



ACTION FOR CHANGE & EMPOWERMENT (A.C.E)

# FUNDRAISING DUE DILIGENCE POLICY

## 1. Introduction

Action for Change & Empowerment (A.C.E.) is committed to ensuring that all fundraising activities are carried out ethically, transparently, and in compliance with relevant laws and regulations. This policy outlines the due diligence processes required to assess potential fundraising sources, ensuring donations and fundraising activities align with our mission and do not pose any risks to the organization's integrity or reputation.

## 2. Purpose

This policy ensures that:

- All fundraising activities are conducted responsibly and in line with legal, regulatory, and ethical standards.
- Potential fundraising partners are vetted to minimize risks related to money laundering, fraud, and conflicts of interest.
- The organization maintains transparency and trust with donors, funders, and the public.

## 3. Due Diligence Principles

The following principles guide Action for Change & Empowerment's approach to fundraising due diligence:

- **Transparency:** All fundraising sources will be reviewed for alignment with our charitable goals.
- **Ethics:** Fundraising activities will not involve any deceptive, misleading, or coercive practices.
- **Compliance:** All activities will comply with UK charity law, data protection regulations, and fundraising codes of practice.
- **Risk Management:** Potential risks related to reputation, financial security, and legal compliance will be assessed before engaging in any fundraising partnership or accepting funds.

website: [www.acegiving.org](http://www.acegiving.org)  
Instagram: [ace\\_giving](https://www.instagram.com/ace_giving)  
Facebook: [ace\\_giving](https://www.facebook.com/ace_giving)  
YouTube: [ace\\_giving](https://www.youtube.com/ace_giving)

**Action for Change & Empowerment (A.C.E)**  
10, Balfe Street, London, N1 9EG  
Company Limited by Guarantee.  
Registered in England & Wales.  
Company number 07708601



ACTION FOR CHANGE & EMPOWERMENT (A.C.E)

## 4. Fundraising Sources

Fundraising activities may involve various sources, including:

- Individual donors
- Corporations and businesses
- Trusts and foundations
- Crowdfunding platforms
- Fundraising events and campaigns

## 5. Due Diligence Process

The following steps will be followed in conducting due diligence for fundraising activities:

### (a) Individual Donors

- **Source Verification:** Ensure the donor's source of wealth is legitimate and not linked to illegal or unethical practices.
- **Public Record Check:** Review public records to verify the donor's background and financial standing, particularly for large donations.
- **Conflict of Interest:** Ensure the donor is not linked to any personal or financial interests that could influence decision-making.

### (b) Corporate and Business Donations

- **Business Ethics:** Assess the ethical practices and corporate social responsibility (CSR) records of the business.
- **Ownership and Structure:** Confirm the legal standing and ownership structure of the business to ensure the organization is not linked to illicit activities.
- **Corporate Relations:** Check whether the business has any associations that may conflict with the values of the charity (e.g., tobacco, gambling, or armaments industries).

### (c) Grants and Foundations

- **Reputation:** Assess the foundation or grant-making organization's reputation and past grant history.
- **Purpose Alignment:** Ensure the grants align with the charity's mission and objectives.
- **Grant Conditions:** Review the terms and conditions of the grant to ensure compliance and that no restrictions would impede the charity's mission.

website: [www.acegiving.org](http://www.acegiving.org)  
Instagram: [ace\\_giving](https://www.instagram.com/ace_giving)  
Facebook: [ace\\_giving](https://www.facebook.com/ace_giving)  
YouTube: [ace\\_giving](https://www.youtube.com/ace_giving)

**Action for Change & Empowerment (A.C.E)**  
10, Balfe Street, London, N1 9EG  
Company Limited by Guarantee.  
Registered in England & Wales.  
Company number 07708601



ACTION FOR CHANGE & EMPOWERMENT (A.C.E)

## (d) Crowdfunding Platforms and Online Donations

- **Platform Integrity:** Assess the credibility of the crowdfunding platform and its compliance with relevant fundraising regulations.
- **Donor Privacy:** Ensure the platform adheres to data protection laws, particularly regarding donor privacy and information sharing.

## (e) Fundraising Events

- **Event Legitimacy:** Ensure the event complies with local regulations regarding fundraising and public gatherings.
- **Budget and Financial Transparency:** Review event budgets, cost breakdowns, and financial reporting to ensure funds raised are properly managed.

