

Ethical Policy

EY Foundation

December 2021

Version	Date	Amendment	Main Author
December 2021	07.10.2022	Minor change - inclusion of SMT (p.6) Formatting changes - font throughout.	Nil Neale

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1. Introduction

- 1.1 The EY Foundation endorses and commits to the NCVO Charity Ethical Principles, 2019, in guiding decision making, good judgment and conduct.
- 1.2 We believe that we should proactively champion ethical behaviour and reflect and apply our charitable values in any activity we undertake, in addition to meeting legal and regulatory requirements expected of us.
- 1.3 Our trustees, staff, volunteers, employers and supporters are asked to actively consider the principles and how these can be integrated in all areas of our work and decision making.
- 1.4 This document aims to set out these principles and provide an over-arching framework to guide our decision making, good judgment and conduct.
- 1.5 This policy applies to all that we do as an organisation: including service delivery, procurement decisions, any form of partnership, acceptance of funding (grants, donations, legacies, in kind support, agreement), investments or any other contractual relationship.
- 1.6 As a charity we have a duty not to decline partnerships, acceptance of funding (grants, donations, legacies, in kind support, agreement), investments or any other contractual relationship which will help us achieve our charitable objectives without good reasons for doing so.
- 1.7 This policy runs alongside all existing EY Foundation policies including the Volunteering Policy, specifically for volunteers, the Complaints Policy, for anyone external to EYF, the Whistleblowing Policy, specifically for those working for EYF, and the EY Foundation Child and Vulnerable Adult Protection Policy and Procedures, for anyone working closely with our young people.

2. The EY Foundation

- 2.1 The EY Foundation helps young people facing barriers to entering the workplace and supports social entrepreneurs scale up sustainably. We aim to put young people at the heart of everything we do.
- 2.2 As a registered independent charity, our values, mission and compliance with legislation shapes all that we do and the decisions that we make.
- 2.3 Our values describe who we are and how we work together to achieve our aims to help young people.
 - Growth mindset:** Increase our impact on more young people through dedication, innovation and hard work
 - Empower people:** Everyone is given the opportunity to develop and to succeed
 - Courage:** Use new learning and diversity of thought to challenge the status quo; embracing lessons learned even if a project misses its targets
 - Collaboration:** Build relationships – internally and externally – to share ideas, embed an inclusive approach and achieve bigger outcomes

3. NCVO Charity Ethical Principles (2019)

- 3.1 In January 2019, the NCVO led by Dame Mary Marsh published the Charity Ethical Principles to support charities, their governing bodies and those who work in and volunteer with them in recognising and resolving ethical issues and conflicts.
- 3.2 These are sometimes matters of judgement and it is therefore important that we have a framework of ethical standards through which we will assess partnerships, investments, procurement, funding or other significant activities.

- 3.3 The NCVO Principles set out a recommended framework for the ethical execution of charitable purpose, and we will adopt these as the starting point for decision making on ethical issues.
- 3.4 We recognise that these principles are a benchmark of good practice and guide the framework of our Ethical Policy and Procedures:

Beneficiaries First: we recognise we have a responsibility to carry out our purposes for the public benefit. The interests of our beneficiaries and the causes we work for should be at the heart of everything we and those who work and volunteer in and with us do.

Integrity: we and those who work and volunteer in and with us should uphold the highest level of institutional integrity and personal conduct at all times.

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

Right to be Safe: every person who volunteers with, works for or comes into contact with us should be treated with dignity and respect, and feel that they are in a safe and supportive environment. We 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 us. We should also be a place where people's wellbeing and mental health are valued and promoted, so that anyone working in or coming into contact with us is encouraged to value and invest in their own health and wellbeing.

- 3.5 **Beneficiaries first:** Under the NCVO Charity Ethical Principles, this means we should:

- Be clear what our purpose, vision and mission is and who or what our beneficiaries are
- Carry out our purpose to provide the greatest benefit to our beneficiaries and our cause regardless of whether this might have a negative impact on the reputation or operation of our charity or our leadership
- When working with beneficiaries ensure that their views and experiences are actively listened to and taken into account
- Ensure that all relevant policies and procedures are drawn up in with the interests of beneficiaries in mind, we will consult our Youth Advisory Board including in the drafting of this policy

- 3.6 **Integrity:** Under the NCVO Charity Ethical Principles, this means we should:

- Ensure appropriate systems are in place to help guarantee decisions are robust, defensible and free from conflicts of interest
- Consider effect of activities conducted in private life on the reputation of the charity and of charities generally
- Ensure resources are managed responsibly and funds are properly protected, applied and accounted for
- Exercise due diligence in understanding ethical standards of commercial partners and individuals, to seek support from those with ethical values that are consistent with those of the charity
- Be sensitive to the impact of activities on both the natural and human environment
- In line with Charity Commission guidance, any donations from an unknown or unverified source are expected to have a due diligence assessment completed and be reported to the Commission as a serious incident.

