

## **1 Overarching Ethical Policy**

This policy establishes the ethical standards for Bliss, ensuring that all within the organisation, including staff, trustees and volunteers, have a consistent ethical approach to all that we do, we deliver our mission to give every baby born premature or sick in the UK the best chance of survival and quality of life.

Policy owner: Chief Executive

Policy lead: Partnerships Manager

Audiences: All relevant stakeholders: Including, but not limited to, Bliss staff, Bliss volunteers, Bliss trustees, beneficiaries of Bliss services, donors, potential and existing partners, suppliers

### Legislation, regulation and guidance

- Equality Act 2010
- Human Rights Act 1998
- Modern Slavery Act 2015
- Bribery Act 2010
- Code of Fundraising Practice
- Charity Fundraising: A Guide to Trustee Duties 2016
- NCVO Ethical Principles
- Charity Governance Code

Formally endorsed by Board of Trustees

Endorsement date      July 2019

Next review date      July 2021

## **1 Introduction**

**1.1** Bliss champions the right for every baby born premature or sick to receive the best care, ensuring that every premature and sick baby in the UK has the greatest chance of survival and quality of life. We do this by empowering families with the knowledge and skills to care for their baby, supporting health professionals to deliver high-quality family-centred care, influencing policy and practice to represent the voices and interests of babies in neonatal care, and enabling life-changing research to improve the quality of life of premature and sick babies for generations to come.

**1.2** Bliss recognises that all our activities need to be conducted with the highest of ethical standards. Primarily this means that in order to ensure that we are consistent with our objectives, we will only ever act in the best interests of babies born premature or sick. This means we will not work with organisations whose activities risk harm to premature and sick babies and their families.

**1.3** In addition, we recognise that as a charity, our beneficiaries, supporters and the public naturally and rightfully expect us to work in an ethical way, and this is fundamental to maintaining high levels of trust and demonstrating our integrity and reliability.

**1.4** We know that our reputation would be negatively impacted if we do not maintain the trust that our stakeholders have in our organisation. This in turn could impact our ability to deliver our services and support for babies.

Policies that should be read concurrently with the Bliss Ethical Policy are listed in Appendix 1.

## **2 Policy aims and scope**

**2.1** At times there are matters of subjectivity and judgement surrounding our work. The aim of this policy is to establish the ethical standards for Bliss, and to provide guidance and safeguards to ensure that these standards are maintained when judgement is required. We define ethical standards as rules and principles we follow to uphold our integrity as an organisation. These standards will govern decisions which are made in relation to everything that we do.

**2.2** In order to guide decision making we will utilise Bliss' Ethical Decision Making Framework, where it is proportionate to do so, allowing us to be informed by best practice and due diligence. We will employ our Ethical Decision Making Framework whenever subjective judgement is required to ensure that we are acting in compliance with the Ethical Standards listed in section 3.

**2.3** In particular it is acknowledged that the following areas of our work are likely to require specific attention with regard to ethical decision making:

- Service design and delivery
- Fundraising and acceptance of donations
- Partnership working and sponsorship
- External communications and public relations
- Significant procurement decisions
- Investments

**2.4** This policy will be published as we aim to be transparent and accountable in our activities and actions.

### 3 Our Ethical Standards

Our Ethical Standards are described as the following:

- As a charity we have a duty not to decline opportunities or funding or partnership working which will help us achieve our charitable objectives without good reason for doing so.
- All activities will be in alignment with our organisational strategy, which includes our vision and mission. This ensures that decisions are made with the best interest of our beneficiaries in mind.
- All activities will also be in alignment with our governing document, Memorandum and Articles of Association
- We will also ensure that we take into consideration real or perceived conflicts of interests to our charitable purpose or services prior to commencing activities with other organisations. We are guided in our actions by our three organisational values: trusted, supportive, and ambitious.
- Human rights: We expect those we work with to uphold and promote human rights and to comply with any responsibilities under the Human Rights Act 1998
- Equality: Bliss will not tolerate any kind of harassment nor unlawful discrimination on the grounds of one or more of the protected characteristics as defined in the Equality Act 2010. We expect those we work with to fully comply with any responsibilities under the Equality Act 2010, and to share our commitment to uphold and promote equal opportunities in a way that is consistent with our Equal Opportunity Diversity Policy.
- We support the objectives of the Modern Slavery Act. We expect all of our partners who meet the financial threshold set by the Secretary of State to comply with their responsibilities in full.
- We understand that within the context of the support we provide to babies and families, our staff, volunteers and/or trustees may come into contact with children, young people or vulnerable adults. Our Safeguarding Policy sets out our responsibilities and procedures in relation to protecting children, young people and vulnerable adults.
- Provision of a safe and supportive acceptable working environment. This includes consistency with our Bullying and Harassment Policy, Remote & Lone Working Policy and Grievance Procedure which commits us to creating an environment in which staff, volunteers, and visitors can carry out activities free from harassment, intimidation and victimisation and are treated with dignity and respect.
- We also support the objectives of the Bribery Act and are committed to complying with our related responsibilities. Bliss has a zero tolerance policy towards fraud, bribery and corruption (including money laundering and funding terrorism). Bliss therefore would not engage in activity or accept funding from the following:
  - Where it was known to be associated with criminal sources
- We will not directly invest in shares in, or commercial paper issued by, companies which could cause detriment to the charity's reputation; which will disproportionately decrease the amount of donations to further the work of the charity.
- Bliss expects suppliers to accept responsibility for labour and environmental conditions under which products are made and services are provided and to make a written statement of intent regarding the company's policy.
- Bliss seeks to purchase goods and services which are produced and delivered under conditions that do not involve the abuse or exploitation of any persons.

