



Final Straw Foundation CIO

Ethical Funding & Partnerships Policy

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Introduction

The primary purpose of this policy is to guide our relationships with funding bodies including businesses, foundations and major donors. Final Straw Foundation welcomes the opportunity to engage with corporate partnerships and other funders where it helps to advance its vision. Support can be in the form of donations and grants, skills, cross-promotion or other resources.

Final Straw Foundation is registered with the [Fundraising Regulator](#), helping to ensure that organisations raising money for charity from the public do so honestly, openly and properly. We reserve the right to reject support from sources that might compromise our reputation, independence and work.

1. Purpose of Policy

1. To ensure that ethical considerations are taken into account in a consistent way when seeking or accepting financial or other support.
2. To ensure that Final Straw Foundation's engagement with donors is in accordance with its vision and values, its governing documents and its strategic framework.
3. To ensure that Final Straw Foundation adopts a consistent and transparent approach to the acceptance of donations from organisations and individuals, and to any corporate partnership or sponsorship.
4. To minimise the risk of any damage to Final Straw Foundation's reputation that may result from the acceptance of a donation or of any other association with a donor.
5. To ensure that Final Straw Foundation maintains its independence.

2. Guiding Principles

1. This policy is available to any donor or prospective donor on request.
2. Final Straw Foundation can accept donations from any source but reserves the right to reject a donation from a company, organisation or individual donor whose objectives or activities are clearly incompatible with the organisation's vision, values and charitable purposes as set out in its Governing Documents and which risk our reputation, independence and work.
3. If acceptance of a donation is likely to damage Final Straw Foundation's reputation, or reduce the chances that others will support, or weaken the organisation more than the money (or other forms of support) would strengthen it, the donation should be refused.
4. Where an offer of support is dependent on the fulfilment of certain conditions that are not acceptable to Final Straw Foundation, the donation should be refused.
5. No form of support or partnership between Final Straw Foundation and a corporate enterprise or donor signifies an endorsement of that corporation's or donor's products or services.
6. Final Straw Foundation will not accept donations from companies, organisations or individuals whose activities are known to be illegal, that are known to have evaded tax, that have been fraudulent or have violated international conventions.
7. Final Straw Foundation will not accept donations from anonymous sources (where we would then be unable to undertake due diligence).



8. The policy applies to all corporate donations, partnerships and sponsorships with Final Straw Foundation of any type and of whatever size (including money, gifts in kind, matched funding, time or publicity) and from any source (individual or organisation) whether directly solicited or not. For individual donors the policy applies to donations over £5,000 (and where organisational capacity allows).
9. Scrutiny of donors is generally applied to the first donation from any source and should be reapplied every two years. It should also be reapplied when there is reason to believe that there is a change in the status, objectives or activities of the donor. If the organisation in question is a subsidiary of a conglomerate, the policies and practices of the wider group should also be considered.
10. The due diligence process will consider if the company or donor has engaged in any of the activities that would prohibit a relationship with Final Straw Foundation within the last ten years.
11. We reserve the right to terminate a partnership for reasons including actual or potential reputational damage, breach of an agreement, legal noncompliance, misuse of our logo or name.
12. Authority for accepting or refusing donations is delegated by the trustee board to staff as detailed in the approval process below, respecting all additional existing policies or requirements for raising funds. Ultimate responsibility for decisions that are taken in accordance with this policy lies with the Final Straw Foundation's trustee board.
13. In implementing this policy, Final Straw Foundation staff and trustee board must not allow individual or collective personal, political or commercial interests, nor personal views on political or ethical issues, which are not directly related to the interests of Final Straw Foundation, to affect their judgement and to be aware that the refusal of a donation in such circumstances might be legally challenged. (Further guidance on trustees' responsibilities in accepting or refusing donations can be found in Fundraising Regulator's "Code of Fundraising Practice").

3. Due diligence and decision-making process

All Final Straw Foundation staff and trustees have a responsibility to be aware and have a thorough understanding of the ethical issues referred to in this policy. Initial due diligence and risk assessment of funding partnerships is delegated to the head of fundraising with support from the chief executive and the chair. In any case where the answer to questions 3, 5 and 6 in the screening process is YES or MAYBE, the head of fundraising will make a recommendation to the Chief Executive and/or the Leadership Team for a decision. Ethical issues for consideration by all staff and trustees are listed in Appendix A. All significant donations (over £50,000) will be referred to the Chief Executive and/or Chair.

In the event that a decision is made to refuse a donation, partnership or an approach from a company, organisation or individual, the Trustee board must be informed. A record of all accepted and rejected donations must be recorded for two years.



