

Policy: Ethical Policy

The purpose of this policy is to give us a framework to ensure that we behave and make decisions in an ethical and socially responsible manner that:

- protects our beneficiaries,
- demonstrates our integrity and values, and
- Inspires public trust and confidence.

This policy applies to:

- **Staff, including permanent and temporary colleagues, as well as colleagues on fixed term contracts.**
- **Volunteers, including trustees and people on student placements**

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1. Introduction

The purpose of this policy is to give us a framework to ensure that we behave and make decisions in an ethical and socially responsible manner that:

- protects our beneficiaries,
- demonstrates our integrity and values, and
- Inspires public trust and confidence.

This policy is consistent with the 'Charity Ethical Principles' (see Appendix One) from the National Council for Voluntary Organisations (NCVO) which were published in 2018 and apply to all charities, regardless of size, type or area of operation. The principles are intended to be complementary to existing sector codes such as the Charity Governance Code and the Stroke Association's own codes of conduct.

This policy is also consistent with [Nolan's Seven Principles of public life](#).

2. Who does this policy apply to?

This policy applies to:

- **Staff**, including permanent and temporary colleagues, as well as colleagues on fixed term contracts.
- **volunteers**, including trustees and people on student placements

3. Our Ethical Framework

1. Our Quality Standards

We provide a wide range of support and information to people affected by stroke, through our Helpline, coordinator led services, community groups and networks, My Stroke Guide, print and digital information. We pride ourselves on ensuring we deliver our support to a high standard, giving all those affected by stroke an excellent service and experience of the Stroke Association. Our [Quality Standards](#) describe our commitment to quality and high standards through all our service delivery.

2. Research and Data

Our [Privacy Policy](#) explains how we keep your personal information safe, tells you about your privacy rights and how the law protects you.

We comply with the UK Policy Framework for Health and Social Care Research which is a requirement for all bodies that fund and conduct medical and health research, and covers a wide range of governance and ethical standards, including involvement of patients in funding processes. We are a member of the Association of Medical Research Charities which provides guidance and mandatory standards for the fair, ethical, responsible and transparent funding processes for research. The AMRC audits its members every 5 years, and only those who reach the AMRC's gold standard are able to retain their membership.

Additionally, we operate within the guidance and frameworks of [INVOLVE](#), which sets out best practice standards for involving patients and the public in research.

Finally, we ensure our grant-holders adhere to the necessary frameworks for conducting their research, such as ensuring that research ethics committee approvals are in place using the [HRA's approved processes](#), and ensuring all animal licenses from the Home Office and requirements for conducting animal research are met, in line with the [legal and ethical frameworks as laid out by the Home Office](#).

When clinical trials are funded, these will always have a legal 'sponsor', which is usually an official University or NHS clinical trials unit or research support office, and it is their responsibility to ensure all legal frameworks are met when conducting research with human participants.

Our [Policy Positions](#) detail the important ethical issues of the use of animals and stem cells in research.

3. People and Behaviours

Our **Values** express who we are at our core. They define our culture and how we all do our jobs every day. Our values are:

- We are human
- We believe in better
- We give our all
- We say it how it is

Our **Strategic Principles** inform and shape our decisions as we implement our strategy

They are:

- We are stroke to the core
- We are in the conversation
- We know how to make an impact
- We unleash potential
- We care for ourselves as for others

Our Values and Strategic Principles underpin our expected behaviours for all staff that we hold ourselves accountable to through regular performance reviews. These are complemented by our Code of Conduct for Trustees and Independent Advisors, which sets out the legal and ethical expectations of our Trustees and Independent Advisors.

Our Equality and Diversity Policy and Equal Opportunities Policy demonstrate our commitment to uphold and promote equal opportunities, create conditions where everyone can give of their best, and challenge discrimination.

Our Safeguarding Policies describe our commitment to protect and promote the welfare of stroke survivors and other vulnerable persons at risk of harm, abuse and neglect.

Our Health and Safety Policy demonstrates our commitment to ensure the safety of all our staff, volunteers, service users, visitors, contractors and event participants, and that all is reasonably done to eliminate or reduce risks of harm or injury to people's health and wellbeing.

Our **Approach to Pay** describes our policy of ensuring fair, consistent and transparent systems of reward for staff. We're also committed to paying our staff **The Real Living Wage**, a voluntary higher rate of base pay. It gives a benchmark for responsible employers who choose to pay their employees a rate that meets the basic cost of living in the UK and London. It's higher than the government's 'National Living Wage' rate because it is calculated according to the cost of living.

