

Preserving Our Independence Our Donations Acceptance & Refusal Policy

GambleAware makes fundraising decisions in pursuit of our vision of a society where everyone is safe from gambling harms. This policy ensures that **we do not accept donations which may compromise our independence** and our values as we implement strategies to realise our vision.

We accept many donations each year. However, we may need to refuse specific donations.

Where there is a perceived risk to our commissioning independence, reputation, financial position or brand in accepting a donation, we reserve the right to refuse such donations.

The charity has robust and informed decision-making process for all donations and partnerships. The relevant policies are reviewed regularly by our Board of Trustees and Executive Leadership Team.

Accepting Donations

GambleAware actively encourages philanthropic support and views the solicitation and acceptance of donations as an essential element in fulfilling our purposes. All decisions are made with the best interests of beneficiaries and the charity in mind and in accordance with guidelines published by the Charity Commission, Institute of Fundraising and The Fundraising Regulator.¹

Gambling operators that hold a licence with the UK Gambling Commission are required by the Commission to make "an annual financial contribution to one or more organisation(s) ... which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling". ²

GambleAware is an organisation approved by the Commission to accept donations to fund safer gambling initiatives in all three categories; research, prevention, and treatment. As the lead Commissioner of services aimed at addressing gambling harm the charity benefits from donations without restrictions on their use.

Refusing Donations

The Trustees have discretion to refuse donations when they consider that refusal is in GambleAware's best interests.

GambleAware will not accept donations that:

- influence the freedom and/or compromise the independence of GambleAware in any way
- could be perceived as an attempt to achieve a benefit for the donor beyond the act
 of giving
- may be perceived as an attempt to influence the charity in its decisions relating to the allocation of those funds
- are subject to restrictions that do not accord with GambleAware's charitable purposes,
- lead to a risk of actual, potential or perceived influence on charity activity, particularly where the donor has markedly different or conflicting interests to those of the charity.
- may reasonably be thought to have been illegally obtained or connected to terrorist activity
- any donations made where GambleAware is unable to identify the donor or source
- expose GambleAware to undue adverse publicity or reputational risk
- cost GambleAware more than the benefit it derives from the donation
- may not be appropriate for acceptance if the donor lacks capacity or is vulnerable

The Board may also refuse any donation if they reasonably believe that accepting it would not be in the best interests of GambleAware for reasons that may or may not include any of the factors listed above. In reaching this decision the Board will consider relevant guidance¹ and take legal advice where appropriate and shall clearly document the reasons for the refusal in the minutes of the relevant Board meeting.

¹ Such as the Institute of Fundraising guidance <u>"Acceptance, refusal and return: a practical guide to dealing</u> with donations"; and Charity Commission blog: "Returning money to charities"

² UK Gambling Commission LCCP 3.1.1.2

Legal Information

This policy is for information only and is not a binding contract and does not confer legal rights on any person. GambleAware reserves all rights (including copyright) in any information and materials provided under this policy.

Who is responsible for the Donations Acceptance & Refusal Policy?

GambleAware's Board of Trustees is responsible for compliance with this policy supported by GambleAware's CEO and COO.

For queries relating to this Policy please email info@gambleaware.org