

# **ETHICAL DONATIONS POLICY**

LAST REVIEWED:

APPROVED BY THE BOARD OF TRUSTEES: 16/04/2024

DATE OF NEXT REVIEW: 16/04/2026



To support its work, Good Vibrations seeks philanthropic support from charitable trusts and foundations, statutory sources, individuals, and companies. Good Vibrations also contracts with public sector bodies, including HM Prisons, to deliver programmes. The scope of this policy is concerned with philanthropic, rather than contractual or commercial, income.

This policy has been developed for the following purposes:

- To set out the circumstances under which Good Vibrations will and will not accept donations from individuals and companies.
- To ensure that Good Vibrations does not compromise any legal or ethical standards applicable to its professional or charitable functions.
- To ensure that the acceptance of any donation does not present a conflict of interest for Good Vibrations or present a risk to the charity's reputation.

Specifically, we aim at all times to be open, honest, fair and to operate in a legal way that meets not only the law, but also fundraising regulation and best practice, including the [Code of Fundraising Practice](#).

Everyone who is involved in fundraising has a responsibility to be aware of and comply with the ethical issues and procedures in this policy.

## **1. SCOPE OF POLICY**

This policy applies to relationships with individuals and companies, but not to statutory bodies or UK government support. As charitable trusts are regulated by the Charity Commission (England & Wales) or OSCR (Scotland), it also does not apply to charitable trusts, unless there is evidence that grant-making is facilitated through one of the listed business areas below.

The policy does not apply to donations of under £5,000, either cumulatively or within a 12 month period, as this is deemed the level over which donations could be perceived to unduly influence Good Vibrations' activities.

## **2. DONATION ACCEPTANCE CRITERIA**

Good Vibrations will accept all donations unless clear evidence demonstrates one or more of the following:

- The funds are the proceeds of a crime.
- Accepting the donation would be detrimental to the achievement of the purposes of the organisation, as set out in the Good Vibrations constitution. This anticipated detriment must be set against the benefit of having the funds from the donor, which would enable the organisation to pursue its purposes.
- The potential donor is a company whose primary business does not align with the values of Good Vibrations. This also applies to corporate foundations of companies operating in these fields, or charitable trusts established with the proceeds of these business areas.

- The potential donor's objectives or activities are inconsistent with Good Vibrations charitable purpose, mission and values.
- The potential donor's objectives or values risk causing harm, either directly or indirectly, to Good Vibrations' beneficiaries.
- Accepting a donation may damage Good Vibrations' reputation and/or risks damaging relationships with other funders.

### **3. DUE DILIGENCE**

Before Good Vibrations either accepts or solicits a donation of £5,000 or more, the donor will be reviewed against the above criteria. The identity and background of the donor will also be confirmed, alongside identifying the source of funds in order to comply with the Bribery Act 2010 and the Money Laundering Regulations. In the case of concerns arising from this initial due diligence screening, these concerns – as set out in the charity's due diligence checklist - will be escalated to the Chief Executive, with a final decision taken by the Board of Trustees. Good Vibrations will not accept or solicit a donation of any size from organisations whose primary business falls into one of the categories set out above.

### **4. ANONYMOUS DONATIONS**

Good Vibrations will not accept donations of £5,000 or more where the identity of the donor is not known, as such donations do not allow for due diligence to be carried out in line with this policy. This does not extend to donations where the donor wishes their gift remain publicly anonymous but is willing for their identity to be known to staff and trustees.

### **5. BENEFICIARIES**

How we represent our beneficiaries, in our communications with funders, is always respectful of them and portrays them in the way they would wish to be seen. We will only use personal information that they have given consent for and for the purposes they have agreed and will not disclose anything that might put them at risk, particularly children and vulnerable people.