Our Whistleblowing Policy allows our staff and volunteers to raise any concerns they may have with the way in which our charity (or any of its staff or volunteers) operates without fear of victimisation, harassment or disciplinary proceedings.

We will be transparent with our supporters, beneficiaries and the wider public about our goals and how we intend to achieve these. We will be open about how we spend funds that have been raised, how our charity's purpose is being fulfilled, celebrate our impact and be open and transparent about things that didn't go to plan. You can find this information in our [Annual Report](#). We actively seek feedback whether good or bad to ensure we are learning from our successes and failures. You can read more about how to provide us with feedback [here](#).

4. Income Generation

Our Gift Acceptance and Refusal Policy describes our approach to undertaking due diligence on donations over £5,000 and the factors that may influence a donation to be refused. This includes our commitment to complying with the ABPI guidance on collaboration between pharmaceutical companies and patient organisations.

Our Ex Gratia Payments Policy governs circumstances where our Trustees request the Charity Commission to issue an order allowing the charity to make a payment out of a charity's entitlement to a legacy, that the trustees believe they are morally obliged to make, but for which there is no legal authority.

Our Anti-Fraud Policy describes our zero tolerance attitude to fraud, bribery and corruption, describes the responsibilities of trustees, staff and volunteers, and is supported by a fraud response plan.

Our [Gambling Policies](#) include our policy on ensuring children and other vulnerable persons are protected from harm or exploitation by gambling, and describes our policy on socially responsible gambling.

Our Ethical and Responsible Investment Policy states that we will not invest in any organisation whose principal products or services can be clearly evidenced to significantly increase the risk of stroke or lead to poor stroke outcomes. This excludes from our investments stocks relating to tobacco, alcohol, and foods with high salt (sodium chloride) content.

We are registered with the Fundraising Regulator and comply with its Fundraising Code of Practice. We also subscribe to its Fundraising Promise, as well as the Institute of Fundraising's guidance on vulnerable people (Treating Donors Fairly).

5. Environment

Our Sustainable Development and Social Value Statement demonstrates our commitment to improve sustainability and efficiency, including supporting initiatives to minimise negative impacts on the environment, economy and society.

6. Ethical Procurement

Our Procurement Policy sets out the framework for procurement decisions, informed by the overarching ethical framework set out in this policy. It embeds value for money as a defining principle.

As part of our procurements, we investigate our Modern Slavery statements of all significant proposed suppliers to make sure no forced labour is used in our supply chains.

Our Working with Pharmaceutical and Medical Technology Companies Policy Statement sets out how we partner with the pharmaceutical and medical technology industries. We acknowledge the need to be open and transparent about such partnerships to ensure we maintain our integrity and independence.

4. Responsibilities

The Board of Trustees has adopted this policy and will monitor compliance with it.

The Executive Directors Team is responsible for ensuring that ethical standards within this policy are implemented through day-to-day decisions and behaviours. If a due diligence assessment presents an ambiguous situation, the Chief Executive will convene relevant Trustees and Executives to agree a policy position for decision by the full Board of Trustees.

The Associate Director of Legal and Governance is responsible for updating this policy every two years.

APPENDIX ONE: NCVO'S CHARITY ETHICAL PRINCIPLES

Beneficiaries first

Charities have a responsibility to carry out their purposes for the public benefit.

The interests of their beneficiaries and the causes they work for should be at the heart of everything charities and those who work and volunteer in and with them do.

Integrity

Charities, and those who work and volunteer in and with them should uphold the highest level of institutional integrity and personal conduct at all times.

Openness

Charities should create a culture and space where donors and supporters, as well as the wider public, can see and understand how they work how they deal with problems when they arise and how they spend their funds.

Right to be safe

Every person who volunteers with works for or comes into contact with a charity should be treated with dignity and respect, and feel that they are in a safe and supportive environment.

All charities have a responsibility to create an inclusive culture that does not tolerate inappropriate, discriminatory, offensive or harmful behaviour towards any person who works for, volunteers with, or comes into contact with the charity.

Charities should also be places where people's wellbeing and mental health are valued and promoted so that anyone working in the charity or coming into contact with the charity is encouraged to value and invest in their own health and wellbeing.