

Campaigning and Political Activity Policy

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Policy Owner	Board of Trustees

1. Purpose and Legal Basis

While the charity is primarily focused on the direct delivery of support and services to its beneficiaries, the Board of Trustees recognises that campaigning can be a legitimate and powerful tool for furthering its charitable objects. This policy provides a robust framework to ensure any campaigning or political activity undertaken by the charity is legally compliant, effective, and strategically aligned with our core mission.

The dual purpose of this policy is:

1. To establish clear principles and procedures for any campaigning or political activity undertaken by or on behalf of the charity, ensuring it always serves the charity's specific objects.
2. To ensure all such activities comply with UK charity law and regulatory guidance, thereby protecting the charity's independence, reputation, and assets.

This policy is grounded in a clear legal and regulatory framework, which includes:

- The charitable objects are defined in **Clause 3 of the Charity Constitution**.
- The general duties of trustees under the **Charities Act 2011**.
- Specific guidance from the Charity Commission, particularly '**Speaking out: guidance on campaigning and political activity by charities (CC9)**'.
- The requirements of **the Equality Act 2010** are to ensure that campaigning activities are inclusive and non-discriminatory.

This policy applies to all individuals and activities undertaken on behalf of the charity, as detailed in the following section.

2. Scope

A clear scope is essential for ensuring consistent and compliant behaviour across every individual associated with the charity. This policy and its principles apply to all campaigning and political activities undertaken by, or on behalf of, the charity.

Specifically, the principles and procedures outlined herein must be followed by:

- The Board of Trustees
- Any volunteers acting for the charity
- Any contractors or consultants engaged by the charity
- Anyone representing the charity in an official capacity

As the charity has no employees, ultimate responsibility for the implementation and oversight of this policy rests with the Board of Trustees. Adherence to this policy ensures that any public statement or campaign represents the charity's official, Board-approved position.

3. Policy Statement

This policy statement represents the charity's core commitment to using its voice responsibly and effectively on behalf of the charity's beneficiaries. It ensures that our advocacy is always mission-focused, independent, and conducted with integrity.

The charity will only engage in campaigning and political activity where it is a legitimate, effective, and responsible means of furthering one or more of its charitable objects. The charity is independent of all political parties and will never engage in party-political activity.

This statement is underpinned by the following core principles:

- **Mission Focus:** All campaigning must be directly linked to the charity's objects, such as promoting the health and wellbeing of the Beneficiary Community,

preserving its heritage, or disseminating research, as specified in Clause 3 of the Constitution.

- **Political Impartiality:** The charity will not support or oppose any political party or candidate. Our engagement will focus on policies and issues, not political affiliations.
- **Evidence-Based:** Campaigning messages will be well-researched, factually accurate, constructive, and based on the lived experience of our beneficiaries or the findings of credible research.
- **Trustee Oversight:** All campaigning activities must be approved and overseen by the Board of Trustees to ensure they are consistent with the charity's strategy, risk appetite, and legal duties.

These principles are clarified by the specific definitions that follow.

4. Definitions

Clear definitions are crucial for interpreting this policy correctly and ensuring trustees and representatives understand the boundaries of permissible activity under charity law. The following terms are defined in the context of this policy.

Term	Definition
Campaigning	All activities that seek to influence public opinion, policy, or legislation to further the charity's objects. This can include public awareness campaigns, research dissemination, and engagement with policymakers.
Political Activity	A specific type of campaigning focused on influencing the policies or decisions of political parties, government, or elected officials. This is permissible as long as it is not party-political.
Party-Political Activity	An activity that supports or opposes a specific political party, candidate, or politician. This is strictly prohibited by charity law and this policy.

Charitable Objects	The specific purposes for which the charity was established are formally stated in Clause 3 of the Constitution . These are the sole justification for any campaigning activity.
The Board	The Board of Trustees of the charity who are ultimately responsible for managing the affairs of the charity as per Clause 9 of the Constitution .

The following procedures outline the practical steps required to apply these principles.

5. Procedures

This section provides the essential step-by-step framework for trustees to follow when considering, approving, and executing any campaigning activity. This ensures that all decisions are robust, well-documented, and legally compliant.

