



ACU donations acceptance policy

Due diligence

Enhanced due diligence will be conducted by the ACU on any donations received totalling GBP 2,500 or more within one financial year. As part of enhanced due diligence, the ACU will conduct research into the donor, including sanctions and reputational risk checks. Donors will be required to provide information on the provenance of the funds and whether they are, or are related to, a Politically Exposed Person.

Refusal of donations

Donations will be refused or returned where:

- They are determined to result from unlawful activities in any country
- The activities of the donor are contrary to the ACU's values, so that association with the donor could negatively affect the organisation's reputation
- Conditions imposed by the donor are contrary to the ACU's values and/or strategic objectives
- The donation requires any unlawful activity by or on behalf of the ACU
- They contravene the ACU's Safeguarding Policy

Cultivation of donor relationships

The ACU will avoid cultivating relationships with donors whose activities would be in contravention of this policy. Preliminary checks will be carried out by the ACU before any approach to donors. The preliminary screening will include research into high risk factors such as sanctions, enforcement, and negative press. Only donors which pass the initial checks will be approached.

Reporting

- If due diligence checks reveal evidence of crime, the ACU is duty bound to report the matter to the police and/or other appropriate authorities.
- The ACU will also report any such incidents to the Charity Commission under the reporting serious incidents regime.

Date of last review	February 2021
Date of next review	February 2021
Policy owner	CFO