

## **SJP DONOR DUE DILIGENCE (DDD) POLICY**

This document aims to set out SJP's risk-based approach to Donor and Potential Donor Due Diligence and monitoring, taking into account the size of our Charity and our specific needs. The risk-based approach recognises that not all Donors and Potential need to be reviewed and monitored in the same way.

All Trustees, staff and volunteers should know what to do if they identify something suspicious, or something which poses particularly high risks to the Charity. Suspicious activities need to be reported to the Trustees who are responsible for reporting to the Charity Commission and other relevant authorities, including the police, if a crime is suspected.

### **DDD OBJECTIVES**

- Reflect the ethical standing and character of the church.
- Not bring SJP into disrepute
- Avoid favoring or discriminating against one group of users, donors and potential donors over others.
- Abide by the universal principles of honesty, respect, integrity, empathy, and transparency.
- In all cases consider whether the reputational impact or moral hazard of accepting a donation is likely to negatively affect future donations from others and whether in all the circumstances this may outweigh the value of the donation being offered.

### **DDD PRINCIPLES**

- SJP will conduct relevant due diligence on all major donors and potential donors and companies they have, or plan to have, a direct engagement with.
- SJP will seek to work constructively with companies, both to secure their support for our work and to influence their policy and practice.
- SJP will not solicit, nor accept donations (including those in the form of legacies) from or seek a partnership with individuals linked to companies whose core products or services are antithetical to the mission or inherently harmful to the people and communities we serve (see SJP's Ethical Fundraising Policy below).
- SJP will make acceptance decisions based on due diligence research undertaken on a case-by-case basis.
- Unless a donor or potential donor gives via an organisation which undertakes Due Diligence on our behalf (i.e., Charities Aid Foundation), SJP will not accept a gift if the identity of a donor or potential donor's source of funds is unclear.
- Aside from low level gifts i.e., collected in boxes, or donations under **£50,000**, the identity of a donor or potential donor who prefers to remain anonymous must, at a minimum, be known to at least the Rector, the Development Director, a church warden and anyone responsible for Due Diligence reporting process (at a Trustee level).
- The perceptions and needs of key stakeholders such as local communities will be taken into consideration when engaging with either individual or corporate donors and potential donors. Having the trust and confidence of the people and communities with which we work is paramount. It is this trust which makes our work effective and contributes to our key competences.
- SJP will strive to be sensitive to cultural values and norms when accepting funds or partnering with companies.
- Whilst SJP will accept sponsorship, no one organisation should be seen to dominate, and



any proposed restrictions or conditions attached to the sponsorship shall be reviewed by the Trustees prior to its acceptance.

## TRUSTEE'S LEGAL REQUIREMENTS & LEGAL RESPONSIBILITIES

### SJP TRUSTEE REQUIREMENTS:

- Act reasonably and prudently
- Not let personal views nor prejudices affect their conduct as Trustees.
- Carefully consider any conditions or restrictions attached to a donation, including:
  - Publicity the donor or potential donor wishes to be given.
  - Acknowledgement opportunities
    - No part of the historic church can be renamed, although suitable acknowledgment plaques can be considered.
    - Rooms in the ancillary buildings can be considered for donor and potential donor acknowledgement on a case-by-case basis.
- Consider the reputational impact of accepting the donation, including the likely reaction of other donors and potential donors; staff and potential recruits; volunteers; and clients insofar as their reaction may affect the achievement of our objective.
- Consider whether the size of the donation, relative to our fundraising programme, may give rise to concerns that we would compromise our independent voice by acceptance.

