

Empowering Futures Ethical Fundraising, Purchasing & Due Diligence Policy

Purpose

The purpose of this document is to:

- Help ensure that funding relationships do not indirectly support activities that are counter to the Charity's mission
- Protect the Charity's reputation by supporting decision-making on funding opportunities
- Provide guidance on the types of companies, funders and fundraising events that the Organisation will or will not be associated with in pursuing fundraising to support delivery of its charitable mission.

Prior to commencing engagement on the farm, inductions are held for all staff, volunteers and participants to ensure this policy is understood and achievable. We have ensured this policy is accessible to all by providing easy-read information with clear, easy-read, basic instructions and pictures to help educate and deliver the message.

Responsibilty

The trustees will have overall responsibility for this policy. Trustees have agreed on this Policy which the Board of Trustees holds. The Chair of Trustees Maria Needs has signed this Policy and is publicly accountable for upholding it

Procedures

- To uphold the policy, an ethical steering committee will be brought in to review new funding partnerships. This includes key members of the team along with trustees.
- Trustees will have a regular review of any partnerships or collaborations at trustee meetings which are held every month.

Introduction to Empowering Futures

Empowering Futures is a registered charity (CIO), social care farm based in South Glocestershire. Care farming is a form of 'Green Care' "nature-based therapy or treatment interventions - specifically designed, structured and facilitated for individuals with a defined need".

Our Objectives

To promote social inclusion for the public benefit by preventing people from becoming socially excluded, relieving the needs of those people who are socially excluded and assisting them to integrate into society by providing therapeutic gardening activities, animal care, arts and crafts, forestry and accessible activities. Our services are 'accessible to all' and are an alternative to standard NHS prescription services. We offer a more person-led approach, which is an alternative service, known as "social prescribing method". Using these methods has



successfully empowered many lives of those who are excluded from society. Participants all face some for of barrier. By offering our quality led and personalised support, we have integrated many people back into society to engage within employment, social engagement activities and enhancing their general well-being.

Giving Back to the earth - Biodiversity and Sustainability

Our farm focuses on educating, growing and giving back to the earth. We are dedicated to improving and ensuring enrichment of the land through both sustainability and biodiversity. We are always looking for ways to attract new wildlife, reduce carbon footprint (especially important as we are sited close to motorways, M4, M32) and create pollinators.

Empowering Futures Mission and charitable purpose

- To reach out and to encourage disabled people and those with additional needs to have a voice in the community and direct input to new ideas of working.
- To provide bespoke opportunities for disabled people who are potentially seen as low skilled.
- To remove inequality and focus on ability and opportunity
- To provide preventative focus on meeting health and well-being strategy.
- To reinvest funds to grow the charity for the community
- To create an environment suitable for people with disabilities and the wider community to enjoy, feel welcomed, interact and support each other by recognising, embracing and overcoming gaps and barriers in the community through bespoke enablement.
- To create meaningful employment and the opportunity for the disabled to learn new skills, escape isolation, promote well-being and enable inclusion

Our Vision

Empowering Futures is a social care farm that exists for the public benefit, and has set out to purposefully fill gaps delivered by other organisations to perceived unemployable and/or disabled people by offering and/or providing assistance to find employment.

To enable and match low-skilled people (who are often excluded from society) to meaningful activities and responsibilities which allow their individual growth in line with their individual capability to enable them to escape exclusion and promote healthier living.

To provide therapeutic experiences, opportunities and employment to people perceived to be otherwise unemployable by providing work experience, innovative activities and voluntary opportunities

To work alongside and support the services provided by the wider community that enhance well-being and social inclusion.

Governance Structure

BEFF is registered as a CIO (Charitable Incorporated Organisation). Registered with the Charities Commission Number 1182139 on 19 February **2019.** The name was changed to Empowering Futures on **19/12/20**. *We are HMRC recognised for Gift Aid.*

The first Trustees are;

- 1. Sarah Harper
- 2. Maria Needs (Head of Trustees)



- 3. Angela Taylor resigned due to poor health
- 4. Susan Farthing appointed 19/1/21

1. Rationale for Fundraising

To help guarantee the availability of ongoing funds to pay for its work, the Organisation aims to maintain a broad base of different sources of funding. The purpose of this policy is to ensure clarity and openness to all our stakeholders.

