Independent Age

Ethical Policy

Policy title	Ethical Policy
Version	2.0
Approved by	Board of Trustees
Date approved	June 2026
Policy owner	Director of Finance and Governance
Policy manager	Head of Governance
Date of last minor update	
Related documents	
Date for next full review	May 2029

Our vision

Every older person can afford to live well.

Our mission

We stand with older people in financial hardship, offering urgent help today, and shaping a fairer, more secure tomorrow.

Our values

Trusted - Empowering - Transformative

1. Purpose

Charities are expected to operate in an ethical manner, and this is fundamental to developing high levels of trust and demonstrating integrity. Ethical principles set standards that are often higher than those required by law. All our activities should be undertaken to the highest ethical standards. Not doing so could jeopardise our ability to deliver services, to provide grants, to influence policy change and to fundraise.

This policy sets out the principles through which we work. As part of our commitment to delivering our Mission, we ensure appropriate safeguards and processes are in place to protect the people we support, our reputation and others we interact with, including funders, partners, grantees, supporters, volunteers and members of the public. The policy sets out the overarching framework of ethical standards through which we assess partnerships, investments, procurement, acceptance of funding, and other significant activities.

2. Roles and Responsibilities

The **Board of Trustees** has overall accountability for this policy and for ensuring that strategic decision-making is aligned to the principles set out in this policy. The Chair, Vice Chair, Treasurer and/or the Board will consider any matters that require trustee decision or oversight, including matters relating to procurement, investment and where a due diligence assessment presents an ambiguous situation that could impact the Charity's reputation (section 3).

The **Chief Executive Officer** is the member of the Senior Leadership Team who is responsible for this policy on behalf of the Board and delegates the drafting and review of this policy to the **Director of Finance and Governance.**

The **Director of Finance and Governance** is the overall policy lead and is responsible for ensuring that the policy is reviewed and manages queries about the policy.

The **Senior Leadership Team** is responsible for ensuring that the ethical standards within this policy are implemented by embedding them in relevant decision-making processes within their Directorates.

The **Heads of Department** are responsible for championing and implementing ethical decision-making in line with this policy within their areas of responsibility.

Everyone is responsible for acting in accordance with this overarching Ethical Policy and all policies and procedures referenced within it.

3. Our Values, Ethical Principles and Framework

Values

Our activities are guided by our three core values:

1. **Trusted:** A culture based on reliability and mutual respect
2. **Empowering:** An inclusive approach that helps people thrive
3. **Transformative:** A commitment to meaningful, intentional change towards shared goals

Principles and Framework

Our ethical framework is underpinned by our Equity, Diversity and Inclusion (EDI) policy and guided by the following four principles and underlying policies:

1. **Beneficiaries first**

- We are committed to and legally bound by the powers and limitations and charitable objects set out in our **Royal Charter**, which guides what we do.
- We will ensure that the views and experiences of older people in financial hardship are actively listened to and taken account of as part of how the charity operates, facilitating engagement and communication through the **Lived Experience Pool**.

2. **Integrity**

- Our safer recruitment practices reinforce our commitment to integrity, and our people know they are expected to act in the best interests of the charity as set out in the behaviours linked to our **Values**, our **People** policies and the **Trustee Code of Conduct**.
- We will ensure that we consider real or perceived conflicts of interest to our charitable purpose and our work, as set out in our **Conflicts of Interest Policy**.
- We are committed to reducing our impact on the wider environment by adapting how we work, to protect the environment and people from further harm associated with climate change. We expect those we work with to share this commitment and comply with the principles set out in our **Environmental Policy.**
- Our **Financial Regulations**, **Anti-Fraud Policy, Anti-Bribery and Tax Evasion Policies and our Expenses policies and procedures** set out our commitment to our responsibilities in deterring, and where possible, preventing such acts by our staff or any organisations or people associated with us.
- We are committed to paying our people appropriately by ensuring a fair, consistent and transparent reward system, as set out in our **Pay Policy**.
- We will decline opportunities or funding only when we have good reasons to do so. This includes terminating partnerships/funding after they have started. We do this in line with the Charity Commission's *Accepting, refusing and returning donations to your charity guidance*.

