

Rotary GB&I Disaster Recover Trust

Privacy Policy

Who we are

We (or 'us') means Rotary GB&I Disaster Recovery Trust, a registered charity (number 1119688), and our registered address is Kinwarton Road, Alcester, Warwickshire, B49 6PB.

We are committed to protecting your personal information and privacy. This Privacy Policy describes exactly how we collect and use your personal information.

By making a donation, contacting us, using our services or visiting our website you are agreeing to be bound by this Policy.

If you have any queries about this Privacy Policy, please contact us at disasterrecoverytrust@rotarygbi.org

Rotary GB&I Disaster Recovery Trust is a charity associated with Rotary international in GB&I and shares the same website and certain information. Therefore, the [Rotary GB&I Privacy Notice](#) and [Rotary GB&I Cookie Policy](#) should also be read in conjunction with this Privacy Policy for completeness.

Your privacy

Everyone has rights with regard to the way in which their personal information is handled. During our activities, we will collect, store and process personal information and we recognise that the correct and lawful treatment of personal information will maintain confidence in the Trust.

Your personal information, which may be held on paper or on a computer or other media, is subject to legal safeguards specified in the Data Protection Act 2018 and UK GDPR.

This policy and any other documents referred to within it, set out the basis on which we will process any personal information we collect from you or that is provided to us by yourself or other sources. This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal information.

What Is Personal Information?

Personal information (also known as personal data) includes information relating to natural persons who can be identified or who are identifiable, directly from the information in question; or who can be indirectly identified from that information in combination with other information.

How do we collect personal information?

We collect personal information about you when you interact with us for example when you visit our website; donate to an appeal or campaign managed by Rotary GB&I Disaster Recovery Trust; or when you donate via a third party service such as GiveStar and give them your permission to share your information with us. A third party donation service will always have their own Privacy Policy which you should check when you give your details.

What personal information do we collect?

Personal information we collect about you may include your name, postal address, email address, phone numbers, date of birth. We do not collect "sensitive personal information" about you.

Where appropriate, and given to us, we may also collect financial bank details for processing your donation.

We may also collect information about how our website is used and track which pages users visit. We use this information to monitor and improve our website. Where possible we use anonymous or aggregated data that does not identify individuals. See further information about cookies below.

How do we use personal information?

We use the personal information collected from you for these purposes:

- to process your donation(s);
- to process gift aid (as appropriate)

We will only use your information to process your donation, you may also be contacted in the event of a specific query needed to resolve any issue with the processing of your donation.

How long we keep your information for

We will hold your personal information for as long as it is necessary for the relevant activity. By way of example, we hold payment details for six years after the year in which the transaction took place so we can fulfil our statutory obligations for tax purposes.

Lawful basis for processing your personal information

Under the Data Protection Act 2018 and UK GDPR our lawful basis for processing and holding personal information on donors is 'legitimate interest' as it is necessary for Rotary GB&I Disaster Recovery Trust to use this information to provide you with our services.

We have separate lawful bases for Board Members of Charities Trust in relation to how we use and protect their data.

Who has access to your data

The following groups will have access to your personal information:

- Rotary GB&I staff – for the purpose of processing your donation.
- Rotary GB&I Disaster Trust Trustees – limited access via reports only (such as name and amount of donation only).

We will never sell your data to any third party nor will we share your details with other entities for marketing purposes.

We will only share information with other organisations where it is necessary for a legitimate reason connected with your donation, or where it is required by law or regulation.

Gift Aid

Some donations you make to Rotary GB&I Disaster Recovery Trust may be eligible for Gift Aid and we claim Gift Aid on your behalf.

In such circumstances, for Rotary GB&I Disaster Recovery Trust to claim Gift Aid on your donation, you must currently pay Income Tax equal to or more than the amount of tax which will be reclaimed on your donation.

As part of this process Rotary GB&I Disaster Recovery Trust is required to submit your details including your address to HMRC, and in asking us to make a Gift Aid claim you are giving us permission to use your personal details in this way.

Data security

Rotary GB&I Disaster Recovery Trust is committed to keeping your personal information safe and secure and we have security policies and technical measures in place to help protect your information.