Below are what we as an Organisation are hoping to gain from these relationships

- Cash income
- Pro-bono support services such as marketing, social value, administration etc
- Stronger local and national partnerships
- Recycable Donations such as christmas trees, wood, materials, tools
- Volunteers This may be local regular volunteers or corporate volunteers
- Sharing of Good Practise Learning from each other and sharing success

2. Key Issues for the Organisation to Consider

Donations, funding and partnerships which may pose a reputational risk to us an Organisation include those which could lead to negative publicity and:

- The loss of donations from other supporters
- The loss of volunteers whose services would be of equivalent or reater value than the gift or partnership
- The loss of staff or the inability to recruit staff with the necessary skills and dedication

Key reputational risks we have have identified through accepting funding or other forms of support, or partnering with, any external organisation or individual are listed below.

We will not work with companies or individuals who participate in activities which:

- could cause detriment to the charity's reputation will disproportionately decrease the amount of donations to further the work of the charity
- undermine our vision and values
- are associated with unsuitable products, corporate or individual (please find below in section 3; avoidance criteria)
- are from individuals, groups or organisations which are known to take advantage of vulnerable people
- are personal gifts to Empowering Futures staff members, which should be discouraged at all times
- are from unknown sources of funding. We will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal potentially harm our relationships with other donors, service users, stakeholders or volunteers expose us to undue adverse publicity or reputational risk require unacceptable expenditure or additional charity resources

As a charity, we have a responsibility to its stakeholders and participants to consider the ethical issues that may arise in working with or accepting funding from an

We follow the Social Model of Disability. We offer bespoke opportunities to ensure we remain person centred. Our services are firmly embedded with quality and purpose for each individual we work with. Our approach is holistic. We encourage personal responsibility. We aim to increase independence and to empower individuals. We have a proven track record of significant success.



organisation/individual and the associated risks to reputation and organisational objectives.

Descision Making

The decision-making course the Organisation will follow when ethical dilemmas arise and outline are listed below

If in the event of an approach or potential offer of a relationship with investment partners occurs, the trustees will review the offer, involve the trustees, managers and teams for openness for all of the Charities stakeholders.

Refusals of donations or gifts

If a donation is received which may not be acceptable under the terms of this policy the member of staff will alert the Trustees at the earliest opportunity. This will be researched further and the matter will be referred to the board with the necessary information regarding the donation.

All anonymous donations of £25,000 or more will be reported to The Charity Commission as a serious incident (in line with current Charity Commission guidelines), and will follow guidance on the handling of such donations.

3. Draft Policy Points

Context

The Organisation actively seeks opportunities to work together with external organisations and individuals to achieve shared objectives. However, it is vital that the Organisation maintains its independence and does not allow any external partnership to bring the name of the Organisation into disrepute.

The Organisation therefore accepts financial support from, and partnership working with, companies and individuals on the following conditions:

• There are strong grounds for believing that it will result in a benefit to the Charities beneficiaries

• The Chief Executive and trustees are satisfied that no adverse publicity will result from accepting such support

• There is no attempt on the part of the company or individual to influence the Charities policy or actions either explicitly or implicitly

• That initiatives do not compromise the independent status of the Organisation

• The company does not participate in business practices that are counter to the Charities mission.

Cause-Related Marketing, Affinity Marketing and Product/Service Endorsement

• The Organisation may want to enter into a partnership in which it will actively endorse or promote a company. However, if the Organisation enters into a partnership but does



not infer endorsement, a disclaimer statement to this effect will be included alongside any branding or

promotion associated with products. E.g. 'The use of this logo does not imply any endorsement by Organisation of this company, its products or services'

• Only the Organisation will have direct access to its database and beneficiaries

In order to ensure that all of the Charities cause-related promotion reflects the Charities values, any potential initiative must come to the Chief Executive and relevant governance committee for approval.

Avoidance Criteria

The Organisation will not accept any funding from companies directly involved in activities that run contrary to its overall charitable objectives / vision / aims. It will not accept financial support or partnerships with companies currently involved with human rights abuses, illegal activity or any of the following activities:

- Animal testing;
- genetic engineering;
- intensive farming;
- manufacture of environmentally hazardous products or chemicals;
- military contracts;
- mining;
- nuclear power;
- third world debt;
- third world marketing;
- the manufacture of tobacco;
- pornography or the sex industry;
- gambling and gaming;
- lending and debt provision;
- and water pollution.

Other reputational risks

The Organisation feels it is appropriate to refuse donations from those that are known to instigate or repeat views of an inflammatory or derogatory nature concerning someone's race, gender, disability, sexual orientation, religion, culture, or any other aspect of that person's life which may be counter to the Charities purposes and values.

