

Acceptance Or Refusal Of Donations

Applicability

This policy applies to all members of our charity, including trustees. Therefore, everyone must follow this policy in accepting or refusing donations.

Compliance

As a registered charity, we comply with all relevant UK laws and regulatory guidelines, including those issued by the Charity Commission, HMRC and the Fundraising Regulator. In soliciting funds we will not knowingly mislead or provide false information, nor put undue pressure on a donor, particularly if s/he may be vulnerable.

Acceptance of Donations

We accept donations on a good faith basis. That is there is a presumption that a donation is acceptable, unless there is evidence to the contrary. We carry out appropriate risk based due diligence to mitigate this risk to an acceptable degree.

In deciding to accept, or reject, a donation we balance the impact on our beneficiaries of not accepting the funding, against the impact on our charity of accepting a donation that should not have been. That may include risks such as harm to our beneficiaries' interests, reputational damage, loss of public trust and the risk of breaking the law. Factors we will consider in making decision will include any physical or mental-health condition, disability or learning difficulties the person may have, whether the person is facing times of stress or anxiety, whether a donation is likely to affect the person's ability to sufficiently care for themselves or leave them in financial hardship, how well the person can speak and understand English, whether the person is under the influence of alcohol or drugs and the person's age.

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

Due diligence

Due diligence means that reasonable checks and research has been carried out on new funders, partners contractors or others to help ensure problems will not arise in working with them. This is risk management and, as such, remains a core accountability for the CEO and Board, although they may delegate the responsibility to others.

The Scale of Risk - Factors to Consider

- Is the project/contract particularly sensitive, important, complex or large scale?
- Is the organisation/individual well known and respected, or might they hold views, undertake activities or work in an area that may potentially be problematic?
- How much potential is there for things to go wrong and what's the worst that could happen?

Quick, easy to do, basic checks

- If they have a website, check that what they’re proposing fits with what’s on there. If available, review what it says about key members of their team and, download and review, their annual report/accounts.
- Carry out an internet search. On the company, if applicable, and key individuals, to see if there is anything of concern. Don’t just check page 1, as older issues may be sufficiently serious to still be relevant.
- Speak to someone who has worked with them, or knows their sector well. A phone call is best, as people tend to be more open.
- Take up references, if appropriate.

Refusal of Donations

We will not accept a donation where there are reasonable grounds to believe:

- The individual or organisation holds views, or is involved in activities incompatible with our values as a charity.
- The donation may be an attempted scam, or to launder money or evade tax, or is in some other way illegal.
- There may be private benefit linked to the donation, such as an obligation to purchase goods or services from a specified company.
- Conditions attached to the donation are so inflexible that they undermine our independence.
 - Or are so onerous as to compromise our effectiveness.
 - Or restrict who may benefit to the extent of undermining our public benefit obligation.
- The cost of accepting the donation would exceed its value.

Regulatory Guidance

We will regularly consult and update our knowledge to ensure we comply with:

- Charity Commission – [donor key questions](#) and [advice on suspect donations](#).
- Fundraising Regulator – [behaviour when fundraising](#).

We will also comply and incorporate guidance shared by The Institute of Fundraising - [practical guide](#).

Approval and Review

Approval By	Date	Next Review Date
Trustee Board	January 2021	January 2022