

Gympanzees Due Diligence Policy

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1. Purpose

The purpose of this Due Diligence Policy is to ensure that Gympanzees conducts its activities in a manner that is ethical, transparent, and compliant with all relevant laws and regulations. This policy aims to safeguard the integrity and reputation of Gympanzees by establishing a clear framework for conducting due diligence on all partners, donors, and stakeholders.

2. Policy Statement

This policy applies to all trustees, employees, volunteers, and contractors of Gympanzees. It covers all due diligence activities related to potential and existing partners, donors, and other stakeholders with whom Gympanzees engages in business or collaborative activities.

Gympanzees will comply with the Charity Commission's 'Know Your Donor' principles by carrying out reasonable due diligence on its donors who donate or gift **£25,000** or more, in order to:

1. Identify and Verify: ensure we know who our donors are.
2. Know: their sources of wealth, business activities and who their associates are.
3. Watch out: for unusual or suspicious activities or requests attached to donations.

In addition, as stipulated by the Fundraising Code of Practice, due diligence will be carried out before a donation or gift solicited by a Gympanzees employee is accepted.

3. Scope

Gifts

Types of gifts recognised by philanthropic intent (be that donations from individuals, trusts or corporates) which apply to this policy include cash donations and pledges, donations of stocks and shares and various gifts in kind. However, gifts which are not covered by this policy include donations generated through legacy income, volunteer or community-led fundraising income and all forms of corporate partnership income raised on our behalf. Note, Due Diligence will be conducted on corporate entities prior to confirming any partnership, as outlined in this policy.

In order to qualify for due diligence, gifts must be £25,000 or more, either as a single donation or as a series of donations of this amount, unless there are considerable

grounds for concern or suspicion. The threshold of £25,000 is consistent with anti-money laundering directives within financial regulation.

4. Donors

Types of donors included in this policy are businesses, individuals and charitable trusts or foundations. Statutory trusts and other Government agencies are not covered by this policy.

5. How to comply

Anonymous donations

Anonymous donations greater than £25,000 from unidentifiable or unverifiable sources which Gympanzees considers as suspicious circumstances must be reported through the Director of Fundraising, CEO or Finance Director to the Charity Commission as a serious incident. However, this does not relate to a donor who wishes to remain anonymous to the public but where either Gympanzees or a trusted third party who is representing the donor is aware of their identify.

6. Unsolicited donations

All unsolicited donations unfamiliar to Gympanzees and greater than £25,000 require the immediate notification of the Director of Fundraising for urgent review, and the Due Diligence processes to commence immediately.

7. Solicited donations

In-line with our policy statement in section 2, due diligence must be carried out before a gift solicited by a Gympanzees employee is accepted. Therefore, the fundraising team should complete due diligence on a donor before or once a relationship with the donor has been established but before they have solicited a gift.

8. Due Diligence Principles

Gympanzees will adhere to the following principles when conducting due diligence:

1. **Integrity:** Ensuring all interactions and engagements are conducted honestly and ethically.
2. **Transparency:** Maintaining openness in all due diligence processes.
3. **Accountability:** Holding all parties accountable to the standards outlined in this policy.
4. **Compliance:** Adhering to all relevant laws, regulations, and best practices.

9. Due Diligence Process

1. The relevant fundraising team member will complete the research in the first instance.
2. Potential donations which are deemed to be risky, or which result in a red or amber rating through the due diligence process will then be referred to the Director of Fundraising to enable immediate action.
3. If there is a financial risk involved, the Finance Director will be consulted.
4. For corporate organisations, the Director of Fundraising will consult with CEO who may refer any high-value or high-risk engagement to the Chair of the Board of Trustees who will decide on whether the proposed engagement needs to be referred to the Trustees.
5. Decisions will be made within 5 working days.
6. Individuals who request to remain anonymous to some trustees will have due diligence applied in confidence by the CEO and Chair.