We will put in place procedures and technologies to maintain the security of all personal information from the point of collection to the point of destruction. Personal information will only be transferred to a data processing company if they are approved by us and agree to comply with these procedures and policies, or if they put in place adequate security measures.

We always ensure only authorised persons have access to your information and that everyone who has access is appropriately trained to manage your information.

Where your data is held

We use a cloud-based accounting system called Clubtreasurer for processing and storing donations which will hold your personal information. [Click here to view the Privacy Policy for Clubtreasurer.](#)

Cookies

You may review the cookie policy for the Rotary GB&I/Rotary GB&I Disaster Recovery Trust website [here](#).

Your rights

The UK GDPR provides the following rights for individuals:

- The right to be informed - You have a right to be informed when your personal information is being collected, what is collected and how it will be used or shared.
- The right of access - You have a right of access to your personal information: the right of access allows you to be aware of and verify the lawfulness of the processing of your personal information. You can also request a copy of the information which we hold on you. This information is usually provided free of charge and should be requested by emailing disasterrecoverytrust@rotarygbi.org
- The right to rectification - You have a right in certain circumstances to have inaccurate personal information rectified, blocked (restrict processing), erased (right to be forgotten), or destroyed.
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

Further clarification of your rights is available on the Information Commissioners website [here](#).

Changes to this privacy policy

We may change this privacy policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our [website](#) or by notifying you directly.

Complaints

In the first instance, you should contact Rotary GB&I Disaster Recovery Trust using email: disasterrecoverytrust@rotarygbi.org

If you remain unhappy with our use of your personal information, you have the right to complain to the [Information Commissioner's Office](#). We would encourage you to contact us in the first instance so we can attempt to resolve any concerns.

Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to disasterrecoverytrust@rotarygbi.org

Date of last revision: 30 November 2021

Data Protection and Confidentiality Policy

1. Statement

Rotary GB&I Disaster Recovery Trust (“the Charity”) promise to respect the confidentiality of any personal data shared with its organisation, or that it has access to through Rotary International (RI), to keep it safe and will always take every effort to protect your privacy.

2. Privacy Notice

The Charities detailed privacy notice information is covered under the “Privacy Notice” for Rotary GB&I available online at <https://www.rotarygbi.org/privacy-policy/>.

3. Effectiveness of Policy

The Trustees shall review and update this policy annually if required.

This policy was originally adopted and became effective on:	Nov 2018
Last review date	Jan 2022
Next review date:	Jan 2023

Health & Safety Policy

1. Statement

Rotary GB & I Disaster Recovery Trust (“the Charity”) acknowledges that it has a responsibility to ensure that all volunteers (i.e. Rotary Clubs, Rotary Club trusts, individual Rotarians, members of the public) are made aware of the essential need to plan and organise all fundraising activities and events in a safe manner.

The charity is committed to ensuring that all reasonable steps are taken to safeguard the participants, members of the public, volunteers, Rotarians and anyone who may be in the vicinity of a fundraising event or activity from risk of injury or ill health resulting directly or indirectly from that activity or event.

The charity is committed to promoting and encouraging development of safe practices as the normal acceptable standard for all fundraising events and activities.

2. Responsibility

The overall responsibility for safety at any fundraising activity or event lies with the fundraiser organising the same, in accordance with all current legislation including Health and Safety at Work Act 1974.

3. Effectiveness of Policy

The Trustees shall review and update this policy annually if required.

This policy was originally adopted and became effective on:	Nov 2018
Last review date	Jan 2022
Next review date:	Jan 2023

Complaints management policy

1. Statement

This policy sets out the principles and practices by which Rotary GB&I Disaster Recovery Trust (“the Charity”) deals with complaints.

2. What this policy covers

The Charity is committed to provide a high quality of service. This policy thus covers the way in which it deals with complaints that may be received in the exceptional circumstances.

3. How to make a complaint

We request that any complaints will be made either in writing to Rotary Disaster Recovery Trust, Kinwarton Road, Alcester, B49 6PB, by email disasterrecoverytrust@rotarygbi.org or by telephone 01789 785411.

