



## Bexhill Heritage

Conservation, protection and improvement  
of the Bexhill-on-Sea built environment.

### Bexhill Heritage Donation Acceptance, and Refusal Policy and Procedure

#### Applicability

This policy applies to all members of the charity, including trustees.

#### Compliance

The charity complies with UK laws and regulatory guidelines, ensuring no misleading information is provided to donors.

The Charity Commission provides clear guidance on accepting and refusing donations. This policy has been developed using those principles as guides. The full guidance is available on the Charity Commission website: [Accepting, refusing and returning donations to your charity - GOV.UK](https://www.gov.uk/government/publications/accepting-refusing-and-returning-donations-to-your-charity)

#### Acceptance of Donations:

- Donations are accepted on a good faith basis, presuming they are acceptable unless evidence suggests otherwise.
- Appropriate risk-based due diligence is conducted to mitigate risks.
- Decisions to accept or reject donations consider the impact on beneficiaries and potential risks to the charity, such as reputational damage or legal issues.
- Factors that might suggest a donor lacks capacity to make an informed decision to donate or is a vulnerable person that need to be considered include the donor's health, stress levels, understanding of English, and age.

#### Anonymous Donations:

- Anonymous donations are acceptable, provided adequate safeguards are in place. Trustees are encouraged to use the Charity Commission checklist to assess the likelihood of an anonymous donation being unacceptable. [Tool 6.pdf](#)
- Trustees must know the charity's donors and assess risks versus benefits.

#### Refusal of Donations

Donations will be refused if there are reasonable grounds to believe:

- The donor's views or activities are incompatible with the charity's values.

- The donation may be linked to illegal activities or scams
- The donor is attempting to donate assets that they do not own.
- The donor meets the criteria to be classed as vulnerable.
- There is a private benefit linked to the donation.
- Conditions attached undermine the charity's independence or effectiveness.
- The cost of accepting the donation exceeds its value.

**Donor Recognition & Private Benefit:**

- Donations from commercial organisations are welcomed, but not if they are for commercial gain.
- Recognition for donors will be standard and not exceed normal thanks.

**Refusal Procedure:**

1. In the first instance, the Chair is responsible for ensuring any donation is supporting the charity in accordance with this policy. Central to this are assurances about the identity of donors, the provenance of funds and the conditions attached to them. The Chair will inform the trustees on any donation that he/she judges could potentially raise questions.
2. On the basis of the evidence available, the Trustees will establish which course of action (i.e. to accept or to refuse the donation) is in the charity's best interests. Trustees can refuse the donation:
  - a) Where it is clear that the activities of a donor are directly detrimental to the objectives of the charity or to its beneficiaries
  - b) Where the potential donor is a person/ company whose activities are not directly related to the charitable objects of the charity, but the charity nevertheless wishes to avoid association with the donor; great care should be exercised in coming to such a decision.
3. Trustees will conduct a risk assessment to demonstrate that the action (of acceptance or refusal) is reasonable in light of the risks and mitigating actions, and, by extension, serves the best interests of the charity. This is important, as the trustees are potentially answerable to the Charity Commission and MUST be able to demonstrate clearly to the Commissioners how 'the best interests of the charity' have been served in accepting or refusing the donation in question.

4. If, having considered the above, the trustees are still concerned about whether or not to refuse a particular donation; they will seek external legal advice. Circumstances where such advice might be considered are those where:
  - a) It is not immediately clear what the 'best interests of the charity' are in relation to the proposed donation
  - b) Large sums of money or property are involved
  - c) The trustees have reason to believe that a decision taken by them might be subsequently challenged in court.
5. Where the trustees decide to refuse a donation, they will keep a careful minute of their decision, and the reasons for it. The Chair of the Board of Trustees will communicate the decision to refuse a donation to the parties concerned.

**Adopted by Board: November 2025**

**Next review date: January 2028**