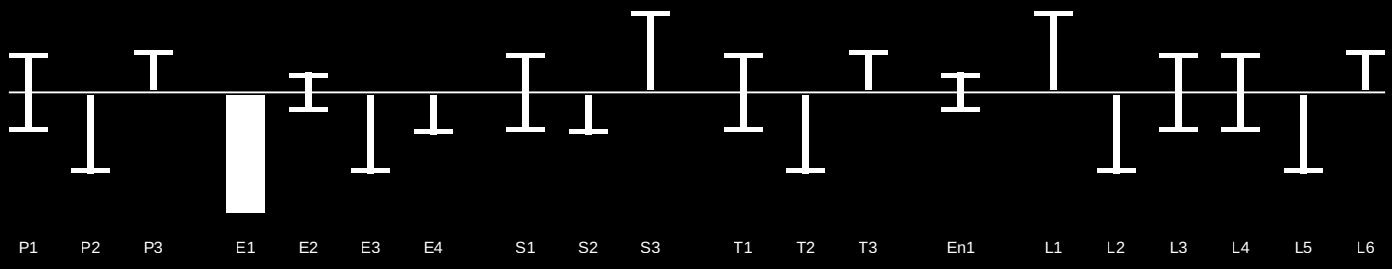
Fundraiser In The Room®

UK Fundraising Market Intelligence

Regulation

Five changes that will show up in your 2027 budget, and the questions your board will ask about them.



The 20 forces in this report, scored. Marks above the line help fundraising, marks below hold it back, and marks across it do both. The taller the mark, the stronger the force. Solid: staff costs, the strongest of them.

November 2026
Free to read and share

EDITOR'S NOTE

For more than twenty years I've watched fundraising directors find out about a change in regulation the hard way.

It comes in a supplier's email, or from a trustee who read something in the paper. Sometimes it arrives as a complaint. It's hard to plan a budget or brief a board when that's how the news reaches you.

Fundraising Market Intelligence is our attempt to do better. We publish a regular series of reports for different territories around the world, and are always seeking contributors to improve the knowledge being shared. The reports are free and are for anyone who wants them.

We've started with regulation because it touches everything else. A year ago most of what follows was still a bill or a consultation. Now most of it is in force. The next six months bring a run of dates that will reach budgets, board papers and supporter journeys.

We've labelled every claim and rated how sure we are of each main finding. Where a number doesn't exist, we say so. If you think we've got something wrong, tell us. We hope you find them valuable.

Damian Chapman
Founder, Fundraiser In The Room

CONTENTS

3	Summary
4	Who the law falls on
5	What changed in 2026
6	Finding 1: Legacies
8	Finding 2: The soft opt-in
9	Finding 3: Agency costs and chains
10	Finding 4: Gift Aid
11	Finding 5: Events and memberships
12	Finding 6: Boards show their working
13	Pressure from five levels
14	What to do
15	Nine questions for your board
16	What's coming
17	Fundraising regulation on a page
18	How we made this report
19	Sources
20	The series

THE 20 FORCES ON THE COVER OUR VIEW

Each mark on the cover is one force from our scoring of the political, economic, social, technological, environmental and legal factors behind this report. Above the line it helps fundraising, below it holds it back, and across it does both. The taller the mark, the stronger the force, and the one solid bar is the strongest.

P1	New Prime Minister and minority governments	**S1**	Trust steady, low-trust group growing	**L1**	The soft opt-in
P2	Security and cohesion agenda	**S2**	Complaints shifting to contact and vulnerability	**L2**	Higher penalty ceilings
P3	Partnership agenda	**S3**	More estates leaving gifts	**L3**	Pensions in inheritance tax
E1	Statutory staff costs	**T1**	AI guidance and EU duties	**L4**	Rules that ask for your reasoning
E2	Frozen income tax thresholds	**T2**	Cyber risk and supplier duties	**L5**	Subscriptions and Martyn's Law
E3	Gift Aid unchanged; pensioner exemption	**T3**	New recurring payment options	**L6**	Higher accounts thresholds; NI bill
E4	Lottery cap held, plus a levy	**En1**	SORP 2026 and risk guidance		

HOW TO READ THIS REPORT

Labels. DATA is something measured or a matter of record. FORECAST is a named source's projection. VIEW is someone's opinion, and OUR VIEW is ours.

Confidence. ●●● high: independent, credible sources agree and the evidence is recent. ●●○ medium: one credible source, or evidence that is dated or indirect. ●○○ low: a single commercial source, a small sample, an inference or our own model.

Money. Where we estimate money in play, we show our working. We usually work per £1m of income from the stream affected, so you can scale it to your own figures.

Published by Fundraiser In The Room, November 2026. Edited by Damian Chapman. We write about the law as informed readers of it. Fundraising Market Intelligence reports are advisory and do not constitute legal, financial or investment advice. For a decision about your own charity, talk to a solicitor.

Summary

Most of the legal changes fundraisers have been waiting for arrived in the last twelve months. The new Code of Fundraising Practice took effect in November 2025, and the last part of the Charities Act 2022 followed a few weeks later. Then 2026 brought the charitable purposes soft opt-in, far higher fines for marketing mistakes, new trustee guidance on fundraising, new charity tax rules and higher accounts thresholds. Much of the rest arrives in the next six months.

THE FIVE FINDINGS WE THINK MATTER MOST

1 LEGACIES

£40k to £100k

for every £1m of annual legacy income is our estimate of what could slip into the next financial year once pensions count towards the estate, mostly from 2028-29.

●●● High on the law ●○○ low on the size

2 THE SOFT OPT-IN

£17.5m or 4%

of global turnover is the new ceiling on fines for electronic marketing mistakes, and it already applies. Any gain from the soft opt-in will build slowly.

●●● High on the law ●○○ low on the size of the gain

3 AGENCY COSTS

3.3% to 4.3%

is our estimate of the rise in the cost of face-to-face acquisition in 2027-28, from pay and employment law alone.

●●● High on the direction ●○○ low on the size

4 GIFT AID

290,000

pensioners are expected to stop paying income tax from April 2027. It's announced but not yet law. Their Gift Aid declarations need checking before then.

●●● High that it's announced ●●○ medium on the numbers

5 EVENTS AND MEMBERSHIPS

800

people expected at once is where enhanced duties start under Martyn's Law for events with entry checks. The law is expected in spring 2027 and has no exemption for charities. New subscription rules start on 1 January 2027.

●●● High on the law ●○○ low on the cost

Across much of it, the rules now ask charities to show their reasoning. Boards will want to see it written down before a regulator asks.

