

Fundraising and Donations Acceptance Policy

Objective and Principles

The objective of the Horniman Museum and Gardens fundraising activity is to support the Horniman's mission and work by the active and effective raising of funds, whilst ensuring a commitment to our values and always protecting the integrity and reputation of the Horniman.

All our fundraising activity will be legal, open, honest, and respectful. The Horniman will comply with all relevant and prevailing legislation including money laundering rules, Gift Aid and VAT legislation, the Bribery Act, Charity Commission guidance, the Museum Association's Code of Ethics, the Institute of Fundraising guidance, General Data Protection Regulation (GDPR) and the Fundraising Regulator's Code of Fundraising Practice.

Donations Acceptance Criteria

In line with Charity Commission guidance (updated in March 2024) the Horniman and its trustees will start from a position of accepting all donations offered or given to the charity. In doing so it acknowledges that there are sometimes legal reasons for refusing and other circumstances where they might decide that, on balance, it is not in the interests of the Horniman to accept the gift. For the purposes of this policy, 'donation' has a broad meaning and includes gifts in response to a fundraising appeal or activity, a legacy or gift in a will, a commercial sponsorship contract or a grant.

Having carefully weighed the benefit of any gift to its work, the Horniman will not accept donations which are judged to be illegally or immorally obtained or that risk adversely affecting our institutional integrity or our financial position. The Horniman will therefore solicit and accept financial support from, and partnership working with, trusts and foundations, companies and individuals based on the following explicit conditions:

1. Donations have not been illegally obtained nor associated with criminal sources or activity.
2. We are satisfied that the donations do not present a conflict of interest nor are counter to our mission and values.
3. We are satisfied that support will not adversely affect our ability to raise funds from other sources.
4. We are satisfied that any potential adverse publicity from a gift or relationship will not generate a level of public condemnation that would be disproportionate to the advantages gained and ultimately damage our reputation.
5. We will exercise a duty of care to our donors and not seek to solicit nor accept a donation from anyone considered not to be of full mental capacity.
6. A truly anonymous donation, where we only deal with an intermediary who is not prepared to identify the donor even to senior management member or a trustee, will not be accepted. We will report any anonymous donations of £25,000 or more to the Charity Commission as a serious incident.
7. We will not accept support which is conditional on the fulfilment of conditions not in the best interests of the Horniman and which may compromise our integrity or undermine our independence.
8. We will not accept donations where the impact or costs of fulfilling any restrictions on, or conditions of the gift would be beyond or disproportionate to the benefit from the gift.
9. We may not accept a legacy gift if this is conditional on being appointed Executor to the estate.

10. We will not accept a donation if there is a risk of financial loss arising from failure to effectively deliver any relationship with funders (in addition to the loss of the gift).

Control and Governance

Executive coordination of all fundraising activity within the Horniman is centralised within the Fundraising team as part of the Audiences and Income directorate (A&I). All staff and trustees are required to ensure that any philanthropic gift, financial or in-kind, is channelled through the Fundraising team having flagged any relevant discussions with this team in advance. To avoid conflicting requests or plans for future funder relationship development, no specific donation request should be made by any members of staff without prior consultation with the Fundraising team, Director A&I or Chief Executive.

The Fundraising staff will ensure that research is conducted into potential individual major gift funders and all trust and foundations and corporate prospects, so that any concerns are identified at the outset and before any approach is made. For all contributions over £5,000, (pledged or received), an initial search of publicly available material designed to highlight potential areas of controversy or concern will be made by the Officer and reviewed by the Head of Fundraising as the key step in our due diligence. This will normally be through a combination of adverse news searches on Google and follow up via our media database and a registry check with Companies House data. The Head of Fundraising may commission further research and then escalate any concerns to the Director A&I for review with a recommendation. The decision to accept or reject a donation in these circumstances will lie with the Director A&I. The Fundraising team will ensure that any gifts accepted at this level will have an agreed written terms of reference outlining how the contribution will be spent/used and any reporting commitments. Any rejections made by the Director A&I will be shared with the Chief Executive and with trustees at their next Board meeting.

If the Director A&I has concerns that a contribution pledged, or already received, appears to contravene our acceptance criteria, and is at a scale that warrants a more comprehensive review (£20k+) then the case will be escalated via the Chief Executive to the Board of Trustees to consider in full, at an upcoming Board meeting. Trustees will exercise their duties in the Horniman's best interests and not allow their personal views, or any external pressures that do not relate to the charity's purposes, to influence them in considering whether to accept a donation. The decision of whether to accept, reject or return a donation in these circumstances will lie with the Chair of the Trustees or the Chief Executive of the Horniman acting under delegated authority and will be noted in the appropriate Board records. Any decision to reject or return a gift will be communicated to the prospect or donor by the Head of Fundraising, Director A&I or Chief Executive as appropriate, sharing our policy and explaining our reasoning.

Policy approval, review and scope

This policy has been approved by the Board of Trustees on 16 May 2024 and will be reviewed in May 2027.

The policy applies to due diligence regarding donations of cash, or assets readily convertible to cash and gifts-in-kind pledged or received by the Horniman; appropriate procedures relating to the gifts of objects, works of art or archives are set out in the Horniman's Collections Development Policy.

Relevant opportunities will be available to all staff with key due diligence roles to be kept up to date with best practice and knowledge.