

Acceptance of Gifts Policy

(updated November 2021)

Seenaryo was founded in 2015 and has been funded through institutional grants and philanthropic donations since inception. Seenaryo aims to transform life chances among refugees and host communities through the arts and education, and in order to achieve this mission we have the ambition to be reaching over 2000 beneficiaries in at least 4 countries and raising over £700,000 per year by 2021. We take pride in forming a community of engaged supporters both in the UK and internationally, who are financially committed to Seenaryo over the long-term.

In addition to our established base of individual supporters, we actively seek and encourage funding from a variety of sources including governments, charitable trusts and foundations, corporations, and we generate our own revenue through contracts with other educators and arts providers.

These guidelines are intended for use across all the countries Seenaryo works in (primarily currently Lebanon, Jordan and UK), as well as international supporters. These guidelines apply to all types of donation, including gifts-in-kind. Relationships with funders should be subject to prior and continuing consideration in order to confirm that they support Seenaryo's mission, vision and strategic aims and are consistent with our overall objectives. No individual should request a donation on their own initiative without first consulting Seenaryo's Co-Directors at an early stage.

The purpose of this document is to help Seenaryo staff and Board of Trustees to make clear and consistent decisions regarding the acceptance or refusal of donations. Ultimate responsibility in respect of the acceptance or refusal of all donations rests with the trustees of the charity.

In principle, trustees of a charity are expected to accept money given to that charity for purposes consistent with the charity objects, but the trustees have discretion to consider other factors relevant to the charity's best interests. The decision making process should consider the benefits of funding against reputational risks, taking into account the legal framework and other considerations which inform the decision making process.

The following considerations should guide the handling of all gifts and donations to Seenaryo and inform the decision making process:

- Does the potential gift fit with Seenaryo's mission?
- Is there any reason to suspect that the proposed gift may be made from a source that arises in whole or in part from an illegal activity, or, more generally, from activities that may have: evaded taxation or involved fraud, violated international conventions that bear on human rights?
- Is there any possible expectation of personal advancement otherwise than in accordance with Seenaryo's requirements for the service of refugees and host communities or the appointment of staff?
- Would acceptance of funding compromise Seenaryo's artistic, educational or professional integrity?
- Is there any possibility that acceptance of the gift might require action that is illegal or could seriously damage the reputation of Seenaryo?

- Could acceptance of the gift harm Seenaryo's relationship with other benefactors, partners, beneficiaries or volunteers?
- Is the offer of support dependent on the fulfilment of conditions placed upon Seenaryo which are perceived to be too onerous or counter to our objectives?

In making these judgements, trustees and their authorised decision-makers must not allow individual personal, political, commercial interests or ethical issues, which are not directly related to the interests of the charity, affect their judgement.

Seenaryo will not accept any truly anonymous donations where the donor cannot be identified. Seenaryo will, however, respect a donor's wish for privacy should they wish their details not to be publicised.

What should due diligence include, when is the process activated and who does it?

Due diligence research will be carried out by Seenaryo's Co-Directors. The due diligence procedure is activated when we are considering making a request or accepting funding of £50k+.

It will include:

- A summary of our existing relationship
- Gift information – where is the money coming from, how much and what for
- Source of wealth/income
- Giving history/benchmark against similar organisations (who else are they funding)
- Negative/positive press
- Highlight any areas for concern

As a matter of course, we will assess any potential donations over £50k, or below if we are aware/made aware of any concerns. The assessment will be made prior to making an ask. The initial assessment will be done internally by the Co-Directors wherever possible. All reports will be held in Seenaryo's internal Dropbox folders. From time to time we may commission the research to be done externally (for example, for international prospects in countries where we don't have access to sufficient information to do a proper assessment).

The acceptance of any gifts and donations to the value of £200,000 or more shall be automatically subject to approval by the Board of Trustees.

No money from fossil fuel companies

Seenaryo recognises that the climate crisis poses the greatest threat of our time, and indeed impacts our beneficiaries. There Seenaryo will not accept money from companies who directly work within the fossil fuel industry, such as oil and gas companies. This does not affect individual giving (e.g. if the CEO of a company were to give in a personal capacity), unless of course other points within this policy comes into play, e.g. reputational risk.

It should also be recognised that all companies consume fossil fuels in some way. This policy does not currently stop Seenaryo receiving money from, say, an airline or shipping company (two industries with very high emissions) because these are not fossil fuel companies. Any companies which are 'grey areas' can be decided at the discretion of the Co-Directors and, if necessary, the board (and again, still subjected to all the other points within this policy).

Exclusions from the Due Diligence Process

Donations and grants of any size from charitable foundations registered with the regulatory authorities in the UK, USA and Canada, or from funding councils or related bodies within the UK, USA or EU can be progressed without going through due diligence review.

With regard to the United Kingdom this means charities regulated and scrutinised by the Charity Commission for England and Wales, the Office of the Scottish Charity Regulator, and the Charity Commission for Northern Ireland, or entities considered an 'exempt charity' by HMRC. For the United States of America this means tax exempt, non-profit corporations or associations under section 501(c) regulated and scrutinised by the Inland Revenue Service (IRS). For Canada this means charities regulated and scrutinised by the Canada Revenue Agency (CRA). Also excluded are funding councils or related bodies within the UK, USA or EU.

Where the funder has previously been approved, there will be an assumption that any subsequent funding will also be approved unless: the proposed funding will reach the threshold requiring review, or in the interim there has been a change in circumstance that might affect Seenaryo's decision as to whether to accept the subsequent funding.

Referral Process

Seenaryo's Co-Directors conduct the research to the agreed format, checking resources in the public domain listed below. They will assess and decide if a referral to the Board of Trustees is necessary. If the situation changes after a gift has been accepted, Seenaryo will review the original donation and donor against these guidelines and act accordingly.

All potential donations of £200,000 plus will be referred to Council.

Source Checklist	Y/ N	Information Checked
Charity Commission (or other relevant organisation for non-UK donors)		Legal status of charity, latest accounts filed
Companies House (or other relevant organisation for non-UK donors) http://wck2.companieshouse.gov.uk/dirsec		Disqualified directors
Factiva (general press)		Negative & positive press
Dow Jones Risk & Compliance		Dow Jones Sanction & Watch lists, Politically exposed persons, known criminal associates
Any other sources		