**ETHICAL FUNDING POLICY**

**Overview**

The Migraine Trust is dedicated to helpling people affected by migraine. [O[ur vision](https://migrainetrust.org/what-we-do/about-the-migraine-trust/)](https://migrainetrust.org/what-we-do/about-the-migraine-trust/) is ‘of a world where migraine doesn’t stop anyone from living the life they want’. Everything we do must help to further our vision, strategic goals and all activity must reflect our organisational values.

**Purpose**

The purpose of this policy is to ensure that in seeking and securing funding, The Migraine Trust has a clearly understood way of working, underpinned by high ethical principles. The Migraine Trust will adhere to the following to minimise any risk of bringing the charity into disrepute.

* Be open and transparent
* Act to further our charitable objectives, and to ensure that there is no compromise of the charity’s independence and reputation
* Act with integrity and treat all funders fairly and honestly
* Act with due care and attention

It is impossible to list the many types of support the charity might potentially receive from third party organisations and it isn’t the intention of this policy to do so.

**Introduction**

The Migraine Trust is reliant on its continued existence through maintaining the trust of a wide range of stakeholders including people affected by migraine, our supporters, the healthcare community, charity commissions, and the wider public. It is a responsibility we take seriously.

The Migraine Trust welcomes and actively seeks fundraising, sponsorship, gifts and donations from industry, corporate and other third-party organisations, to support the work to deliver our charitable purpose.

All subsequent references in this Policy to “funding” applies equally to all three categories of donors and subsequent references to “third-party organisations” applies equally to all three categories of funders.

Working with third-party organisations can present a range of opportunities to further our strategic goals and improve the lives of people affected by migraine. This can include industry who may be a helpful resource in supporting our goals, and as such we always need to acutely beware of perception of bias that could can be created through certain types of support. This ethical funding policy highlights steps we take to mitigate this and how we always endeavour to be impartial and honest regarding any relationship we have with third party organisations. Being open and transparent, and having clear rules in place about these relations fosters public trust in how funding is used and reduces the risk that people perceive there may be undue influence over the decision we make.

Income raised from third-party organisations is unconnected to our advocacy work nor influences strategic decisions. Industry and corporate partners have their own values and industry codes of conduct. In particular pharmaceutical companies must ensure they always adhere to the ABPI [code of conduct](https://www.abpi.org.uk/media/6655/abpi-code-of-practice-2019.pdf) and the ABPI sourcebook when working with patient organisations. It is important for all parties to have in place a clear set of rules and ways of working that prevent both undue influences, and the risk of the perception of undue influence.

**Ethical Fundraising**

The Migraine Trust ensures it has the funds to deliver its charitable purpose, by maintaining and growing a broad base of funding sources whilst adopting the [Fundraising Regular Code of Practice](https://www.fundraisingregulator.org.uk/code) guiding our fundraising activities, covering: -

* Acceptance criteria defining the principles we observe for fundraising or donations.
* Avoidance criteria identifying the conditions under which we would not accept a donation, gift, or other contribution with a financial benefit.
* Ethical fundraising procedures

Key principles of working with third party organisations

1. **Openness and Transparency**

The Migraine Trust will be open and transparent about its funding, policy and influencing priorities, and how these are pursued and developed over time. The Migraine Trust will acknowledge and thank sponsors of individual projects or activities proportionately to avoid advertising. The Migraine Trust will carefully consider any request to display corporate logos and avoid giving them undue prominence.

1. **Consistency with The Migraine Trust’ charitable objectives, independence, and reputation.**

The Migraine Trust welcomes financial and other material support for its work if funding is provided free of any conditions that might compromise The Migraine Trusts’ charitable status, reputation, and independence. Any support will be judged by its potential benefit for people with neurological conditions and all that is accepted will be deemed to further The Migraine Trust’s objectives.

The Migraine Trust seeks a diverse funding base in the interests of financial sustainability and to avoid dependence, and the appearance of dependence, on any one source.

Unless explicitly agreed upon in a formal contract and aligned with our organisational values, The Migraine Trust strictly refrains from endorsing, promoting, or engaging on activities that advance the commercial interests of our funders. Our commitment to ethical conduct and transparency remains paramount, and any potential collaboration must adhere to the following principles;

1. Explicit contractual agreements: Any endorsement or promotion of products on behalf of our funders must be clearly stipulated in a formal written agreement, outlining the scope, duration, and specific terms of the collaboration.
2. Alignment with organisational principles: All collaborative efforts must be consistent with the values upheld by The Migraine Trust. We reserve the right to decline any engagement that contradicts our mission or ethical standards.
3. Transparency: In cases where collaboration involves endorsing or promoting products, The Migraine Trust is committed to maintaining transparency with our stakeholders. Clear communication about the nature of the collaboration and any associated agreements will be provided.
4. Non-Lobbying for commercial interest: The Migraine Trust shall not engage in lobbying activities that serve the commercial interests of our funders. Our advocacy efforts will be driven by a commitment to the public good and the betterment of the diagnosis, treatment and support of the migraine community. We will work alongside third parties on campaigns, lobbying and calls to action only where these align with The Migraine Trust’s own priorities and values.

