

# **Fundraising Donations Acceptance Policy**

April 2026



# Contents

<b>Document control</b> .....	<b>2</b>
<b>Objectives</b> .....	<b>3</b>
<b>Membership status</b> .....	<b>3</b>
<b>This policy</b> .....	<b>3</b>
<b>Types of donations we accept</b> .....	<b>3</b>
Exceptions.....	4
<b>Policy guidelines</b> .....	<b>4</b>
<b>Process for managing donations with identified risk</b> .....	<b>5</b>
Donation Review Committee .....	5
Solicited donations .....	5
Unsolicited donations .....	6
Tainted donations.....	6
Intermediary donors .....	6
Anonymous donations.....	6

## Document control

<b>Policy Owner</b>	<b>Sightsavers Global Board</b>
<b>Policy Administrator</b>	<b>Director of Fundraising and Marketing</b>
<b>Document Status</b>	Approved
<b>Review period</b>	<b>2 years</b>

# Objectives

The objectives of this policy are to:

- Provide guidance and clarity for staff, trustees and other volunteers
- Ensure compliance with the relevant laws and regulatory guidance
- Protect the reputation of Sightsavers
- Clarify who has authority to take decisions in regard to donation acceptance
- Ensure decisions are consistent and based on the needs of the organisation.

# Membership status

We are members of the appropriate regulatory bodies in the countries where we fundraise and abide by the relevant fundraising codes in all of our activities.

These memberships include:

- **UK:** Fundraising Regulator, Data & Marketing Association (DMA).
- **Ireland:** Dóchas, Charities Institute of Ireland (CII), Charities Regulation Authority (CRA), Companies Registration Office (CRO).
- **Sweden:** Svensk Insamlingskontroll (90 Konto).
- **Norway:** Innsamlingskontrollen.
- **Italy:** Fundraising is regulated by the revenue agency/guardia di finanza, and the Single National Registry of the Third Sector (Ministry of Labor), however, there is no discrete body that regulates fundraising.
- **US:** Compliance is required via the Internal Revenue Service, which we abide by.

# This policy

Sightsavers fundraising activity takes place across different countries. Regardless of where we work, our approach is to ensure our fundraising is ethical, meets legislative requirements, follows guidance from regulators, and that we treat our donors and supporters fairly, respectfully and with transparency.

This policy sets out how we accept donations in accordance with our legal obligations and mission. It should be read in conjunction with related policies, including our: supporter privacy policy and supporter promise. We follow the provisions set out in the UK Fundraising Regulator codes of practice with regards to dealing with vulnerable people, and follow similar approaches in other countries.

# Types of donations we accept

As outlined in the UK Charity Commission guidelines on accepting donations, our starting point is always to accept donations in line with the principal duty to further Sightsavers' purpose.

Donations will generally be accepted without review up to a value of £10,000 (the value for other currencies is the equivalent value), or as per the fundraising country's norms. This includes:

- Cash (cheques, bank transfers, standing orders, direct debits)
- Donations in kind, e.g. property, art
- Stocks and shares (our policy is to sell shares immediately on receipt)
- Legacies
- Pro bono work.

## Exceptions

---

We will seek legal advice on certain types of donations, regardless of value, as follows:

- Donations of shares that are subject to restrictions or buy-sell agreements
- Donations requiring Sightsavers to assume financial or other obligations, e.g. as executor of an estate
- Donations of property that may be subject to environmental or other regulatory restrictions.

We will not accept any donation from companies whose business is primarily based on the sale of tobacco products, as there is evidence that smoking can contribute to age-related macular degeneration, and WHO policy about partnerships with tobacco companies would make accepting donations extremely problematic. If an unsolicited donation is offered by a company with investments in tobacco as part of a highly diversified portfolio of businesses, this will be referred to the Donation Review Committee (see below) for assessment.

## Policy guidelines

Our policy covers all donations from third parties and applies in all conditions. Once a donor's contribution exceeds the £10,000 threshold, either in a single donation or cumulatively over 12 months, they become subject to these guidelines.