### TRUSTEE'S LEGAL RESPONSIBILITIES

- The “Know your” principles are already part of the legal duties and responsibilities of Trustees in charity law. The core elements involve:
  - **Identify:** Know who you are dealing with
  - **Verify:** Where reasonable and the risks are high, verify information received
  - **Know what the organisation or individual's business is** and be assured that this is appropriate for the Charity to be involved with.
  - **Know the counterparty's specific business with the Charity** – are there any specific requests, or obligations linked to the donation. Do these adhere to the Charity's Objectives and Principles?
  - **Watch out** for unusual or suspicious activities, conduct or requests.
- Charity Commission guidance confirms that:
  - Trustees should report known, or suspected, criminal activity to the police, a customs officer (HMRC), or the National Crime Agency, as appropriate.
  - Trustees must notify the Charity Commission of unverified substantial anonymous donations (over £25,000).
  - Trustees must be able to *demonstrate* a good reason for refusing a donation. Reasons for refusal should be clearly articulated well, documented, and safely stored in line with SJP's Data Protection Policy.

## REFUSING A DONATION

- St James's Trustees can refuse a donation if:
  - It would be unlawful to accept it, for example it likely represents the proceeds of crime.
  - Acceptance would be more detrimental to the charity than refusal. The law allows for the consideration of practical and ethical factors if these are likely to affect the specific interests of the charity.
  - Accepting the donation would be detrimental to the achievement of the purposes of the Charity. This anticipated detriment must be set against the benefit of having the funds from the donor or potential donor, which would enable St James's Piccadilly to pursue its purposes.

## PRACTICAL RISKS<sup>1</sup>

Practical risks do exist, and charities can be abused in several ways, for example:

- **Money laundering:** Donors can make loans to charities as a means of laundering money through a charity, or they can make donations with specific restrictions as to which partner or project is to be funded as a means of transferring funds overseas and disguising the origin of the funds.
- **Proceeds of crime:** Anonymous cash donations or donations through suspect third parties may be a means of disposing of the proceeds of crime.
- **Tax avoidance/evasion:** Donors may seek tax relief on their donations while at the same time seeking private benefit as a result of their donation or insist that the charity purchases services from an associated company as a condition of the donation, thereby obtaining tax relief on the donation and securing business at the same time.

Trustees should be aware of any funding relationship which involves a return of part or whole of the cash donated to the donor or potential donor or where the donor or potential donor benefits in any substantial way as a result of making the donation. Third parties making donations on behalf of a donor who wishes to remain anonymous may also be a cause of suspicion unless the third party is reputable or allows trustees to know the name of the donor and potential donor with the proviso that this is not made public.

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<sup>1</sup> Source: Charity Commission: Compliance Toolkit – Protecting Charities from harm.

### **SJP ETHICAL FUNDRAISING POLICY (EFP)**

SJP aims to receive donations from individuals and entities whose wealth / capital has been obtained through ethical means and positive investment.

SJP will use best endeavors to solicit and consider donations according to the ethical guidelines set out in the Church of England's ethical investment policies as operated by CCLA. If donations are proposed from entities that reasonably fall outside these parameters, investigation may be undertaken regarding the company's overall performance in order for the PCC to take a view. These include entities that derive income from:

- Extracting and refining coal, oil, or gas
- Tobacco
- Military sales
- Civilian firearms
- Adult entertainment
- Gambling
- High-interest rate lending
- The production of nuclear weapons, landmines, or cluster munitions
- Testing of cosmetics on animals
- A producer of single-purpose abortifacient
- A producer of baby milk substitutes with minimum responsibility standards
- An entity with substantiated allegations of non-conformity with recognised labour, human rights, biodiversity, and climate change standards
- Entities that do not align with the Paris Nationally Determined Contributions (NDCs)

The above list is for guidance and is not prescriptive. SJP acknowledges that it may not be practically possible to determine the origin of wealth / capital if the information is not publicly available.

