

PCC Donations Acceptance Policy – Guide for Creation and Discussion

Introduction

The [Code of Fundraising Practice](#) (effective 1 November 2025) requires all charities that undertake fundraising or receive donations for charitable purposes to have clear policies and procedures about:

- The circumstances in which you will refuse or return donations
- How you will carry out due diligence on donors and donations
- How donors, staff and volunteers can report any concerns they have about your fundraising practice, and how you will respond to these.

The National Giving Directorate have produced a template policy for PCCs that brings this all together in a single policy document. You'll need to discuss and agree this as a PCC and review it regularly alongside your other policies.

If you already have a fundraising policy in your church and it doesn't cover the points above, you should consider adopting this policy too, or combining it with your existing one.

Donations and Fundraising

In this guidance 'donation' has a broad meaning. It can be money, land, goods or other property of any kind freely given to your charity. Some examples are money or property given:

- in response to any of your charity's fundraising activity
- as a gift, or a gift in a will (a legacy)
- as a grant.

In this guidance, fundraising and giving are used to mean any activity in your church where people are encouraged to make donations – this could be in response to requests for regular gifts towards your church's mission and ministry (including through the Parish Giving Scheme or by Standing Order) but also in response to specific fundraising appeals, for a church roof or building refurbishment for example.

Documenting Your Fundraising Decisions

Being able to explain and justify your decisions is a key part of good governance and accountability. This [guide from the Fundraising Regulator](#) provides advice on when and how to keep records of decisions that affect your fundraising – from accepting or refusing donations to handling complaints.

The guide also offers tips on writing meeting minutes, managing conflicts of interest, and carrying out and recording risk assessments. It explains why documenting decisions matters, especially if concerns are raised by donors or the public, or, in extreme circumstances, if your PCC is ever subject to an investigation by the Fundraising Regulator. This doesn't happen at all often, as most charities comply with Fundraising Regulations, so you don't need to panic. However, having the correct policies in place is the first thing the Fundraising Regulator will look for, so it's important to discuss and approve this policy with your PCC.

Clear documentation helps to show that your decisions were made using appropriate information and advice, and in line with your PCC's best interests.

You should keep a written record of the following:

- Decisions you make that are relevant and important to your fundraising activity.
- Conflicts of interest relating to the decisions you make about fundraising.
- Risk assessments relating to your potential or actual fundraising activity.
- Professional advice you have received to inform your fundraising decisions.
- Due diligence checks you conduct relating to your fundraising activity.

Further Support and Guidance

[Chartered Institute of Fundraising 'Acceptance, Refusal & Return: A Practical Guide to Dealing with Donations'](#)

[Accepting, refusing and returning donations to your charity - GOV.UK](#)

[Fundraising Regulator 'Complaints handling guidance for charities and third-party fundraising organisations'](#)

[Fundraising Regulator 'Due Diligence and Fundraising'](#)

[Charity Commission 'Compliance Toolkit: Protecting Charities from Harm, Chapter 2: Due diligence, monitoring and verifying the end use of charitable funds'](#)

Policy Drafting Guidance

1. Purpose

Your policy should outline the principles and procedures under which your PCC would accept, refuse, and return donations to ensure compliance with the [Code of Fundraising Practice](#) (effective 1 November 2025) and to uphold the integrity and mission of the church. Before meeting to discuss the policy, you should have looked over the Code of Fundraising Practice.

2. Scope

In this section agree who your policy applies to, usually all trustees, staff, volunteers, and fundraising partners involved in soliciting or receiving donations on behalf of your church.

Normal day-to-day decision making and donations handling will usually lie with the treasurer, gift aid secretary and/or office staff. You should discuss and agree when decisions should be escalated to the Church Wardens/Vicar/Executive Committee and when to the full PCC.

You should also discuss and agree the following points:

- Who in your organisation has the power to endorse the policy and make the final decision?
- Who will communicate decisions to the donor?
- Will there be a chance for church volunteers/PCC members/staff or other stakeholders to state an opinion or appeal a decision?
- Are you going to make your donation acceptance policy publicly available? This could be on your website, church noticeboard or A Church Near You page.

3. Principles for Accepting Donations

As trustees, your principal duty is to further your church's mission and ministry. Your starting point therefore will always be to accept and keep a donation offered or given to your PCC. You should know, at least in broad terms, where the money they are being given comes from (e.g. grants, cash donations etc). Trustees should also be able to identify and be assured of substantial donations. A good, open and transparent relationship between a charity and its donors is essential for building trust and confidence. It will help to ensure that expectations and commitments are clear and may encourage longer term funding.