## 6. Donor Approval Thresholds

To ensure proper scrutiny, the following donor approval thresholds will be applied:

- **Donations below £5,000:** The Fundraising Manager / Director will conduct the due diligence process and approve the donation.
- **Donations between £5,000 and £20,000:** Due diligence will be conducted by the Fundraising Manager, reviewed by the Director, and approved by the co-ordinating committee members.
- **Donations above £20,000:** A comprehensive due diligence process, including external verification if necessary, will be conducted. The donation must be approved by the full Board of Trustees / Directors.

## 7. Risk Management and Monitoring

- All fundraising activities will be continuously monitored to assess whether any risks arise during the fundraising process.
- The organization will conduct quarterly reviews of major fundraising partnerships and donors, ensuring continued alignment with the charity's values and mission.
- A Fundraising Due Diligence Register will be maintained to record all checks performed for fundraising sources. The register will be reviewed annually by the Board to ensure compliance.
- Any donor or fundraising partner flagged for potential risks or conflicts will be reviewed immediately by the Risk Management Committee.

website: [www.acegiving.org](http://www.acegiving.org)  
Instagram: [ace\\_giving](https://www.instagram.com/ace_giving)  
Facebook: [ace\\_giving](https://www.facebook.com/ace_giving)  
YouTube: [ace\\_giving](https://www.youtube.com/ace_giving)

**Action for Change & Empowerment (A.C.E)**  
10, Balfe Street, London, N1 9EG  
Company Limited by Guarantee.  
Registered in England & Wales.  
Company number 07708601



ACTION FOR CHANGE & EMPOWERMENT (A.C.E)

## 8. Reporting and Transparency

- **Transparency with Donors:** The organization will maintain clear and open communication with donors regarding the use of funds.
- **Public Disclosure:** The charity will publish annual financial reports detailing fundraising activities, income sources, and how funds have been used.
- **Audit Compliance:** All fundraising activities will be subject to periodic audits to ensure compliance with this policy.

## Donation Oversight and Regulatory Compliance Statement

Action for Change & Empowerment (ACE) is committed to maintaining the highest standards of financial transparency and ethical conduct. As part of our governance framework, ACE actively monitors all incoming donations to ensure they are lawful, appropriate, and aligned with our charitable objectives.

In accordance with UK financial regulations, ACE has a duty to report any donation that appears fraudulent, suspicious, or otherwise irregular to the relevant authorities, including the UK Financial Conduct Authority (FCA) and Action Fraud. This reporting obligation is guided by the Proceeds of Crime Act 2002 and other applicable legislation designed to prevent financial misconduct and protect public trust.

ACE conducts proportionate due diligence on donors and donation sources, and reserves the right to refuse or return any contribution that raises legal or ethical concerns. Where necessary, ACE will cooperate fully with law enforcement and regulatory bodies to support investigations.

Any legal proceedings arising from fraudulent or unlawful financial activity connected to ACE will be subject to the jurisdiction of the United Kingdom.

This policy reflects our unwavering commitment to integrity, accountability, and the responsible stewardship of public and private support.

website: [www.acegiving.org](http://www.acegiving.org)  
Instagram: [ace\\_giving](https://www.instagram.com/ace_giving)  
Facebook: [ace\\_giving](https://www.facebook.com/ace_giving)  
YouTube: [ace\\_giving](https://www.youtube.com/ace_giving)

**Action for Change & Empowerment (A.C.E)**  
10, Balfe Street, London, N1 9EG  
Company Limited by Guarantee.  
Registered in England & Wales.  
Company number 07708601



ACTION FOR CHANGE & EMPOWERMENT (A.C.E)

**Policy Owner:** Board of Trustees / Directors

**Policy Lead:** Director / Senior Responsible Owner (SRO)

**Audience:** Employees, Volunteers, and Fundraising Partners

**Formally Endorsed By:** Board of Trustees / Directors / Coordinating Committee

**Last Reviewed:** 01/09/2025

**Next Review:** 31/08/2026

Bola Obanubi

Director, A.C.E NGO

Action for Change & Empowerment (A.C.E NGO)

website: [www.acegiving.org](http://www.acegiving.org)  
Instagram: [ace\\_giving](#)  
Facebook: [ace\\_giving](#)  
YouTube: [ace\\_giving](#)

**Action for Change & Empowerment (A.C.E)**  
10, Balfe Street, London, N1 9EG  
Company Limited by Guarantee.  
Registered in England & Wales.  
Company number 07708601