

Spotlight on Corruption Policy for Accepting Donations

Introduction

Spotlight on Corruption welcomes donations, both monetary and in-kind. Such donations are essential for us to carry out our work and we are grateful to our grant funders and donors for their support.

In exceptional circumstances, it may be necessary to refuse a donation if acceptance would compromise Spotlight's independence, integrity or reputation.

This policy is informed by the [Charity Commission Know Your Donor guidance](#) and by the [Institute of Fundraising guidance](#).

Policy statement

The Board of Trustees has overall responsibility to ensure that decisions of whether to accept funding are made in the best interests of the charity.

When a donation is offered or received, Spotlight on Corruption will carry out proportionate risk-based due diligence checks on the donor, and on any conditions attached, to ensure that accepting the donation would not:

- Impair Spotlight's independence or credibility in pursuing its mission;
- Endanger Spotlight's integrity or reputation;
- Breach any of Spotlight's legal or regulatory obligations.

This policy applies to donations from individuals and institutional funders such as grant making trusts. It does not preclude the acceptance of restricted donations, provided the project is consistent with Spotlight's mission and strategic aims.

Anonymous donations

In line with [Charity Commission guidance](#), Spotlight will accept anonymous donations, provided there are no suspicious circumstances. Donations over £25,000 which are suspicious or where the donor's identity cannot be verified, will be reported to the Charity Commission [in line with their guidance on reporting serious incidents](#).

Procedure

The responsibility for carrying out due diligence checks is delegated by the Board of Trustees to the Executive Director (ED), assisted by the Senior Management Team (SMT).

The due diligence checks will be carried out by the Senior Grants and Operations Manager (SGOM) on donations of £100 or more. The SGOM will use the key questions from the Charity Commission [Know Your Donor toolkit](#) to carry out the checks, this will be done in a way that is proportionate to the size of the donation and the level of risk.

The core principles of the Know Your Donor approach are to, in a way that is proportionate to the risk: **identify** the donor, **verify** their identity, **know what their business is** (e.g. where the money has come from), know **what their business with the charity is** (e.g. when conditions are attached to the donation) and **watch out** for anything suspicious.

If there is any cause for concern, the SGOM will notify the ED, who will (with the SMT) assess whether to escalate to the Treasurer. The Treasurer may seek advice from the Charity Commission and/or ask the Board for sign off.

If Spotlight decides that a donation should be refused or returned, the Senior Grants and Operations Manager will record the decision and the reason, and this will be reported to the Board.

Adopted by the Spotlight on Corruption Board of Trustees: 31st January 2024