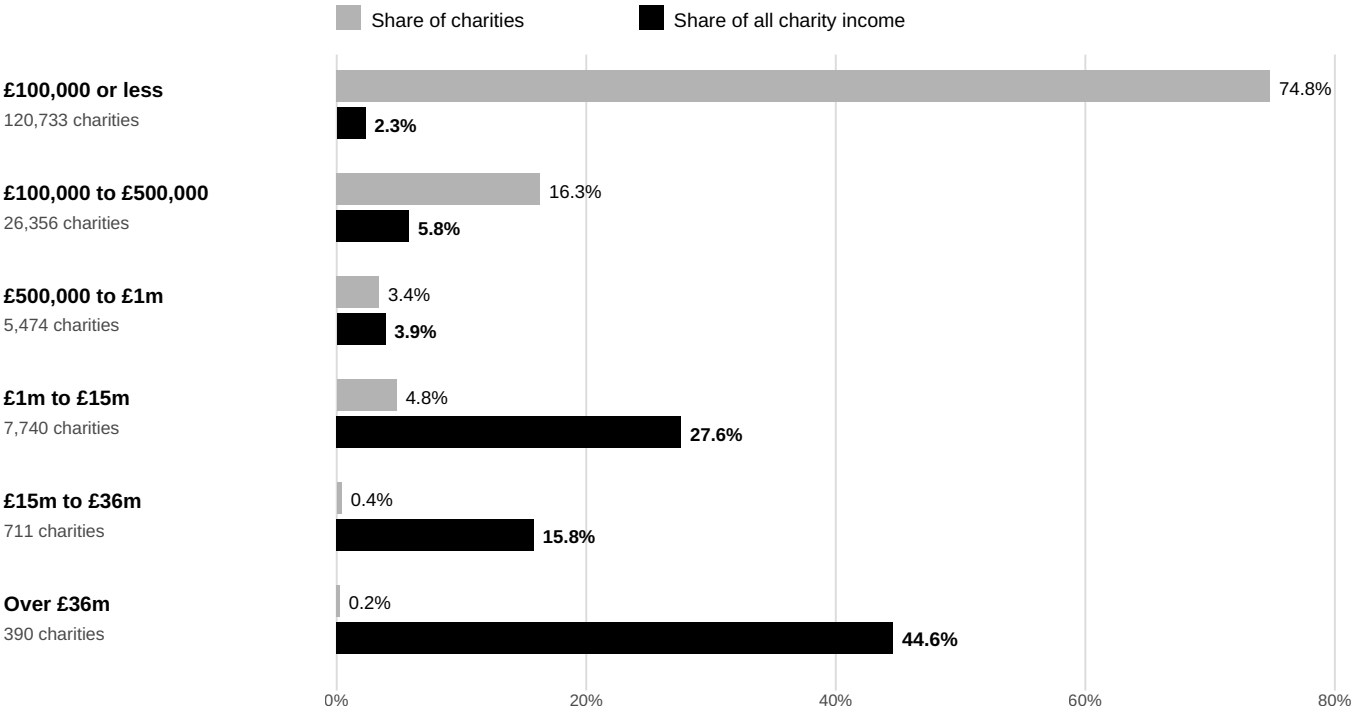
THIS QUARTER

- ☐ Check that every trustee of a charitable company has verified their identity with Companies House. The transition for existing directors ends on 17 November 2026.
- ☐ Add a timing lag for estates with pensions to legacy forecasts for 2027-28 and 2028-29.
- ☐ Re-run payback on 2027-28 regular giving acquisition with April 2027 costs.
- ☐ Write to donors over State Pension age about Gift Aid before April 2027.
- ☐ Check events and memberships against the January and spring 2027 dates.
- ☐ Read the DCMS consultation on trustee disqualification before it closes on 23 December 2026.

Who the law falls on

Much of what's new depends on size. We ran the Charity Commission's register of charities in England and Wales against the thresholds that now matter. Three-quarters of charities have an income of £100,000 or less, and between them they hold 2.3% of the income. At the other end, 390 charities hold 44.6% of it.

SHARE OF CHARITIES AND SHARE OF INCOME, BY SIZE OF CHARITY



161,404 charities in England and Wales with an income figure, about £101bn of income in total. Register extract dated February 2025; most accounts in it are for 2023 or 2024. DATA our computation.

INCOME	WHAT APPLIES
£100,000 or less	Independent examination above £40,000. Most fundraising law still applies.
£100,000 to £500,000	Independent examination.
£500,000 to £1m	SORP tier 2, qualified examiner.
£1m to £15m	Audit above £1.5m. Our reading is that the fundraising statement in the annual report goes with the audit.
£15m to £36m	SORP tier 3.
Over £36m	May be in scope for failure to prevent fraud.

390

Charities with income over £36m. They hold 44.6% of all reported charity income, and £36m turnover is one of the three tests for the failure to prevent fraud offence.

32,292

Registered charities with a Companies House number. Their trustees are company directors, so each must verify their identity.

4,472

Charities with income over £500,000 spending £100,000 or more on raising funds. That includes trading costs such as shops, so it overstates fundraising. Even so, it suggests the Fundraising Regulator's levy base of about 2,400 could grow.

What changed in 2026

The year's main changes, in the order they took effect.

1 Nov 2025 New Code of Fundraising Practice in force. About 45% shorter, and most rules now ask if something was "appropriate", "reasonable" or "proportionate".

27 Nov 2025 Charities Act 2022 fully in force.

3 Feb 2026 The Charity Commission relaunches CC20, its fundraising guidance for trustees. It covers AI for the first time, and says boards stay responsible for what agencies and their subcontractors do.

5 Feb 2026 The charitable purposes soft opt-in starts. Fines for electronic marketing mistakes rise to £17.5m or 4% of global turnover.

9 Mar 2026 In Scotland, trustee names and full accounts become public on the register.

6 Apr 2026 Charity tax anti-abuse rules apply and day-one sick pay starts. The same month, the National Living Wage rises to £12.71.

19 Jun 2026 A new duty to acknowledge data protection complaints within 30 days.

16 Sep 2026 The Commission updates its guidance on trustees (CC3), reserves (CC19) and risk (CC26).

30 Sep 2026 In England and Wales, the audit threshold rises from £1m to £1.5m. The ICO becomes the Information Commission, though it's still called the ICO.

28 Oct 2026 Budget 2026 leaves Gift Aid unchanged, announces a pensioner income tax exemption from April 2027, and gives executors more say over pensions in the 10% charity test.

WHO REGULATES FUNDRAISING

Charity Commission for England and Wales
Charities and trustees, including CC20

OSCR
Scottish charities and trustees

Charity Commission for Northern Ireland
NI charities and trustees

Fundraising Regulator
The Code and complaints in England, Wales and NI, and in Scotland for charities registered elsewhere

Scottish Fundraising Adjudication Panel
Complaints about charities registered only in Scotland

Information Commission (ICO)
Data protection and electronic marketing

HMRC
Gift Aid and charity tax

Gambling Commission
Society lotteries

Competition and Markets Authority
Consumer law, including subscriptions from 2027

Security Industry Authority
Martyn's Law, from spring 2027

Pensions will make some estates slower to pay out

Signal. From 6 April 2027, unused pension funds and death benefits count towards the estate for inheritance tax. Personal representatives become responsible for reporting and paying the tax, and pension benefits can be held back for up to 15 months. HMRC's May 2026 guidance put pension wealth in the estate's "general component", the base for the 10% charity test DATA Budget 2026 then announced that executors will be able to count it separately for that test. It still has to be legislated VIEW advisers' reading of the Budget.