Due Diligence Policy & Purpose

Due diligence is a process to satisfy legal and ethical obligations. It includes checking the identity of donors and partners to ensure there are no conflicts (or potential conflicts) of interest and carrying out such research to guard against legal and reputational risk. The core elements of due diligence across each of the 'Know Your Donor' principles developed by the Charity Commission require reasonable steps to ensure that

- We know what the Charities or individual's business is and be assured this is appropriate for the charity to be involved with



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

- Research is carried out using a range of publicly available sources which may include the Electoral Register, Companies House, the Register of Charities, the Charity Commission, newspaper reports and company websites.

Due Diligence may be carried out on donations of £500 or more from individuals, £1000 or more from grant making trusts, unsolicited corporate donations of £1000 or more, and all businesses which the Organisation is actively partnering with.

In line with Charity Commission guidance, if a donation of £25,000 or more is received from an unknown or unverifiable source, it is to be reported to the Charity Commission as a serious incident. N.B. This only applies when the donor is completely anonymous, not when the donor is known to the Organisation but wishes to remain publicly anonymous.

Acceptance Criteria

When deciding whether to accept any particular donation, the Chief Executive and Trustees have a duty to demonstrate to the Charity Commission that we have acted in the best interest of the charity, and that association with any particular donor does not compromise the Charities ethical position, harm its reputation or put future funding at risk.

The Organisation complies with all relevant legislation, including money laundering rules, the Bribery Act and Charity Commission guidance, including terrorism and political activity.

The Organisation would therefore not accept any of the following where the donation:

• Was known to be associated with criminal sources and/or illegal activity

• Would help further a donor's personal objectives which conflict with those of the Organisation

• Would lead to a possible decline in support for the Organisation, and so risk a fall in the resources available to fund its work or damage its longer-term fundraising prospects

- Would otherwise impact adversely on the Charities reputation
- Accepting a donation from any particular source is inconsistent with Government policy

The Organisation will actively seek support from donors and companies, and will prioritise those whose practices align to its mission to support disadvantaged groups within the communities. *Have 'investors in people' accreditation, pay the living wage, are a DECA* **accredited** *Disability Confident* **Employe***r*, *Have Green Mark Environmental Accreditation, Have relevant industry or supply chain accreditations*

Purchasing

The Organisation will not knowingly purchase goods and/or services produced and delivered under conditions which involve any form of abuse or exploitation of third parties.

Evidence (not exhaustive) of such abuse and exploitation includes:

- The use of child labour
- Failure to pay employees a minimum wage



- · Working hours are excessive
- Evidence of any form of inhuman, unreasonable or discriminatory treatment of employees
- Undertake practices that violate human rights through environmentally unsustainable business practices.

The Organisation expects suppliers to accept responsibility for labour and environmental working conditions under which products are made and services are provided, and to make written statement of intent regarding the company's policy.

Management

Protocol to develop partnership agreements.

Expectations - For a partnership considered to have some level of risk, either because it is higher amount, multi-year, high-profile, involves use of logos or other collateral, or because of donor track record, the organisation may request a **full disclosure principle**, requiring the partner to provide information on its business practice, in relation to specific ethical / avoidance criteria, so that the organisation can make an informed decision.

Further Points

The Organisation recognises that, in accepting funding from statutory bodies, it must consider the policy implications and obligations that might be tied to it and ensure that these do not contravene the aims of the Organisation.

The Organisation will not allow any supporter to compromise our policy independence and all supporters, and staff associated with these supporters, must be clear that the positions we take are based on our independent assessment of the most effective way to advance our mission. They are not constrained in any way by the policy or priorities of any organisations or individuals that support us.

The Organisation can seek to raise funds from a series of charitable Trusts and Foundations, but recognises that, simply because these have been registered with the Charity Commission does not mean that they are ethical givers. The Organisation therefore does not accept money from any charitable Trust where its source funding might run contrary to the Charities aims, or if it is a requirement of grant receipt to advertise any company or organisation whose activities run contrary to the Charities aims.

The Organisation will maintain accountability and open and honest relationships with all its partners, by regularly monitoring and evaluating its work.

This statement of policy is meant as a working guide for the Organisation. Any final decisions will be governed by the Board of Trustees. It is the duty of the Board to advise of any potential conflicts of interest with regards to funding or partnerships, and for the Board to act in the best interests of the Organisation at all times.

Agreed at the Meeting of the Board of Trustees on: 19/4/2023 Signed by: *Maria Needs*

Role: *Chair, Board of Trustees* **Date:** 19/4/23 **Revised and updated:** 19/4/2024

South Characteristics