Guidance on GDPR: [Advice for small and medium organisations | ICO](#)

4. Refusing or Returning Donations

Sometimes a PCC must refuse or return a donation. It should always carefully balance all the factors that are relevant to the church's circumstances.

In considering whether to accept a donation or not, you should evaluate the risks to the PCC of accepting, refusing or returning it before making a final decision.

You must follow the law and Charity Commission [guidance](#), and you may need to take advice about your next steps.

Find out more about:

- [the reasonable steps you should take to know who your charity's donors are](#)

- [how to spot a donation with suspicious features](#)
- [how to report a suspicious donation to the Commission and other relevant authorities](#)

You might want to discuss the following questions as you agree which donations you might return or refuse:

- Are there specific industries or activities that run counter to your charitable objectives from whom you would not take a donation? *For example, someone associated with an illegal activity. There is no right or wrong answer here, but you should discuss what you think is best. You can of course address this on a case-by-case basis but it's helpful to have agreed in advance so you can make effective decisions.*
- Will the policy apply to all kinds of donation? *E.g. cash, donations in kind, shares, legacies, pro bono work, sponsorship, corporate donations.*
- Is there a threshold, financial or not, as to when your policy applies? *E.g. donations over a certain size? Cumulative donations of a certain value over a set-time?*
- Do you need to consider the cost of accepting a donation? *E.g. will accepting a restricted donation be undeliverable without your church incurring additional costs beyond the initial donation?*
- What will your position be on anonymous donations? Remember, anonymous donations with a value of over £25,000 need to be reported to the Charity Commission as a serious incident
- Are PCC members confident about how to identify donations that come from people in vulnerable circumstances, and the situations in which should not be accepted?
- Can you ensure that you can meet the specific requirements of a donation (including a gift in a will) while carrying out your church's key objectives?

5. Due Diligence

Due diligence on donors and donations should be appropriate and proportionate to the donation's size and risk. Most donations you receive are likely to be from people you know, in your church congregation or local community. However, you must be assured that donations offered or received do not come from inappropriate or illegal sources, are not subject to restrictions, prohibitions or sanctions, and will not bring the church into disrepute. Common sense is needed here in your day-to-day operations, but equally, your policy should cover all bases.

You need to make sure your policy lists the ways in which you will reduce risk by:

- Assessing the risks of accepting, declining or returning certain donations.
- Undertaking research to ensure that donations do not come from an inappropriate or illegal source.

- Assessing whether any conditions or restrictions accompanying a donation would compromise your independent and reasonable decision making.
- Assessing the risk of working with a third-party fundraiser and/or any other party you are considering entering into an agreement with, in order to carry out your fundraising activity.
- Obtaining assurance that your fundraising activities will not cause harm.
- Checking that those who fundraise on your behalf, for example PCC members, staff, the congregation and in some circumstances, third parties, do not pose a risk of harm to others, to your fundraising reputation, and to that of fundraising generally.

6. Safeguarding

Having a policy for your church's fundraising and its approach to people in vulnerable circumstances has multiple benefits: it demonstrates good governance processes; expresses the values of the organisation; and provides a framework so that all staff and volunteers know what's expected of them. It can also be used to explain to supporters or the public how you are going about your work and aid transparency and accountability.

When encouraging generous giving, you may encounter people who are in potentially vulnerable circumstances and could lack capacity to make decisions about giving. The Code of Fundraising Practice offers specific guidance on [Treating Donors Fairly](#) which gives more information on working with people in potentially vulnerable circumstances. The Church of England's [Guide for Churches on Giving and Capacity](#) helps churches develop a greater understanding and confidence in responding to such givers appropriately.

It might be helpful to watch this 5 minute video on [Giving, Vulnerability and Capacity](#) which provides a useful introduction and links to further information.

7. Complaints

In this section, you'll need to agree:

- Where complaints should be sent
- How quickly you will acknowledge and investigate complaints
- Who will investigate complaints
- How complaints will be handled to ensure that

Where possible, organisations should ensure that complaints are investigated by someone within the organisation who is independent of the events complained about. Where this is not possible, organisations should consider whether a third party outside of the organisation should be asked to investigate the complaint.

If your PCC already has a complaints policy, ensure that the fundraising complaints procedure is in line with your existing policy.

8. Monitoring and Review

Your policy should be reviewed regularly as part of any other policy review.