Please ensure that you provide the following details:

- Full name and contact details
- The nature of your complaint
- Your expectation in how you would like your complaint to be resolved.

4. How we handle your complaint

- 4.1 We will aim to acknowledge your complaint within 5 working days either by post or email (whichever is the most expedient) and enclose a copy of this policy.
- 4.2 We may ask further information to aid us in any investigation we may need to undertake in resolving your complaint. If this is required, we will ask for the information to be received within a specific period of time.
- 4.3 We will update you on the progress of your complaint at relevant intervals.
- 4.4 Where required/warranted we may invite you to a meeting to discuss your complaint. You may not have to attend if you do not wish to or are unable to do so. We will be happy to discuss options should this required.
- 4.5 We will aim to resolve your complaint within 21 days from the date of acknowledgement of the same. We will provide information regarding our investigation and resolution of your complaint.

Were we are unable to resolve your complaint in the given time scale, for example due to the need for further investigations etc. then we will inform you of the same and give an expected timescale for the resolution.

5. Additional option

If, for some reason, you are unsatisfied with the outcome of the handling of your complaint, then you may want to consider taking your complaint to:

- Fundraising Regulator (for complaints relating to fundraising)
- Advertising Standards Authority (for advertising complaints)
- The Charity Commission in England & Wales.

6. Effectiveness of Policy

The Trustees shall review and update this policy annually if required.

This policy was originally adopted and became effective on:	Jan 2022
Last review date	Jan 2022
Next review date:	Jan 2023

Volunteer Policy

1. Statement

This policy sets out the principles and practices by which Rotary GB&I Disaster Recovery Trust (“the Charity”) involves volunteers. The policy relates to Rotary GB&I staff and trustees.

It aims to create a common understanding and to clarify roles and responsibilities to ensure the highest standards are maintained in relation to the management of volunteers.

2. Scope

The Charity recognises volunteers as an integral part of the organisation and acknowledges that they have always been, and continue to be, vital in leading and delivering the charities work.

The Charity appreciates that volunteering is an important method of increasing participation in it’s work and develops greater awareness of its strategic vision.

The Rotary GB&I staff members working for the Charity are clear about their role in supporting the Charity and foster a good working relationship between themselves and the volunteers.

The Charity is committed to offering a flexible range of opportunities and encourages a diversity of people to volunteer, including those from under-represented groups through the Rotary GB&I Equality & Diversity policy.

3. Definition of volunteer

The Charity defines a volunteer as someone who, without receiving payment, gives their time to assist the organisation’s vision and purpose of their own free choice.

Volunteers may be involved on a one-off, short term or on a longer term, regular basis. They may be involved

- in the direct delivery of our services
- on our board of management trustees

Volunteers are valued for

- bringing additional skills and new perspectives to the organisation
- enabling more responsive and flexible approaches
- championing the Charity’s causes within Rotary GB&I and the wider community

4. Roles and responsibilities

The volunteer role is based on trust and mutual understanding. There is no enforceable obligation, contractual or otherwise, for the volunteer to attend or to undertake particular tasks or for the organisation to provide continuing opportunities for voluntary involvement, provision of training or benefits.

However, there is a presumption of mutual support and reliability. Reciprocal expectations are acknowledged – both of what the organisation expects of volunteers and what volunteers expect of the organisation.

The organisation expects volunteers:

- to be reliable and honest
- to uphold the organisation's values and comply with organisational policies
- to contribute positively to the aims of the organisation and avoid bringing the organisation into disrepute
- to carry out tasks within agreed guidelines

Volunteers can expect:

- to have clear information about what is and is not expected of them
- to receive adequate support
- to be treated with respect and in a non-discriminatory manner
- to be able to say "no" to anything which they consider to be unrealistic or unreasonable
- to know what to do if something goes wrong

5. Recruitment and selection

The Rotary GB&I staff are recruited under the recruitment principles held by Rotary GB&I.

The trustees are appointed due to their past or present positions within Rotary GB&I and thus equal opportunities is adhered to through Rotary GB&I's selection process to the positions.