Why it matters. Gifts in wills make up 30% of fundraised income for the top 1,000 legacy charities DATA Legacy Futures. In 2025 a record 17.4% of estates going through probate included a charitable gift, and those estates gave an estimated £4.4bn DATA

What it does. On the May 2026 position, pension wealth could make a percentage gift bigger and leave a fixed sum short of the 10% test for the 36% rate. The Budget change is meant to stop wills missing the test. Executors will usually choose whichever treatment saves the estate most tax, so don't plan on percentage gifts growing.

And estates with pensions will take longer to settle, in a probate service that already has 47,003 open cases, up 19% in a year DATA

HOW THE RULES MOVED IN 2026

May 2026: HMRC guidance puts pension wealth in the general component → **October 2026: the Budget announces executors can count it separately** → **6 April 2027: pensions enter inheritance tax**

The Budget change still has to be legislated, and we haven't seen the Finance Bill wording. Law firms' worked examples written before the Budget show percentage gifts growing; treat them with caution.

47,003

Open probate cases, up 19% in a year. Stopped cases take an average of 14 weeks DATA Ministry of Justice.

15 months

How long pension benefits can be held back while personal representatives settle the tax DATA

WHEN IT BITES

Deaths from 6 April 2027 → **First receipts hit, late 2027** → **Most of the effect, 2028-29**

MONEY IN PLAY **OUR VIEW**

£40,000 to £100,000

for every £1m of annual legacy income could move into the next financial year.

The government expects the pension change to affect about 8% of estates each year FORECAST We use that as a rough guide to the share of legacy receipts that could be delayed, and take 20% as an upper case for knock-on delays in a stretched probate service.

If those receipts arrive six months late and receipts are spread evenly through the year, about half the delayed money crosses the year end. The money should still arrive. The year it was budgeted for will be short of it.



Bar = £1m of annual legacy income.
Black = the part that slips into the next financial year.

> **"For a local hospice that relies on residuary legacies, the gap between a death and the gift arriving gets wider. Its income over five years may not change, but some of it can fall into a later year than the one the hospice planned for."**
>
> **OUR VIEW** How pressure travels from national tax law to a hospice's cash flow

£98,000

Approximate average residuary gift in 2025. Residuary gifts are paid from what's left once the estate is settled, so a slower estate delays them DATA

£6,100

Approximate average pecuniary gift, a fixed sum, in 2025
DATA Legacy Futures and Smee & Ford, as reported.

What you'd see first. Executors asking for pension details, and longer gaps between notification and receipt in your legacy pipeline. The Ministry of Justice's quarterly statistics will show any rise in stopped probate cases.

WHAT TO DO NOW

- ☐ Add a timing lag to legacy forecasts for 2027-28 and, above all, 2028-29. Agree it with your finance director before budgets are set.
- ☐ Make naming a charity in a pension nomination part of the legacy conversation. It counts towards the 10% test.
- ☐ Ask your legacy administration team to flag estates with pension wealth from April 2027.

CONFIDENCE ●●● High on the law
●○○ Low on the size, because there is no official estimate of the effect on charitable legacies

The soft opt-in pays slowly, and fines for mistakes are far higher

Signal. Since 5 February 2026, charities can email and text some people without prior consent. The ICO's final guidance came out on 28 April 2026. On the day the soft opt-in started, the maximum fine for breaking the electronic marketing rules rose from £500,000 to £17.5m or 4% of global turnover DATA

WHO YOU CAN CONTACT UNDER THE SOFT OPT-IN

- ✓ Details the charity collected directly, on or after 5 February 2026
- ✓ From someone showing interest in, or support for, its purposes at the time
- ✓ With a clear opt-out when the details were collected, and in every message

WHO YOU CAN'T

- ✗ Details collected before 5 February 2026
- ✗ People recruited through peer-to-peer platforms or ticketing sites
- ✗ Details gathered by a trading subsidiary or any other third party

What it does. More of the people a charity recruits through its own donation, event and volunteer journeys can now be contacted. That shifts value towards the journeys a charity runs itself.

THE GAIN FORECAST

£9,000 a year

per £1m of voluntary income, once the opt-in file has built up over several years. Up to about £30,000 a year in the long run, if the source's longer-term figure proves right. Based on Wood for Trees, 2024. ●○○ Low confidence.

THE RISK DATA

£17.5m or 4%

of global turnover: the most the ICO can now fine for breaking the electronic marketing rules. In 2022 Penny Appeal sent more than 460,000 texts in ten days, including to people who had not consented or had opted out. It received an enforcement notice and no fine. The same facts today would fall under the new ceiling.

What you'd see first. Rising unsubscribe and complaint rates among newly contactable supporters, complaints about repeat contact, and Fundraising Preference Service requests.

WHAT TO DO NOW

- ☐ Record the lawful route for every new contact.
- ☐ Put a clear opt-out on every form where details are collected, and in every message.
- ☐ Keep older records out of the soft opt-in pool.
- ☐ Check agency and platform contracts. A charity can be treated as the sender of messages an agency sends for it.
- ☐ Acknowledge data protection complaints within 30 days, as the law has required since 19 June 2026.

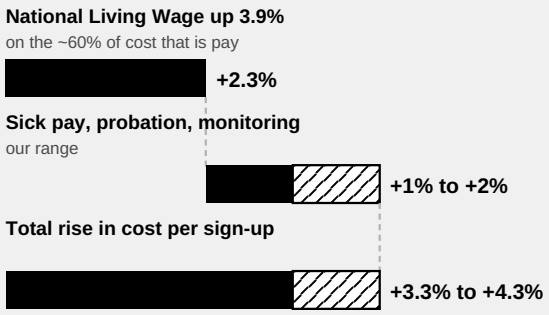
CONFIDENCE ●●● High on the law ●○○ Low on the size of the gain

Face-to-face costs more from April, and charities answer for failures down the agency chain

Signal. The National Living Wage rises from £12.71 to £13.21 in April 2027. From 1 January 2027, employees gain unfair dismissal rights after six months, with no cap on compensation. Day-one sick pay has applied since April 2026 DATA In 2026 the Fundraising Regulator found two charities responsible for door-to-door failures several links down an agency chain: the National Deaf Children's Society and Christian Aid. Both were decided under the 2019 Code DATA

MONEY IN PLAY OUR VIEW

How 2027 pay and employment law add to the cost of a face-to-face sign-up

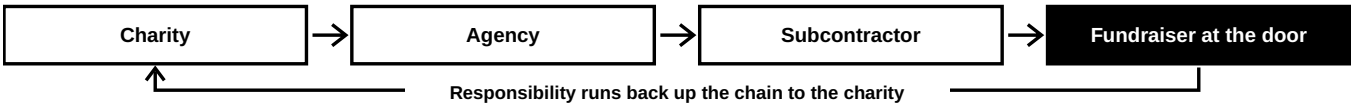


Solid = point estimate. Hatched = the range we can't narrow.

