

## **Donation Acceptance and Refusal Policy**

The Trustees of Horsham Matters have a responsibility to act in the best interests of their charity.

The Managing Director has the responsibility to refer any donations of concern to the Trustees.

When deciding whether to accept or refuse a donation, the Trustees must only decline if to not do so would be detrimental to the Charity.

Donations to our Charity will be considered on a case by case basis and only rejected in exceptional circumstances, when:

- It would be unlawful to accept it, e.g. the donation fund or gift is derived from the proceeds of crime
- Accepting the donation would be detrimental to the Charity e.g. the donor source is not in line with our values. To accept a donation in this instance could result in a loss of donations from other supporters, loss of volunteers and staff and an inability to recruit in the long term.

Should the Board make the decision to refuse a donation the reasons for this decision must be documented.

### **1. Refunding Donations**

Under charity law, and in common with all registered charities, Horsham Matters is only able to refund donations in certain circumstances including:

- If the terms and conditions of the gift provide for it to be returned in particular circumstances; or
- Where the law specifically provides for the gift to be returned in particular circumstances; or
- By way of an ex-gratia payment

Depending on the circumstances, there may be restrictions on whether a donation can be returned, and the charity regulator may need to allow such returns by issuing a specific order.

## **2. Receiving an anonymous donation**

To ensure that the Charity is not in receipt of tainted donations, the Charity will use the Charity Commission's tool kit – Know Your Donor. Anonymous donations have been used in the past to facilitate criminal activity such as money laundering.

In accordance with the toolkit the Trustees will notify the Charity Commission to report any payment/payments totalling £25,000 from an anonymous source. Any decisions and the reason for such a decision made must be documented.