6. Support

The Rotary GB&I staff members will be given training and support appropriate to the specific tasks to be undertaken by the relevant role within the Charity.

Other volunteers will be offered support as appropriate. Arrangements vary according to the volunteer and the role undertaken and may include telephone support and group meetings.

7. Recognition

The charity recognises the valuable contribution of its volunteers and although they do not seek financial reward, they do appreciate and value recognition in other ways.

All Rotary GB&I staff working with the volunteers are encouraged to ensure appropriate acknowledgement is given. This could range from a simple 'thank you' to acknowledging their involvement with projects in press releases.

8. Expenses

The trustee board members are able to recover their out-of-pocket expenses only.

9. Resolving problems

The organisation aims to treat all volunteers fairly, objectively and consistently. It seeks to ensure that volunteers' views are heard, noted and acted upon promptly.

The Charity will attempt to deal with any problems informally and at the earliest opportunity. All volunteers will be able to turn to the Trustee Chairman in the case of any difficulty. Where an informal resolution is not possible the charity will follow the dispute procedure laid out by Rotary GB&I.

10. Confidentiality

All volunteers have a duty of confidentiality. This means that they must not disclose anything learned from one of our donors, without their consent, that would allow others to identify them.

This includes information of a personal nature, for example, name, address, telephone number or any other information which might result in the identity of the customer being disclosed.

Volunteers should not share, copy or retain information they have access to. Volunteers must also respect the confidentiality of Rotary GB&I staff and fellow volunteers by not discussing information which is not public with Rotary GB&I staff, fellow volunteers or anyone outside the organisation.

11. Effectiveness of Policy

The Trustees shall review and update this policy annually if required.

This policy was originally adopted and became effective on:	Nov 2018
Last review date	Jan 2022
Next review date:	Jan 2023

Safeguarding Policy Protection of Vulnerable Adults

1. Statement

Rotary GB&I Disaster Recovery Trust (“the Charity”) recognize that the services they provide may be used by adults who are vulnerable or may be vulnerable at certain times.

The charity has a duty to ensure the welfare of vulnerable adults who may be at risk. This duty involves reporting the risk to an appropriate agency, and by promoting a safe environment within the organisation.

The charity believes that vulnerable adults must be safeguarded from all forms of abuse. It recognises that it must at all times protect vulnerable adults from the risk of abuse and identify and deal with specific instances of abuse if they occur.

The charity will take every possible action to prevent abuse and will deal with it as promptly and effectively as possible if it occurs.

2. Aim of the Policy

The aim of this safeguarding policy is to be a public guide as to how the charity approaches the Safeguarding of Vulnerable Adults, identifies ways in which the charity does this, takes steps to avoid abuse taking place and shows actions that will be taken by the charity to deal with abuse should it occur.

3. Definition of Abuse

Abuse may take any of the following forms:

- physical abuse
- financial or material abuse
- psychological abuse
- sexual abuse
- neglect
- discriminatory abuse
- inhuman or degrading treatment
- inappropriate or excessive restraint.

4. Responsibility

The charity has a duty to report serious concerns relating to abuse to appropriate agencies including the Disclosure & Barring Service (DBS)* as well as the reporting of a serious incident to the Charity Commission.

The charity has a duty to ensure that anyone supporting charity activities that include working with vulnerable adults adopt safe practices.

Where the charity initiates its own activities, it will undertake DBS* checks on all new and existing volunteers as appropriate and will undertake regular education of its members to minimise any risks to vulnerable adults.

The charity will:

- Set out and inform trustees, members and volunteers of the procedures for responding to suspicions or evidence of abuse.
- Maintain vigilance concerning the possibility of abuse of vulnerable adults from whatever source
- Encourage a climate of openness which enables the public to pass on concerns about behaviour that might be abusive
- Produce and regularly revise policies and procedures to minimise the risk of abuse
- Investigate any allegations of abuse quickly and thoroughly
- Implement improvements to procedures if an investigation reveals deficiencies in the way in which the charity operates
- Collaborate with other relevant agencies in combating abuse and improving the protection of vulnerable adults

The charity expects its members to:

- Refrain from any abusive action in relation to vulnerable adults
- Report to the charity anything they witness which is or might be abusive
- Co-operate in any investigation into alleged abuse.

