



## **Launchpad's Ethical Policy**

### **1. Introduction**

1.1. As Launchpad's Fundraising develops and grows, it is important that this income stream is guided by clear policies and procedures with regard to the criteria that determine whether gifts to the Charity should be accepted or refused. As an independent institution, it is right that the Charity makes its own decisions in the area in light of its own circumstances.

1.2. Having an Ethical Fundraising Policy enables a charity to express its values and ethos. Donations to charities should be accepted or rejected for proper, defined reasons. Donations should not be accepted from sources involved in the following:

- Tobacco
- Illegal arms trading
- Addictive gambling (grants stemming from lotteries and raffles ARE acceptable)
- Pornography

1.3 The law (Charities Act 1992) states that Trustees can refuse donations if they are not in the best interests of the charity to accept. In deciding whether to accept or refuse a particular donation, the law requires Trustees to carefully consider, on the basis of 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 taken into account 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.

1.3. The Development and External Relations Team and the Charity Director should always be able to explain their decision making to the Executive Team and Trustees. They will use the Ethical Fundraising Policy to decide which supporters to approach and what support to accept. Once exclusions are agreed, decisions about whom to approach should be simplified. There will, however, always be uncertainties that will need greater consideration.

### **2. Launchpad's Ethical Fundraising Committee**

2.1 Launchpad's Board of Trustees takes full responsibility for all decisions around the acceptance of gifts. An Ethical Fundraising Committee will be formed of a minimum of two Members who are also Board Members.

2.2 The Committee should review the policy when it is felt necessary and meet at least annually to review the terms of reference and the business undertaken by delegated authority.



### **3. Launchpad's Charitable Objectives**

#### **3.1 The objects for which the Charity is established are:**

The relief of financial hardship amongst service personnel and armed forces veterans and their dependents (including those who are serving members that are about to leave, and those who have served in the armed forces and have already left) by the provision of housing and accommodation, the provision of education, training, employment and financial support to help them resettle into civilian life.

To promote social inclusion for the public benefit by preventing the beneficiaries identified in the Object from becoming socially excluded, relieving the needs of those beneficiaries who are socially excluded and assisting them to integrate into society.

For the purpose of this clause 'socially excluded' means being excluded from society, or parts of society, as a result of one or more of the following factors: unemployment; financial hardship; youth or old age; institutionalisation; ill health (physical or mental); substance abuse or dependency including alcohol and drugs; poor educational or skills attainment; relationship and family breakdown or rejection; poor housing (that is housing that does not meet basic habitable standards); crime (either as a victim of crime or as an offender rehabilitating into society).

### **4. Background**

4.1 Launchpad's Board of Trustees ('the Trustees') has a duty to maximise the Charity's income available to expend on pursuing Launchpad's charitable objectives. This duty is a legal obligation.

4.2 Launchpad actively seeks opportunities to work with individuals and external organisations to achieve shared objectives. It is vital, however, that the Charity acts primarily to further its own objects and also that it does not allow individuals and external organisations to bring the name of the Charity into disrepute. The Charity will adopt an attitude of professional scepticism in relation to its consideration of these matters.

4.3 Launchpad, therefore, accepts financial support from, and works in partnership with individuals, companies and grant-making trusts on the following conditions:

- There are grounds for believing this will result in a benefit to armed forces' veterans.
- The Charity is satisfied that neither the independence nor the integrity of the Charity would be compromised by accepting such support.
- The Charity is satisfied that any publicity that results from accepting such support will be beneficial [not be negative] to the Charity.



4.4 This policy sets out the legal and ethical criteria which must be considered when accepting or refusing donations and also when deciding whether Launchpad should be involved in opportunities connected with accepting donations, grants, sponsorships or other partnerships.

## 5. All opportunities

5.1 The following principles apply to all opportunities (including donations; grants; sponsorships; gifts of property, shares and other securities; pro bono work or other partnership or arrangement).

5.2 Launchpad **must** refuse opportunities where:

The gift derives from any illegal activities such as (but not limited to) tax evasion, fraud or money laundering and where it is otherwise required to do so by specific, prevailing legislation.

The source of the gift, or its ethical origin is unclear, and/or could impact on the Charity's reputation were it to be accepted, regardless of value.

5.3 Launchpad **may** refuse opportunities where:

i) the gift comes from an individual or organisation which is in direct conflict with Launchpad's vision: a fellowship of global citizens with shared values of tolerance, respect, understanding, service and togetherness (reflecting the spirit of the UK and the principles of the Commonwealth);

ii) it is believed that the cost to the Charity of accepting a donation/opportunity will be greater than the value of the donation/opportunity itself;

iii) the gift is deemed to come from a vulnerable person or a person in vulnerable circumstances;

iv) the gift is made with the intention of influencing the Charity with an explicit or implicit exchange for favours or benefits;

v) the gift, through either its magnitude or nature, will unduly restrict the Charity's ability to deliver or to be seen to deliver the full scope of its charitable endeavour;

vi) it is considered that the opportunity may, in the opinion of Launchpad, bring the Charity into disrepute or involve the Charity in controversy or publicity which would do meaningful damage to Launchpad's reputation and standing;

vii) it is otherwise allowed to by specific prevailing legislation.