The due diligence process at Gympanzees involves the following steps:

Process	Actions	By who	Escalated to
Initial Assessment	<p>Collect and review basic information about the potential partner, donor, vendor, or stakeholder.</p> <p>Conduct a preliminary assessment to identify any obvious risks or issues.</p>	Fundraising Assistant / Trusts Officer	Business Development Manager / Trusts and Grants Manager
Background Checks	<p>Perform comprehensive background checks, including legal, financial, and reputational assessments.</p> <p>Verify the identity, legal status, and financial health of the entity or individual.</p>	Fundraising Assistant / Trusts Officer	Business Development Manager / Trusts and Grants Manager
Risk Assessment	<p>Evaluate potential risks, including financial, legal, ethical, and operational risks.</p> <p>Assess the potential impact of these risks on Gympanzees' operations and reputation.</p>	Fundraising Assistant / Trusts Officer	Business Development Manager / Trusts and Grants Manager or Director of Fundraising
Decision-Making	Document the findings of the due diligence process.	Fundraising Assistant /	Director of Fundraising

	<p>Make informed decisions based on the assessed risks and benefits.</p> <p>This may be whether or not to pursue an un-approached prospect or update an engaged supporter.</p> <p>If the latter, Gympanzees will discuss areas of concern with the company, funder or individual, if we are already engaged with them. This enables assessment of their openness to Gympanzees' ethics statement and establishes the groundwork for a strong, transparent engagement. This conversation will remain private and confidential until a decision is made on whether to proceed with the engagement.</p> <p>Obtain approval from senior management or the Board of Trustees, if necessary.</p> <p>Inform Fundraising Assistant of the outcome.</p>	<p>Trusts Officer</p> <p>Director of Fundraising</p>	<p>CEO and/or Trustees</p>
<p>Ongoing Monitoring</p>	<p>Continuously monitor and review relationships with partners, donors, vendors, and stakeholders.</p> <p>Update due diligence records and reassess risks periodically or when new information arises.</p>	<p>Fundraising Assistant / Trusts Officer</p>	<p>Business Development Manager / Trusts and Grants Manager</p>

Timing of the research and risk assessment or due diligence is conducted at the outset of the development of the partnership with the company, funder or individual. The research will be reviewed and refreshed on an annual basis, or in the event of a significant negative publicity incident.

10. Documentation and Record-Keeping

Gympanzees will maintain accurate and up-to-date records of all due diligence activities. Documentation should include:

- Background check reports
- Risk assessment summaries
- Decision-making records
- Ongoing monitoring reports

These records will be stored securely and accessed only by authorised personnel.

The [Due diligence form](#) will be used to capture information and saved securely.

All refused donations must have a record of the decision to refuse it and reasons, as stipulated by the Fundraising Code of Practice 2019.

In addition, all documentation relating to due diligence, internal escalation, acceptance or refusal, must be confidentially stored and retained for the period of time specified by the records retention schedule.

11. Roles and Responsibilities

- **Board of Trustees:** Provide oversight and ensure the due diligence policy is implemented effectively.
- **Senior Management:** Oversee the due diligence process and make decisions based on the findings.
- **Fundraising Assistant and Trust Officer:** Conduct due diligence activities, maintain records, and monitor ongoing compliance.
- **Employees and Volunteers:** Adhere to the due diligence policy and report any concerns or issues.

12. Training and Awareness

Gympanzees will provide regular training to all relevant staff on due diligence practices and procedures. This training will ensure that employees and volunteers are aware of their responsibilities and understand how to conduct due diligence effectively.

13. Review and Update

This policy will be reviewed annually and updated as necessary to reflect changes in laws, regulations, or best practices. Any changes to the policy will be approved by the Board of Trustees.

14. Duty to Report and Comply

Trustees and staff have a duty to report any evidence of crime, terrorist financing, money laundering and other suspicious circumstances to the police and in severe cases, to the Charity Commission. Trustees and staff can be personally and criminally liable for committing an offence under certain money laundering and terrorist

financing legislation, or allowing such an offence to be committed. This includes failure to report knowledge or suspicions of terrorist financing.

Failure to comply may result in disciplinary action and the organisation suffering serious reputational damage. If you suspect that this policy is being breached concerns should be raised with your line manager and in accordance with the Whistleblowing Policy

15. Risk Reporting

The Director of Fundraising is responsible for reporting into the Audit & Risk Committee on a quarterly basis using a risk register of potential and current donors and partners where significant risk has been identified. This register will also include management and/or mitigation of said risks.

Date Policy reviewed on:	11/04/2025
Name (s) of Reviewers	M Mason/Trustees
Date for next review:	26/03/2027