- 3.7 **Openness:** Under the NCVO Charity Ethical Principles, this means we should:

- Operate a presumption of openness and transparency, subject to complying with legal and regulatory requirements, this includes publishing this policy externally, and disclosing all companies and individuals giving over £10,000 on our website. We only accept funds we can ascertain the provenance and as long as our due diligence has been met, we will honour a supporter's wish to remain anonymous
- Publish annual reports (including section on how our purpose and values are being fulfilled), safeguarding policy, gambling policy, complaints procedure and whistleblowing procedure
- Establish clear lines of responsibility and accountability for all our work, both internally and externally

3.8 Right to be safe: Under the NCVO Charity Ethical Principles, this means we should:

- Stand against and have a clear approach to prevent abuse of trust and power, as documented in our Child Protection Policy and Procedures and Whistleblowing and Complaints Policies
- Create a culture that supports the reporting and resolution of allegations, suspicions or concerns about abuse or inappropriate behaviour, through our Whistleblowing and Complaints Policies
- Ensure anyone working or volunteering for us understands the expectations placed upon them, and provide training to support them, as documented in our Volunteering Policy
- Ensure anyone who works or volunteers for us has access to proper support and advice, as documented in our Volunteering Policy
- Not endorse or approve products or companies. A statement to this effect will be included alongside any branding or promotion associated with products raising funds for the EY Foundation
- Not sell our data, only EY Foundation staff has access to our database, as documented in our Privacy Notice

4. Due diligence on potential partners

4.1 We will undertake a due diligence process and pay special attention to the following categories given the potential to threaten the physical, mental health and well-being of young people and families we work with:

- Tobacco and vaping manufacture
- Companies generating a material proportion of their revenue from the sale of pornography
- Alcohol companies
- Arms and ammunition
- Gambling companies
- Weight loss / dieting companies
- Short term loan providers / pay day lenders
- Companies that have been prosecuted for poor working practices, wages and conditions
- Companies that have been prosecuted for a poor safeguarding record
- Companies that have been prosecuted for a poor environmental and sustainability record

The focus of this due diligence process will be on partnerships, grants, donations, legacies, in kind support and investment from organisations (private, public, charity or otherwise) rather than on individual fundraisers or donors.

4.2 If any opportunity requires further review and scrutiny, a risk assessment will be completed and escalated to the EY Foundation Leadership Team.

4.3 When making a determination, the EY Foundation Leadership Team will consider:

- the nature, scope and intent of the proposed relationship
- what is in the best interest of our organisation and beneficiaries
- the extent to which a potential partner or donor has taken positive steps to mitigate or resolve past issues of concern.

4.4 The Chief Executive will take the final decision on all matters under this section of the policy.

4.5 If a due diligence assessment presents an ambiguous situation, the Audit and Risk Committee can be consulted. The Audit and Risk Committee will not have a decision-making role, any final decision would be taken by the Chief Executive post consultation. If the situation still cannot be resolved, the Board of Trustees will be consulted.

4.6 Trustees will receive annual reports about instances where donations or offers of fundraising have been refused.

5. Responsibilities and Compliance

- 5.1 The Board of Trustees is ultimately accountable for this policy.
- 5.2 The Audit and Risk Committee will consider any fundraising, procurement or investment matters that require consultation, for example when a due diligence assessment presents an ambiguous situation (see 4.6 above).
- 5.3 The Board of Trustees will only be involved in a final decision or oversight when a resolution cannot be found after consultation with the Audit and Risk Committee.
- 5.4 The Chief Executive is the member of the Leadership Team who is responsible for this policy on behalf of the Board.
- 5.5 The Leadership Team are responsible for ensuring that ethical standards within this policy are implemented by embedding them in relevant decision-making procedures and processes in their directorates.
- 5.6 The Senior Management Team are responsible for championing and implementing ethical decision-making in line with this policy within their areas of responsibility.
- 5.7 The Chief Financial Officer is the policy lead and is responsible for developing and reviewing the policy; developing an organisational communications plan for the policy; and managing queries about the policy on a day-to-day basis.
- 5.8 The Head of Finance, Governance and Assurance is responsible for maintaining a list of all major donors and funders, and of funding declined.
- 5.9 All of our trustees and staff members at the EY Foundation are part of our wider fundraising efforts and responsible for acting in accordance with the policy.
- 5.10 We would encourage our people to use the Whistleblowing and Complaints policies and procedures should they wish to report any concerns about behaviour that breaches the standards in this policy.

6. Review and Maintenance

- 6.1 This policy was last reviewed and approved by the Board of Trustees in December 2021 and is reviewed annually. It is next due to be reviewed by December 2022.