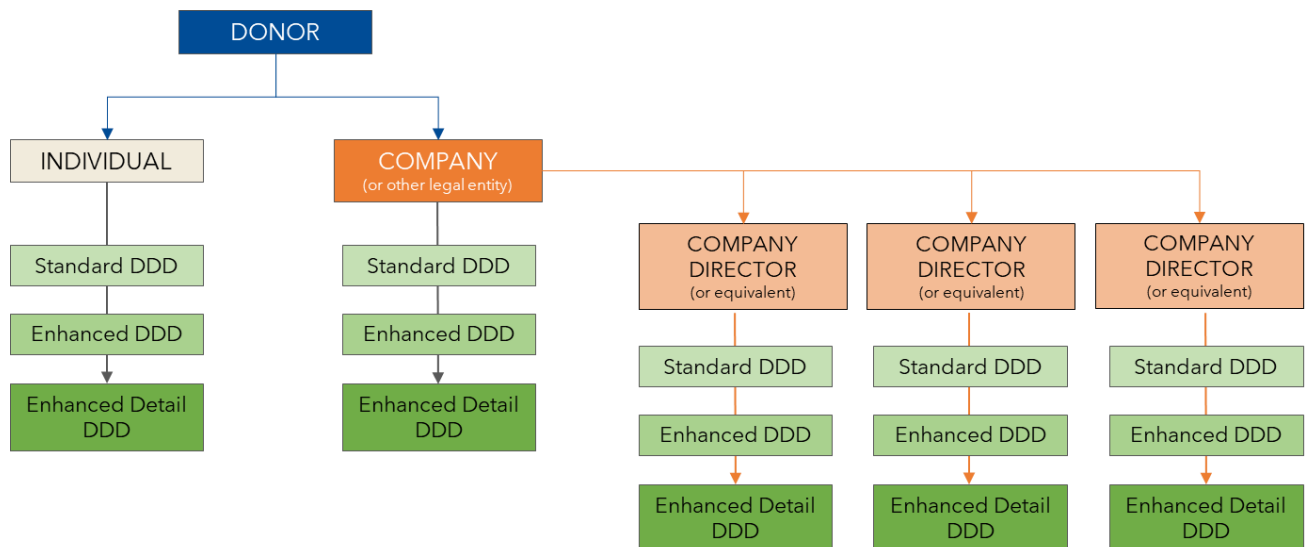
SJP Trustees will seek to review this Ethical Fundraising Policy (EFP) on a regular basis.

## DONOR DUE DILIGENCE (DDD) RISK ASSESSMENT LEVELS

Due Diligence Level	Requirements
Standard Due Diligence	<p>Screen Donor and Potential Donor for:</p> <ul style="list-style-type: none"> <li>• Sanctions and trade restrictions</li> <li>• Watchlists</li> <li>• PEP – Politically exposed person</li> <li>• Bribery and corruption</li> <li>• Money laundering</li> <li>• Tax evasion</li> <li>• Any other criminal conduct</li> <li>• Negative or adverse media searches</li> </ul>
Enhanced Due Diligence	<p>Standard Due Diligence above, plus:</p> <ul style="list-style-type: none"> <li>• Structured internet searches using advanced databases to further screen the Donor and Potential Donor.</li> <li>• Where the entity is not listed on a Recognised Stock Exchange, an appropriate number of the Donor and Potential Donor's Controllers for the matters described in the Standard Due Diligence.</li> </ul> <p><i>Note: If the Donor or Potential Donor is a wholly owned subsidiary of an entity listed on a Recognised Stock Exchange, structured internet searches and screening of the Donor or Potential Donor's Controllers as noted above is not required.</i></p> <p><i>Attestations:</i> Counterparties required to undergo Enhanced DDD will be required to complete certain portions of the DDD Request Form, with the aim of obtaining key information and attestations not otherwise available (e.g., confirmation that UBO's are not subject to sanctions or trade restrictions, government officials, etc.).</p>
Enhanced Detail Due Diligence	<p>Enhanced Due Diligence above, plus:</p> <ul style="list-style-type: none"> <li>• Where the Donor or Potential Donor is not an individual, screening of UBO's who have a shareholding or interest in the Donor or Potential Donor of 10% or more of the Donor or Potential Donor's ownership, whether direct or indirect, for the matters described above using the DDD Management Tool.</li> <li>• This can necessitate conducting DDD on several layers of corporate entities to reveal the true UBOs and can necessitate the verification of a Counterparty's identity. UBO's are always natural persons.</li> <li>• Where, during Enhanced Detail Due Diligence, UBOs with a shareholding or interest of 10% or more are known to exist but are unable to be identified, this is to be considered as a Red Flag. Where no natural person owns a 10% or more shareholding / interest, discuss next steps with a compliance specialist.</li> </ul> <p>Depending on the rationale for conducting Enhanced Detail Due Diligence, in consultation with a specialist, the following further due diligence can be conducted:</p> <ul style="list-style-type: none"> <li>• Discussions with the Donor or Potential Donor, its employees or owners;</li> <li>• Commissioning external due diligence on the Donor or Potential Donor; or</li> </ul>

- Any other steps considered appropriate in consultation with a compliance specialist.