### **All opportunities must clearly comply with the Charity's Anti Bribery and Corporate Criminal Offences Policies**



## **6. Donations**

6.1 A donation from an individual or an organisation which is not aligned with Launchpad's charitable cause and values may attract questions from our alumni and other supporters and may lead to materially adverse press coverage thereby damaging our reputation.

6.2.1 Launchpad must accept relevant Ts&Cs from donors to confirm the management and governance of programmes.

6.2.2 Where the Charity offers to name a building, room or any other aspect of its activities in recognition of a particular benefaction, the duration of such naming opportunity should be agreed between the donor and the Charity. In addition, the Charity reserves the right to withdraw such named recognition in the future, where:

- it transpires that the source of the funding is suspicious or arose in whole or part from any activity listed under the recommendations regarding the refusal of donations.
- the actions of the donor lead the alignment of the Charity with the named party to materially damage the Charity or its ability to deliver its charitable objectives.
- the donor does not meet its commitments in full and in line with the agreed timescale.

## **7. Commercial Participation Agreements**

7.1 Fundraising through commercial participation covers much corporate fundraising, sponsorship and other exchange of benefits. Launchpad is not obliged to enter into these arrangements but when it does care needs to be taken to ensure that deals of this kind do not damage the Charity's reputation or are in some other way not in the best interests of Launchpad. Launchpad should not become involved with any person, organisation, business or cause which, in the opinion of the Charity, might bring the Charity into disrepute or involve Launchpad in controversy or publicity which would do damage to the Charity's reputation and standing. At all times Launchpad must enter into a written agreement with all corporate partners. This agreement will set out clearly the nature of the partnership and the obligations of each party.

## **8. Launchpad's Fundraising Ethics Process for Governance**

8.1 The Ethical Fundraising Committee advises those with the authority to accept donations on behalf of the Board and advises the Board on the Ethical Fundraising policy.

8.2 Board Trustees delegate daily decisions on acceptance of donations to the CEO and Ethical Fundraising Committee, but noting Paragraph 8.3.

8.3 The CEO is to make Trustees aware of any potentially suspicious donations and any significant and potentially contentious issues before accepting the donation.



## 9. Sign Off Procedure:

### Value of Gift, Decision on Acceptance can be made by:

#### 9.1

- Under £15k, CEO
- Between £15k and £100k, Ethical Fundraising Committee
- Above £100k, Board of Trustees

9.2 Between £100k and £1m Fundraising and Development Committee by majority. The Chairmen of the Board and of the Audit Committee should be informed of any unresolved disagreement amongst the members of the Fundraising and Development Committee

9.3 Over £1m, The Board, acting in the knowledge of the advice of the Fundraising and Development Committee.

9.4 If those with the delegated authority do not feel able to accept the recommendation of the Ethical Fundraising Committee then the matter must be referred to the Board as a whole for a binding decision.

9.5 The biggest risk is when a donation is made from a source that is unexpected, i.e. when a donor comes to us without being approached first. This is more likely to happen as the Charity's fundraising activities reach new audiences and the work of the Charity becomes better known.

9.6 All donations accepted or rejected over £100K will be reported to the Charity's Audit Committee. Launchpad's Development and Finance teams will take all reasonable steps to ensure that they are aware of the source of funding for each gift, and have processes in place to satisfy themselves that the funds do not derive from activity that was illegal or runs counter to the core values of the Charity.

9.7 Using the Ethical Fundraising Policy the majority of decisions should be able to be made reasonably easily within the team.

9.8 A truly anonymous donation, where the Charity only deals with an intermediary who will not identify the donor, even to the CEO or a Trustee, should not be accepted. The risks of accepting a gift without a proper understanding of its provenance are too great.

9.9 A gift by a donor who wishes for their name to remain anonymous to all but the Trustees and senior staff of the Charity should be dealt with, as far as possible, in exactly the same way as other gifts. If the donor is prepared to reveal their name to the CEO or Trustee, it will fall to those executives to determine its acceptability in terms of the current ethical guidelines; if not, paragraph 9.8 applies. The Ethical Fundraising Committee will be required to have sight of such gifts of a value in



excess of £15k for final approval. The donor must be informed of this process from the beginning of any discussion.

9.10 If the Charity is asked to refund a donation made in error, then it must ensure that it complies with relevant Anti Money Laundering requirements. Any refund in excess of £10,000 must be authorised by the Chair of the Ethical Fundraising Committee.

9.11 The Charity is a member of CIOF, Cobseo, Charity Commission and will follow their fundraising guidance.

9.12 Governance should be reviewed on a biennial basis or more frequently if it is felt necessary. Terms of reference and processes should also be reviewed on a biennial basis, or more frequently if felt necessary.

Drafted by DAHS 16 Jul 22

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