Donations Acceptance Policy

Policy owner

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Business and Performance Manager (FM&M)

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7

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Owning department

Fundraising, Marketing and Media

Applicability

The RNLI complies with the Fundraising Regulator's Code of Fundraising Practice (2025) and aligns with the Charity Commission guidance for England & Wales and incorporates additional compliance requirements for Northern Ireland, Scotland, the Republic of Ireland, and Crown Dependencies as outlined in the 'Applicable Laws and Guidance' section.

Background of policy

This policy ensures compliance with all relevant laws and the UK Fundraising Regulator's Code of Fundraising Practice (2025), safeguarding the RNLI, its staff, and supporters. It provides a framework for refusing donations that could negatively impact the charity

Objective of Policy

This policy provides a clear, ethical, and consistent process for accepting, rejecting, or returning donations. It reflects the RNLI's values and clarifies who is responsible for decision-making. The RNLI remains neutral on any activity that is legal. Each donation is assessed individually using proportionate due diligence.

As a donation-funded charity, the RNLI must act in its best interests and may need to avoid association with certain individuals or organisations. Risks are assessed case by case by relevant staff and/or Trustees.

Donations should only be refused in exceptional circumstances and only for the defined reasons in this policy. All decisions must be documented to ensure transparency. A donation should be declined only if accepting it would cause more harm than benefit. Where concerns arise, risks and benefits are carefully weighed to support ethical, consistent, and compliant decision-making.

Policy

Guiding Principles

The RNLI will accept donations provided they are legitimately given and comply with all legal requirements. Donations must not interfere with or conflict with our core purpose of saving lives at sea. They should not pose a significant reputational risk that could result in financial loss greater than the value of the donation, nor impose conditions that would cause such a loss. The donor must not be in vulnerable circumstances without appropriate support, and any restrictions attached to the donation must align with the RNLI's ability to achieve its charitable aims.

Accepting Donations

The RNLI follows all Charity Commission guidance and has procedures in place so that we are alert to unusual donor activity, such as a large, one-off donation or a series of smaller donations from an unfamiliar, unverified or anonymous source. The Charity Commission permits charities to accept anonymous donations provided trustees apply appropriate safeguards and remain alert to suspicious circumstances. The charity adopts a proportionate, risk-based due diligence approach consistent with the Fundraising Regulator's Code of Fundraising Practice and Charity Commission guidance. Donations received via recognised intermediaries or professional advisers may be accepted where there are no indicators of financial crime or reputational risk.

Grounds for Refusing a Donation

Refusing a donation is rare and will only occur in exceptional circumstances. There are two defined grounds for refusal: first, if it would be unlawful to accept the donation, such as where the gift comprises the proceeds of crime; and second, if accepting the donation would be detrimental to the RNLI's charitable purposes as set out in its constitution. Any anticipated detriment must be weighed carefully against the benefit of receiving the funds, which enable the RNLI to pursue its objectives.

Additional refusals or returns should only occur in exceptional circumstances, for donations made in error, guidance is provided in the Exceptional Refund Process for Payment Errors document. For donations related to donors in Vulnerable Circumstances guidance is provided within the Vulnerable Circumstances Guidance Notes.

Returning Donations

Charities should generally accept donations because they help advance the charity's purpose. Refusal or return should only occur in exceptional circumstances. Donations must be refused or returned if they are unlawful, such as those linked to criminal activity, money laundering, or terrorism financing, or if conditions attached to the donation are illegal. Trustees must act in the best interests of the charity and may refuse or return a donation if accepting it would cause more harm than benefit, for example, significant reputational damage or loss of other support.

Where a refund may be applicable for moral reasons, we will refer to the Scheme of Delegation (Fundraising – Legacies) or the Vulnerable Circumstances procedure for guidance and where necessary consult with the Charity Commission.

Risk Assessment and Governance

All donations are assessed proportionately. For gifts exceeding £/€10,000, the Major Gift Team leads the due diligence process, which includes checks for legality, reputational risk, and safeguarding. Trustees annually review delegated decisions. Decisions on high-risk/high-value cases recommended for refusal also rest with Trustees. When it is not immediately clear what the 'best interests of the charity' are, or to pre-empt possible disputes and/or negative publicity in complex or potentially difficult cases, trustees may also apply to the Charity Commission for an order authorising the charity to refuse a donation.

Associated Policies and Guidance

- Corporate Association Policy
- Restricted Funds Fundraising Policy
- Legacies Scheme of Delegation
- Gifts in Kind Policy

Related Forms and Institutions

- RNLI Indemnity form template
- Process for Indemnifying solicitors donating from their dormant client accounts
- Philanthropy Due diligence Process
- Trusts and Grants Due diligence process
- Exceptional Refund Process for Payment Errors
- Legacy Administration – Due Diligence Guidance
- Asset donation guidance

Applicable Laws and Guidance

Jurisdiction	Regulator / Source	Key Guidance
England & Wales	Charity Commission	Accepting, refusing and returning donations to your charity [gov.uk]
	Chartered Institute of Fundraising	Acceptance, Refusal & Return – A Practical Guide (PDF) [ciof.org.uk]
Northern Ireland	Charity Commission NI	Charity Legislation Overview [charitycom...nni.org.uk]
	Dept for Communities	Regulation of Charities [communitie...-ni.gov.uk]
Scotland	OSCR	Charities and Benevolent Fundraising Regulations 2009 – Guidance [oscr.org.uk]
	Legislation	The Charities and Benevolent Fundraising (Scotland) Regulations 2009 [legislation.gov.uk]
Republic of Ireland	Charities Regulator	Charities Regulation Overview [gov.ie] Charities (Amendment) Act 2024
	Fundraising Guidelines	Charities Regulator Ireland - Guidance for fundraising
	Revenue Commissioners	Charitable Donations – Tax Relief [revenue.ie]

Crown Dependencies	Local charity law + UK Charity Commission	Use Charity Commission guidance as baseline; check Jersey, Guernsey, Isle of Man requirements [gov.uk]

Review information

Next review date

[29/04/2027]

Amendment history

Date	Version	Author/Contributor	Amendment details
08/03/2024	6	Angela Rook	Guidance - Accepting, refusing, and returning donations

Review frequency

[12 months]