Donations to charities can, and should, only be rejected in exceptional circumstances and these are outlined below. The only bases on which Sightsavers will refuse a donation are:

1. That it would be unlawful to accept it (e.g. the organisation knows that the donation comprises the proceeds of crime).
2. That accepting the donation would be detrimental to the achievement of the purposes of the organisation, as set out in its charter. Such anticipated detriment has to be set against the benefit of having the funds from the donor, which enable the organisation to pursue its purposes. Detrimental factors include:
  - Contrary to mission: acceptance of the donation negatively affects the mission of Sightsavers.
  - Reputational risk: acceptance of the donation damages Sightsavers' reputation and credibility in a significant way, or leads to inability to work within a particular country or region.

- Incompatibility: the intent of the donor and Sightsavers' desired use of the donation are incompatible, including unreasonable conditions being imposed upon Sightsavers (e.g. requirement to work with a specific partner, or to fund work in which Sightsavers does not wish to engage).
  - Form of donation: the donation is offered in a form that Sightsavers cannot use without incurring substantial expense or difficulty.
  - Effect on future giving: acceptance of the donation leads to the loss of current donors/supporters or discourages future donations from other donors, to an extent where such loss exceeds the value of the donation in question.
3. We have reason to believe that the donor is in vulnerable circumstances, the intentions behind the donation are not genuine, or that accepting and processing the donation could cost more than the value of the donation (e.g. a one-off card donation of less than £1).

## Process for managing donations with identified risk

The best way to avoid the situations described above is to have a clear process for actively managing such risks. All decisions to solicit and/or accept potentially controversial donations will be made to go through the following process:

1. The management team will assess the soliciting of donations flagged with 'identified risk' by the prospect research team, and unsolicited donations flagged by fundraisers. In cases where the management team feels that the level of risk may outweigh the benefit of accepting the donation or conversely that turning down the donation may be unusually controversial, they will refer it to an internal Donation Review Committee (see below for details). Committee members are expected to feed back their decision within four working days. All decision-making discussions can be completed via email and a majority decision will rule, excepting circumstances where both trustee members are in the minority, in which case the donation will be referred to the Board of Trustees for decision.
2. Solicited or unsolicited donations of £100,000 or more, which a majority of the committee feels warrant further discussion, will be presented to the Trustees.

## Donation Review Committee

The committee comprises at least two trustees, relevant director(s) representing Fundraising, Programmes and Institutional Fundraising, and the Director of Campaigns and Communications. A chair will be nominated by the committee. In the event of no majority the chair will have the deciding vote, subject to point 1 above.

## Solicited donations

When actively soliciting donations above £10,000, fundraising staff should ensure that all prospects (whether individuals, corporates, or trusts) have been through a process of due diligence. The initial desk review is undertaken by the prospect research team to establish

whether the potential donor carries associated risks (as outlined above), including the risk of corruption and money laundering (see Sightsavers' Anti Fraud and Corruption Policy for additional information). Additional input will be sought from the Governance and Assurance team and other colleagues where relevant.

## Unsolicited donations

---

If Sightsavers receives an unsolicited donation of more than £10,000, this should be reported immediately to the Director of Fundraising & Marketing or Director of Institutional Funding as appropriate, and to the Prospect Research team who will conduct due diligence. Process will then follow, as above, with referral to the Donation Review Committee if a risk is identified.

## Tainted donations

---

As part of due diligence processes, Sightsavers will consider whether a donation could be deemed a tainted donation under the guidance of the UK Finance Act (FA) 2011. Potential tainted donations will follow the process outlined above, with referral to the Donation Review Committee if a risk is identified.

## Intermediary donors

---

This policy acknowledges the intermediary donor as the main donor in this circumstance. Examples here are the likes of the Charities Aid Foundation (CAF), Geneva Fund, or GiveWell Foundation, which manage and distribute donations through their organisations to partner organisations, and perform due diligence on our behalf. We therefore rely on their due diligence processes for the sourcing of funds they distribute to Sightsavers.

## Anonymous donations

---

All donations of £25,000 or higher received from UK donors who are anonymous will be risk assessed and reported to the Charity Commission in line with their guidelines. In this context, anonymous donors are those where Sightsavers does not know the identify of the donor.

This policy will be reviewed every two years by the Trustees.

We work with partners in low and middle income countries to eliminate avoidable blindness and promote equal opportunities for people with disabilities.

[www.sightsavers.org](http://www.sightsavers.org)