**Ethical Donations Policy**

**Introduction and commitment to ethical fundraising**

The Neonatal Nurses Association (‘the NNA’) is a UK charity working to support neonatal nurses to feel confident and valued in their role, optimising the care received by neonates and their families.

To support this work the NNA raises funds from a variety of sources, including individuals, companies, and public bodies.

The NNA is committed to open, honest and ethical fundraising. The NNA will follow the Code of Fundraising Practice and register with the Fundraising Regulator.

**The purpose of the NNA’s ethical donations policy is:**

* To set out the circumstances under which the NNA will and will not accept donations from individuals and companies.
* To ensure a consistent approach to decision making regarding acceptance of donations, encompassing legal and ethical considerations.
* To ensure that reputational impacts are given due consideration along with financial impacts.

**Scope of policy**

This policy applies to donations from living individuals and companies. It does not apply to donations from public bodies or Charitable Trusts.

Charitable Trusts are all registered charities and as such are regulated and monitored by OSCR in Scotland, the Charity Commission in England and Wales and the Charity Commission Northern Ireland in Northern Ireland. When we begin Trust fundraising charitable trusts will, therefore, not be screened unless there is any reason to believe they are under investigation by one of the above regulators.

When we begin Legacy fundraising Anti-Money Laundering (AML) checks will be carried out on all legacies as information is made available by Executors, but legacy donations will only be declined in specific circumstances, either:

1. the restriction on use written into the Legator’s Will makes it impossible for the funds to be realistically spent by the NNA as envisaged by the Legator and only as a last resort after discussion with the Executor.
2. there is a significant risk to the reputation of the NNA in accepting the donation.

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**Donation acceptance criteria**

The Code of Fundraising Practice (section 2.3.1) states that charities “must not refuse or return donations, except in exceptional circumstances”.

The NNA will therefore accept all donations unless clear evidence demonstrates that they come from either:

* Companies whose primary business centres on pornography, armaments production, tobacco, fossil fuels or infant formula.
* Individuals or companies whose objectives or activities are clearly inconsistent with the NNA’s charitable objectives, mission, vision or core aims.
* Individuals or companies with whom association would adversely damage the NNA’s reputation and/or the NNA’s ability to raise funds from other sources.

Assessment of the above criteria is at the sole discretion of the NNA and will be based on robust and consistently applied due diligence procedures. The NNA will not reject donations purely based on a lack of available detailed information on a donor.

While gathering data to make informed decisions, the NNA will act in compliance with its Privacy Policy.

Donations from individuals will only be screened against the above criteria if they are £10,000 or over, either individually or cumulatively over a 12-month period. Individuals are distinct from companies; the NNA may accept a donation from an individual who is employed by a company that the NNA would choose not to work with.

Due to the higher risk of reputational damage, donations from companies will be screened against the above criteria if they are £100 or over. This does not include companies match-funding employees’ giving through payroll giving or online fundraising pages. In-kind support from companies will be carefully reviewed on a case-by-case basis.

**Anonymous donations**

Other than small donations (below £100), the NNA cannot accept genuinely anonymous donations, because such donations do not allow checks to be carried out in line with this policy.

For anonymous donations of £100 or over, insofar as General Data Protection Regulation (GDPR) allows, the NNA will seek assurance that the donation is consistent with this policy.

Public acknowledgement of individual donations will only take place with express written consent.

**Relationship with other policies**

This Ethical Donations Policy should be read alongside our organisational policies, procedures, guidance and other related documents, including:

* Data Protection
* Whistleblowing Policy