## **4 Ethical Fundraising**

**4.1** Bliss is committed to its charitable aims, and fundraises in order to give every baby born premature or sick in the UK the best chance of survival and quality of life.

**4.2** Fundraising practice must follow the fundraising provisions of the Charities Act and other relevant legislation, and local government by-laws. Fundraising is regulated by the Fundraising Regulator which holds the Code of Fundraising Practice for the UK. The Fundraising Regulator is there to ensure that all fundraising is legal, open, honest and accountable.

**4.3** We are dedicated to responsible fundraising practices. We are registered with the Fundraising Regulator (Registered charity no. 1002973) and have signed up to the fundraising promise which means our fundraising activity will always be legal, open, honest and respectful.

**4.4** We actively seek opportunities to work with a range of commercial organisations to achieve our strategic aims. However, it is vital that we make all decisions in alignment with our ethical standards.

- All new substantial commercial partnerships will be assessed using the Ethical Decision Making Framework, as laid out in section 2.2
- If an agreement is reached to form a commercial partnership, a formal commercial participator will be signed by both parties, as required by the Fundraising Code of Practice.
- When making a determination using the Ethical Decision Making Framework, we will consider the extent to which a potential partner has taken positive steps to mitigate or resolve past issues of concern.
- Following extensive stakeholder feedback Bliss has committed to not accepting any funding from infant feeding formula manufacturers, or their parent companies. The prevalence of specially formulated pre-term formulas and breastmilk fortifiers on neonatal units and their vital usage in ensuring babies born premature or sick are properly nourished should be noted in this policy, as occasional interaction or dialogue between Bliss and these companies may be needed in the best interests of babies and their families. We will always continue to support parents, no matter what their feeding choices, but no funding will be accepted from these companies.

**4.5** In exceptional circumstances ex gratia payments (a payment of money, a transfer of property, or the waiver of rights to money/property) are to be made if the Board of Trustees believe there is a moral obligation to do so (such as issues arising when gifts are left to Bliss in a will). In addition to Board approval, approval to make ex gratia payments must be authorised by the Charity Commission.

**4.6** In line with Charity Commission guidance, any donations from an unknown or unverified source exceeding £25,000 are expected to have a due diligence assessment completed and be reported to the Charity Commission as a serious incident.

## **5. Decision-Making**

**5.1** Wherever necessary, we will utilise the Bliss Ethical Decision Making Framework in order to guide decisions.

**5.2** If the Bliss Ethical Decisions Making Framework assessment presents an ambiguous situation, this can be escalated to the appropriate committee such as the Finance and Fundraising Committee or Risk and Evaluation Committee.

**5.3** These decisions are not binding, e.g. if a particular request to work with a given organisation was turned down it does not automatically mean we would not work or engage with that organisation in the future.

## **6 Responsibilities**

**6.1** The Board of Trustees is ultimately accountable for the Ethical Policy.

**6.2** The Finance and Fundraising Committee will consider any fundraising matters that require Board decision or oversight.

**6.3** The Chief Executive is the member of the Senior Management Team who is responsible for this policy on behalf of the Board of Trustees.

**6.4** The Senior Management Team is responsible for ensuring that ethical standards within this policy are implemented by embedding them in relevant decision-making procedures and processes.

**6.5** The wider department managers are responsible for championing and applying ethical decision-making in line with this policy within their teams.

**6.6** The Partnerships Manager is the policy lead and is responsible for developing and reviewing this policy; developing an organisational communications plan for the policy; and managing queries about the policy on a day-to-day basis.

**6.7** All staff members, trustees, and volunteers are responsible for acting in accordance with the policy.

## **Appendix 1 – Concurrent Policies**

### Financial Policies

Anti-Fraud Policy

Anti-Corruption Policy

Conflicts of Interest Policy

Investments Policy

Reserves Policy

### Public & Legal Policies

Safeguarding Policy

Data Protection Policy

Privacy Policy

Equal Opportunities & Diversity Policy

Complaints Policy

Health & Safety Policy

Supporter Promise

### Staff & Volunteer Policies

Grievance Procedure

Remote & Lone Working Policy

Whistleblowing Policy

Bullying & Harassment Policy