



CRS: Checklist for charities

Are you affected?

- Do you know if your charity qualifies as a Financial Institution' for the purposes of CRS?
If not, use our [flowchart](#) to help you assess whether you might be affected, and consult the [guidance](#).
- If you are not sure of your requirements or status, have you taken advice from professionals or contacted HMRC?

If you are affected:

Due diligence

- Do you understand your charity's due diligence and reporting requirements under CRS?
- Have you gathered data on the tax residency of all your grantees in 2016, even those registered in the UK?
Note: UK registered charities are presumed to be UK tax resident. For all other individual and entity grant holders you must use [self-certification](#) to check their status.
- Have you collected all the [reportable information](#) on your account holders?
- Are you able to store this data for six years in compliance with data protection law?
- Have you considered the reasonableness of their self-certification? And if necessary, have you followed up on any doubts?
- Have you considered any risks to the human rights of your grantees if their details are shared with the authorities in their tax jurisdiction?
If you feel there is a risk, you can apply to have information withheld from exchange (redacted) [here](#).

Reporting and compliance

- Are you aware of the deadlines for reporting to HMRC?
If not, see the [timetable](#) for Automatic Exchange of Information.
- If you have information to report, have you created an account with HMRC for the Automatic Exchange of Information, and are you familiar with the mechanics of uploading the relevant information?
If not, [create your account here](#). Note that it will take 24 hours for registration to take effect, so it is advisable to do this well in advance of the 31 May deadline.
- Have you notified grantees that their information may be shared with HMRC and potentially with authorities in other jurisdictions?
If not, you must do this by 31 January of the year following the end of the reporting calendar year. Permission from grant holders is not necessary to share their information. HMRC have promised a '[soft landing](#)' for the initial years of the regime, meaning they will not apply penalties where efforts to comply have been made.
- Are you aware that there are penalties for failing to comply with your reporting requirements?
If not, consult HMRC's [guidance](#) for further information.

When you are confident that you have fulfilled the requirements which apply to your charity, you can then submit your data to HMRC before 31 May in the year following the end of the reporting calendar year. Going forward, you may wish to consider how best to integrate CRS requirements into your normal grant-making procedures and agreements.

Disclaimer

Please note that although ACF has tried to ensure the information is correct, we do not guarantee the accuracy of these pages and any person using information contained in them does so entirely at their own risk. See our website for more information. If you have any doubts about your duties under CRS, please refer to the [guidance](#), seek professional advice, or [contact HMRC](#).