A charity spending £1m a year on face-to-face acquisition would pay about **£33,000 to £43,000 more** in 2027-28 for the same number of new donors. Or it would get about 4% fewer donors for the same budget. Payback lengthens by a similar share. We found no published estimate to check this against.

What it does. Agencies will need probation reviews and written performance processes in a fundraiser's first six months, and some of that cost will be passed on. Charities carry more of the risk for what happens further down the chain. Large incorporated charities can also be liable for fraud committed by people acting for them, and that is likely to include agencies (DATA on the offence; OUR VIEW on agencies).

WHERE RESPONSIBILITY SITS



What you'd see first. Rate-change notices from agencies, and fundraisers leaving in their first six months. Complaints about doorstep or repeat contact are another sign.

WHAT TO DO NOW

- ☐ Re-run payback models for 2027-28 with higher costs.
- ☐ Check that every agency contract says whether subcontracting is allowed, what standards apply, and what monitoring and audit rights you have.
- ☐ If you're in scope for failure to prevent fraud, write down the procedures that cover agencies and Gift Aid declarations.

CONFIDENCE ●●● High on the law and the direction of cost ●○○ Low on the size

Some older donors will stop paying income tax from April 2027

Signal. Budget 2026 announced that from April 2027 people above State Pension age will pay no income tax if their income is no more than the full new State Pension. It still has to be legislated. The government expects about 290,000 people to pay no tax at all FORECAST HM Treasury. HMRC's April 2026 guidance recommends that charities check active donors' details every two years DATA

Why it matters. Older donors make up a large part of many regular giving and legacy pledge files, and their Gift Aid declarations usually have no end date. In HMRC's figures, donors over 65 gave about 3.5% of their income on average, against 2.4% across the UK DATA

What it does. A donor who stops paying enough tax should cancel their Gift Aid declaration. HMRC's model declaration makes the donor responsible for any shortfall DATA So the risk falls first on loyal older supporters, who may get a bill they didn't expect, and then on the charity's relationship with them.

290,000

pensioners expected to pay no income tax at all from April 2027 FORECAST Announced, still to be legislated.

MONEY IN PLAY



£2,500 of Gift Aid that should no longer be claimed

Gift Aid is worth 25p for every £1 given.

We can't say what share of any charity's Gift Aid this affects. Your own database can, if it holds dates of birth or donor ages.

£1.88bn

Gift Aid paid to charities in 2025-26, up 10%. HMRC says about half the rise came from a few very large gifts DATA

1.3 million

People who declared donations on their tax returns for the year to April 2025, down 2%. The value they declared rose about 12% DATA

What you'd see first. Donors asking whether they still pay tax, and older donors cancelling Gift Aid.

WHAT TO DO NOW

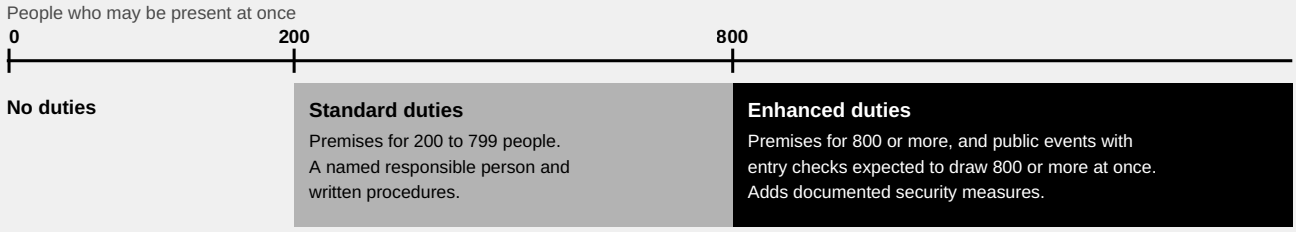
- ☐ Before April 2027, write plainly and kindly to donors over State Pension age. Ask them to tell you if they no longer pay enough tax.
- ☐ Build HMRC's two-year check into your stewardship calendar.

CONFIDENCE ●●● High that it has been announced ●●○ Medium until it's legislated, and on the number of people affected

Martyn's Law and new subscription rules are due in the first half of 2027

MARTYN'S LAW · EXPECTED SPRING 2027

The Terrorism (Protection of Premises) Act 2025 will be enforced by the Security Industry Authority. There is no exemption for charities DATA



SUBSCRIPTIONS · CONTRACTS FROM 1 JANUARY 2027

Excluded: memberships that give access to view charity property or performances, such as museums, gardens, heritage sites, wildlife and the performing arts.

May be caught: other memberships and supporter schemes that supply goods, services or digital content. New members need reminder notices, cooling-off rights and easy cancellation.

ALREADY IN FORCE

Drip pricing. Mandatory booking and participant fees belong in the headline price.

Safeguarding. Since 1 September 2026, some volunteers working with children need an enhanced DBS check with a barred list check.

Money in play. We found no reliable estimate of what Martyn's Law will cost a charity event, and we won't invent one. Test your own net income per event against the extra planning time and stewarding the duties need. For memberships, easier cancellation and renewal reminders may raise lapse rates (OUR VIEW untested).

What you'd see first. Venue contracts arriving with new security clauses, and insurers asking about Martyn's Law. On the membership side, members using the new routes to cancel.

WHAT TO DO NOW

- ☐ List every event and venue by expected attendance and whether entry is checked.
- ☐ Check which membership and supporter products fall inside the subscription rules. Take legal advice where the exclusion is unclear.
- ☐ Show mandatory fees in the headline price on event and ticketing pages.

CONFIDENCE ●●● High on the law ●○○ Low on cost

Boards will be asked to show their working

Signal. The new Code asks whether a charity's approach was "appropriate" or "proportionate". CC20 says boards stay responsible for fundraising done by agencies and subcontractors, and covers AI for the first time. CC19 links designated reserves to donor trust. Under the failure to prevent fraud offence, large incorporated charities have a defence only if reasonable procedures were in place DATA

What it does. Under rules like these, a charity is judged on the reasoning it recorded when it made a decision. It gets little credit for reasoning written down afterwards. Boards will spend more time on fundraising oversight, and fundraising teams will need to write more down.

