charities but more importantly it allows hundreds of children to see Father Christmas in his Sleigh in their street. They also of course receive a sweet from Santa.

We have a minimum of 16 different routes in and around Chesham so the 14 days is not enough for us to cover all of Chesham. When we take the Sleigh out, we have a different local charity provide the collectors who knock on the doors and collect money. The vast majority of the collectors work full time and as soon as they finish work on their day with the Sleigh we meet up and out we go. That means that we cannot start until 5.30 - 6.00pm. We aim to finish by 8.30pm but the recent Licences have allowed us to be out until 9.00pm. If the proposal for ending at 7.00pm is implemented it would not be possible to be out for more than one hour when most routes take two and half to three hours. It would make taking the Sleigh out in the weekday evenings impractical and therefore it is likely that the visit of the Sleigh and Santa to the majority of streets in the Chesham area would not take place.

Street Collections. The proposal is to allow one street collection Permit per charity for one day per calendar period. That period relating to Christmas events is October, November and December. In recent years we have had the Sleigh in a static location in the Market Square Chesham for the Christmas in Chesham event which is always towards the end of November. In addition from early December we have the Sleigh in a static location in The Broadway Chesham on market days, every Wednesday and Saturday from 9.00am until 3.00pm. Father Christmas is in his Sleigh during all of that time and children can get up in the Sleigh, sit next to Santa, have their photo taken and chat to him. That totals 6 or 7 occasions currently. The proposal would restrict that to once only. It is likely therefore that we would not have the Sleigh and Santa at the Christmas in Chesham event. We would probably prefer to use

up our Permit for one day at one Saturday close to Christmas in The Broadway. A substantial reduction in occasions when the children could see the Sleigh and Santa in the daytime.

I apologies for the length of this message but I have tried to paint the picture of what is a potential disaster for the Christmas Float and Sleigh in Chesham if these proposals are accepted. At the very least there should be consideration of an exemption of these proposals to allow a Christmas Float and Sleigh to make more appearances and for longer and later times of the day and evening.

Kind regards

Mervyn Edwards
Rotary Club of Chesham



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Charitable Collection Policy
consultation Printed survey
PDF Document · 266 KB

From: [Kathryn Graves](#)
To: [Licensing Mailbox](#)
Cc: [REDACTED]
Subject: [EXTERNAL] Buckinghamshire Council Charitable Collections Policy consultation
Date: 20 June 2023 09:49:11

Hi,

We are grateful for the opportunity to comment on the new charitable collections policy. The policy was considered at Chesham Town Council's meeting of the 19th June and they have authorised me to respond with the following comments:

The council was pleased that there will be a specific exception during the pre-Christmas period, which enables more than one house to house collection to be permitted in each location per day. However, other aspects of the policy will cause significant problems for the Santa Sleigh which has been operated very successfully in Chesham by the Rotary Club of Chesham for many years.

Specifically, for House to House Collections, the policy proposes to restrict collections between 9am and 7pm. The Santa Sleigh relies upon volunteers to carry out the collections, many of whom work full time, making it impossible for them to complete weekday collections by 7pm. The policy also proposes to grant only once licence per quarter to any organisation and the licence will be granted for a maximum of 14 days. The Santa Sleigh collections run across most of December to fully cover Chesham.

For Street Collections, the policy proposes to restrict collections between 8am and 8pm. The Sleigh is a feature of the Town Council's Christmas in Chesham event, which runs until 9pm. The policy would prevent Rotary from collecting donations for the last hour of the event, which is unhelpful, as the sleigh always has a long queue of parents and children throughout the evening, with parents being very happy to provide donations in return for their children getting to sit in the sleigh. The policy also proposes to allow just one Street Collection permit per charity per calendar quarter, which covers a single day. At present the Santa Sleigh attends The Broadway on a number of dates in December.

The Santa Sleigh is not only an important mechanism for collecting donations for a variety of local charities, but is a positive, seasonal experience for local children and helps to create a festive atmosphere in the town centre during December each year.

Within the Decision Making and Appeals section of the policy, it is stated that: "4.9 Where it is necessary for the Council to depart substantially from this policy, clear and compelling reasons for doing so will be given. Departure from the policy may be permitted in accordance with this section if it is considered necessary to do so in specific circumstances." The council seeks reassurance that the Licensing Team has the flexibility to depart from the policy where there are special collections of a local and traditional nature, such as Rotary's Santa Sleigh, who need to collect later into the evening and over more days than the policy allows.

Finally, the town council would like to request if Bucks Council has the ability to delegate authority to town and parish councils to authorise departure from the

policy for such local and traditional cases.

Many thanks,
Kathryn.

Kathryn Graves
Community, Economy & Environment Manager
Chesham Town Council

Tel: 01494 774842 ext 113

Web: <http://www.chesham.gov.uk>

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Dear Licensing,

Coleshill Parish Councillors have reviewed your recent consultation on Licensing Charities to call door to door to sign up residents for donations. The Council have read the documents attached to the consultation and are alarmed that Buckinghamshire Council would even consider allowing Charities to canvas door to door unannounced.

Councillors representing the Parish were all against the plan agreeing that as a small hill-top village with no street lighting residents would not welcome this intrusion at their home.

The reasons given for being against this form of licensing are summarised as follows:

The approach offers no realistic safeguards for householders, is impractical administratively and should be considered invasive by nature. Although there is recognition the representatives of charities are 'commercial collectors' there is no consideration of the behaviour such collectors are likely to exhibit as they try and reach personal revenue-generation targets which are inextricably linked to their personal income on residents.

A) "Require a licence for collecting direct debit information house to house restrict house to house collections to 9:00am to 7:00pm – no collections will be permitted where a “no cold calling” or similar notice is displayed" There is no evidence residents want or welcome collectors representing charities (or other salespeople) to call house to house. Older residents, vulnerable people and residents at home alone are at significant risk of granting money and information via this method, and although the notional exclusion of a sticker on the door is proposed it does nothing to protect these groups.

B) "Allow only one house to house collection in any one council ward area on any given day, other than for exceptions stated in the policy" Although this 'rule' suggests careful management, it is likely to be unenforceable. Charities will be focused more on collection revenue than adherence, and why Council should invest resources into this scheme when resources are in such demand is not clear either.

C) "Grant licences for a maximum of 14 days" The time limit looks like an effort to generate revenue from charities as it is arbitrary.

D) "Allow charities one house to house licence per calendar quarter (January to March etc.) see B

E) "Require charities to submit a declaration confirming that they are satisfied with the amount being donated to charitable causes by commercial collectors" This is not relevant.

F) "Require applicants provide evidence of public liability insurance for a minimum of £5 million" This only raises concerns as to what risks are anticipated needing such insurance.

If the consensus is that this policy go ahead, Council believes the current draft requires amending –

1. That the hours of 9am to 7pm is inappropriate when considering the more vulnerable population, those who live alone or are isolated, day light hours and those with children/dependents.
2. The proposal is not clear on how many collections any one given household can expect to receive in any given time period.
3. The amount being donated to the charitable donations is not specified as Council believe it should be.

Council is also concerned that should this policy go ahead then it could open the flood gates for those criminal gangs who are already known to try calling at residents' homes e.g. Nottingham Knockers. These pose as reformed criminals trying to sell small household items but who are in fact looking at the security of properties with a plan to come back later and burgle them.

If a license is given can the Council please request 250 `no doorstep selling` stickers so that 1 can be issued to every home in the parish. Please send to : Coleshill Parish Council, Village Hall, Barrack Hill, Coleshill HP7 0LN

Coleshill Parish Council 20.6.23