The Friends of Trowbridge Bandstand

Due Diligence Policy

(Including Due Diligence Checklists)

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1 DOCUMENT CONTROL

1.1 Document Status

DRAFT

1.2 Document Revision History

Version	Date	Author:	Revision Detail	Next Review Due:
0.1	09/06/2026	Stephen Cooper	Initial document creation	08/06/2027

2 DOCUMENT PURPOSE

There is a statutory requirement to meet Charity Commission, fundraising and other regulator due diligence compliance rules when assessing the viability of both donors/donations, as well as partners/contractors and applicants/applications for grants.

It is important to identify the specific risks and implement appropriate action to manage these. For large scale, complex issues, this may require formal due diligence by lawyers and accountants. However, basic due diligence may be as simple as phoning round to check that a proposed new local minor works contractor is reliable.

3 DEFINITIONS

In this Policy Document:

“**the Trust**” means the The Friends of Trowbridge Bandstand;

“**the Commission**” means the Charity Commission for England and Wales;

4 DUE DILIGENCE POLICY

It is the policy of the Trust to exercise the appropriate level of due diligence whenever considering whether to accept a donation or consider an application for a grant or disbursement.

As a minimum, the Trust must be satisfied that all reasonable steps have been taken to confirm that any donation or application for a grant or disbursement is legal and ethical.

The Trust must also be satisfied that any donation or application for a grant or disbursement would further the aims and objectives of the Trust as defined in the Trust's Constitution and no donation or application for a grant or dispensation can be accepted if it is apparent that such acceptance would be in conflict with the Objects and/or the charitable aims of the Trust.

No donation or application for a grant can be accepted if it is apparent that such acceptance would place the Trust under an obligation, either implicit or implied, that conflicts with the Objects and/or the charitable aims of the Trust.

If there is any remaining element of doubt having completed all internal due diligence checks, professional/legal guidance should be sought or the donation/application for grant refused.

5 CHECKLISTS FOR DONORS AND DONATIONS

The following checklists can be used to gather the relevant information needed to inform a decision of whether or not to seek/accept a donation. The amount of information available will depend on whether the donor is an individual or an organisation. All of this information can be obtained for free, via public records.

5.1 Regulatory Checks

- Is the donor registered with the relevant regulator? (e.g.Companies House, Charity Commission, FCA)?
- Is the donor complaint and up to date with all required returns?
- Is the donor under investigation?
- Is the donor's governing document available (if applicable)?
- Are the donor's accounts viewable?
- Are any directors/trustees/individuals connected to any other organisation under investigation or with repeated late returns?

5.2 Internet and Social Media Checks

- Is the donor present and active on Social Media platforms (e.g. X, Facebook, Instagram or LinkedIn)?

- Is their “brand” well known? What is their reputation with the public and our stakeholders?
- Has the donor received any adverse publicity/negative feedback? If so, how long ago? What for?
- What ethics does the donor publicly portray (e.g. on the environment, diversity or discrimination)?
- Is the donor a member of any networks, societies, community organisations or political parties?
- Is the source of the donor’s wealth publicly know and potentially problematic, embarrassing or of questionable legality?
- Does the donor contribute to or support any other charities or causes?

Remember to look for factual evidence and clues to possible public perceptions, so less traditionally reliable sources (such as certain tabloid newspapers), may still be relevant to inform the decision.

6 CHECKLISTS FOR APPLICANTS AND APPLICATIONS FOR GRANTS

The due diligence checks undertaken on applicants for grants are similar to those detailed for donors at Section 5 above.

However, the Trust will usually only consider applications for financial assistance from the owners of the Bandstand, Trowbridge Town Council, and only then when any grant applied for meets the aims and objectives of the Trust and falls within the scope of:

- the Rules that set out the relationship between the Trust and the Bandstand’s owners
- the Trust’s Grants and Disbursements Policy

However, in the rare circumstances where the Trust may be asked to directly provide financial assistance (disbursements) to a third party, not only should this fall within the aims and objectives of the Trust, but the due diligence checks below should be undertaken as well as the Trust’s Grant’s and Disbursements Policy being followed.

6.1 Regulatory Checks

- Is the applicant registered with any relevant regulator? (e.g.Companies House, Charity Commission, FCA)?
- Is the applicant complaint and up to date with all required returns?
- Is the applicant under investigation?
- Is the applicant’s governing document available (if applicable)?
- Are the applicant’s accounts viewable?
- Are any directors/trustees/individuals connected to any other organisation under investigation or with repeated late returns?

6.2 Internet and Social Media Checks

- Is the applicant present and active on Social Media platforms (e.g. X, Facebook, Instagram or LinkedIn)?
- Is the applicant's "brand" well known? What is their reputation with the public and/or our stakeholders?
- Has the applicant received any adverse publicity/negative feedback? If so, how long ago? What for?
- What ethics does the applicant publicly portray (e.g. on the environment, diversity or discrimination)?
- Is the applicant's financial status publicly known and potentially problematic, embarrassing or of questionable legality?
- Has the applicant requested contributions or support from any other charities or causes?

Additional due diligence should be applied to the application itself.

6.3 Checks on the Application itself

- Does the application comply with the charitable aims and Objects of the Trust?
- Is the application of benefit to the public?
- Is the application of sufficient merit?
- Is the application financially viable?
- Is the application deliverable within reasonable timescales?
- Would a successful application lead to a more than incidental gain to the applicant?

7 USEFUL POTENTIAL SOURCES OF INFORMATION ON PROSPECTIVE DONORS AND APPLICANTS

- Register of Charities https://register-of-charities.charitycommission.gov.uk/
- Companies House https://find-and-update.company-information.service.gov.uk/
- Financial Conduct Authority https://mutuals.fca.org.uk/
- Ethical Consumer Listings https://www.ethicalconsumer.org/

END OF DOCUMENT

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