Money in play. Mostly time. If the work isn't done, the cost shows up in regulatory findings, bad publicity and lost trust, and we can't put a price on those.

ALSO ON THE BOARD'S LIST

- **Trustees and senior managers:** refresh declarations. The DCMS consultation on wider disqualification, including for existing convictions, closes on 23 December 2026 DATA
- **Charitable companies:** every trustee is a director and must verify their identity with Companies House.

236

annual reports reviewed by the Fundraising Regulator. They were weakest on reporting third-party fundraising and the protection of vulnerable people DATA

A QUARTERLY FUNDRAISING OVERSIGHT PACK

1. Methods in use
2. Agencies and subcontractors
3. Complaints
4. Vulnerable donor cases
5. AI use

FROM OUR WORK

A shorter Code that rests on principles gives chief executives and fundraising directors more room to use their judgement. It also leaves them more to answer for. Making a call you can defend later is a skill, and it's one we work on with charity leaders in executive coaching.

CONFIDENCE ●●● High

OTHER CHANGES IN BRIEF

Lotteries. Society lotteries can't grow past the £50m sales cap. Charities working with prize draw operators should expect to be asked what share of ticket sales they receive, whatever the Fundraising Regulator decides on its proposed 10% to 20% minimum.

Cyber. A breach at a supplier becomes the charity's data protection problem, as the August 2026 incident at the CRM provider Beacon showed. In the government's 2025-26 survey, 28% of charities had a breach or attack in the previous year DATA

Campaigning. The next general election is due by 2029. Charities that may register as non-party campaigners should plan for the stricter enforcement the Representation of the People Bill would bring.

US donors. From the 2026 tax year, the US tax deduction is less generous for top-rate givers.

Pressure from five levels

Westminster is only one of the places where fundraising rules are made.

Global

The UK holds the presidency of the Financial Action Task Force and faces its own evaluation, with the onsite visit planned for June 2027. Civic space keeps shrinking. CIVICUS puts about 7% of the world's people in countries rated open or narrowed, down from nearly 13% in 2020 DATA New US tax rules cap the value of deductions for top-rate donors from the 2026 tax year.

Felt as: Friction with banks, and questions from US donors.

European Union

AI transparency duties apply now. AI-generated content from systems already on the market must be marked from 2 December 2026, a duty that falls mainly on tool providers. The UK's data adequacy decision runs to December 2031. New money laundering rules apply from 10 July 2027 DATA

Felt as: Two AI regimes and two data regimes for charities raising money in Ireland or the EU.

Governments of the United Kingdom of Great Britain and Northern Ireland

Andy Burnham became Prime Minister on 20 July 2026, and John Healey gave his first Budget on 28 October. The King's Speech had no charities bill. The SNP governs Scotland as a minority and has promised a Partnership Agreement with the third sector. Plaid Cymru governs Wales as a minority, and the Welsh Government's Third Sector Scheme continues DATA In Northern Ireland, the Assembly election is due by 6 May 2027 DATA and the Charities (Amendment) Bill must pass before then or it falls OUR VIEW

Felt as: Change through regulations, codes and guidance, which is easier to miss than an Act of Parliament.

English Regions

The English Devolution and Community Empowerment Act 2026 gives strategic authorities more power over regional funding and commissioning. The government's "Our Place to Give" roadmap plans regional ambassadors to advise on match funding DATA

Felt as: Commissioning and contract income that moves at a different pace in each area.

Local

Councils license cash collections under Acts from 1916 and 1939, and each council sets its own rules. Five bodies, including the Fundraising Regulator and the Charity Commission, have asked DCMS to remove the £200 fine cap for unlicensed street collections DATA

Felt as: Hundreds of local regimes for a national charity.

HOW PRESSURE TRAVELS

1. Global standard to local direct debit

FATF review, 2027 → Bank delays an account or withdraws merchant services → **Small charity can't take card or direct debit payments**

In 2026, 13% of charities in England and Wales had trouble opening a bank account DATA

2. National tax law to a hospice's cash flow

Pensions enter inheritance tax → Pension data gathered; benefits held up to 15 months → **Residuary legacies arrive later than planned**

3. EU rule to a UK supporter journey

EU duties on AI content → AI-assisted appeal to supporters in Ireland → **Tell them when they're talking to a chatbot**

OUR VIEW medium confidence; the reach of EU duties to UK charities is unconfirmed.

ACTIONS

What to do

Every charity

- Set up the soft opt-in properly before you rely on it. Record a lawful route for every new contact, put an opt-out wherever details are collected and in every message, and keep older records out of the pool.
- Before April 2027, write to donors over State Pension age about whether they still pay enough tax for Gift Aid.
- Acknowledge data protection complaints within 30 days.
- List your events and venues by expected attendance and whether entry is checked. Check volunteer roles with children against the September 2026 DBS change.
- Take the board through the new CC20, and agree an AI policy that covers fundraising.

Charitable companies of any size

- Confirm every trustee has verified their identity with Companies House.

Charities that need an audit (broadly, income over £1.5m)

- Make sure the fundraising statement in your annual report covers third-party fundraising and how you protect vulnerable people.
- Check what every agency contract says about subcontracting, monitoring and audit rights.
- Re-run payback for 2027-28 regular giving acquisition with April 2027 costs.
- Put a timing lag into legacy forecasts for 2027-28 and 2028-29.

Large incorporated charities

- Check whether you meet two of three tests: more than 250 staff, more than £36m turnover, more than £18m of assets. If you do, write down the fraud prevention procedures that cover fundraising agencies and Gift Aid declarations. Reasonable procedures are your only defence.

By nation

Scotland. Your full accounts and trustee names are now public. Read your accounts the way a journalist or a major donor would. Check PVG membership for regulated volunteer roles.

Northern Ireland. Follow the Charities (Amendment) Bill. If it doesn't pass before the 2027 Assembly election, the section 167 risk remains.

Wales. Watch for the new government's position on the Third Sector Scheme.

England and Wales. New accounts thresholds apply to financial years ending on or after 30 September 2026.

FOR TRUSTEES

Nine questions for your board

1. **Which of our fundraising is done by someone other than our own staff? How would we know if a subcontractor broke the Code?**
2. **If a regulator asked why we judged our approach "appropriate", what would we show them?**
3. **Have we built a timing lag for estates with pensions into our legacy forecasts for 2027-28 and 2028-29?**
4. **What will the April 2027 pay and employment changes do to the payback on our regular giving acquisition?**
5. **Are we using the soft opt-in? Now that fines can reach £17.5m or 4% of turnover, how sure are we that we're using it correctly?**
6. **Do we have an AI policy that covers fundraising? Would a donor be surprised by anything in it?**
7. **How many of our donors will stop paying income tax in April 2027, and how will we tell them?**
8. **Would a donor understand why each of our designated reserves is held?**
9. **Are our trustee and senior manager declarations up to date? Do they cover the disqualification grounds now being consulted on?**

FROM OUR WORK

Board advisory is part of our work, and these nine questions are where we'd start with a board. fundraiserintheroom.com/intelligence

THE SYSTEM VIEW

What this means for your fundraising system

The charities that grow income through this period, and get a better return on what they invest in fundraising, will be the ones where a change picked up in one place reaches every part of fundraising it affects. Most fundraising leaders will have seen it go another way. A legal change comes in through one team and the legacy forecast doesn't hear about it. Nobody updates the agency contract, and the board finds out last.

