

## Ethical sourcing and fundraising policy

### Policy statement

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This policy has been set out by the Trustees of the Jon Egging Trust ('JET'). It is JET's policy to seek, source and purchase goods and services that are produced and delivered under labour conditions that do not involve the abuse or exploitation of any person. It is also a public guide to how JET makes decisions on accepting and refusing donations and the procedures they follow.

### Purchasing

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JET aspires to adopt the Ethical Trading Initiative (ETI) Base Code outlined below for labour standards in relation to any goods we purchase. The ETI is an alliance of companies, non-governmental organisations and trade unions committed to working together to identify and promote good practice in the implementation of codes of labour practice, which are based on the International Labour Organisation (ILO) Conventions. Please see [www.ethicaltrade.org](http://www.ethicaltrade.org)

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed

In addition to the above, JET believes the following principles should also apply to all suppliers, and that a member of the SLT (Senior Leadership Team) will decide whether to work with a supplier who does not comply.

- Suppliers must make every effort to minimise the impact on the environment by seeking continual reduction in the use of resources, waste generation and by re-using and recycling where practical without affecting quality
- No organisation within the supply chain should be linked to an oppressive regime, or be involved in a business that may damage the reputation of or is unacceptable to the principles of JET

Upholding the principles of this policy will be a shared responsibility between JET and its suppliers and the policy will be adopted at senior level within JET however all JET staff involved in the procurement of goods

and services have a responsibility to be aware and have a thorough understanding of the ethical issues referred to in this policy.

## Environment

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We strive to better our practices to minimise waste, energy and carbon footprints whilst achieving our charitable objectives. We encourage environmental responsibility amongst our staff, volunteers and trustees and have a commitment to continuous improvement in our actions to decrease our environmental impact. All JET staff have a responsibility to be aware and have a thorough understanding of the issues referred to in this policy.

- We encourage our staff to use their teleconferencing equipment as much as possible for remote meetings instead of travelling to them
- We use online education resources for all staff to save travelling to a special facility
- Where travel to a staff meeting is necessary, we encourage the use of car sharing
- As far as possible, we encourage a paperless approach to our office operations, only printing documents that are really necessary. We encourage staff to utilise double-sided printing and photocopying where possible and to re-use paper
- When printing promotional material we will seek to use companies that are environmentally-accredited and use and promote digital and litho print using vegetable-based inks on sustainably sourced paper

## Investments

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The finance team will be preparing an investment strategy.

## Acceptance and refusal of donations

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JET welcomes donations from individuals, companies, public bodies and other charities. It is extremely grateful for all support received, but there will be times when as a charity we need to consider if donations made are in the best interests of JET.

This policy is aligned with the Codes of Fundraising Practice published by the Institute of Fundraising in the United Kingdom.

This document makes clear the Trustees' legal obligations with regard to the acceptance and refusal of donations. It outlines the day-to-day procedures that need to be adhered to and ensures that decisions are not taken on an ad-hoc basis, but are in support of JET strategy and objectives.

This policy provides a clear objective standard against which external bodies can judge JET's actions in cases of potential or actual dispute, and should protect JET's reputation against adverse public reaction from existing or potential supporters.

## The Trustees' legal obligations with respect to the acceptance or refusal of donations

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The Trustees take overall legal responsibility for decisions relating to whether a donation is accepted or refused. The Trustees must be able to demonstrate that they have acted in the best interest of JET in each and every case.

The Trustees have a duty to consider carefully, on the basis of the evidence made available to them, whether JET's interests will be better served by accepting or refusing the donation and to act accordingly. These judgments must not promote any Trustee or employee's personal moral agenda or interest and the Trustees must not allow individual or collective personal, political or ethical issues, which are not directly related to the interests of JET, to affect their judgment.

Trustees must derive no personal benefit (individually or collectively) from donations, loans or other material support offered to JET.

### Procedures

On a day-to-day basis, JET's Board of Trustees delegates the responsibility to accept or refuse donations to JET's CEO, assisted by the Senior Leadership Team (SLT). In the first instance, the Director of Income Generation and Communications is responsible for ensuring any potential corporate or individual donor are supporting JET in accordance with this policy. If any element of the policy is contravened the Director of Income Generation and Communications will make recommendations to the CEO on the acceptance or refusal of suggested donations.