5. Effectiveness of Policy

The Trustees shall review and update this policy annually if required.

This policy was originally adopted and became effective on:	Nov 2018
Last review date	Jan 2022
Next review date:	Jan 2023

** or relevant state authority*

INVESTMENT POLICY FOR THE ROTARY DISASTER RECOVERY TRUST

OBJECTIVES

1. To safeguard the value, in real terms, of the assets of the Trust, for future investment in projects.
2. To achieve long-term growth, in real terms, having regard to the requirement for the Trust to satisfy its cash needs.

To achieve these Objectives -

- a) The Trustees shall be responsible for the management and operation of the Trust's investment policy.
- b) The Trustees, acting as a majority, shall appoint a professional qualified fund manager ("Investment Manager"), with discretionary management powers subject to the terms of the Investment Policy as approved by the majority of Trustees.
- c) A reasonable balance of investment shall be maintained between equities, fixed interest securities and commercial properties.
- d) Investment in any one equity shall be limited to a maximum of 10% of the equity portion of the portfolio.

1. Investment Performance Objectives

The Trustees have a duty to preserve the purchasing power of the capital and to provide for income generation.

The Trustees shall determine the proportion of assets to be placed under the control of the Investment Manager.

By delegating the investment management activities to the Investment Manager, the Trustees wish the Investment Manager to protect and enhance the value of the portfolio in order to maintain the purchasing power of the funds.

To ensure the performance target is measured and defined, the Trustees wish the Investment Manager to generate a target net return of 3 - 4%.

The performance of the Investment Manager will be judged over an agreed period. It is important that the services provided are pro-active and good professional relationships are formed between the Investment Manager and i) the Trustees, and ii) Rotary GB&I Head of Finance.

2. Risk Objectives

The Trustees understand that in order to generate overall returns in excess of inflation it will be necessary to expose the portfolio to a medium/low degree of risk.

The trustees would look to re-consider the investment strategy if the value of the portfolio was to decline, or increase, by more than 10%.

3. Performance and Risk Monitoring reporting

In order to ensure the return and risk guidelines are adhered to, the Trustees require quarterly written reports from the Investment Manager in a form to be agreed. The Investment Manager will be required to provide the trustees with performance, asset allocation and currency allocation data together with copy valuations in accordance with the instructions. Such information shall also be sent to the Rotary GB&I Head of Finance at the Rotary Support Centre at Alcester.

The Trustees shall, in presenting the audited accounts to Rotary GB&I for incorporation in the Rotary Annual Report and the final accounts submitted to the Charity Commission, include reference to any significant change in investment strategy during that year.

4. Tax status of the Trust

As a UK Charitable Trust, the Trust is subject to UK taxation but in most cases, the Trust will pay no tax on its gains or income, assuming it uses the income and gains for charitable purposes.

5. Investment restrictions

The portfolio of investments will avoid direct holdings in companies whose activities do not align with the ethos of Rotary GB&I and Rotary International.

There shall be no direct investment in the following categories:

- a. Investments that are generally accepted as high risk,
- b. Companies involved with armaments or tobacco.
- c. Purchase of property,
- d. Purchase of foreign currencies.

6. Review of Investment Policy

This Investment Policy can be reviewed and amended at any time should there be any change in the **circumstances**.

7. Effectiveness of Policy

The Trustees shall review and update this policy annually if required.

This policy was originally adopted and became effective on:	Mar 2022
Last review date	Mar 2022
Next review date:	Mar 2023

Fundraising Policy

1. Statement

This policy covers fundraising activities and events on behalf of Rotary GB&I Disaster Recovery Trust (“the Charity”) by volunteers (i.e. Rotary Clubs, Rotary Club trusts, individual Rotarians, members of the public).

