



the brain injury association

## Ethical Fundraising Policy

**Owner:**  
Director of Fundraising

**Relevant to:**  
Trustees, employees, self-employed contractors, workers, agency workers and volunteers.

*Office Use only:*

<b>DEPARTMENT FAMILY:</b> Corporate	<b>SLT OWNER:</b> JM	<b>APPROVAL/RE- APPROVAL DATE:</b> July 2024	<b>IMPLEMENTATION DATE:</b> July 2024	<b>NEXT REVIEW DATE:</b> June 2025
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Date: July 2024	Doc Name: Ethical Fundraising Policy	Ref: SPP18
Originator: JM	Family: Governance	Page:

## NEW POLICY OR SUBSTANTIVE POLICY REVIEW

Version	Date	Policy development agreed by (SLT owner)	Policy Development Author	Draft policy verified by	Policy approval	Impact assessment (if applicable)
V1	July2024	JM	JM	CEO	CEO	N/a

<b>Rationale for new or substantive policy review</b>	Following a review of all of the policies a decision was made to rewrite the ethical fundraising policy.
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*Please make explicit if change/review relates to procedures, guidelines and associated documents only*

## PERIODIC POLICY REVIEW / CHANGE HISTORY

Version	Date of review / revision	Description of change	Reviewed by	Approved by (SLT owner)

## COMMUNICATION

To be agreed by SLT Team

All Staff Email	x	Team Meetings	
Newsletter		External website	

Date: July 2024	Doc Name: Ethnical Fundraising Policy	Ref: SPP18
Originator: JM	Family: Corporate	Page 1 of 5

## **Contents Page**

1. Policy Statement .....	3
2. Definitions.....	3
3. Principles .....	3
4. Scope and limitations.....	3
5. Responsibilities.....	3
6. Implementation arrangements.....	4
7. Charity supporters and donors .....	4
8. Protecting and respecting staff and volunteers .....	4
9. Protecting vulnerable donors .....	4
10. Acceptance and refusal of donations.....	5
11. Monitoring and review .....	5

Date: July 2024	Doc Name: Ethnical Fundraising Policy	Ref: SPP18
Originator: JM	Family: Corporate	Page <b>2</b> of <b>5</b>

## 1. Policy Statement

We are always extremely grateful to anyone wishing to support our work to improve life after brain injury and therefore adopt an ethical approach in our fundraising strategy.

This policy reflects a robust framework for ethical fundraising, covering various aspects from legal compliance to donor relationships, protection of vulnerable individuals, and responsible partnerships and the acceptance and refusal of donations.

## 2. Definitions

**SERVICE USERS:** Includes individuals that use Headway UK services, such as people directly impacted by brain injury, including survivors, their family members and carers, professionals accessing Headway UK support via the website, publications or helpline, or corporate and individual members of Headway UK.

**STAKEHOLDER:** Includes volunteers, fundraisers, professionals, contractors, corporate partners, and others that come into contact with Headway UK.

## 3. Principles

We commit to being open, honest and fair in our fundraising operations.

We commit to being legally compliant, to the include adherence of fundraising regulations, best practices, and the [Code of Fundraising Practice](#).

## 4. Scope and limitations

This policy applies to trustees, employees, self-employed contractors, workers, agency workers and volunteers.

## 5. Responsibilities

**TRUSTEES:** In deciding whether to accept or refuse a particular donation, the law requires trustees to carefully consider, based on relevant law (including anti-money laundering legislation) and the evidence available to them, which course of action will be in the charity's best interests.

The law allows practical and ethical factors to be considered where they are relevant to the charity's charitable objects. In exercising this power, the trustees must not allow personal views or prejudices to affect their conduct and decisions. In turn the trustees commit to observing guidance and follow the principles regarding their fundraising duties across the regulatory bodies in England and Wales, Scotland and Northern Ireland.

We pledge to be honest about achievable goals, use funds appropriately, and respond to fundraising complaints promptly.

Date: July 2024	Doc Name: Ethnical Fundraising Policy	Ref: SPP18
Originator: JM	Family: Corporate	Page 3 of 5

**MANAGERS:** Will be responsible for ensuring that their staff are aware of this guidance and ensuring that they comply in full with the policy.

**STAFF:** Will be responsible for ensuring that they are aware of the content of the policy adhering to the principles.

## 6. Implementation arrangements

All staff and managers will be made aware of this policy at the point of launching, as part of the induction process, and following any subsequent content reviews.

## 7. Charity supporters and donors

We are open, honest, and respectful. We treat all our supporters fairly, providing information to enable informed decisions about how they choose to support us.

- We commit to providing clear, truthful information to our supporters and donors.
- We adhere to Charity Regulators' guidance and UK law regarding openness and honesty with our supporters or members of the public.
- We respect the privacy and contact preferences of donors, responding promptly to requests and complaints.
- We commit to representing beneficiaries respectfully and using their personal information with consent and in accordance with agreed purposes.

## 8. Protecting and respecting staff and volunteers

We operate a zero-tolerance policy for abuse, discrimination, bullying, or sexual harassment for our staff, volunteers and anyone involved with our charity.

We promise to maintain a culture of respect and equality, addressing any allegations of abuse promptly and sensitively.

## 9. Protecting vulnerable donors

We are committed to being considerate of the communication preferences of our supporters to avoid assumptions and respond empathetically to vulnerable donors ensuring we do not place any undue pressure on individuals to donate.

To support this commitment we will where required, refer to section 1.3 the Code of Fundraising Practice on [informing donors and treating people fairly](#)

Date: July 2024	Doc Name: Ethnical Fundraising Policy	Ref: SPP18
Originator: JM	Family: Corporate	Page 4 of 5

## 10. Acceptance and refusal of donations

We recognise and are grateful for our supporters' desire to raise funds to support our work and adhere to;

- Charity Commission for England and Wales
- The Scottish Charity Regulator (OCSR) for Scotland.
- The Charity Commission for Northern Ireland

on deciding whether to accept or refuse a donation and will not partner with organisations contrary to charitable objects.

Our due diligence process will evaluate the activities of donors and potential partners, with particular attention to activities and businesses that directly impact those affected by brain injury.

If a potential concern arises (detailed below), the Director of Fundraising will first assess the opportunity and provide information to the CEO to make an informed decision, considering the proposed relationship's nature and what best serves the charity and our beneficiaries.

Circumstances that may raise legitimate concerns include, but are not limited to, companies and individuals involved in:

- Manufacturing guns and armaments
- Producing and distributing pornography
- Producing tobacco, nicotine or vaping products
- Alcohol production
- Promoting gambling or risky financial behaviour
- Boxing and mixed martial arts

Inclusion on the above list does not automatically disqualify individuals or companies from partnering with us, though it will impose certain limitations on our collaboration.

## 11. Monitoring and review

This policy will be reviewed every year or sooner if there are changes in legislation in line with the regulatory bodies under which we operate.

Date: July 2024	Doc Name: Ethnical Fundraising Policy	Ref: SPP18
Originator: JM	Family: Corporate	Page 5 of 5