



ACCEPTANCE AND REFUSAL OF DONATIONS POLICY

Dunamis Bible Church (DBC) Trustees have overall legal responsibility to consider which course of action will be in the charity's overall best interests, decisions relating to whether a donation (refers to both donation or gift) is accepted or refused. Trustees must be able to demonstrate that they have acted in the best interest of DBC in pursuing its purposes, as set out in its constitution. Trustees have a duty to consider carefully, on the basis of the evidence made available to them, whether the charity's interests will be better served by accepting or refusing the donation and to act accordingly whilst upholding the public trust and confidence. This means that, when deciding whether to refuse a donation, Trustees must only do so if to accept it would be more detrimental to the charity being able to achieve its objectives than rejecting it. These judgments must not promote any Trustee or employee's personal moral agenda or interest and the Trustees must not allow individual or collective personal, political or ethical issues, which are not directly related to the interests of the charity, to affect their judgment. Trustees must derive no personal benefit (individually or collectively) from donations, loans or other material support offered to the charity.

This policy applies to all staff, volunteers and contracted fundraisers at DBC, and provides a guide to the checks to apply to donations where accepting them could pose a risk to DBC. It also serves as a public guide to how DBC makes decisions on accepting and refusing donations and the procedures they follow.

1. Guiding principles to dealing with donations

- 1.1. Trustees, staff and volunteers will act in the best interests of DBC and do their utmost to solicit and accept funds to further its charitable objectives, with the presumption that donations are given in good faith and that refusal must be only on the reasonable grounds detailed in this policy. In soliciting donations from individuals or organisations, DBC will act with honesty and integrity, will not put undue influence or pressure on donors and will not mislead or knowingly give false information.
- 1.2. Where there is doubt about the legitimacy of a donation, DBC will seek guidance or approval from the Charity Commission as to the best interests of the charity due to negative publicity, moral grounds, or the possibility of a challenge in the courts.
- 1.3. DBC will refuse donations if the acceptance of the donation would be detrimental to the achievement of its purposes, as in the following circumstances:
 - (a) Where DBC suspects that the donation, in whole or in part, is made:
 - (i) to facilitate money laundering;
 - (ii) from illegal or unethical activity;
 - (iii) constitutes a criminal activity, an offence under the Proceeds of Crime Act, the Terrorism Act (and related legislation) or the Bribery Act.

- (b) Where it can be clearly shown that the cost to DBC of accepting a donation will be greater than the value of the donation itself, and that acceptance of the donation will directly lead to loss of public trust and confidence in DBC or a net decline in its assets.
 - (c) Where the offer of support is dependent upon the fulfilment of certain conditions (or special conditions) placed upon DBC, and these conditions:
 - (i) are contrary to the objectives of DBC
 - (ii) requires to repay donations (in substance loan)
 - (iii) requires to pass on the donation to a specific entity or use for a specific unusual purpose
 - (iv) requires the charity to keep the donation only for a limited (often short) time before returning it in full but keeping any interest earned.
 - (v) as above but the donation is received in one foreign currency and must be returned in another
 - (vi) where very specific services need to be provided to secure the donation.
 - (vii) requires an unreasonable level of support from DBC especially in relation to the size or impact the donation will have on DBC charitable activities
 - (viii) will divert DBC from pursuing its current objectives, policies or work priorities.
 - (d) Where the donor's reputation or associations may be such that accepting funds would undermine confidence in the charity's independence and adherence to its core values.
 - (e) Where a donation which could impose a very restrictive course of action on the charity and compromise the independence and effectiveness of the board of trustees.
 - (f) Where the activities of a donor are directly contrary to the objectives or policies of DBC.
 - (g) Where an offer of support, whilst reflecting DBC's objectives, is untenable. For example, if DBC does not have the resources to maintain the running costs associated with the donation.
 - (h) Where the support consists of goods, services or property which DBC cannot lawfully use, convert, exchange or sell in direct support of its charitable objectives.
 - (i) Where a donation may for some other reason pose a risk, not limited to; legal, financial, reputation and dependence risk to the charity.
- 1.4. DBC ***will take great care and consideration*** in deciding whether to accept or refuse a donation where an offer of support is dependent upon DBC first spending its own money or resources in order to facilitate the conditions of the donation, as this might place the charity's resources under undue and inappropriate risk. ***Donations should preferably be given in full up-front or alternatively in instalments linked to an agreed contract and work plan.***

2. Donations from people in vulnerable circumstances

- 2.1. If a fundraiser has reasonable grounds for believing that a supporter lacks the capacity to make a decision then a donation will not be taken.

- 2.2. If a donation has already been made and at the time of donating the individual lacked capacity (and DBC receives evidence of this) then we will return the donation, since the original donation was invalid.

3. Donations from organisations

- 3.1. Before accepting a donation from an organisation, their nature of business should be ascertained and judgement taken on whether acceptance could cause reputational risk. DBC does not accept donations from organisations that do not share DBC core values. For example, tobacco and etc.
- 3.2. As a charity, it is important to maintain our independence. We value our corporate partners and our donors, but cannot allow funders and corporate partnerships to affect our reputation or unduly influence our charitable activities. Accepting support from organisations will not prevent us calling their actions into question or expressing our views. We also cannot endorse or approve products, services, commercial initiatives, companies or industries.

4. Returning donations

- 4.1. Donations will only be refunded in exceptional circumstances and with explicit consent from Trustees and the Charity Commission.