- We will report to the Charity Commission any donation exceeding £25,000 from an unknown or unverified source as a serious incident, as set out in the Serious Incident Reporting Procedure.
- Ex gratia payments (a payment of money, transfer of property, or the waiver of rights to money/property) may be made where the Board believes there is a moral obligation to do so (such as issues arising when a gift is left to the Charity in a will), in line with the Charity Commission's *How charities can make a moral, or 'ex gratia', payment guidance (CC7)*. Approval must be sought from the Board of Trustees and the Charity Commission, as needed.

3. Openness

- Our **Ethical Fundraising and Know Your Donor Policies** set out a clear framework for donations we will accept and our due diligence process for working with partners, which ensures we work in accordance with the law and regulatory requirements.
- Our **Procurement Policy** sets out the principles and framework for procurement decisions and our commitment to value for money.
- Information about our **grants** - including recipients, amounts, dates awarded and purposes - is published on our website and on 360Giving.
- Our **Investment Policy Statement and Beliefs** set out our Responsible Investment beliefs and how we align with them where practical and proportionate through the pooled funds in which we invest.
- We are a **Learning Organisation** committed to continual improvement through reviewing what we have done before; we reflect on feedback and complaints, we promote open and transparent communication and acknowledge and learn from our mistakes.

4. Right to be safe

- We will provide a safe and supportive environment. This includes:
    - Our commitment to protecting people we come in to contact with, who may be at risk of or experiencing harm and abuse. We will respond to disclosures proportionately and appropriately, in line with our **Safeguarding Policy.**
    - Our **Health & Safety and Mutual Respect Policy** set out our commitment to promoting the health, safety and welfare of our people, contractors and members of the public, when undertaking activity on behalf of the Charity.
    - We will respect every individual's dignity and rights to privacy and confidentiality through our **Data Protection and Confidentiality Policy.**
    - Our guidance on challenging discriminatory behaviour sets out our expectation that anyone working with, supporting our charity or using our

services will treat each other with dignity and respect – and helps colleagues to challenge and report discriminatory or abusive behaviour.

- Independent Age is committed to equity diversity and inclusion (see Section 8). We expect those we work with to fully comply with their responsibilities under the Equalities Act 2010**.**

4. Legislation or Regulatory Guidance

This policy will ensure we comply with relevant legal and regulatory obligations set out in the policies referenced and ethical guidance issued by the Charity Commission and where relevant, the Charity Governance Code. We are legally bound by the powers and limitations and charitable objects set out in our Royal Charter.

5. Implementation

This policy will be made available to all members of staff, suppliers and contractors. It will be publicised internally and a policy statement will be available externally. There are no additional resources required nor are there any specific training requirements for implementing this policy. Any member of staff who has any queries about this policy should contact the Director of Finance and Governance or the Head of Governance for support.

We encourage our people to contact the Governance and Risk Team, should they which to discuss any concerns about behaviour that breaches the standards set out in this policy or refer to the Whistleblowing Policy.

6. References

Royal Charter
Conflicts of Interest Policy
Complaints Policy
Data Protection and Confidentiality Policy
Equity, Diversity and Inclusion Policy
Environmental Policy
Pay Policy
Safeguarding Policy
Health & Safety Policy
Ethical Fundraising Policy
Procurement Policy
Anti-Fraud Policy
Anti-Bribery and Tax Evasion Policy
Investment Policy Statement and Beliefs
Serious Incident Reporting Procedure
Mutual Respect Policy

7. Monitoring Compliance

The Governance and Risk team will monitor compliance with this policy as part of their programme of assurance activity.

8. Commitment to Equity, Diversity, and Inclusion

We celebrate diversity at Independent Age, and we champion the differences and nuances which make each and every one of us unique. We believe that everyone should benefit from equity of opportunity and no one should be subject to any form of discrimination.

The contents of this document will be reviewed from time to time to ensure they remain aligned to our equity, diversity and inclusion (EDI) commitments. Part of our commitment is to remain compliant with the Equality Act 2010, which enshrines everyone's legal rights with respect to EDI. In the UK, it is against the law to discriminate against someone because of a protected characteristic, i.e. because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

9. Feedback

If you have any feedback or have identified an issue or inaccuracy with this policy, please contact the Governance & Risk Team at:
GovernanceandRisk@independentage.org