



Due diligence, Monitoring and Verification Policy

December 2025

Purpose

This policy ensures that the charity conducts reasonable checks before receiving or awarding grants and donations, and that it monitors how the awarded funds are used. It helps safeguard charitable funds, fulfil legal obligations, and ensure funds are used as intended.

Our commitment

The public and donors to charity should trust that the money received is legitimate, used properly, and reaches those it is meant to help. The trustees are responsible for ensuring that policies are put in place to ensure that charitable funds are used correctly.

Scope

This policy applies to all trustees and volunteers involved in assessing grant applications, awarding grants, reviewing grant use, and conducting due diligence checks.

Principles

The trustees adopt a proportionate, risk-based approach to this policy, performing simple checks for low-risk grants and more detailed assessments for larger or higher-risk grants. Checks will be practical and suitable for the size of this charity and its operation.

General controls

Suitable internal and financial controls will be maintained to ensure that all funds are fully accounted for and used in a manner aligned with the Foundation's purpose. Up-to-date and accurate financial records will be maintained for both the receipt and use of all funds, along with audit trails of decisions made.

If funds are accepted by the trustees with conditions attached, such funds shall be kept in segregated accounts with controls on their application, including the approval of the full Trustee board for the use of the funds.

Due diligence

Reasonable and appropriate steps will be taken to identify the donor or beneficiary, with additional suitable checks carried out where the risks are considered to be higher. The core elements of the Foundation's due diligence for donors and beneficiaries (the Foundation does not operate through partners) include taking reasonable steps to ensure they:

- Understand who they are dealing with
- Where reasonable and risks are higher, to verify this
- Know what the organisation's or individual's business is and ensure it is appropriate for the Foundation to be involved
- Understand their specific relationship with the Foundation

Beaulieu Common Good Foundation
Due diligence, Monitoring and Verification Policy
(Cont'd)

- Watch out for unusual or suspicious activities, conduct, or requests

Monitoring

This risk-based approach recognises that not all financial transactions require the same level of monitoring. However, if monitoring uncovers suspicious circumstances or indicates possible non-compliance, the matter will be escalated to the Trustee board.

Serious Concerns

Concerns related to safeguarding, fraud, misuse of funds, or serious risks will be swiftly escalated to the relevant authorities or the Charity Commission if necessary.

Retention

Assessment records shall be retained for at least six years

Review

This policy shall be kept under periodic review by the trustees.