

JCC OF HOLY TRINITY AND WEST MALVERN

Donations Acceptance Policy

Date Approved: 25th November 2025

Approved By: the JCC of Holy Trinity and West Malvern

Review Date: November 2026

CONTENTS

1. Purpose

This policy outlines the principles and procedures under which the JCC of Holy Trinity and West Malvern would accept, refuse, and return donations to ensure compliance with Charity Commission guidance and law [Accepting, refusing and returning donations to your charity - GOV.UK](https://www.gov.uk/government/guidance/accepting-refusing-and-returning-donations-to-your-charity) (effective 1 November 2025) and to uphold the integrity and mission of the church.

2. Scope

This policy applies to all JCC members, staff, volunteers, and fundraising partners involved in soliciting or receiving donations on behalf of the church.

Day-to-day decision making and donations handling will lie with the Treasurer. Decisions about accepting donations, the need to carry out due diligence or other concerns about accepting or refusing a donation will be first escalated to the Vicar and Church Wardens before being escalated to the full JCC for decision.

3. Principles for Accepting Donations

The church will accept donations that:

- Are given freely without conditions that conflict with the church's mission or values.
- Are legal and do not originate from unethical or criminal sources.
- Do not compromise the church's independence or reputation.

JCC members must ensure:

- Donors are informed about how their donations will be used.
- Donations are processed securely and transparently.
- Records of donations are maintained in accordance with data protection laws.

4. Refusing or Returning Donations

Donations may be refused or returned if:

- The source or conditions of the donation are illegal or conflict with the church's values or legal obligations.
- The donation could damage the church's reputation or public trust.
- The donor lacks capacity or was unduly pressured to give.
- The donation would place an unacceptable burden on the donor.
- The donation would confer a benefit on the donor.

Donations may also be returned if a fundraising appeal for a specific purpose does not raise sufficient funds or it raises too much money. Our wording for appeals will always say clearly what will happen to any surplus funds or if not, enough funds are raised.

JCC members must document the rationale for refusing or returning a donation, following the [guidance on documenting fundraising decisions](#).

It will be the responsibility of the vicar to communicate with the donor where appropriate, regarding the donation acceptance policy and the final decision of the JCC to refuse or return a donation.

5. Due Diligence

[Due diligence](#) involves carrying out proper checks to help the JCC confirm the identity and verify the legitimacy and suitability of donations, donors and others it works with. The JCC must be assured that donations it is offered or receive do not come from inappropriate or illegal sources, are not subject to restrictions, prohibitions or sanctions, and will not bring the church into disrepute.

Due diligence checks will be appropriate, reasonable and proportionate, with a commonsense approach taken. Due diligence checks into existing regular donors, small cash donors, donors known to the JCC and other regular and expected donations will not normally be necessary unless there are other risk factors present, for example if the donations are coming from someone who might be considered vulnerable, or whose well being might be in jeopardy as a result of making these donations, or where there are suspicious circumstances. See the section on Safeguarding below.

JCC members will carry out appropriate, reasonable and proportionate due diligence on:

- Donations involving significant reputational or ethical considerations.
- Fundraising partners and third-party platforms. *Please note that some providers recommended by the national Church of England have already been subject to its due diligence processes.*

- Unusual unsolicited donations, such as those individual single donations that are unusually large.
- Anonymous donations or those made through an unknown intermediary.
- Donations with unusual, unreasonable or potentially illegal conditions or restrictions.
- Donations associated with complex banking or complex tax arrangements.
- Time-limited donations.
- Donations in the form of loans.
- Donations from foreign sources or made in a foreign currency.
- Donations of a significantly different value than expected.
- Donations of property, particularly of significant or potentially appreciable value, such as real estate or cryptoassets.

Due Diligence will consist of some or all of the following as appropriate:

- Confirming the identity of donors through reliable documentation (e.g. photo ID, business registration information).
- Evaluate whether accepting a donation could harm the church's reputation by considering the donor's background, affiliations, and public perception.
- Maintaining clear records of due diligence checks, including the rationale for accepting or refusing donations.
- Using external resources such as online searches, publicly available databases, news sources, and regulatory lists to assess donor credibility.

Due diligence will be proportionate to the size and nature of the donation. Higher-value or complex donations will require more thorough checks.

6. Safeguarding

Fundraising will be respectful, fair, and avoid any undue influence. JCC members must ensure all JCC safeguarding policies are followed when any fundraising activity is undertaken.

We will always consider the needs of existing or potential donors who may be in vulnerable circumstances or need extra care and support to make an informed decision. This includes:

- not accepting a donation if you know, or have reason to believe, that a person cannot make an informed decision to donate; and
- returning a donation if you discover that the donor could not make an informed decision at the time of the donation.

We are not expected to assess every existing or potential donor's capacity to make an informed decision. However, those who receive donations should be alert to signs that someone lacks the capacity to make an informed decision and support them appropriately.

JCC members will carry out due diligence checks into the suitability of people fundraising on the church's behalf, where they are likely to have access to children or adults at risk to ensure they do not pose a risk of harm to others, to its fundraising reputation, and to that of fundraising generally. Treasurers should never be afraid to make careful enquiry to be confident that any and all donors are making informed decisions.

7. Complaints

The JCC takes complaints seriously.

[Fundraising complaints](#) should relate to activities carried out by and on behalf of the church to raise funds for ministry and mission. If you believe that the church has not complied with the new [Code of Fundraising Practice](#), please raise your concerns with us.

Email: info@holytrinitymalvern.org.uk

Post: The Vicarage, 2 North Malvern Road, Malvern, Worcs WR14 4LR

We will aim to acknowledge all complaints within 7 days and to resolve them within 30 working days. Your complaint will be investigated thoroughly and fairly, and we will let you know the outcome within the timescales above. Throughout the process we will treat you fairly, and deal with your complaint sensitively. Your complaint will be treated confidentially and details shared only with those involved in the investigation.

If JCC members are unable to resolve complaints themselves, they may be referred to the Fundraising Regulator for consideration. You can always make a complaint to the Fundraising Regulator directly. Its service is free and can be used by anyone who believes they have been affected by poor fundraising practice. Complaints should be made within two months of the PCC's final response to a complaint.

[Make a Complaint to the Fundraising Regulator](#) – you can do this via their online form or by:

- emailing complaints@fundraisingregulator.org.uk
- calling 0300 999 3407 (Monday to Friday, 09.30 am – 4.30 pm)
- sending a letter to Fundraising Regulator, 50 Featherstone Street, London, EC1Y 8RT

8. Monitoring and Review

The JCC will:

- Monitor compliance with this policy.
- Review the policy annually or in response to changes in regulation or church practice.