Donation Acceptance Policy

Approved by the board of trustees on 14 July 2026

Signed

Change Record

Date of Review	Reviewer Name	Comment
20/07/2023	Leticia Armengod	Draft issued
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St Anthony's Trust Limited

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St Anthony's Trust Limited

Welcome

For over 50 years people in our community have supported St Anthony's Trust in fostering education and training in biodynamic farming and gardening, principally by helping us to look after the biodynamic land and buildings at Tablehurst and Plaw Hatch Farms. Members of the community have also supported us in providing for those in need, principally through the care home and straw bale house at Tablehurst. Donations remain as important to us as ever; our ability to continue to foster education, training and care depends on your generosity in donating to the Trust.

There are many ways in which you can support the work of the Trust, principally through lifetime gifts (most of which can attract Gift Aid or be advantageous in terms of personal taxation) and legacies in your wills. Recent donations and legacies have enabled us to:

- Acquire more land for both Tablehurst and Plaw Hatch Farms;
- Provide a new sewerage system for Plaw Hatch Farm, thus improving both soil and water quality;
- Provide new farm buildings at Tablehurst.



All of these projects are creating a better environment in which to provide educational and training in biodynamic farming, as well as improving our ability to care for the land, those who work on the land and everyone in the community who benefits from the existence of the farms.

Of course we can – and need – to do more – more land, more housing (for farm staff and those in need), better education and training facilities, for example. So please do talk to us about the ways in which you can support the Trust to support you and all members of the community.

2. Introduction

The purpose of this policy is to establish guidelines for accepting, refusing and returning donations made to St Anthony's Trust Limited (referred to in this document as: "we", "the charity", or "the organisation.")

We are committed to ensuring that all funds entrusted to us are used responsibly, transparently, and in direct furtherance of our charitable purposes, which are:

- Education, training and research in biodynamic farming and horticulture; and
- Providing assistance to the aged, infirm and poor.

Transparency is a core value underpinning our operations, ensuring that every financial transaction is conducted with integrity and accountability. By verifying the legitimacy of our funding sources, we aim to maintain the trust of our community and ethical standards in all aspects of our work.

In setting out our policy on the receipt of donations we have followed guidance from the Charity Commission and the Institute of Fundraising, published in "Acceptance, refusal, and return: a practical guide to dealing with donations", which forms part of the advice of the Fundraising Regulator's Code of Fundraising Practice.

Small donations

In line with this guidance we will, in principle, accept donations from known sources without major review if they are less than £25,000 in a calendar year. Gifts, grants or legacies in excess of this amount will require enhanced due diligence to ensure that we comply with legal requirements, prevent money laundering and maintaining our reputation and integrity.

3. Donor Identification and Due Diligence

3.0 Triggers for Enhanced Due Diligence

Enhanced due diligence will be carried out whenever a donation presents increased risk due to its **value**, **source**, **conditions**, or **payment method**. The following situations will automatically trigger enhanced due diligence:

- **High‑value donations**, including any single donation of £25,000 or more, or cumulative donations exceeding £25,000 within a 12‑month period;
- **Donations from unfamiliar, unverified, or anonymous donors**, including donors with no prior relationship to St Anthony's Trust Limited;
- **Donations where the source of funds cannot be readily confirmed**, or where the donor is unwilling to provide reasonable information;
- **Donations originating from high‑risk jurisdictions**, or from individuals or organisations associated with higher‑risk sectors or activities;
- **Donations made through unusual or irregular payment mechanisms**, such as payments from third parties, overseas transfers without clear explanation, or methods inconsistent with typical donor behaviour;
- **Donations with conditions attached**, particularly where conditions may affect the charity's independence, reputation, or ability to fulfil its purposes;
- **Donations from organisations whose mission, activities, or funding sources are unclear or potentially inconsistent with our values;** and
- **Any donation that raises concerns during initial screening**, including inconsistencies, incomplete information, or reputational red flags.

3.1 Donor Identification

a. All donors must provide accurate and up-to-date personal information, including full name, contact details, and proof of identity if necessary.
b. The Trust will conduct reasonable due diligence to identify and verify the donor's identity, particularly for significant donations or when the donor is unknown or not previously associated with the charity.
c. The donation will be gratefully accepted provided the due diligence checks result in reasonable assurance that the donor can be trusted: e.g., the contribution comes from a trusted source (for example and not exclusively: a known person, a trusted organisation in the UK, a legacy from a known person) and it has no conditions attached, or the conditions are ethically feasible and aligned with our mission and objectives.