1. **Proposal and Justification:** Any proposed campaign must be presented to the Board with a written justification. This document must explicitly state: (a) which charitable object(s) the campaign will support, (b) the intended outcome and target audience, and (c) why campaigning is the most effective method to achieve the desired outcome.
2. **Risk Assessment.** Before approving any campaign, the Board must conduct and document a risk assessment. This assessment must evaluate potential risks to the charity's reputation, finances, and independence. It must also outline clear strategies to mitigate these identified risks.
3. **Board Approval:** All campaigning activity must be formally approved by the Board of Trustees. This decision must be recorded in the minutes, in line with **Clause 24 of the Constitution**. The minutes must demonstrate that the trustees have fully considered the link to the charity's objects, the associated risks, and the relevant guidance in Charity Commission document CC9.
4. **Resource Management:** The use of any charity funds, property, or resources for campaigning must be approved by the Board. Such use must be demonstrably in the best interests of the charity and adhere to the principles for the application of property as outlined in **Clause 5 of the Constitution**.
5. **External Communications** All public communications related to a campaign must be factually accurate, consistent with the charity's impartial stance, and be clearly identified as coming from the charity.

These procedures are overseen by individuals with clearly defined responsibilities.

6. Roles and Responsibilities

Assigning clear roles and responsibilities is fundamental to ensuring accountability and effective oversight of all campaigning and political activities undertaken by the charity.

- **The Board of Trustees:** Holds ultimate responsibility for ensuring all campaigning and political activity is legally compliant, risk-assessed, and furthers the charity's objects. Their duties include approving all campaign proposals, overseeing risk management, and ensuring adherence to this policy.
- **The Chair** is responsible for ensuring the Board gives proper and thorough consideration to campaign proposals and that all related decisions are made and recorded in accordance with the Constitution.
- **Delegated Trustee(s) or Committee:** In line with **Clause 14 of the Constitution**, the Board may delegate the day-to-day management of an approved campaign to one or more trustees or a committee. Any such delegation must be formally minuted with clear terms of reference and reporting requirements.
- **Volunteers and Contractors:** Any volunteer or contractor involved in campaigning on behalf of the charity must be briefed on this policy. They must act strictly within the scope of the activity approved by the Board and must not express personal political views as those of the charity.

Effective implementation is key to embedding these responsibilities into the charity's operations.

7. Implementation

A policy is only effective when it is properly implemented and understood. This section details the practical steps for embedding the Campaigning and Political Activity Policy into the charity's governance framework.

Effective Date: This policy is effective immediately upon its formal adoption by the Board of Trustees.

Communication and Training As per **Clause 11 of the Constitution**, a copy of this policy will be provided to all new trustees as part of their induction pack. All current trustees must be briefed on its key provisions to ensure a shared understanding of their collective responsibilities.

Resource Allocation: This policy does not require a dedicated budget for its own implementation. However, any specific campaign undertaken must have its own detailed budget approved by the Board as part of the formal proposal process outlined in Section 5.

8. Monitoring, Evaluation, and Review

Ongoing monitoring and regular review are essential to ensure this policy remains effective, relevant, and compliant with any changes in charity law or the charity's strategic direction.

- **Evaluation:** For each approved campaign, the Board will establish clear and measurable success metrics to evaluate its effectiveness against the stated objectives. The delegated trustee or committee will be responsible for reporting on these metrics to the full Board.
- **Reporting:** The progress, outcomes, and expenditure of any significant campaigning activity will be a standing item on the agenda of Board meetings for the duration of the campaign.
- **Policy Review:** This policy will be formally reviewed by the Board of Trustees annually, or more frequently if there are significant changes to Charity Commission guidance or relevant legislation. The review date noted in the header will be updated upon completion of each review.

This policy forms part of a wider suite of governance documents that guide the charity's work.

9. Related Policies and Documents

This policy operates within a broader framework of governance documents. Understanding its connections to other policies is essential for consistent, compliant, and effective management of the charity.

Key related documents include:

- Charity Constitution
- Risk Management Policy
- Conflict of Interest Policy
- Internal Financial Controls Policy
- Complaints Handling Policy