



## **Donor Policy:**

At Hartlepool Baby Bank (HBB) we are conscious that all donors should have confidence that their item or money will be used for legitimate purposes. Following advice from the Charities Commission and the Institute of Fundraising our policy seeks to promote transparency and accountability.

At HBB we will treat all donations the same, irrespective of type (corporate donation, small/large, campaign appeals etc.) or size.

We will seek to refuse financial donations only in exceptional circumstances. E.g. Proceeds of crimes, where a donation would be detrimental to our achievements or does not represent our values. We will also reject where we feel there is a demonstrable risk that this donation would prevent other donors making equal or larger donations, or where there is a demonstrable risk it would prevent us recruiting staff or volunteers.

We will consider any potential conflicts that may arise from accepting donations, such as industry type or any political ramifications, or damage to our reputation.

This policy will be viewable to the public via our website ([www.hartlepoolbabybank.co.uk](http://www.hartlepoolbabybank.co.uk)) and members of the general public may request a copy in writing or by emailing [babybankhartlepool@gmail.com](mailto:babybankhartlepool@gmail.com). We will endeavour to provide a copy within 7 working days.

Where we need to review a financial donation before acceptance, we will communicate this to the potential donor at the point of offer. The review process will be no longer than 7 working days. (In the case of exceptional circumstances we will contact the donor and explain the delay.)

We will keep a record of how each review was carried out and by who.

Where HBB are unable to accept a financial donation we will write to the prospective donor and explain our reasoning. Requests for appeal must be received in writing and the trustees will consider. Volunteers unhappy with the outcome of the review may ask the trustees to reconsider.

*Where further help is required in accepting or refusing large sums of money or property, Hartlepool Baby Bank will seek advice from the Charity Commission.*

### **Physical donations:**

Where physical donations are rejected due to space or damage, a clear verbal explanation will be given.

Where items are donated via the postal service, HBB will try to trace who and why.

If items are financially or politically inappropriate we will return.

Where items are unsuitable due to age or type we will endeavour to pass on to another community group or charity.

### **Financial donations:**

Receipts will be given for all financial donations above £100 – we will aim to query where and how the money was raised.

Anonymous donations will be accepted and anything above £25,000 reported to the Charity Commission as a serious incident.

Due diligence will be carried out for all donations, we will seek to verify companies via Google searches and Companies House.

We will consider the implications of money laundering and any cash over £10,000 will have a crime report and investigation.

Should our income /donations for the year total more than £25,000 we will complete the declaration relating to serious incidents as part of our annual return to the Charities Commission.

### **Donor jar:**

Amounts in the jar must be recorded at the end of each session. Any anomalies such as large cash amounts must be flagged to the trustee running the session immediately.

### **Politically exposed persons (PEPS)**

We will review any donation by a PEP or their near relative as standard. We will consider the higher risk, that by virtue of their position and the influence it holds, there is a greater potential for bribery or corruption.

### **Vulnerability:**

Where a donation is received from someone we perceive to be vulnerable we will consider mental capacity and also ensure the donor is aware that, donations are voluntary –There is no charge for a HBB service or item - unless discussed at the start of the process.

If someone donates who we later find lacks the mental capacity to donate, or, where someone else has Power of Attorney we will refund the donation as this person didn't have the right to give.

**Conflicts:**

Where a potential conflict of interest arises involving a volunteer or trustee a review must be carried out.

**Fundraising:**

For all fundraising events where a fixed total is required for a specific large item or event, the information for this event must clearly state, that should the total not be received, we will use the funds towards the general daily running of HBB.

*For example we require £5000 for renovation of a building.* The terms and conditions must clearly state what will happen if we only raise a percentage.

Where we have reason to believe a donor would not have donated had they known the money could be used for general purposes trustees have the discretion to refund. (Minus any applicable admin costs.)

Policy Number 3

Review Date 5<sup>th</sup> November 2023

Next Review Date End of November 2024.