DOCTORS OF THE WORLD UK

ETHICAL FUNDRAISING AND ACCEPTANCE OF FUNDS POLICY



Version control			
Version	Author	Date	Changes
1.0	Unknown	Unknown	
2.0	Andrew Rawstron	05/06/2024	Rewrite
3.0	Sam Braithwaite	07/10/2026	Rewrite

Approval Date:17/11/2026
Approved By: Board of Trustees
Review Date: 17/11/2028

HEALTHCARE IS A HUMAN RIGHT.

ETHICAL FUNDRAISING AND ACCEPTANCE OF FUNDS POLICY

Contents

1. Purpose 2
2. Scope 3
3. Core Principles 3
4. Presumption to Accept Funds 4
5. Sources of Funding We Will Not Accept 4
6. Sources of Funding Subject to Enhanced Due Diligence 5
7. Working with the Pharmaceutical, Life Sciences and Healthcare Industries 5
8. Assessment Criteria 6
9. Types of Donations Requiring Review 8
10. Due Diligence Process 8
11. Independence & Conflicts of Interest 8
12. Acceptance and Escalation Process 9
13. Grounds for Refusing Funding 10
14. Transparency and Reporting 10
15. Monitoring and Review 10

1. Purpose

Doctors of the World UK relies on charitable funding to deliver healthcare, advocacy and support for people facing barriers to healthcare. We are committed to raising funds in ways that are consistent with our mission, values and strategic objectives while protecting the charity's independence, integrity and reputation.

This policy provides a framework for assessing funding opportunities, managing reputational risk and making decisions about accepting or declining donations, grants, sponsorships, gifts in kind and other forms of support.

It aims to ensure that:

- Funding supports our charitable mission.
- The charity remains independent and able to speak freely.
- Relationships do not undermine trust among our patients, supporters, partners, staff, volunteers or wider stakeholders.
- Decisions are transparent, proportionate and consistent.
- Fundraising complies with charity law, Fundraising Regulator guidance and the Charity Commission's expectations regarding due diligence and acceptance of funds.

The following documents support the implementation of this policy:

1. Funder Prospect Screening Checklist.
2. Funder Due Diligence Assessment.
3. Partner Due Diligence Assessment.
4. Anti-Bribery & Corruption policy.

2. Scope

This policy applies to all forms of income generation, including:

- Individual giving
- Major donors
- Regular giving
- Community fundraising
- Events fundraising
- Trusts and foundations
- Institutional grants
- Corporate partnerships
- Sponsorship
- Cause-related marketing
- Payroll giving
- Employee fundraising

- Legacy gifts
- Gifts in kind
- Pro bono services
- Pharmaceutical and healthcare industry funding

It applies to all staff, trustees, volunteers and consultants involved in fundraising or partnership development.

3. Core Principles

Doctors of the World UK will:

- **Mission Alignment:** Only accept funding that supports or is compatible with our mission, vision and strategic objectives.
- **Independence:** Maintain complete independence in policy positions, campaigns, advocacy and service delivery regardless of funding source. Acceptance of funding does not imply endorsement of a donor, company, product, service or political position.
- **Transparency:** Be open and transparent about significant funding relationships and sources of income.
- **Integrity:** Ensure that fundraising activity is legal, ethical and in the best interests of the charity and its beneficiaries.
- **Human Rights:** Work in a manner consistent with our commitment to human rights, social justice, anti-racism and health equity.
- **Reputation:** Carefully consider the reputational impact of any funding relationship.

4. Presumption to Accept Funds

The Trustees recognise that Doctors of the World UK requires charitable funding to deliver its mission and maximise impact for people facing barriers to healthcare.

The charity therefore adopts a presumption to accept funding unless there is a compelling reason to decline it. In considering funding opportunities, the charity will balance:

- The potential benefit to beneficiaries;
- The risks to the charity's reputation, independence and values;
- The views of key stakeholders;
- Legal and regulatory obligations; and

- The charity's duty to maximise resources in pursuit of its charitable objectives.

The Trustees recognise that individuals, companies and organisations may have complex histories and that it may not be possible to find donors whose activities align perfectly with every aspect of the charity's values. Decisions will therefore be made on a proportionate and evidence-based basis.

Acceptance of funding does not imply endorsement of a donor, company, product, service or political position. Where concerns exist, the charity will undertake appropriate due diligence and consider whether risks can be effectively managed. Funding will only be declined where the Trustees or delegated decisionmakers determine that acceptance would not be in the best interests of the charity.

5. Sources of Funding We Will Not Accept

Doctors of the World UK will not knowingly accept funding from organisations whose core activities are:

- Automatically Excluded Sectors
- Arms and weapons manufacturing
- Defence systems designed primarily for military use
- Tobacco production and manufacture
- Pornographic content, products or services
- Fossil fuel extraction, production and processing
- Coal, oil and gas extraction companies
- Alcohol production and manufacture
- Companies involved in serious or repeated violations of human rights
- Companies involved in modern slavery or severe labour exploitation
- Organisations linked to terrorism, sanctioned individuals or criminal activity

Where uncertainty exists, the charity will assess the extent to which these activities represent the organisation's primary purpose and revenue source.

6. Sources of Funding Subject to Enhanced Due Diligence

The charity may consider funding from the following sectors but will undertake additional due diligence before any decision is made:

- Pharmaceutical companies
- Biotechnology companies
- Medical technology companies
- Diagnostic companies
- Healthcare communications agencies
- Food and beverage companies
- Financial services organisations
- Construction and infrastructure companies
- International corporations operating in high-risk jurisdictions

Enhanced due diligence will consider:

- Human rights record
- Environmental impact
- Regulatory compliance
- Media coverage
- Employment practices
- Equality, diversity and inclusion commitments
- Alignment with our values and mission

7. Working with the Pharmaceutical, Life Sciences and Healthcare Industries

Doctors of the World UK recognises that pharmaceutical, biotechnology and healthcare organisations play an important role in healthcare systems and medical innovation.