Very little in this report touches only one team. Pensions entering inheritance tax matter to legacy marketing, finance and stewardship. The soft opt-in involves data, digital, events and supporter care. Agency liability runs from procurement and compliance up to the board.

How far a change travels depends on how your fundraising works as a system. That's the question the Fundraising System Audit is built to answer, and the Self Audit is a good place to start.

fundraisingsystemaudit.com

What's coming

DATE	WHAT HAPPENS
17 Nov 2026	Companies House identity checks: transition for existing directors ends.
Nov 2026	Fundraising Regulator's one-year review of the new Code due.
2 Dec 2026	EU deadline for marking AI-generated content from systems already on the market.
23 Dec 2026	DCMS consultation on wider trustee disqualification closes.
Dec 2026	Scottish Draft Budget.
1 Jan 2027	Subscription contract rules start. Unfair dismissal rights after six months.
Jan 2027	Expected: Fundraising Regulator casework report for the first casework year to include the new Code.
Mar 2027	Limits on fire and rehire.
Spring 2027	Martyn's Law expected to come into force.
1 Apr 2027	National Living Wage rises to £13.21.
6 Apr 2027	Pensions enter inheritance tax. Pensioner income tax exemption (announced, to be legislated).
Apr 2027	Expected: bereavement leave; equality action plans become mandatory.
By 6 May 2027	Northern Ireland Assembly election. The Charities (Amendment) Bill must pass before dissolution.
Jun 2027	FATF onsite evaluation of the UK.
10 Jul 2027	EU money laundering rulebook applies.
2027	New Fundraising Regulator chief executive and 2027-32 strategy.

STILL WAITING, NO DATE

- The government's response on wills reform, overdue since May 2026
- Guaranteed hours for zero-hours and agency workers
- The start of mandatory reporting of child sexual abuse in England
- Trustee identity checks for all charities
- Council fining powers for unlicensed street fundraising
- The Fundraising Regulator's decision on minimum charity shares for free draws
- The ICO's statutory code on AI and automated decision-making
- Whether debanking notice rules have started

Further out

These are plausible futures, not predictions. Each comes with the early sign that it's starting.

3 years

to 2029

Published casework under the principles-based Code starts to define what "appropriate" means in practice. A general election is due by 2029.

Early sign: the first casework report in early 2027.

5 years

to 2031

Frozen income tax and inheritance tax thresholds end in April 2031, and the EU's data adequacy decision for the UK runs to December 2031. A mature soft opt-in file makes email and text the main stewardship channel for new supporters.

Early sign: repeat-contact complaints in the 2027 and 2028 casework reports.

10 years

to 2036

Wills reform has been legislated and electronic wills are normal. More legacy disputes reach court. Ministers have held a reserve power to regulate fundraising by statute since 2007, and a serious scandal could prompt them to use it.

Early sign: a sharp rise in vulnerable-donor cases.

20 years

to 2046

Legacy Futures forecasts £10bn a year of legacy income by 2046 FORECAST Whether it gets there depends partly on how inheritance tax is designed.

Early sign: any Budget consultation on inheritance tax reliefs.

Fundraiser In The Room®

Fundraising regulation on a page

Tear it out, pin it up, take it into the board meeting.

Five dates

- **17 November 2026.** Trustees of charitable companies must have verified their identity with Companies House.
- **23 December 2026.** DCMS consultation on wider trustee disqualification closes.
- **1 January 2027.** Subscription rules for new memberships. Unfair dismissal rights after six months.
- **Spring 2027.** Martyn's Law for events and venues.
- **April 2027.** National Living Wage £13.21 (1 April). Pensions enter inheritance tax, and about 290,000 pensioners are expected to stop paying income tax (6 April; the exemption is announced and still to be legislated).

Five findings

- **Legacies:** estates with pensions will be slower to pay out. Allow for £40,000 to £100,000 per £1m of legacy income to slip into the following year, mostly from 2028-29.
- The soft opt-in builds slowly, and mistakes now risk fines of up to £17.5m or 4% of turnover.
- Face-to-face acquisition costs rise by about 3.3% to 4.3% in 2027-28 (our estimate).
- Older donors' Gift Aid declarations need checking before April.
- Regulators now judge the reasoning you recorded at the time.

Five questions for your board

- Who fundraises for us besides our own staff, and how would we know if they broke the Code?
- What would we show a regulator to prove our approach was "appropriate"?
- Do our legacy forecasts for 2027-28 and 2028-29 allow for slower estates?
- What do April 2027 costs do to our acquisition payback?
- How will we tell donors who stop paying tax about Gift Aid?

Fundraising Market Intelligence UK is free from Fundraiser In The Room. This page describes the law at 12 November 2026. Fundraising Market Intelligence reports are advisory and do not constitute legal, financial or investment advice. fundraiserintheroom.com/intelligence

METHOD

How we made this report

We drew on six research strands: charity law and regulators; fundraising methods; data, digital and AI; tax and legacies; employment, corporate and crime; and the laws still to come. We checked every source between 9 and 12 November 2026. Before publication, a separate check tested every figure in the draft against its source. We ran our own figures from the Charity Commission's register.

We grade every source. A is official, statutory or peer-reviewed. B is an established independent source. C is commercial, agency or professional comment. Where a law firm and a regulator disagree, we follow the regulator.

WHAT NOBODY HAS MEASURED

- How many charities are using the soft opt-in, and what it has added to income
- What Martyn's Law will cost a typical charity event or venue
- What the Employment Rights Act will add to the cost of face-to-face, door-to-door and telephone fundraising
- How many lottery, sponsorship and membership schemes fall inside the new subscription rules
- Fundraising Regulator casework for the first year that includes the new Code (due around January 2027)
- A current count of registered charities in Northern Ireland

WHAT WE COULDN'T VERIFY

- Where the March 2026 plans stand, apart from disqualification. That covers closure powers, ID checks for all trustees, digital accounts and council fines for unlicensed street fundraising
- The Fundraising Regulator's decision on free draw minimums
- The exact start date of Martyn's Law, and how it applies in Scotland and Northern Ireland
- Whether the debanking notice rules have started
- Whether the Cyber Security and Resilience Bill has received Royal Assent
- A current count of registered charities in Northern Ireland
- How far the subscription rules reach regular giving, sponsorship and lottery subscriptions

HOW TO CITE

Fundraiser In The Room (2026). *Fundraising Market Intelligence UK, Controller Edition: Regulation, November 2026.* Edited by Damian Chapman.

