



Holding, moving and receiving funds safely in the UK and internationally

Checklist of issues to consider when the charity receives donations from outside the UK

- has there been sufficient prudence and care in verifying and recording the source and origin of the donations from outside the UK?
- what donations and payments were expected?
- do they match against payments received?
- do trustees need to take additional steps to verify sums received from particular sources or for sums above a certain amount?
- are particular financial controls needed to receive certain funds, eg do trustees need to open new accounts in particular currencies?
- is there any suggestion of pressure being put on the trustees to receive or apply the funds in a particular way?
- are the trustees satisfied that they have full discretion and proper control of the application of the funds for the appropriate charitable purposes
- wherever donations are from, the trustees should be satisfied that there are no express or implied conditions attached which are not in the charity's interests
- if the funds have been received through intermediaries are the trustees satisfied that these transactions have been through properly regulated and registered agents?
- if the funds have been received in cash are the trustees satisfied that the transfer has been done legally and with the appropriate declarations to HMRC?
- are there any issues in respect of financial sanctions or anti-money laundering regulations that the trustees have not taken into account?
- are the trustees clear that this is a donation and the charity will not be expected to repay some or all of the payment at a later date?
- broadly, are the trustees content that there are no concerns regarding the source of the money?