The diagram below illustrates the depth of DDD required depending on whether the Donor or Potential Donor is an individual or an organisation. The same principle applies regardless of whether the entity is a company, a partnership, a foundation, etc.



## DONOR DUE DILIGENCE (DDD) ASSESSMENT THRESHOLDS

Donation Amount	DDD Required	APPROVAL REQUIRED BY				Notes
		Development Director	Rector	Church Warden	PCC	
Below £50,000	DDD not required	-	-	-		Donations and collections under £50,000 do not need approval.
£50,001 - £249,999	Standard DDD required <i>(unless red flags)</i>	X	X			If red flags, seek advice from a Warden. Potentially elevate to Enhanced or Enhanced Detail DDD
£250,000 - £999,999	Enhanced DDD for individuals  Enhanced Detail DDD for legal entities	X	X	X		The Development Director, the Rector and 1 Church wardens are required to agree and approve
Above £1,000,000	Enhanced Detail DDD for both individuals and legal entities	X	X	X	X	PCC to approve. <i>(A simple majority is required to sign off)</i>



## **SJP DONATIONS DUE DILIGENCE PROCEDURE**

Due Diligence is the range of practical steps that need to be taken by/on behalf of Charity Trustees so that they are reasonably assured of the provenance of the funds given to the Charity; confidence that they know the people and organisations the Charity works with; and able to identify and manage any associated risks.

The purpose of our DDD procedure is to identify any risks associated with donations received, offered, or solicited, to facilitate the decision-making process in whether to accept or refuse donations or opportunities. It sits alongside the Ethical Fundraising Policy, which sets out SJP's approach. Any donation greater than £50,000 offered or to be solicited will be considered against this DDD procedure.

### **STEP 1. Know the Donor or Potential Donor**

- **Identify:** Know who we are dealing with, specifically:
  - The nature of the organisation or individual's business
  - The provenance of the funds
  - The board members and key individuals, known associates and non-invasive social media (LinkedIn, Twitter)
- **Verify:**
  - Verifying the origin of Donor or Potential Donor funds is one of the main aspects of DDD.
  - The information received from the Donor or Potential Donor needs to be researched and validated through the DDD Procedure.
  - Anonymous donations – check to ensure donations do not contravene the SJP DDD Policy.
  - If a risk is identified or there is a cause for concern, proceed to step 2.

### **STEP 2. DDD Research and Risk Assessment**

- The Development Team will perform DDD as part of ongoing prospect research and for:
  - Unsolicited donations or
  - Pledges over £50,000, or
  - Where there may be cause for concern identified in step 1 above.
- There are 3 DDD Risk Assessment levels dependent on the donation value and /or associated risk profile:
  - Standard DDD
  - Enhanced DDD
  - Enhanced Detail DDD
- The DDD Risk Assessment should always consider whether a potential donation might contravene:
  - SJP's DDD Principles
  - SJP's Ethical Fundraising Policy; or
  - Potential reputational risk

A simple scoring system has been devised to ensure that donations are assessed uniformly. We will aim to complete the due diligence risk assessment within 3 days of identifying any potential risk.

### **STEP 3. Decision Making Process**

The Development Director will advise the Rector whether to proceed with the relationship. If further discussion is needed, the Development Director will discuss further with the Rector who will then involve the Treasurer, and Lay Chair or Warden as necessary. They will determine whether:

- A donor or potential donor's activities are in total conflict with SJP Principles, in this case we will not work with them, or
- Whether a degree of conflict exists, in which case this will be assessed by the Trustees on a case-by-case basis to balance furthering SJP's objectives against the size of the donation presented and potential reputational risk.