3.2 Enhanced Due Diligence:

a. Enhanced due diligence measures will be applied in cases of substantial donations, especially when coming from anonymous sources, organisations, higher-risk individuals or jurisdictions, if they have conditions attached, or when they come through an unusual payment mechanism where this would not be a typical payment method.
b. **Enhanced due diligence** may include verifying the donor's identity, legitimacy, and reputation through reliable sources (such as identity documents, references, public records, or third-party agencies specialising in due diligence checks), identifying an organisation's name purposes, mission and supporters, tracking payment sources to the extent possible to verify the jurisdiction of origin, checking the legal and tax requirements from the country of origin (when coming from outside the UK).
c. When performing enhanced due diligence, the form in Annex 1 (suspicious donation log) will be filled for future monitoring purposes.
d. **Donor screening processes** will be established to identify any potential conflicts of interest, reputational risks, or concerns. Such screening may include conducting online research, reviewing public records, or seeking professional advice as necessary.
e. The results from the enhanced due diligence and the donor screening process will be disclosed to the board of trustees so a decision can be made.

3.3. Anonymous Donations:

a. Anonymous donations may be received as a single donation or as a series of smaller donations from an unfamiliar, unverified, or unidentified source. Anonymous donations may also take non-monetary forms, such as shares or goods. The Trust will make reasonable and proportionate efforts to identify the source of any anonymous donation, including establishing whether it originates from a grant-making body, a legacy, or a third party acting on behalf of a donor.

b. Anonymous donations will automatically be treated as *donations requiring enhanced due diligence*. Where the Trust is unable to identify the donor, the source of funds, or the donor’s intentions, additional checks will be undertaken to ensure compliance with legal and regulatory requirements.

c. If, after carrying out enhanced due diligence, the Trust is still unable to obtain sufficient assurance about the legitimacy of the donation or the intentions behind it, the trustees may decide to decline the donation. The charity will not accept anonymous donations where the risk cannot be adequately assessed or mitigated.

d. Third parties making donations on behalf of an anonymous donor will also trigger enhanced due diligence unless the third party is reputable and allows trustees to know the donor’s identity on a confidential basis.

e. Any anonymous donation of £25,000 or more will be reported to the Charity Commission as a serious incident, in line with regulatory requirements.

3.4 Donations Made by Organisations

We value every donation we receive, and we want to make sure that we are funded by organisations that share our values, care for each other and our planet and demonstrate transparency in their actions.
a. When the donation comes from an organisation that does not have a well-established relationship with Saint Anthony’s Trust, we will request precise and accurate information about its funding sources and the organisation’s activities, mission and ethos.
b. The donation acceptance will be subject to approval from the board of trustees (see decision-making clauses). Trustees will evaluate the donation's origin to ensure it is appropriate to receive; they will carry out all the necessary efforts to ensure its acceptance will not affect our reputation or the public trust in us.

3.5 Donations Coming from High-Risk Individuals and Jurisdictions

a. Where an unfamiliar donor operates a business or is from a country outside the UK about which public concerns have been raised, we will request precise and accurate information about its funding sources and the donor’s activities, mission and ethos.
b. The donation acceptance will be subject to approval from the board of trustees (see decision-making clauses); they may need to refuse a donation if they do not receive satisfactory replies.

3.6 Donations with Conditions Attached

a. Trustees can accept donations with conditions attached, provided those conditions are legal and compatible with our ethos, purposes, priorities and activities.
b. If the conditions are so stringent that they could undermine our independence, the trustees may need to refuse the donation.
c. If fulfilling the conditions will cost us more resources than we can gain by accepting the donation, the trustees may need to reject the donation.
d. The donation acceptance will be subject to approval from the board of trustees (see decision-making clauses).

3.7 Unusual Payments

a. We will investigate payments received through an unusual payment mechanism where this would not be a typical payment method.
b. The donation acceptance will be subject to approval from the board of trustees (see decision-making clauses).

3.8 Conflicts of interest

a. Any donation that involves, or may appear to involve, a conflict of interest must be declared immediately in accordance with St Anthony's Trust Limited's Conflict of Interest Policy. A conflict of interest may arise where the donor is a trustee, employee, volunteer, close family member, business associate, or an organisation connected to any of these individuals.

b. Where a potential conflict of interest is identified, the affected individual must take no part in the due diligence process, decision-making, or discussions relating to the donation.

c. The trustees will assess whether the conflict can be managed appropriately or whether accepting the donation could compromise, or be perceived to compromise, the charity's independence, integrity, or reputation.

d. All conflicts of interest and the steps taken to manage them will be recorded in the minutes or relevant governance records to ensure transparency and accountability.