2. Legislation and Institute of Fundraising Code of Practice

All fundraising conducted on behalf of the Charity, whether by Rotarians or members of the public must comply with the Institute of Fundraising Code of Practice and all relevant legislation, including but not limited to the most up to date versions of:

- Charities Act
- Licensing Act
- Gambling Act
- Equality Act
- Data Protection Act
- Safeguarding Vulnerable Groups Act
- Health & Safety at Work Act
- Management of Health & Safety at Work Regulations

Rotarian fundraisers (i.e. Rotary Clubs, Rotary club trusts, individual Rotarians and friends of Rotary), must also comply with all related policies outlined in the Rotary International in GB & I compliance statement for clubs/districts.

It is the charities policy for the organiser to carry out a risk assessment during the planning stage of any fundraising event in line with the Rotary International in GB & I insurance compliance requirements.

3. Notification of fundraising activity

Anyone wishing to fundraise for the Charity, not utilizing an online platform linked to the charities online fundraising page, must first register their proposed activity with the Head of Finance at Rotary GB&I Head Quarters by way of completion of the Fundraising Registration Form and forward the completed form by email to disasterrecoverytrust@rotarygbi.org or by post to Fundraising, Rotary GB&I Disaster Recovery Trust, Kinwarton Road, Alcester, B49 6PB.

Anyone fundraising in aid of the Charity, who has not first registered their activity as outlined above, will be deemed to be acting independently of the charity and, as such, the Charity takes no responsibility for their actions.

4. Handling of donations and funds raised

Funds raised for and on behalf of the Charity belong to the Charity and, once collected, must be paid over to the Charity in a timely manner. The handling of donations and fundraised monies must comply with the Rotary International GB & I insurance policy on cash handling.

All funds raised, or donations received must provide the following information:

- Exact amount of the donation or funds raised
- In case of a donation, the title, full name, postal address including postcode, telephone and email address of the donor. Also, whether the donation is an unrestricted donation, or it has been made for a specific fund.
- In the case of funds raised, the title, full name, postal address including postcode, telephone and email address of the fundraiser, plus the type and date of the fundraising event or activity undertaken;
- How funds have been received (eg. cash, cheque).

Written receipts for donations or funds received will only be issued on special requests by the donor.

All donations or funds raised will be recorded on a Spreadsheet with limited information held electronically. A thank you letter or email will only be issued to the donor or fundraiser if expressly requested.

5. Types of funds

Fundraising on behalf of the Charity undertaken in regards to

- the "General Disaster Fund" (unrestricted)
- Restricted funds (please check with the Rotary GB&I Head of Finance which restricted funds are available).

All fundraising undertaken on behalf of the Charity must be corporately branded. Any documentation produced relating to fundraising must display the Charity registration number.

6. Unauthorized activities

It is the policy of the Charity not to engage in house-to-house collections, street fundraising commonly known as "chugging" or telephone fundraising.

It is the policy of the Charity not to engage in balloon releases or the release of sky/Chinese lanterns due to the potentially harmful effects to wildlife and the environment, even when these products purport to be bio-degradable.

The Charity will hold the right to ban any fundraising activity or event, if the same is deemed to be unethical or too high risk or could potentially damage the reputation of the Charity.

7. How to make a complaint regarding fundraising

Anyone wishing to make a complaint regarding fundraising in connection with Rotary GB&I Disaster Recovery Trust should contact the Rotary GB&I Disaster Recovery Trust in writing at Kinwarton Road, Alcester, B49 6PB, or email disasterrecoverytrust@rotarygbi.org, or by phone 01789 765411. An acknowledgement of receipt of your complaint can be expected within 5 working days.

8. Effectiveness of Policy

The Trustees shall review and update this policy annually if required.

This policy was originally adopted and became effective on:	Nov 2018
Last review date	Jan 2022
Next review date:	Jan 2023

Donations Repayment Policy

This policy has been set out by the Trustees of Rotary GB&I Disaster Recovery Trust (“the Charity”). It is a guide to how the Charity deals with requests for repayments of donations by donors.

Procedure

1. One off Donations/Payments

Each application for a return of a payment is considered on its own merits.

For the Charity to process any request for repayment, the request has to be made in writing by the originator of the payment.