### **Refusing a Donation**

- St James's Trustees can refuse a donation if:
  - It would be unlawful to accept it, for example it is likely to represent the proceeds of crime.
  - Acceptance would be more detrimental to the Charity than refusal. The law allows for the consideration of practical and ethical factors if these are likely to affect the specific and best interests of the Charity.
  - Accepting the donation would be detrimental to the achievement of the purposes of the Charity. This anticipated detriment must be set against the benefit of having the funds from the donor and potential donor, which would enable the organisation to pursue its purposes.

### **STEP 4. Record and Monitor**

#### **RECORDS**

- All DDD decisions are to be securely recorded in line with SJP's Data Privacy Policy.
- Where a decision is taken to refuse or return a donation, this will be communicated to the Donor and potential donor by either the Development Director or the Rector and will be recorded in PCC meeting minutes. Results of the DDD Risk Assessment will be recorded on the Donor and potential donor's file held on ChurchSuite.

## MONITORING

- The Development Team will conduct an annual review as part of the planning process for the following year. This will look at high value multi-year opportunities to determine whether new risks have been identified during the year and among prospective supporters.
- SJP Development Team maintains the right to review and reconsider any previous gift acceptance decision (limited to those over £50,000, to avoid disproportionate effort). If subsequent events or previously unknown information becomes known, the response in such circumstances will be reported by the Development Director to the Rector and the PCC.

Monitoring will usually involve steps aimed at ensuring:

- The Charity's funds can be accounted for.
- There is an audit trail showing the expenditure of funds.
- The funds were received from the individual / legal entity on which DDD was conducted and there is an audit trail to show this.
- The Charity's funds have been used for the purposes for which they were intended, and the beneficiaries intended by the Charity have benefited. Any significant variations shall be communicated to the Donor and potential donors as required.
- Any concerns that need to be dealt with are identified.

## STEP 5: DONOR AND POTENTIAL DONOR REPORTING

On a regular basis, the Development Team will provide feedback to significant Donor or Potential Donors on the progress of the project (and/or the purpose for which the funds were donated).

## RISK MATRIX

The level of risk should be measured by both the likelihood of something occurring and the severity of impact if it were to happen. The risk matrix can subsequently be used as a risk register for ongoing monitoring and review of risk throughout the life of a project. The following is an example of a section of a risk matrix.

AREAS	RISKS	LIKELIHOOD	IMPACT	CONTROLS
Reputation	A real or perceived link or association between the Charity and an unsuitable donor or potential donor which is likely to cause damage to the Charity's reputation.	LOW	HIGH	<ul style="list-style-type: none"> <li>• Draw up detailed legal agreements.</li> <li>• Review counterparty's governance structures.</li> <li>• Review project audit and monitoring, including field visits.</li> <li>• Include an impact and risk assessment for all projects.</li> <li>• Take references and contact other affiliates of the partner for recommendations.</li> <li>• Request Enhanced documentation and invoices.</li> <li>• Check the consolidated list of designated individuals and entities.</li> </ul>
Financial / Criminal	Financial loss, fraud, money laundering, terrorist financing.  Failure to comply with UK, International or local regulations.  Exchange rate losses or gains.  Funds or assets provided are not used for the intended project or misappropriated.	MEDIUM  HIGH  MEDIUM  LOW	HIGH  MEDIUM  MEDIUM  MEDIUM	<ul style="list-style-type: none"> <li>• Clear responsibilities and segregation of duties.</li> <li>• Scheme of delegation</li> <li>• Developing and implementing a fraud policy.</li> <li>• Purchases and tender controls, reconciliations of cash book to petty cash and bank, expenses procedures and authorisation limits.</li> <li>• Monitor exchange rate losses or gains and</li> <li>• Review impact on expenditure and income</li> <li>• Use appropriate bank accounts and procedures.</li> <li>• Quarterly project financial reviews and project reports.</li> <li>• Documented financial Procedures.</li> <li>• Regular budget monitoring and forecasting and grant management</li> </ul>
Security	Risk to staff and/or beneficiaries.  Obstacles to the effective delivery of services.  Areas of conflict, political instability, hostile government.	HIGH	HIGH	<ul style="list-style-type: none"> <li>• Country specific security risk assessment.</li> <li>• Crisis management policy and procedures.</li> <li>• Health &amp; safety and security training</li> </ul>