4. Decision Making

4.0 Roles and Escalation in the Decision-Making Process

a. The administrator will carry out the due diligence checks required under this policy, including both standard and enhanced checks, and will document all findings clearly and accurately.

b. The administrator will present the results of the due diligence process to the trustees, together with any concerns, inconsistencies, or recommendations for further action.

c. The trustees retain ultimate responsibility for ensuring that appropriate due diligence has been carried out and for deciding whether to accept, decline, or return a donation.

d. Where a donation raises concerns or triggers enhanced due diligence, the administrator will escalate the matter to the full board of trustees for collective decision-making.

e. If trustees disagree on whether to accept or decline a donation, the Chair will facilitate further discussion. Where consensus cannot be reached, the trustees will make a decision by majority vote, ensuring that the rationale is clearly recorded in the minutes.

f. External legal or regulatory advice will be sought where due diligence checks identify potential illegality, significant reputational risk, or uncertainty about the charity's legal powers to accept or return a donation.

g. All decisions relating to the acceptance, refusal, or return of a donation will be documented in the organisation's minutes or fundraising records, including the checks undertaken, the risks considered, and the final rationale.

4.1 Decision-Making Process

- The trustees will be informed of any suspicious donation
- One or more trustees will be assigned to follow the case with the administrator.
- The form in Annex 1 will be filled out.
- Enhanced due diligence checks will be carried out.
- The donor will be checked against the consolidated lists of financial sanctions targets and prescribed organisations.
- Bring the investigation results to the board of trustees.

b. If the checks bring back a satisfactory result and there is no risk perceived in accepting the donation, trustees will gratefully accept the donation.
c. If due diligence checks do not offer a satisfactory result, we may seek legal advice from our advisors or the Charity Commission.
d. Should due diligence checks reveal evidence of a crime, money laundering, terrorism, or other illegal activities, we will not accept the donation and will report the matter to the police, HRM, Charity Commission or other appropriate authorities.
e. The decision-making process will be documented in the organisation's minutes or fundraising records to maintain transparency and accountability. We will document the rationale for accepting or declining a donation (including risk assessments).

4.2 Sanction List Checks

Sanctions screening will be carried out for all **donations requiring enhanced due diligence**. The administrator will check the donor against the **UK Office of Financial Sanctions Implementation (OFSI) Consolidated List of Financial Sanctions Targets**, and any other relevant UK or international sanctions lists where appropriate. The administrator will report any concern to the board of trustees.

The trustees retain ultimate responsibility for ensuring that appropriate sanctions checks have been completed before a donation is accepted.

4.3 Legal Considerations:

The law requires charity trustees, in deciding whether to accept or refuse a particular donation, to consider the charity's best interests, taking an overall view. The law allows practical and ethical factors to be considered as long as these are likely to affect the specific interests of the charity. Although ethics and values will be important in reaching the decision, these cannot be the decisive factors. The organisation needs to demonstrate that acceptance of the donation would be detrimental to achieving its purpose.

4.4 Ethical and Reputational Considerations:

a. In addition to legal and financial checks, the trustees will consider whether accepting a donation is consistent with the values, mission, and charitable purposes of St Anthony’s Trust Limited.
b. Saint Anthony’s Trust Limited can refuse a donation when accepting it would be detrimental to achieving our purposes. This anticipated detriment (like the reputational cost) will be set against the benefit of having the funds from the donor, which would enable the organisation to pursue its purposes.
c. Saint Anthony’s Trust Limited reserves the right to refuse donations that come from controversial industries or are inconsistent with its mission, values, or ethical standards or that may harm the charity's reputation or compromise its mission.
d. We want to ensure that the donations we accept come from people and organisations aligned with our ethos, mission and values.

5. Reporting Suspicious Activity:

a. All employees, volunteers, and trustees are responsible for reporting to the board of trustees any suspected illegal activities, money laundering, or unethical behaviour related to donations.
b. A designated individual or committee should be appointed to receive and investigate reports, ensuring that appropriate actions are taken and, if necessary, reporting the matter to the appropriate authorities.
c. We will also be alert to the risk that individuals may be raising funds in our name that never reach us or where only some of the money is passed on. If trustees have concerns that this might be the case, we will report this to the appropriate authorities. If any individual suspects this is happening, we would appreciate it if you could communicate with us immediately through our administrator: admin@saintanthonystrust.com
d. If our trustees have reasonable cause to suspect that a donation is related to terrorist financing or money laundering, they are under specific legal duties under criminal law to report – terrorism offences must be reported to the police; concerning money laundering, the disclosure will be made to the police, an HMRC customs officer, or an officer from the National Crime Agency (NCA)

6. Refusing or Returning a Donation We Have Already Accepted

Saint Anthony's Trust Limited will not refund donations except for specific circumstances:
a. It is proved that the donation comes from a vulnerable person who lacks mental capacity when donating.
b. Appeals: when a specific appeal has not raised enough funds, and this appeal's wording does not state what will happen if insufficient funds are raised.
c. Appeals: when a specific appeal raises more funds than intended, and this appeal's wording does not state where the additional funds will be applied.
d. A donation is made to us intended for another charity.

