

Helping Our Kehillah

Acceptance or Refusal of Donations Policy

Applicability

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

This policy does not cover matters governed by separate legal or regulatory frameworks, including ex gratia payments, the management of failed fundraising appeals, or income that constitutes contractual payment for services rather than charitable donations. These areas are addressed through separate policies and procedures as appropriate.

Compliance

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. In accordance with the Fundraising Code 2.3.1 we would only refuse or return donations in exceptional circumstances. In the event we considered such action, the circumstances and rationale for the decision made would be documented.

In soliciting funds, we will not knowingly mislead or provide false information, nor put undue pressure on a donor, particularly if he/she may be vulnerable.

If we suspect that our charity has received a donation from an illegal source, we will not return it or contact the donor and, instead will notify the relevant authorities, including the charity regulator.

We also recognise our legal obligations to refuse or return any donation:

- From a donor who:
 - Does not have the mental ability to decide to donate.
 - Cannot legally be given to your charity. For example, where the donor does not own the property that they are donating.
- Where, under the terms of the donation, must be returned in certain circumstances.

Acceptance of Donations

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 appropriate risk based due diligence to mitigate this risk to an acceptable degree.

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.

Factors we will consider in making decision 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.

We will also take all reasonable steps to avoid asking for regular donations (for example, by direct debit) from anyone aged under 18.

Cryptoassets

In deciding whether we will accept and hold donations of cryptoassets, we will assess the opportunities, benefits, risks and limitations. In doing so, we will ensure that we either have or source relevant expertise. If we decide to accept cryptoassets, we will implement appropriate financial and other controls, and manage the risk on an ongoing basis.

Anonymous Donations

Donations through collection tins and online platforms are often anonymous and any donor may remain anonymous if he or she chooses to. The Charity Commission 'know your' donor principle does not mean charities cannot accept anonymous donations and doing so is perfectly acceptable providing charities look out for suspicious circumstances and put adequate safeguards in place.

Trustees will take reasonable and appropriate steps to know who the charity's donors are and will not accept a donation where the risk to the charity is assessed to be greater than the benefit of having the funds donated. There can be no absolute guide to what may be suspicious, but indicators are where significant sums are being donated, particularly if this is unusual, in cash or from overseas. Any prospective donor who wishes cash to be forwarded in advance or for the charity to pay some of the donation to a third party will always be considered highly suspicious.

The trustees will consider reporting suspicious donations as a Charity Commission Incident report.

Refusal of Donations

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

- The activities being funded would fall outside of our charitable object(s).

- The individual or organisation holds views or is involved in activities incompatible with our values as a charity.
- The donation may be an attempted scam, or to launder money or evade tax, or is in some other way illegal.
- There may be private benefit linked to the donation, such as an obligation to purchase goods or services from a specified company.
- May result in a valid legal claim or risk of a claim against our charity.
- Conditions attached to the donation are so inflexible that they undermine our independence.
 - Or are so onerous as to compromise our effectiveness.
 - Or restrict who may benefit to the extent of undermining our public benefit obligation.
- The cost of accepting the donation would exceed its value.

Donor Recognition & Private Benefit

We welcome donations from commercial organisations, but will not accept donations where, in the view of the trustees, the purpose might reasonably be considered to be for commercial gain. That is, by enabling the company to use its connection to the charity to market itself to its customers and the public as ethical and an active supporter of our work, when it is not. For example, by promoting its support for our work when its own working practices, products or services do not reflect our values and activities.

The recognition given to donors will be no more than the normal thanks provided to any other similar donor. Nothing in addition to this is either expected or has been asked for – we can be confident that any private benefit will be no more than incidental.

Charity Commission Guidance and Approval

- For complex or high-risk decisions about donations, trustees can apply to the Charity Commission E&W for formal advice; and
- Where trustees have a moral obligation to refuse/return items or funds, they must use the ex-gratia regime including seeking consent from the Commission, rather than using the wider power to return donations referenced in the guidance.

Version Control - Approval and Review

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	Board	15/01/26	Initial draft approved	Annually