**NOTE:** DDD should be approved on Donations above £250,000 *before* receiving Donor and potential donor funds. Donations under £250,000 may be received, provided that DDD is completed within 3 months of receipt of funds. Once funds have been received, the Finance Team must confirm that the funds received were from the *same Donor or Potential Donor entity* and *Donor or Potential Donor bank number* recorded in the DDD. Any funds which are not approved will be returned to the Donor and potential donor, in accordance with this DDD policy.

In addition, all gifts over £250,000 are subject to a separate Gift Agreement Process. This entails correspondence sent to the donor and potential donor, outlining the mutual and clear understanding of the gift's ultimate purpose and handling of by SJP. This correspondence will be saved in the CRM system.

If any member of the fundraising team or other staff are aware of a donation or appeal to a Donor or Potential Donor that could be covered by this policy, which includes donations and planned giving from the SJP congregation, they will:

- Discuss the issue with their line manager in the first instance.
- If the manager is unable to resolve the situation, the matter should be referred to the Development Team to perform due diligence in accordance with the DDD Procedure.
- If concerns remain, the Director of Development without delay will discuss with the Rector, Treasurer and Lay Chair of the PCC or a Church Warden.
- If a conclusion is still not clear, or carries significant risk to the Charity, the matter shall be referred to the PCC for a decision.
- In extreme cases, it may be appropriate to consult the Charity Commission before a gift is refused or returned.
- Any member of staff with concerns should refer to the separate SJP Whistleblowing Policy.

## **SJP DONATIONS DUE DILIGENCE TOOLKIT**

### **KNOW YOUR DONOR OR POTENTIAL DONOR – Key questions:**

These questions are not intended to be asked in respect of each donor and potential donor. However, trustees may need to consider them depending on the risk, including the size and nature of the donation, and whether it appears to have any suspicious characteristics.

#### **General information**

- Who are the donors or potential donors?
- What is known about them?
- Does the charity have a well-established relationship with them?
- Do any additional identity checks need to be made? Full use should be made of internet websites, particularly to check whether a donor or potential donor's organisation is registered with another regulator. Registration may provide access to the organisation's accounts and governing documents.
- Are the donor and potential donors UK taxpayers, and can Gift Aid be claimed?
- If Gift Aided, does the donation fail all the 3 tests, in which case it is a tainted charity donation? The tests establish:
  - Whether the person, or linked person or entity, gains a financial advantage from the donation.
  - Whether 1 of the main or sole purposes is to obtain a financial advantage directly or indirectly from the charity for the donor or potential donor or linked person; and
  - The donor or potential donor is not a wholly owned subsidiary of the charity or provider'.
- In what form is the money being received? Cash, cheque, bank transfer?
- Have any public concerns been raised about the donor and potential donors or their activities? If so,
  - What was the nature of the concerns; and
  - How long ago were they raised?
  - Did the police or a regulator investigate the concerns?
  - What was the outcome?
- Would any adverse publicity about the donor and potential donor have a damaging

effect on the charity? Comments:

**The nature of the donation and any conditions**

- How big is the donation?
- Is it a single donation, or one of several regular donations, or the first of multiple future donations?
- Is the donation one of a series of interest-free loans from sources that cannot be identified or checked by the charity?
- Are there unusual or substantial one-off donations?
- Does the donation come with any conditions attached? What are they? Are they reasonable?
- Is there a condition that funds are only to be retained by the charity for a period and then returned to the donor or potential donor, with the charity retaining the interest?
- Is the donation conditional on particular organisations or individuals being used to apply the funds?
- Is the donation conditional on being applied to benefit particular individuals either directly or indirectly?
- Is there a suggestion that the charity is being used as a conduit for funds to a third party?
- Is the donation in sterling or another currency, perhaps with a requirement that the donation be returned in a different currency?
- Are any of the donor or potential donors based, or does the money originate, outside the UK? If so, from which country?
- Does this country/ area pose any specific risks?
- Are donations received from unknown bodies or international sources where financial regulation or the legal framework is not rigorous?
- Is the donation received from a known donor or potential donor but through an unknown party or an unusual payment mechanism where this would not be a typical method of payment?
- Is anything else unusual or strange about the donation?

Comments:

**What trustees should do if they are suspicious:**

- If due diligence checks reveal evidence of crime, trustees must report the matter to the police and/or other appropriate authorities.
- If the trustees have reasonable cause to suspect that a donation is related to terrorist financing, they are under specific legal duties under the Counter-Terrorism Act to report the matter to the police. In the case of money laundering, reports can be made to the police, a customs officer (HMRC), or an officer of the National Crime Agency.
- Such issues should be *reported to the Charity Commission* under the reporting serious incidents regime, especially if significant sums of money or other property are donated to the charity from an unknown or unverified source. This could include an unusually large one-off donation or a series of smaller donations from a source you cannot identify or check. The commission would expect trustees to report any such payment (or payments) totaling £25,000 or more.
- Check the donor or potential donor against the consolidated lists of financial sanctions targets and proscribed organisations.
- Consider whether to refuse the donation.

Comments:



**DONOR DUE DILIGENCE QUESTIONNAIRE**
**DONOR AND POTENTIAL DONOR QUESTIONNAIRE**
**Individual Donor and Potential Donor**

 Name of Donor or  
 Potential Donor

Email Address:

Contact Telephone #

Passport #

Address

**Corporate Donor or  
 Potential Donor:**

Organisation Name

Legal status

(Company, Partnership, Charity)

Country:

Organisation #

(Attache Governing Document)

Date Established:

Website

Nature of Business

Organisation Address

Name Primary Contact

Email Address:

Contact Telephone #

Passport #

Key Personnel

Passport #

Key Personnel

Passport #

Key Personnel

Passport #

Key Personnel

Passport #

Key Personnel

Passport #

### DONATION DETAILS

Amount of donation

Date received

Currency

Cheque / Bank Transfer

Gift Aid be claimed?

#### Bank Details

Account Name

Name of Bank

Sort Code

Account Number

BACS Reference

Name of  
Signatory(ies)

Any previous  
donations?

Any conditions  
attached to the  
donation?

## DONOR DUE DILIGENCE – Required Documents

DONOR AND POTENTIAL DONOR – Required Documents	
Donor and Potential Donor: Individual	<p>Copy of Passport(s)</p> <p>Copy of Utility Bill</p>
Donor and Potential Donor: Organisation:	<p>Governing documents</p> <p>List of key personnel</p> <p>Key personnel - passports</p>

## **SUPPORTING INFORMATION**

This policy should be read alongside:

- SJP Professional Codes of Conduct, which includes:
  - The Fundraising Regulator's Code of Fundraising Practice
    - Clause 2.3.4.: You must carry out due diligence, appropriate for the size and nature of your donation, on both the financial and reputational dealings of possible partners before accepting their donations.
    - Clause 2.3.4.: If you decide to refuse a donation, you must keep a record of your decision and the reasons for it.
- The Fundraising Standards Board's Fundraising Promise.
- The Data Protection Act
- St James's Privacy Notice
  - "We carry out due diligence on donors and potential donors in line with the SJP Donor Due Diligence Policy to meet our legal and ethical responsibilities".
- Charity Commission:
  - Information on registered charities, including Trustees, contact information, Annual Reports
  - Charities and Risk Management (CC26)
  - Compliance Toolkit: Protecting Charities from Harm (Ch 2: Due Diligence, monitoring and verifying).
  - <https://www.gov.uk/government/organisations/charity-commission>