NOT ADVICE

We write about the law as informed readers of it, as it stood on 12 November 2026. For a decision about your own charity, talk to a solicitor. Fundraising Market Intelligence reports are advisory and do not constitute legal, financial or investment advice.

Sources

All checked between 9 and 12 November 2026. Grades: A official, statutory or peer-reviewed; B established independent; C commercial, agency or professional commentary. Every link is at fundraiserintheroom.com/intelligence.

CHARITY LAW AND REGULATORS

Charity Commission, Annual Report and Accounts 2025-26, July 2026 (A).

Charity Commission, Public trust in charities 2026, 8 July 2026 (A).

Charity Commission, "One in four charities directly affected by divisions", 8 July 2026 (A).

Charity Commission, "Regulator updates guidance after legislative changes on moral payments", 27 November 2025 (A).

Charity Commission, Charity Commission news, August 2026 edition (A).

Dame Julia Unwin, "A precious treasure", speech to the Annual Public Meeting, 15 October 2026 (A).

UK Fundraising, "Charity Commission launches revised fundraising guidance, CC20", 3 February 2026 (C).

Bates Wells, "Navigating the Charity Commission's new fundraising guidance CC20", 17 February 2026 (C).

Browne Jacobson, Charity law update, autumn 2026 (CC3, CC19, CC26, SORP 2026, new thresholds), October 2026 (C).

Charities SORP, Summary of changes, SORP 2026 (A).

Keystone Law, "What increased powers will the Charity Commission have?", 26 March 2026 (C).

DCMS, Consultation on the extension of the Charity Commission's powers to tackle extremism, 14 October 2026, closes 23 December 2026 (A).

Mills & Reeve, "Proposed new powers for the Charity Commission to tackle extremism", 5 November 2026 (C).

OSCR, "Changes to charity law after the Charities (Regulation and Administration) (Scotland) Act 2023" (A).

OSCR, "New sector overview report shows Scottish charity sector remains steady", 6 July 2026 (A).

NI Assembly, Committee for Communities, Charities (Amendment) Bill (A).

Withers, "Charities (Amendment) Bill: what it means for Northern Ireland operations", 30 September 2026 (C).

GOV.UK, "New Civil Society Council established", 10 March 2026 (A).

legislation.gov.uk, The Charities Acts 1992 and 2011 (Substitution of Sums) Order 2026, SI 2026/427, made 17 April 2026, in force 30 September 2026 (A).

Withers, "Financial thresholds in Charities Acts increased in relation to fundraising, accounting and reporting", 13 May 2026 (C).

Hempsons, "Charities and social enterprise legal update summer 2026", 29 June 2026 (C).

Senedd Research, "The results are in: what happens now?", 11 May 2026 (A).

Charity Commission for England and Wales, register of charities public extract, 8 February 2025, analysed by Fundraiser In The Room, 12 November 2026 (A, our computation).

FUNDRAISING REGULATION AND METHODS

Fundraising Regulator, Code of Fundraising Practice, effective 1 November 2025 (A).

Fundraising Regulator, Casework Insights and Trends 2024-25, January 2026 (A).

Fundraising Regulator, Annual Complaints Report 2023-24, March 2025 (A).

Fundraising Regulator, Business plan 2026-27 (A).

Fundraising Regulator, Guidance on using artificial intelligence in fundraising, updated 8 December 2025 (A).

Fundraising Regulator, Christian Aid and Gather Campaigns Ltd, investigation summary, July 2026 (A).

Fundraising Regulator, "Positive fundraising experiences help build future support", 16 July 2026 (A).

Fundraising Regulator, Market Inquiry: subcontracting in face-to-face fundraising, March 2024 (A).

Fundraising Regulator, Annual report and accounts 2024/25, directors' report (A).

Fundraising Regulator, free draw consultation page (A).

Civil Society, "Fundraising Regulator's income rises by more than 25 per cent amid levy cost increase", 12 March 2026 (C).

Gambling Commission, Funds raised for good causes, Q1 2026-27, 4 August 2026 (A).

Civil Society, "Door-to-door fundraising investigation finds 12 code breaches", 24 March 2026 (C).

Civil Society, "Fundraising Regulator reports levy non-payers to Charity Commission", 31 March 2026 (C).

CCNI and Fundraising Regulator, memorandum of understanding, October 2025 (A).

Gambling Commission, Ian Angus speech to the Lotteries Council conference, 21 May 2026 (A).

Gambling Commission, Statutory gambling levy, updated 13 March 2026 (A).

Civil Society, "Government rejects society lottery cap rise", 27 June 2025 (C).

DCMS, Voluntary code of good practice for prize draw operators, updated 19 October 2026 (A).

legislation.gov.uk, Charities Act 2006, Part 3 (A).

GOV.UK, "Understanding Martyn's Law and the SIA's role as regulator", updated 9 November 2026 (A).

Mills & Reeve, "FAQ: charities and Martyn's Law", 24 June 2026 (C).

Mills & Reeve, "Charities and subscriptions: exception to the rule", 27 October 2026 (C).

DATA, DIGITAL AND AI

DLA Piper, "Commencement of the data protection provisions in the Data (Use and Access) Act", 6 February 2026 (C).

Hill Dickinson, "Data (Use and Access) Act: changes to UK data protection law come into effect", 11 February 2026 (C).

Lewis Silkin, "The charitable purposes soft opt-in: ICO issues updated direct marketing guidance", 8 May 2026 (C).

DLA Piper, "New complaints handling rules under DUAA take effect on 19 June 2026", 11 June 2026 (C).

Lewis Silkin, "What the ICO's transformation into the Information Commission means", 29 September 2026 (C).

ICO, "ICO warns charities about direct marketing rules as it orders Penny Appeal to stop sending spam texts", March 2024 (A).

Osborne Clarke, "New consent-free marketing route for charities: ICO publishes guidance on the charitable purposes soft opt-in", 28 May 2026 (C).

Wood for Trees, "UK charities losing out on £290m additional annual income without email marketing soft opt-in", 27 November 2024 (C, forecast).

Lewis Silkin, "The Digital Omnibus on AI enters into force today", 27 July 2026 (C).

Lewis Silkin, "Digital rulebook: simplification of EU data protection and cyber rules", 9 November 2026 (C).

DSIT, Cyber Security Breaches Survey 2025/26, May 2026, via NI Business Info (A).

VinciWorks, "Cyber Security and Resilience Bill: government defeated twice", 29 October 2026 (C).

Lewis Silkin, "UK Payments Initiative launches new open banking recurring payments scheme", 11 June 2026 (C).

