



## Lads Need Dads CIC – Donations Policy

### **Donations shall be refused if they are:**

- 1 – From the proceeds of crime
- 2 - Contravening, or not in line with the mission of Lads Need Dads
- 3 – Are from donors whose involvement might otherwise be to the detriment of LND, due to reputational or other reasonably anticipated risks
- 4 – Involve LND in additional expenses which the Director's deem excessive and/or not in line with the mission of Lads Need Dads
- 5 – Are from an individual whom lacks mental capacity
- 6 – Are from an individual or an organisation whom risks the detriment of their own financial security by making donations
- 7 – Are from an individual or an organisation whom expects some monetary or other valuable return in exchange for the donation

### **Donations shall be considered for refund if they:**

- 1 – Represent an excess over a specified amount solicited in an individual appeal and cannot be directed elsewhere without the explicit consent of the donors.
- 2 – Are accepted but are on review deemed to contradict one of the principles set out in the previous section around refusal clauses.

### **General Policies:**

- 1 – As a general rule, donations under the value of £1,000 should be accepted without further investigation, but the right is reserved to decline or return any donations at any time.
- 2 – Donations above this amount, whether as a one off gift or as an accrual of a series of gifts, shall be reviewed formally by the Directors at each board meeting, in line with the guidance above.
- 3 – Donations over the value of £5,000 will be subject to full due diligence procedures (noted below) before receipt.

4 – All donations in cash should be kept to an absolute minimum and only accepted where there is no plausible way to collect a cheque or an electronic donation.

### **Lads Need Dads CIC 5k+ Donations Due Diligence Procedure**

- Who are the donors?
- What is known about them?
- Do we have a well-established relationship with them?
- Do any additional identity checks need to be made?
- In what form is the money being received? Cash, cheque, bank transfer?
- Have any public concerns been raised about the donors or their activities?  
(If so, what was the nature of the concerns and how long ago were they raised? Did the police or a regulator investigate the concerns? What was the outcome?)
  
- Would any adverse publicity about the donor have a damaging effect on our organisation?
- How big is the donation?
- Is it a single donation, or one of a number of regular donations, or the first of multiple future donations?
- Is the donation one of a series of interest-free loans from sources that cannot be identified or checked?
- Are there unusual or substantial one-off donations?
- Does the donation come with any conditions attached?  
(If so, what are they? Are they reasonable? Is there a condition that funds are only to be retained by the charity for a period and then returned to the donor, with the charity retaining the interest?)
  
- Is the donation conditional on particular organisations or individuals being used to apply the funds?
- Is the donation conditional on being applied to benefit particular individuals either directly or indirectly?
- Is there a suggestion that the charity is being used as a conduit for funds to a third party?
- Is the donation in sterling or another currency, perhaps with a requirement that the donation be returned in a different currency?
- Are any of the donors based, or does the money originate, outside the UK?  
(If so, from which country? Does this country/ area pose any specific risks?)
  
- Are donations received from unknown bodies or international sources where financial regulation or the legal framework is not rigorous?
- Is the donation received from a known donor but through an unknown party or an unusual payment mechanism where this would not be a typical method of payment?
- Is anything else unusual or strange about the donation?