Approval process:

Question		Action required
1	<p>Illegal activity Is there any reason to believe that the donor/partner is involved in illegal activities?</p>	<p>If YES refuse. If NO proceed to Q2 for individual donors, and Q3 for company donations</p>
2.1	<p>Gift level (for individual donors only) Is the gift below £5,000 and from an individual donor?</p>	<p>If YES, accept If NO proceed to Q3</p>
2.2	<p>Gift level for <u>all corporate donations, and for individual donations £5k-50k</u> Is the gift from a corporate prospect (at any gift level) or from an individual giving between £5k-£50,000?</p>	<p>If NO proceed to Q2.3 If YES proceed to Q3</p>
2.3	<p>Gift level (for all donation sources) Is the gift above £50,000?</p>	<p>If YES, refer to the Chief Executive and/or Chair with recommendation to accept/refuse based on due diligence</p>
3	<p>Ethical issues that are directly related to Final Straw Foundation's vision and charitable purposes Is there any evidence that the donor's current activities, investments or policies are, or will be in the future, harmful to the land and/or marine environment in or outside the UK within the past ten years? (refer to due diligence checklist in Appendix A) These include companies involved in:</p> <ul style="list-style-type: none"> • Negative impact on biodiversity (land or marine), directly or indirectly • Gas, oil or mineral extraction, processing & distribution (including oil/tar sands, oil & gas shales, hydraulic fracturing) • Any net reduction on natural climate solutions • Use of products or processes which lead to natural habitat destruction (eg palm oil) • Developments on land or sea which hold environmental designations • Any industry contributing to the net loss of habitats, species or contributing to climate change 	<p>If YES or MAYBE, the decision on whether or not to accept or refuse a donation should be referred to the Chief Executive and Leadership Team. If the decision is likely to be controversial, the Trustee board needs to be consulted. If NO proceed to Q4.</p>
4	<p>Employee initiated fundraising activity Is the company passing on donation(s) from one or more individuals (e.g. as a result of a fundraising initiative by the company's staff or as an 'in memoriam' gift) and does not include a contribution from the company?</p>	<p>If YES accept. If NO proceed to Q5.</p>



5	<p>Conflicts of interest or likely future conflicts (refer to Appendix A) Is the company, individual or the sector in which they work the target of a Final Straw Foundation policy campaign? Do any activities raise concern? Is there anything about the partnership that may limit our independence or demand exclusivity?</p>	<p>If YES or MAYBE, the decision on whether or not to accept or refuse a donation should be referred to the Chief Executive and/or Leadership Team. If the decision is likely to be controversial, the trustee board needs to be consulted. If NO, proceed to Q6.</p>
6	<p>Reputational risk (refer to Appendix A) Is public association with the company/individual and/or its donation likely to lead to a decline in support of Final Straw Foundation and/or cause damage to its integrity or professional standards and therefore its reputation? In particular, this will include:</p> <ul style="list-style-type: none"> ● Operations with high risk to human rights ● Arms manufacturing (including components), distribution or investment ● Unethical labour practices, confirmed or alleged, eg child and/or bonded workers ● Tobacco industry ● Pornography industry ● GM crops or livestock ● Tax avoidance through offshore companies ● Animal testing for non-medical products eg cosmetics or cleaning products ● Products or ingredients derived from animals or harmful to animals for non-food products eg fur, pest control, ● Support to oppressive political regimes or in support of governments with clear abuse of human rights. ● Non-compliance with required legislation, including GDPR, PECR, DPA & Modern Slavery 	<p>If YES or MAYBE, the decision on whether or not to accept or refuse a donation should be referred to the Chief Executive and/or Leadership Team. If the decision is likely to be controversial, the trustee board needs to be consulted. If NO, accept the donation.</p>



4. Further guidelines & considerations

Where a partnership is approved after the due diligence process, we will have a written 'contract'/partnership agreement/MOU agreed with and signed by the company or funder.

This contract is likely to include:

- a. Clear, agreed aims and objectives for the partnership
- b. Guidelines for use of logo and any Final Straw Foundation brand collateral
 - Use of Charity name, logos and Intellectual Property
 - Appropriate acknowledgement of the partnership (in annual reports, website, sponsorship etc).
- c. Guidelines for partnership communications and PR (including use of our name, logo, IP) and right to approve statements in recognition of the partnership - see Appendix B for detail
- d. Budget of any costs and income associated with the partnership where applicable
- e. Anticipated timescale of the partnership and key milestones

The due diligence and decision-making process will be tested over 2022/2023 and will be reviewed by March 2023 at latest.

This policy will be supported by

- a. Template partnership agreement contract
- b. Register of corporate partnerships
- c. Register of partnerships that Final Straw Foundation has refused
- d. Guidance for use of logo, name and intellectual property.