TAX AND LEGACIES

HM Treasury, Budget 2026, 28 October 2026 (A).

HM Treasury, "Budget 2026: breathing space for today, hope for the future", 28 October 2026 (A).

Enaid Accountancy, "Budget 2026: four changes charities need to plan for", 29 October 2026 (C).

Civil Society, "Sector bodies express disappointment at budget's lack of support for charities", 29 October 2026 (C).

HMRC, UK charity tax relief statistics, 1 July 2026 (A).

HMRC, "Legislation to introduce changes to charity tax rules", 26 November 2025 (A).

Sackers, "Finance Act 2026 paves the way for pensions IHT changes", 19 March 2026 (C).

Mills & Reeve, "How the 2027 pension inheritance tax changes could affect charitable gifts in wills", 15 October 2026 (C).

Mishcon de Reya, "Giving more than you bargained for: pension changes and the charitable legacy trap", 2026 (C).

Remember A Charity, "Legacy income holds strong in 2025", 21 May 2026, reporting Legacy Futures and Smee & Ford, Legacy Giving Report 2026 (B).

ehospice, "Legacy Giving Report 2026 reveals resilient £4.4 billion market", 14 June 2026 (C).

Civil Society, "Gift aid income for charities rises 10% to £1.88bn", July 2026 (C).

GOV.UK, "Gift Aid declarations: claiming tax back on donations" (HMRC model declaration wording) (A).

Ministry of Justice, Family Court Statistics Quarterly: April to June 2026, 24 September 2026 (A).

National Law Review, "One year and counting: the UK's missed electronic wills deadline", 30 September 2026 (C).

DWF, "The rise in probate disputes" (STEP Barometer 2026), 16 June 2026 (C).

EMPLOYMENT, CORPORATE AND CRIME

Lewis Silkin, "What's in the Employment Rights Act?", updated 5 November 2026 (C).

GOV.UK, "Minimum wage rates for 2027", 28 October 2026 (A).

Grant Thornton, "Employment cost rises: where things stand in 2026/27", 27 August 2026 (C).

Home Office, Guidance to organisations on the offence of failure to prevent fraud, updated 10 October 2025 (A).

Mills & Reeve, "Charity fraud in 2026", 2 November 2026 (C).

Stephens Scown, Employment Rights Act for charities, 2026 (C).

Mishcon de Reya, "Companies House reform: first prosecutions for ID verification offences", 25 September 2026 (C).

Pinsent Masons Out-Law, "UK directors: ID verification deadline looms", 10 September 2026 (C).

Hill Dickinson, "EHRC's updated statutory code of practice now in force", 5 August 2026 (C).

GOV.UK, Representation of the People Bill policy summaries: political finance, updated 28 October 2026 (A).

NSPCC Learning, "Mandatory reporting of child sexual abuse in England", 20 May 2026 (B).

CFG, "Government to bring forward debanking legislation", reviewed 12 June 2026 (B).

HORIZON, POLITICS AND GLOBAL CONTEXT

Capsticks, "37 bills announced in the King's Speech", May 2026 (C).

OPB (Associated Press), "Andy Burnham succeeds Keir Starmer as the UK's 7th prime minister in 10 years", 20 July 2026 (B).

Associated Press, "Andy Burnham becomes the UK's seventh prime minister in a decade after Starmer resigns", 20 July 2026 (B).

Fraser of Allander Institute, "The aftermath of the Scottish parliamentary election", 30 June 2026 (B).

Scottish Government, Programme for Government 2026 to 2031, 1 September 2026 (A).

Welsh Government, Programme for Government 2026 to 2030, 10 September 2026 (A).

Civil Society, "Government publishes £1m roadmap to boost place-based philanthropy", 13 April 2026 (C).

RUSI, "Opening the door: the UK's 2027 FATF evaluation", 30 June 2026 (B).

FATF, Outcomes of the FATF Plenary, 17 to 19 June 2026 (A).

CIVICUS Monitor, People Power Under Attack 2025, 9 December 2025 (B).

Fidelity Charitable, "OBBB: impact on charitable giving" (C).

Hunton, "European Commission renews UK data adequacy decisions", December 2025 (C).

ACADEMIC

Chapman, C. M., Hornsey, M. J. and Gillespie, N. (2021). No global crisis of trust: a longitudinal and multinational examination of public trust in nonprofits. Nonprofit and Voluntary Sector Quarterly, 50(2). doi: 10.1177/0899764020962221. More than three years old.

UK Fundraising Market Intelligence

Theme by theme, territory by territory

We publish new reports regularly, across three categories: organisational fundraising, individual fundraising, and the forces that shape them both. Each is written for a territory, and they're all free to read and share.

ORGANISATIONAL FUNDRAISING

- **B1** **Trusts** — Which trusts are still open to new applicants, and what they now ask for.
- **B2** **Foundations** — How the largest foundations and lottery distributors are changing what they fund.
- **B3** **Corporates** — Where company giving, sponsorship and payroll giving are heading.
- **B4** **National government** — What the four governments will fund, and how they'll pay.
- **B5** **Local government** — What council finances and reorganisation mean for grants and contracts.
- **B6** **ODA** — How changes in official development assistance reach UK charities.

INDIVIDUAL FUNDRAISING

- **C1** **Challenge events** — Who is still signing up for runs, rides and treks, and what they raise.
- **C2** **Events** — What galas, dinners and charity-owned events cost to run, and what they return.
- **C3** **Community** — How schools, faith groups, workplaces and local fundraisers are giving now.
- **C4** **Philanthropy** — Where the UK's wealth sits, and how major donors are deciding.
- **C5** **Regular and individual giving** — What it now costs to recruit a donor who stays.
- **C6** **Legacy** — What pensions, probate and wills reform mean for gifts in wills.

THE FORCES · CONTROLLER EDITION

- **K1** **Data** — What the new data rules, AI and cyber risk let you do.
- **K2** **Fundraising** — Standards, complaints, skills and pay across the profession.
- **K3** **Governance** — What boards are being asked to oversee, and how to show it.
- **K4** **Regulation** — You're reading it.

TERRITORIES

UK · Europe North · Europe South · Europe East · Europe West · Africa North · Africa South · Africa East · Africa West · Africa Middle · Canada · United States · South America.
India and Australasia to follow.

GET EVERY REPORT

fundraiserintheroom.com/intelligence

Sign up for an alert when each one is published.

ABOUT FUNDRAISER IN THE ROOM

We help charities grow income and get a better return from fundraising. We work on the How.

Fundraising systems consultancy · The Fundraising System Audit · Board advisory · Executive coaching

Creating Scalable and Profitable Fundraising.™ A better world. Made possible by fundraisers.™ Fundraising Market Intelligence reports are advisory and do not constitute legal, financial or investment advice.

Fundraiser In The Room®