
1.0 BACKGROUND

As a registered charity (Charity no. 291245), Britten Sinfonia is expected to ‘raise funds and to invite and receive contributions provided that in raising funds the charity shall conform to any relevant statutory regulations.’ (Britten Sinfonia Memorandum of Association)

The overriding principle of Britten Sinfonia’s fundraising is that donations are made in good faith and will be accepted unless there are reasonable concerns. The purpose of this document is to define our gift acceptance approach and how we identify and act on reasonable concerns.

Britten Sinfonia Trustees are ultimately responsible for the acceptance of donations, acting in the best interests of the charity. This document defines where these responsibilities may be delegated to the Britten Sinfonia Executive, and how decisions on gift acceptance are made and by whom.

2.0 FUNDRAISING REGULATION

Britten Sinfonia has signed up to the Fundraising Regulators *Code of Fundraising Practice*, and commits to abide by this comprehensive code which outlines best practice in ethical fundraising. Furthermore, Britten Sinfonia’s gift acceptance policy is guided by the Charity Commission’s guide to *Acceptance, Refusal, and Return* of donations.

3.0 EXCLUSIONS

As per the Institute of Fundraising’s guide ‘donations can and should only be refused in exceptional circumstances.’ For Britten Sinfonia, these circumstances are defined as:

1. It being known by Britten Sinfonia after conducting due diligence that acceptance of the donation would be unlawful.
2. Acceptance of the donation being detrimental to the purposes or values of Britten Sinfonia.
3. The donation comes with conditions that are likely to restrict artistic freedom and decision making to an unacceptable level.
4. If the gift is from an individual on the UK’s sanctions list.
5. If there are reasonable grounds for believing, or there is evidence that, the gift may be comprised or derived from funds arising from an illegal activity, fraud, or the evasion of taxation.
6. If the position of an existing supporter changes over time and the Development Director, CEO, or Trustee become aware of a new cause for concern, a diligence report shall be shared with trustees, which may include commissioning an independent due diligence review.

4.0 DUE DILIGENCE

4.1.1. Internal due diligence

For any individual, organisation, or grant making institution wishing to make a gift/grant of more than £5,000, the Development team will review publicly available information through desk-based research. This is to assess whether the individuals or organisations are known donors, whether their gifts have been accepted elsewhere and whether there is any substantiated negative press about them, or a likely conflict with Britten Sinfonia’s values, which may negatively impact Britten Sinfonia’s reputation or its relationships with other stakeholders.

Where the due diligence highlights potential cause for concern, these shall be shared with the Gift Acceptance Committee for further discussion and agreement as to whether the charity should proceed with the gift or sponsorship.

4.1.2 External due diligence

The Development Director and CEO shall consider the need to commission independent due diligence reports in the following circumstances:

- Where desk-based research by members of the Development department flags potential risks.
- For donations from new individual donors giving more than £25,000 where sufficient publicly available information cannot be gathered via desk-based research.

Independent due diligence reviews will seek to identify the source of funds from which a gift will be made and highlight any potential risks.

Summary findings of all externally commissioned due diligence reports will be reviewed by the Development Director and Chief Executive Officer before the Development Department proceeds further.

5.0 DONATIONS FROM VULNERABLE INDIVIDUALS

Britten Sinfonia Development team / CEO is obliged to raise concerns to the Gift Acceptance Committee about any donation when they feel there are reasonable grounds to think that a donation has come from an individual who lacks the capacity to make an informed decision to donate, is in a vulnerable situation, or has been coerced into making a donation.

The Development team shall provide a report to the Gift Acceptance Committee who shall decide by simple majority if they believe the individual is vulnerable, or commission further research if appropriate.

6.0 GIFT ACCEPTANCE DECISION MAKING

The Trustees are ultimately responsible for the acceptance of donations or gifts, with support from the Development Director and CEO.

- Up to £25,000
The Trustees have delegated authority and authorised the Development Director to accept donations of up to £25,000 on behalf of the Trustees, where no risks are identified through the due diligence process.
- £25,000 to £50,000
Any gifts of between £25,000 and £50,000 where no risks are identified may be approved by the Development Director with the endorsement of the CEO on behalf of the Trustees.
- Over £50,000
Any gifts over £50,000 where no risks are identified may be approved by the Development Director with the endorsement of the CEO and Chair of Trustees on behalf of the Trustees.

7.0 GIFT ACCEPTANCE COMMITTEE

The Gift Acceptance Committee is responsible for discussing any potential gifts that have been identified as being of potential concern by the Development Director and/or CEO.

7.1 Committee members

The Gift Acceptance Committee shall consist of:

- Chair of Trustees (Chairing)
- The CEO and/or Development Director
- Two designated members from the Board of Trustees
- Chair of the Development Committee

The Gift Acceptance Committee shall meet when a gift has been identified as potentially problematic. Three members of the Gift Acceptance Committee, including the Chair of Trustees and CEO/Development Director, shall constitute a quorum.

Ahead of meeting, the Development team will prepare a report summarising context for the potential gift, findings to date – to include potential concerns and mitigations.

7.2 Conflicts of interest

If a committee member has a personal or professional connection to the potential donor/organisation in question, this shall be declared immediately and considered a conflict of interest.

The committee member will be excused from attending the meeting. If a conflict of interest is declared by the committee member who is Chairing the meeting then a trustee will assume Chairing responsibilities for that specific meeting.

7.3 Meeting decisions

The Gift Acceptance Committee shall make a recommendation to the Board as to whether to accept or decline the gift, to include the rationale plus additional documentation.

Trustees will have five calendar days to raise any views contrary to the recommendation of the Gift Acceptance Committee. If in this timeframe no contrary views are expressed, then the recommendation will be actioned.

If contrary views are expressed, then a decision to accept or decline the gift in question, will be made by the Board of Trustees, with a 70% or greater majority required (with a decision quorate if at least 50% of Trustees vote). This decision will be made within five calendar days of trustees being requested to vote on whether to accept or decline the gift.

8.0 ANONYMOUS DONATIONS

Some donors may wish not to be publicly acknowledged, however, it should be the norm that the Development Team knows the name of such anonymous individual donors and these records are kept securely in accordance with privacy rules on Britten Sinfonia's CRM database, but these donors will not be named in any public facing communications or materials.

In rare cases, donations may be made completely anonymously, where Britten Sinfonia does not know the identity of the donor. In this instance steps should be taken to discover the identity of the donor.

If a donor cannot be identified, the gift in question shall be referred to the Gift Acceptance Committee for a decision.

Note: This does not relate to the gift of cash received at Britten Sinfonia concerts or events.

9.0 USEFUL PUBLICATIONS

- 9.1 Charity Commission 'Know your donor' toolkit
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550694/Tool_6.pdf
- 9.2 Charity Commission Guidance for charities facing decisions about donations
<https://www.gov.uk/government/news/new-guidance-for-charities-facing-decisions-about-donations>
- 9.3 Charity Commission's guide to *Acceptance, Refusal, and Return* of donations:
<https://www.gov.uk/guidance/accepting-refusing-and-returning-donations-to-your-charity#donations-you-must-refuse-or-return>
- 9.4 The Fundraising Regulators *Code of Fundraising Practice*:
<https://www.fundraisingregulator.org.uk/code>
- 9.5 UK Government's Financial Sanctions list
<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets>
- 9.6 UK Government's proscribed list of terrorist organisations
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/266038/List_of_Proscribed_organisations.pdf

Last updated: 21 May 2025