The Migraine Trust name and logo are its property and may not be used by a funder or supporter without the explicit permission of the charity.

**3. Integrity**

The Migraine Trust will not accept funding or support from any party whose activities and business practices are demonstrably unlawful or unethical, demonstrably harmful to health and wellbeing, or in other ways demonstrably harmful to the public good, in the judgement of the Board of Trustees.

The Migraine Trust will expect funders or supporters to comply with their respective industry codes of practice governing funding relationships with third parties such as charities.

The Migraine Trust will not disclose to funders or supporters the contact details of individuals working for or associated with its member or associate organisations, without the explicit permission of the individuals concerned.

The Migraine Trust will, when providing information, insight, or opportunities to support activities, take reasonable steps to ensure that such information is shared with all relevant parties at the same time.

The Migraine Trust will not instigate funding or support where any of the following criteria apply:

* The source is known or suspected with credible evidence to derive from the proceeds of crime, or from illegal activity, or from pornography, or from unethical activity or to be associated with a regime known to be in violation of human rights, from goods and services produced under conditions involving the abuse or exploitation of any person(s)
* It has the potential to cause damage to the reputation of The Migraine Trust or its relationships with its stakeholders and supporters
* It derives from a source conflicting with The Migraine Trust’s ethical values
* If acceptance of funding and any terms attached to it might lead to an undue and inappropriate third-party influence, or impression of such influence, on the decisions or the independence of The Migraine Trust
* It has the potential to create unacceptable conflicts of interest
* Acceptance is likely to deter other funders or jeopardise existing and future relationships with other donors or fundraising sources
* Acceptance would involve onerous obligations, the cost of which would outweigh the benefits.
1. **Due care and attention**

This due diligence will cover the nature, activities, and reputation of the third-party funder; the nature of the funding or support relationship proposed; the associated activities proposed; the size of the proposed contribution; and any risks posed to The Migraine Trust and associated mitigation.

All agreements to fund or support The Migraine Trust must be in writing, with clarity about the benefits that each party expects to gain.

The Migraine Trust will not accept money or support from any third-party whose activities or business practices we perceive to cause harm to health and wellbeing, to be damaging to the public good, or to be unethical. If we discover subsequently that we have accepted funding from any party who we believe does not meet our ethical standards, the Board of Trustees will decide if it is appropriate to keep or return the funding.

Where possible, we will actively encourage third parties to make donations that are unrestricted, i.e. the funding they give us can be used however we see fit. This is the best way for us to further our strategic goals and plan for the future, while at the same time avoiding any perception of undue influence over our activities.

The Migraine Trust will only accept financial or other material support if it is provided free from any conditions that might compromise – or might be perceived as compromising – our charitable status, independence, or reputation.

Where funding is given for a specific project, we will if appropriate, seek funding from as many industries, corporates, or funders as possible to eradicate the potential of undue influence over how the project is run or what it delivers.

The Board of Trustees and Senior Leadership Team are required to complete an annual declaration of interests’ form. Any conflicts of interest, or perceptions of a conflict of interest, will be reviewed by our Board of Trustees. Anyone found to have acted not in accordance with this policy, our values or to have not acted in the best interests of our charity will be dealt with through our disciplinary procedures.

We will work alongside organisations where our interests align. For example, we would be comfortable making the case for a particular treatment to be made available for migraine patients on the NHS if and where the patient’s doctor or nurse also believes it is in the migraine patient’s best interest to receive that treatment.

All funding for a defined specific purpose, and the corresponding subsequent expenditure will be recorded separately and be recorded as charitable activity and restricted funds in the annual financial statements. The charity will ensure it is rigorous with its records keeping, including any sponsorship contracts, which are also shared with auditors. Trustees will be kept updated on support at board meetings and if required through our Finance and Audit Committee meetings.

**An ethical committee to support and review issues and policies.**

We have a nominated group of trustees who have been given delegated authority by the Board to review and update this policy on an annual basis, check that it is being implemented effectively, approve in advance any donation by third-parties in excess of 10% of expenditure in that financial year, and to act as an arbiter for any questions or issues that arise in the day-to-day operation of this policy.

**Meeting Charity Commission guidance**

We work to the [Office of the Scottish Charity Regulator](https://www.oscr.org.uk/) and [Charity Commission guidance](https://www.gov.uk/guidance/guidance-for-charities-with-a-connection-to-a-non-charity) when working with industry and corporate partners and funders.

**Recognising support**

The Migraine Trust agrees levels of recognition with organisations dependent on their funding. This may include marketing or communications through the charity or branding on materials and/or at event venues.

The Migraine Trust will acknowledge financial and gift-in kind support from pharmaceutical companies in our Annual Review.

A contract must be agreed and signed by both The Migraine Trust and the company providing sponsorship (in cash or in kind) before income is invoiced.

Glossary / appendix

* Industry = any company working in the field of health or disability. In practice this usually means a company working in the health and migraine field, e.g., a pharmaceutical or medical device company.
* Corporates = any private company.
* Funders = a government department, non-government agency (e.g. NHS England), a think tank, a charitable trust or foundation.