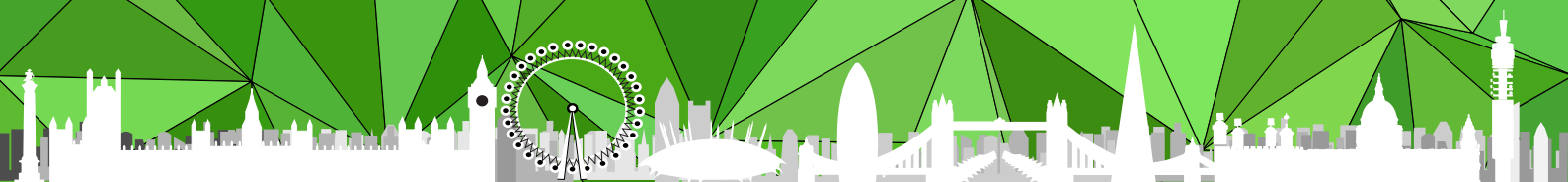




DONATION POLICY

Last Reviewed: December 2022
Last Modified: January 2023



Donor Due-Diligence:

Basch Helps CIC must act reasonably in the interests of the community enterprise as set out in our objectives.

The policy and implementation process ensures that our advisory board and staff abide by set procedures and guidelines which conform to UK legislation on Anti-Money Laundering/ Know Your Client policies on donor acceptance and refusal.

It has been set out by the Advisory Board of our charity to implement a rigorous due-diligence process for all donations over £2,000.00. The day to day procedures that need to be adhered to and ensures decisions are not taken in an ad-hoc manner, but support Basch Helps CIC ethics and codes of conduct policy objectives.

The Advisory Board will be legally responsible for decisions relating to whether a donation is accepted or refused.

On a daily basis the Basch Helps CIC Advisory Board delegates responsibility to accept or refuse donations to the Managing Director, the Managing Director and all Advisory Board members will be assisted by the appointed Legal & Compliance Team and our delegated Financial Institution will run additional screening processes if necessary.

The Advisory Board accept that all donations over £2,000.00 must be screened by relevant departments, they must demonstrate evidence that the Basch Helps CIC due-diligence process was implemented effectively without hindering the community organisations image.

The Managing Director is responsible for ensuring that all donors both individual and corporate are wholeheartedly supporting the community organisation in accordance with this policy. If the Managing Director or any affiliates in the due-diligence/ discovery process uncover malicious evidence, then they will advise the Advisory Board of Basch Helps CIC to refuse the donation.

Basch Helps CIC – Due-Diligence guiding principles:

1. Does the donation contribute towards the campaigns overall mission and plans?
2. Can Basch Helps CIC successfully deliver the agreed activity and advance its mission under any conditions tied to the donation?
3. Are the donor's objectives or motivations discordant with Basch Helps CIC ethics, mission or values? Does the donor's donation affect our public image or professional reputation?

The Key Questions asked during our donor screening process:

Factors to consider by Advisory Board members on donations over £2,000.00:

- The size and nature of the donation?
- Does the donor appear to have any suspicious characteristics when presenting themselves to the Advisory Board?
- Do any of the Advisory Board members have interests outside the community organisation with the donor? (Refer to Conflict of Interest Guidelines)
- Are their conditions attached to the donation? What are they?
- What is the method of payment?
- Is it a single donation or multiple donations?
- Source of income check? Does the country of origin showcase any relevant (financial sanctions/regulations, anti-money laundering legislation, global corruption indexes)
- Has Legal & Compliance ran the necessary identity checks and any relevant additional checks? (political affiliations, negative press) (Refer to Ethics Guidelines)
- Are there any detrimental outcomes for accepting the donations (Basch Helps CIC, Risk Analysis)?

Negative Outcome Procedures for donors who do not pass our due-diligence process for donations over £2,000.00.

- Basch Helps CIC will report evidence of crime to the relevant authorities.
- If Basch Helps CIC has reasonable cause to suspect a donation is related to terrorist financing, they are under specific legal duties under the Counter-Terrorism Act to report the matter to the relevant authorities.
- If the outcome of the due-diligence suspects acts of Money-Laundering, the advisory board have a right to report it to HMRC and all other relevant authorities.
- If the offer of support is attached with the fulfilment of conditions which directly contravenes Basch Helps CIC's policies and guidelines:
- Contravenes the objectives of Basch Helps CIC.
- Is regarded as requiring an unusual level of support or commitment which diverts the community organisation from its current campaigns and relief efforts.
- If the funds from donors are illicit in nature: Basch Helps CIC will refuse any donation if the wealth has been generated from corruption or proceeds of crime.

What legislation/regulation needs to be considered?

- The Charities Act 1992: in relation to commercial participators and professional fundraisers.
- Data Protection 1998: in relation to handling the personal data of any donors.
- Freedom of Information Act 2000: in relation to freedom of information requests.
- The Bribery Act 2010: in relation to bribery offences.
- Finance Act 2011: in relation to tainted charity donations.
- Proceeds of Crime Act 2002: in relation to suspected money laundering
- Terrorism Act 2000: in relation to disclosures of beliefs or suspicions of terrorism offences.

This is not an exhaustive list, and different legal issues may apply depending on individual circumstances.