e. The trustees may refuse or return a donation where accepting it would be unlawful, inconsistent with the charity's purposes, or likely to cause significant harm to the charity's reputation, beneficiaries, or independence.

f. A donation may also be refused or returned where enhanced due diligence has not provided sufficient assurance about the donor's identity, the legitimacy of the funds, or the donor's intentions.

g. The administrator will prepare a summary of the concerns identified, the due diligence undertaken, and any outstanding risks, and will present this to the trustees for decision. The trustees will consider whether the risks associated with accepting the donation can be mitigated. Where risks cannot be adequately managed, the trustees may decide to refuse or return the donation.

h. Decisions to refuse or return a donation must be made by the trustees collectively and recorded in the minutes, including the reasons for the decision and the steps taken to reach it.

i. Where a donation is returned, the charity will ensure that the funds are returned to the original source using a secure and auditable method, and that appropriate records are retained.

j. If the donation is significant or the circumstances raise regulatory concerns, the trustees will consider whether the matter should be reported to the Charity Commission as a serious incident.

7. Record-Keeping and Audit Trail

The administrator will maintain clear and accurate records of all due diligence checks carried out under this policy, including both standard and enhanced checks. For donations requiring enhanced due diligence, the administrator will retain copies of all supporting documentation, including identity information (where applicable), sanctions-screening results, correspondence, and any external advice obtained.

The administrator will maintain a **Due Diligence Log** recording:

- the donor's name (or anonymous status),
- the nature and value of the donation,
- the due diligence checks completed,
- any risks identified,
- the decision reached by the trustees, and
- the rationale for that decision.

All decisions relating to the acceptance, refusal, or return of donations will be recorded in the trustees' minutes or other governance records, including the factors considered and the reasons for the final decision.

Records relating to donations requiring enhanced due diligence will normally be retained for **six years**, or longer where required by law or where ongoing risks justify extended retention.

Access to due diligence records will be restricted to the administrator and trustees, and handled in accordance with the charity's data-protection obligations.

8. Administrative and Governance Costs

To ensure donations are managed responsibly and sustainably, the Trust recovers the direct costs involved in receiving, processing and reporting on restricted funds. This includes fees and transaction charges directly related to the donation; administrative time spent on donation handling, due diligence, tracking and reporting; and audit and financial governance costs.

These cost-recovery measures ensure that donations can be administered transparently and without placing an unfunded burden on the charity.

As a small charity with limited funds, the trustees cannot normally accept donations that expressly prohibit the allocation of funds to cover administration costs. However, each donation will be assessed on its merits, and, in exception, the costs of administration can be met from general funds.

9. Confidentiality and Data Protection

a. Personal information collected during the due diligence checks will be handled confidentially and in compliance with applicable data protection laws.
b. Data obtained during due diligence checks should be securely stored and accessed only by authorised personnel who need it for decision-making purposes.

c. We have the legal obligation to store personal information from donors supporting an appeal:
d. We have a legal obligation to maintain a record of the donor's details (the name and postcode are the minimum requirements) when we claim Gift Aid

10. Policy Review

a. The trustees will review this policy at least once every two years, or sooner if there are significant changes in legislation, Charity Commission guidance, or the charity's activities that affect donation acceptance and due diligence requirements. The administrator will monitor the implementation of this policy on an ongoing basis and will report any issues, emerging risks, or patterns of concern to the trustees.

b. The trustees will review a summary of donations requiring enhanced due diligence at least annually, including any donations refused or returned, to ensure that the policy is being applied consistently and proportionately.

c. Where the review identifies gaps, operational challenges, or areas for improvement, the trustees will update the policy and ensure that any changes are communicated to relevant staff, volunteers, and partners.

The trustees will ensure that this policy remains aligned with Charity Commission guidance, including *Know Your Donor*, *Protecting Charities from Harm*, and relevant anti-money-laundering and sanctions regulations.

Annexe 1) Suspicious Donation Log

St Anthony's Trust Limited

Suspisious donations log			
Name of donor			
Amount of donation		Date received	
Form of donation (eg cheque, direct transfer)			
Name of bank			
Sorting code & account number		BACS reference	
Account name			
Name of cheque signatory			
Currency used			
Nature of suspicion/ reason for query			
Any previous donations from this source?			
Any conditions attached to donation?			
Action to be taken (indicate all that apply)	☐ Report to police (state crime ref number) ☐ Report to Charity Commission ☐ Report to HMRC ☐ Refuse donation ☐ Other action (record overleaf or attach)		