The charity is willing to accept support from life sciences and healthcare organisations where doing so advances our mission and does not compromise our independence. This approach reflects existing principles developed for charitable engagement with healthcare and life sciences partners.

We will not accept funding from pharmaceutical companies whose practices have been shown to undermine access to healthcare, contribute to excessive pricing, restrict access to essential medicines, or conflict with humanitarian and public health objectives.

Principles
We will:

- Retain full editorial independence.

- Retain full independence over policy, advocacy and campaigning positions.
- Not endorse specific medicines, products or treatments.
- Not allow funding to influence healthcare information, policy positions or public statements.
- Continue to comment publicly on healthcare issues irrespective of funding relationships.
- Ensure all funding arrangements are transparent.
- Protect all patient, supporter and beneficiary data.

Funding relationships must not require:

- Promotion of specific products.
- Advocacy for particular treatments.
- Endorsement of commercial products.
- Exclusive relationships preventing engagement with other organisations.
- Industry Codes
- Where relevant, partnerships with pharmaceutical and biotechnology companies should comply with applicable industry codes, including the ABPI Code of Practice.

8. Assessment Criteria

All significant donations and partnerships should be assessed against the following criteria:

- Ethical Considerations
- Compatibility with our values
- Human rights record
- Anti-racism commitments
- Equality and inclusion practices
- Labour standards
- Modern slavery prevention
- Environmental impact
- Safeguarding practices

This reflects considerations already identified within the current policy framework.

Reputational Risk
Consider:

- Potential conflict with our advocacy work
- Media coverage

- Public perception
- Stakeholder reaction
- Potential impact on service users
- Potential impact on supporters and funders

The charity must consider whether accepting funding could reasonably be expected to damage confidence in the organisation.

Financial Assessment
Where appropriate assess:

- Financial stability
- Source of funds
- Regulatory compliance
- Risk of insolvency
- Ability to honour commitments
- Legal and Regulatory Compliance

The charity will not accept funding where there is evidence of:

- Criminal activity
- Fraud
- Corruption
- Money laundering
- Tax evasion schemes
- Regulatory enforcement action giving rise to serious concerns

9. Types of Donations Requiring Review

Additional review should be undertaken where donations involve:

- Funding above £20,000
- Anonymous donations above £10,000
- Donations raising ethical concerns
- Donations from sectors identified for enhanced due diligence
- Donations subject to significant public scrutiny
- Donations linked to naming rights or sponsorship
- Gifts from politically exposed persons
- Unsolicited very large donations
- Donations from overseas sources presenting heightened risk

10. Due Diligence Process

Depending on risk level, checks may include:

- Basic Checks
- Public website review
- Charity Commission or Companies House searches
- Internet and media searches
- Review of annual reports
- Source of wealth assessment
- Enhanced Checks
- Independent media searches
- Modern slavery policies
- ESG reporting
- Equality and diversity reporting
- Litigation history
- Regulatory sanctions
- Watchlist screening
- Financial assessment

Any findings should be documented and retained securely.

11. Independence & Conflicts of Interest

Doctors of the World UK will not accept funding where the conditions attached could compromise, or reasonably be perceived to compromise, the organisation's independence, mission, advocacy positions, programme delivery, research integrity, or ability to speak publicly on issues relevant to its charitable objectives.

Any material restrictions, conditions or conflicts associated with funding from institutional donors, statutory bodies, universities, corporate partners or other funders will be assessed as part of the due diligence and funding acceptance process. Where risks are identified, appropriate mitigations will be considered before a funding decision is made.

All fundraising activities must comply with the charity's Conflict of Interest Policy. Trustees, staff or volunteers with a personal connection to a prospective donor or funding opportunity must declare that interest and remove themselves from any decision-making process where appropriate. Similar principles exist within the current policy.

12. Acceptance and Escalation Process

Routine Approval
The Head of Fundraising and Partnerships may approve funding opportunities that:

- Fall outside excluded sectors.
- Present low reputational risk.
- Require only standard due diligence.

Senior Review
The Executive Director should review:

- Donations over £50,000.
- High-profile partnerships.
- Pharmaceutical and healthcare partnerships of strategic significance.
- Cases involving potential reputational concerns.

Trustee Approval
Board approval should be required for:

- Donations exceeding £250,000.
- Funding representing more than 10% of annual income.
- High-profile or contentious partnerships.
- Any case where there is significant disagreement among senior leadership.

13. Grounds for Refusing Funding

Doctors of the World UK may refuse funding where:

- The source of funds is unclear.
- Acceptance could damage public trust.
- Acceptance could compromise independence.
- The donor seeks undue influence.
- The donor requires endorsement of products, services or policies.
- The donation appears unlawful or suspicious.
- The donation conflicts with this policy.

Trustees retain ultimate discretion to refuse funding where acceptance would not be in the best interests of the charity.

14. Transparency and Reporting

The charity will:

- Report income in accordance with statutory requirements.
- Acknowledge significant funding partnerships appropriately.
- Be transparent about pharmaceutical and healthcare industry funding where applicable.
- Publish information as required by law and charity reporting standards.

15. Monitoring and Review

This policy will be reviewed every two years or sooner if:

- Fundraising activities materially change.
- New regulatory guidance is issued.
- A significant ethical fundraising issue arises.

The Board of Trustees retains responsibility for oversight of this policy.