Dependent on the value of the original payment received, the following process is in place:

Payment amount	Request requirement	Decision makers
Up to £500	written – email will suffice	Head of Finance & one other trustee
Over £500	written – formal letter to Trustees	Majority Trustees

Should the request be related to a payment made by a Rotary Club, then any form of correspondence needs to be signed by the Club President seconded by one other club officer.

2. Effectiveness of Policy

The Trustees shall review and update this policy annually if required.

This policy was originally adopted and became effective on:	Nov 2018
Last review date	Jan 2022
Next review date:	Jan 2023

Acceptance or refusal of donations policy

1. Statement

This policy sets out the principles and practices by which Rotary GB&I Disaster Recovery Trust (“the Charity”) accepts or refuses donations and the procedures they follow.

2. Scope

The policy applies to all volunteers (i.e. Rotary GB&I staff & trustees) and complies with Charity Law as the Charity is registered as such.

The document makes clear the Trustee’s legal obligations with regard to the acceptance and refusal of donations. It outlines the day-to-day procedures that need to be adhered to and ensures that decisions are not taken on an ad-hoc basis but are in support of the charities strategy and objectives.

3. Trustees’ Legal Obligations with respect to acceptance or refusal of donations

The Trustees take overall legal responsibility for decisions relating to whether a donation is accepted or refused.

The Trustees must be able to demonstrate that they have acted in the best interest of the Charity in each and every case.

The Trustees have a duty to consider carefully, on the basis of the evidence made available to them, whether the Charity’s interests will be better served by accepting or refusing the donation and to act accordingly.

These judgements must not promote any Trustees or volunteer’s personal moral agenda, or interest and the Trustees must not allow individual or collective personal, political or ethical issues, which are not directly related to the interests of the Charity, to affect their judgment.

4. Procedures

On a day-to-day basis, the Charity’s Board of Trustees delegates the responsibility to accept or refuse donations to the Rotary GB&I Head of Finance.

Donations are presumed to be given in good faith and in the best interest of the Charity, however if there is doubt or question over the acceptance of a donation (using the guiding principles set out below), then the trustees will be presented with evidence and all relevant information for them to make a final decision on acceptance or refusal of the donation in question.

If due diligence checks reveal evidence of a crime, this must be reported to the police and/or other appropriate authorities.

5. Guiding principles

A donation must be evaluated in order to establish whether it would be in the best interest of the Charity to accept or refuse it.

The following principles apply:

- The donation contributes towards the charities overall strategy and plans
- The donor's objectives or activities must not appear to be incompatible with the Charity's vision, mission and values, particularly if this risk causing significant damage to the charities integrity, public image or professional reputation

The Charity will refuse donations in the following circumstances:

- The Charity will not accept donations from companies or individuals whose wealth are known to result from illegal activities or where there are indications of corruption and related economic crime.
- Where the activities of a donor are directly contrary to the objectives or agreed policies of the Charity or the Charity suspects that the gift has been donated to facilitate money laundering or other criminal activity (see Appendix A – check list for unusual/high risk donations)
- Where it can be clearly shown that the cost to the Charity of accepting a donation will be greater than the value of the donation itself, and the acceptance of the donation will directly lead to a net decline in the assets of the Charity.
- Where the offer of support depends upon the fulfilment of certain conditions placed upon the Charity and any condition:
 - a) Is in itself contrary to the objectives of the Charity
 - b) Is regarded as needing an unreasonable level of support from the Charity especially in relation to the size or impact the donation will have on the charities charitable activities
 - c) Will divert the Charity from pursuing its current objectives, policies or work priorities as a necessary result of the fulfilment of the conditions alone.

The trustees will take great care and consideration in deciding whether to accept or refuse a donation:

- Where an offer of support is dependent upon the Charity first spending its own money or resources in order to facilitate the conditions of the donation, as this might place the Charity's assets under undue and inappropriate risk. Donations should

preferably be given in full up-front or alternatively in instalments linked to an agreed contract and work plan.

- Where the support, whilst reflecting the Charity's objectives, is untenable. For example, if the Charity does not have the resources to maintain the running costs associated with the donation.
- Where the support consists of goods, services or property which the Charity cannot lawfully use, convert, exchange or sell in direct support of its charitable objectives.

