Donations Policy (April 2022)

Policy for the acceptance or refusal of a donation

This policy has been set out by the trustees of Haemochromatosis UK, as a public guide to how we make decisions on accepting and refusing donations. It also sets out the processes we will follow including due diligence checks where they are required.

The trustees of Haemochromatosis UK are legally responsible for the acceptance or refusal of donations. The decision to accept or reject a donation is not taken on an ad-hoc basis, but in support of our strategy and objectives, guided by consistent processes within the context of our ethical values.

On a day-to-day basis, the charity's board of trustees delegate the responsibility to accept or refuse donations to the charity's chief executive, assisted by the senior management team (SMT). The chief executive will ensure that the board of trustees is informed of any donation that he/she judges could potentially raise questions to why the charity rejected it or accepted it. In this scenario, the chief executive, assisted by the SMT will present the case, any evidence and share the key decision points and procedure that was followed in that particular case in order for the trustees to make a recommendation of acceptance or refusal.

Guiding Principles

We are an independent charity, governed by a constitution and accountable to our membership. Consequently, we will not adjust our strategy to elicit a donation from a donor for us to implement their specific purposes if their purposes are inconsistent with our established charitable objectives.

No trustee may derive any benefit (financial or otherwise) from a donation.

All donations will be accepted only if they are consistent with our ethical values as an organisation :

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- People first
- Living well
- Health equality
- Clear communication
- Collaborative & co-operative
- Responsible & accountable

We will not accept donations from donors where :

- The cost of handling or processing or reporting on the donation would incur disproportionate cost relative to the value of the donation
- The donor is engaged in activities inconsistent with our ethical values
- The donor is engaged in activities inconsistent with our charitable objectives, or the interests of our beneficiaries
- There is credible evidence that the funds have been obtained unlawfully or where the charity suspects on reasonable grounds that it has arisen from activities which are corrupt (eg money laundering)
- Acceptance of the donation may, in our reasonable view, result in reputational, financial or other loss to the charity
- The offer of support is in exchange for our charity fulfilling certain conditions, which are (a) unrelated to the proper impact reporting and assessment of the donation itself or (b) contrary to our charitable objectives or (c) regarded in our view as requiring an unreasonable level of organisational support to deliver or (d) will divert our organisation from its established strategy, plans and projects as a necessary result of fulfilling the terms of the donation

If the chief executive is satisfied a proposed donation complies with the guiding principles (above), the proposed donation will be evaluated through a process intended to be timely, non-intrusive and robust as follows:

Donations up to £5,000 in value

Donations up to £5,000 will be accepted providing they have been made lawfully, comply with our guiding principles (above) and on the basis that they are

unrestricted funds. How such donations are deployed is at the sole discretion of the charity, its trustees and officers.

Donations of £5,000 to £35,000 in value

The chief executive and SMT will carefully evaluate any suggested donation over £5,000 to determine whether it would be in the best interests of HUK and its beneficiaries to receive it.

Donations valued at £5000 or more, may be accepted provided that :

- They comply with our guiding principles (above)
- Any donation is made legally
- Any donation should contribute our overall strategy and plans, for the benefit of our beneficiaries
- The donor's objectives or motivations in making the donation should be compatible with our own existing or planned strategy & objectives.
- We should be able to effectively deploy the donation towards our work within a reasonable timeframe, whilst respecting any conditions attached to the donation, reporting requirements or other legal aspects of the donation

Unless otherwise specifically agreed in writing by the chief executive or chair of trustees, all donations received will be treated as unrestricted funds. How such donations are deployed is at the sole discretion of the charity, its trustees and officers.

Donations over £35,000 in value

The chief executive and SMT and at least one board of trustees member will carefully evaluate any suggested donation over £35,000 to determine whether it would be in the best interests of HUK and its beneficiaries to receive it. Such donations will be considered for acceptance only if :

- It complies with our guiding principles (above)
- Any donation is made legally
- Any donation should contribute to our overall strategy and plans, for the benefit of our beneficiaries

- The donor's objectives or motivations in making the donation should be compatible with our own existing or planned strategy & objectives
- We should be able to effectively deploy the donation towards our work within a reasonable timeframe, whilst respecting any conditions attached to the donation, reporting requirements or other legal aspects of the donation
- If the donor is a private individual, the individual is able to demonstrate their identity and residence for the purposes of money-laundering checks (eg passport or driving license, recent utility bill issued by a recognised supplier within the past 3 months)
- If the donor is not a private individual (eg corporate, foundation or trust), the charity will undertake appropriate due diligence on the donor, specific to the nature and scale of the donor's organisation and the scale and nature of the proposed donation

Unless otherwise specifically agreed in writing by the chief executive or chair of trustees, all donations received will be treated as unrestricted funds. How such donations are deployed is at the sole discretion of the charity, its trustees and officers.

Process for evaluating a donation

The charity may, at its discretion, conduct due diligence and evaluate any donation values over £5,000 against public data sources, including :

- HM Treasury/Home Office PEPs and sanctions lists
- Companies House
- Charity Commission
- Arachnys
- Onfido
- Social media sources, including Facebook, Twitter, Instagram
- Search engine searches, including Google, Bing and DuckDuckGo

The results of this evaluation will be reviewed in-the-round to inform the charity's final decision as to accept or decline a proposed donation.

Process for accepting a donation

We are grateful to our supporters and donors and upon accepting a donation will write to the donor thanking them and providing opportunities for them to receive details of the impact and deployment of the funds donated over time.

Process for declining a donation

If we are unable to accept a donation, the chief executive shall write to the prospective donor declining the donation. Where funds have been provided (eg in the form of a cheque) these shall be returned.

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