The CEO will ensure that the Board of Trustees is informed on any donation that he/she judges could potentially raise questions to why JET rejected it or accepted it. The CEO, assisted by the SLT will present the case, any evidence and share the key decision points and procedure that was followed in that particular case in order for the Trustees to make a recommendation of acceptance or refusal.

### Guiding principles

A suggested donation must be clearly evaluated in order to establish whether it would be in the best interest of JET to accept or refuse it. The donation will be evaluated against these factors:

- The donation should contribute towards JET's overall strategy and plans
- JET should be able to successfully deliver the agreed activity and advance its mission under the conditions tied to the donation, such as schedule and channelling of payment(s), required co-funding if any, reporting requirements and other legal aspects of the contract

- The donor's objectives or activities must not appear to be incompatible with JET's vision, mission and values, particularly if this risks causing significant damage to JET's integrity, public image or professional reputation
- JET will not accept donations from companies or individuals whose wealth are known to result from illegal activities or where there are indications of corruption and related economic crime

JET will refuse donations in the following circumstances:

- Where the activities of a donor are directly contrary to the objectives or agreed policies of JET or JET suspects that the gift has been donated to facilitate money laundering or other criminal activity
- Where it can be clearly shown that the cost to JET of accepting a donation will be greater than the value of the donation itself, and that acceptance of the donation will directly lead to a net decline in the assets of JET
- Where the offer of support is dependent upon the fulfilment of certain conditions placed upon JET and any condition is:
  - In itself contrary to the objectives of JET
  - Regarded as needing an unreasonable level of support from JET especially in relation to the size or impact the donation will have on JET's charitable activities
  - Will divert JET from pursuing its current objectives, policies or work priorities as a necessary result of the fulfilment of the conditions alone

The Trustees (and their delegates) will take great care and consideration in deciding whether to accept or refuse a donation:

- Where an offer of support is dependent upon JET first spending its own money or resources in order to facilitate the conditions of the donation, as this might place JET's assets under undue and inappropriate risk. Donations should preferably be given in full up-front or alternatively in instalments linked to an agreed contract and work plan
- Where the support, whilst reflecting JET's objectives, is untenable. For example, if JET does not have the resources to maintain the running costs associated with the donation
- Where the support consists of goods, services or property which JET cannot lawfully use, convert, exchange or sell in direct support of its charitable objectives.

## Commercial partners

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JET will not endorse products, treatments or companies.

## Policy concerning specific industries

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JET will consider each donation on a 'case by case' basis for each donation including industries listed below. However when reactively approaching companies a master spreadsheet to which the CEO has access will be approved in advance of any requests being made.

- Alcohol Industry
- Tobacco Industry
- Food Industry
- Pharmaceutical industry
- Defence partners both commercial and forces

## Use of donations

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If supporters wish to make a donation to a specific area of work they may make a restricted donation by providing written instructions to this effect with their donation. We will always respect this.

## Anonymous donations and publication

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Funding received from a donor who wishes to remain anonymous will be subject to the same acceptance/refusal process outlined above.

Funding received where JET does not know the identity of the donor will in most instances be accepted. If communications attached to the funding e.g. via email/letter specify conditions, these will be subject to the acceptance/refusal process.

In both cases, the accounts and JET's annual report will state 'anonymous donation' and will record the amount donated.

## Returning donations

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Where the trustees receive a request for the return of part/all of a donation they will only do so when:

- The written agreement surrounding the donation specify that in a particular circumstance it will be returned
- Where the law dictates that it must be returned in certain circumstances
- On occasion JET may refuse a donation or delay its acceptance to liaise with the donor to consider making the gift in a tax efficient manner e.g. via Gift Aid.

## Relevant legal framework

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As a way to pre-empt possible disputes and/or negative publicity in potentially difficult cases, JET, as a UK registered charity, has the option of applying to the Charity Commission for an order authorizing JET to refuse a donation.

## Transparency

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JET will ensure that this policy is visible to all stakeholders.

Author	Last updated
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