6. Effectiveness of Policy

The Trustees shall review and update this policy annually if required.

This policy was originally adopted and became effective on:	November 2018
Last review date	Jan 2022
Next review date:	Jan 2023

Appendix A – Unusual / High Risk Donations - Record

These questions are not intended to be asked in respect of each donation, but need to be considered depending on the risk, including the size and nature of the donation and whether it appears to have any suspicious characteristics.

Name of Donor

Amount of Donation

Date received

Form of Donation (e.g. cheque/BACS etc.)

Reason for Query/Nature of suspicion:

- 1 Donation is over £10,000
- 2 Donation is over £10,000 made through a third party on behalf of an anonymous donor
- 3 The Donation has conditions attached
- 4 Suspicions relating to nature of the donation(s) – i.e. unusual payment mechanisms; a series of donations from one credit/debit card
- 5 Donation from outside the UK
- 6 The Donation suggests that the Association is being used as a conduit to transfer funds.
- 7 Other reason

Please log details here dependent on the reason ticked above:

For 1. Please record if any other donations had been made by the same donor

For 2. Please record the donors name. The Charity Commission recommends knowing the identity of donors for what would be considered “substantial” donations. It is reasonable for the organisation to insist that trustees know of the identity of the donor but to keep this anonymous from the rest of the organisation.

For 3. Specify the conditions attached in detail

For 4. Give detail of the nature of the donation and why they appear to be suspicious

For 5. Country the donation was made from

For 6. Detail of what has raised the suspicion and any substantiating evidence

For 7. Detail.

Recommendation to the trustees:

After evaluation of the donation at hand, we recommend that (tick all relevant boxes)

- the donation is accepted
- the donation is refused.
- the Charity Commission is informed under the "Serious Incident" reporting
- HMRC is contacted
- Action Fraud is contacted immediately
- the Police is contacted (please note Crime number here:) _____
- Any other action (detail below)

The above is a recommendation only, the actual decision needs to be verified by agreement of a majority of the Rotary International in GB & I Disaster Recovery Trust Trustees in writing (emails acceptable).

Evidence of the same needs to be attached and held with this record.

Fundraising activity Register

This form needs to be completed by any fundraiser (individual, club, district, committee) fundraising on behalf of Rotary GB&I Disaster Recovery Trust, Charity number 1119688 not linked to our online fundraising facilities.

Please be aware: Rotary clubs/club trusts raising funds for their own charity do not need to complete this form.

Individual/Group organising the activity/event:

Individual Name/Rotary Club/District/Committee: _____

If individual & Rotarian, please give RI ID Number _____

If Club/District/Committee, please give detail (Club/District No./Committee name): _____

If Club/District/Committee, please give contact name _____

Address: _____

Post code _____

Phone _____

Email address _____

Online Fundraising page
(if applicable and not linked to RIBI Donations Trust already) _____

Twitter Username _____

Fundraising Activity/Challenge /Event

Please give detail about your fundraising event/challenge/activity below:

Date (if applicable) _____

Venue (name & address) _____

Fundraising activity/challenge/Event on behalf of:

I/We are raising funds for:

	Fund	%age distribution of funds, if applicable
<input type="checkbox"/>	General Disaster fund	
<input type="checkbox"/>	Restricted fund (please give detail below):	

Data protection and Confidentiality Policy

The Charities detailed privacy notice information is covered under the “Privacy Notice” for Rotary International in Great Britain and Ireland available online at <https://www.rotarygbi.org/privacy-policy/>

Declaration

By signing this document, I agree to/I agree to, on behalf of the club/District/committee

- Transfer all funds raised to Rotary GB&I Disaster Recovery at the earliest opportunity
- Accept full responsibility and liability for this event/challenge/activity and any injury, loss or damage suffered by myself or anyone else as a result.

Signature: _____ Date: _____

Name: _____

Please return your completed form to:

Rotary GB&I Disaster Recovery, Kinwarton Road, Alcester, B49 6PB, or email to disasterrecoverytrust@rotarygbi.org