

Acceptance or Refusal of Donations Policy

1. APPLICABILITY

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

2. COMPLIANCE

- 2.1. 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.
- 2.2. In soliciting funds, we will not knowingly mislead or provide false information, nor put undue pressure on a donor, particularly if they may be vulnerable.

3. ACCEPTANCE OF DONATIONS

- 3.1. 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 <u>appropriate risk</u> <u>based due diligence</u> to mitigate this risk to an acceptable degree.
- 3.2. 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.
- 3.3. Factors we will consider in making decisions 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.
- 3.4. We will also take all reasonable steps to avoid asking for regular donations (for example, by direct debit) from anyone aged under 18.

4. REFUSAL OF DONATIONS

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

- 4.1. The individual or organisation holds views, or is involved in activities incompatible with, our values as a charity.
- 4.2. The donation may be an attempted scam, or is intended to launder money or evade tax, or is in some other way illegal.
- 4.3. There may be private benefit linked to the donation, such as an obligation to purchase goods or services from a specified company.
- 4.4. Conditions attached to the donation are so inflexible that they undermine our independence;
 - 4.4.1. Or are so onerous as to compromise our effectiveness.

- 4.4.2. Or restrict who may benefit to the extent of undermining our public benefit obligation.
- 4.5. The cost of accepting the donation would exceed its value.

5. REGULATORY GUIDANCE

- 5.1. Charity Commission know your donor key questions and advice on suspect donations.
- 5.2. Fundraising Regulator behaviour when fundraising.
- 5.3. The Institute of Fundraising has produced a practical guide.

6. REVIEW

6.1. This policy was reviewed in February 2021 and February 2024 and is due for review in February 2027.