



Changing childhoods.
Changing lives.

Advocacy & Campaigning Policy

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(This applies to all employed colleagues and volunteers, including trustees.)

Sponsor:	Director of Strategy and External Affairs
Owner:	Head of Policy & Public Affairs & Head of External Communications & Engagement
Data Reviewed:	28 May 2024
Next Review Date:	28 May 2025
Distribution:	Non-Confidential, Internal Use

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Part 1: our approach to advocacy and campaigning at Barnardo’s

1. Introduction

- 1.1. At Barnardo’s we have a rich history of speaking out on behalf of the children, young people and families we support and represent.
- 1.2. In our new three-year Strategy, we set out three key areas of work that are needed in order to deliver on our agreed Purpose: *Changing Childhoods. Changing Lives*. These are:
 - 1.2.1. Run excellent, inclusive services that improve the lives of children and young people
 - 1.2.2. Improve practice, policy–making and systems so that they really work for all children and young people
 - 1.2.3. Drive change in attitudes towards childhood, working closely with partners and supporters

1.3. Our direct delivery of services to children and young people will always be at the heart of what we do as a charity. However, influencing decisions and structures, as well as changing attitudes are also necessary in order for us to achieve lasting, transformative change for cohorts and generations of children.

1.4. Any advocacy and campaigning that we do will always be in line with our charitable objects ('Charitable Objects'), in line with our regulatory requirements. These are:

1) To promote the care, safety and upbringing of children and young people by:-

1.1 supporting and assisting those in need, their families and carers;

1.2 promoting their health; and

1.3 advancing their education.

2) The relief of those in need by reason of age, ill-health, disability, financial hardship or other disadvantage.

2. Our advocacy principles

2.1. Beyond the need to operate within our Charitable Objects, additionally, when advocating on behalf of children and young people, we will always ensure our activities are:

2.1.1. Based on the areas of focus set out in our Strategy and Theory of Change

2.1.2. Based on evidence, either from the children and young people we support/our direct work with them; or from trusted external sources

2.1.3. Independent of any political party and otherwise in line with relevant charity and election law and regulatory guidance¹

2.1.4. Collaborative – recognising that we can achieve more in partnership with others who share our values and concerns

¹ See principal Charity Commission (England & Wales) guidance can be found [here](#); see Part 2 of this note for additional election-related law and guidance.

3. Ways of working

- 3.1. To ensure we follow these principles, and to protect our reputation as a charity, our advocacy and campaigning activity will be closely managed.
- 3.2. This applies to activity including but not limited to:
 - 3.2.1. Direct contact with national, regional and local politicians and other decision makers about matters of policy – such as meetings, consultation responses, written briefings and email correspondence;
 - 3.2.2. Public statements relating to policy positions – including on Barnardo’s website (and other websites relating to Barnardo’s), to the media, and to social media channels;
 - 3.2.3. Any other activity that involves commenting on or seeking to influence policy or public attitudes.
 - 3.2.4. Any activity that could be perceived as intended to influence or campaign on public policy, whether or not this is the primary purpose of the work, and regardless of whether the work has initiated in the Policy and Public Affairs Team, or with another team or Department.
- 3.3. All activity of this nature should be managed by the Policy and Public Affairs Team, or the External Communications and Engagement Team. All final outputs to be shared with decision makers or to be published in Barnardo’s name must follow agreed sign off processes:
 - 3.3.1. Operational responsibility is with the Director of Strategy & External Affairs (delegated as appropriate);
 - 3.3.2. This is escalated where necessary to the Chief Executive – usually in the context of reputational risk or where a ‘new’ position is being communicated; and
 - 3.3.3. Ultimate responsibility lies with the Board of Trustees. The Board’s involvement will be necessary in cases where there is significant reputational risk, as outlined in paragraph 4 below and in the Appendix.
- 3.4. The content of any new policy development should be decided with reference to internal and external evidence (as set out in our principles above) but also in consultation with relevant leadership colleagues in our Children’s Services Directorate, as well as other colleagues and partners where appropriate.

- 3.5. Where possible and appropriate, we also seek to involve children and young people directly in the development of policy positions.
- 3.6. No advocacy or campaigning content (broadly defined) should be shared with decision makers or published in Barnardo's name (or in the name of individual programmes or 'centres' which fall within the charity's governance arrangements) outside of these processes. This includes on social media - see [Social Media Policy](#) for more details.
- 3.7. Where we are working in partnership with other organisations:
- 3.7.1. This will be subject to careful due diligence and assessment of whether collaboration, including but not limited to activity undertaken as part of a formal coalition, remains consistent with the principles set out in this Policy.
- 3.7.2. Even when we are members of a coalition, each joint activity will be subject to our sign-off processes, as set out in this Policy.

4. Risk management

- 4.1. Where we are considering advocacy or campaigning activity that could be deemed controversial and likely to pose reputational risk in the current political and media environment, but which we consider to be in line with the principles in Section 2 of this policy, we will follow the framework set out in Appendix 1, which has been agreed with our Board of Trustees.

Part 2: Our preparation for the General Election to take place by January 2025

5. Implications of the General Election period

- 5.1. At the time this Policy becomes operational (1 May 2024), we are already in a regulated period under applicable election law² commonly known as the 'long campaign' in the run-up to the UK General Election.

² Principally the Transparency of Lobbying, Non-Party campaigning and Trade Union Administration Act, 2014 (commonly known as the Lobbying Act 2014); for further guidance on applicable law and regulation see specific Charity Commission Guidance [here](#), and Electoral Commission Guidance [here](#)

- 5.2. We need to be particularly conscious of the rules that apply to charity campaigning (broadly defined) during this period, both due to the additional regulatory burden, but also due to the heightened reputational risk associated with the external environment and increased scrutiny of charities.
- 5.3. We have decided that we will not plan to engage in ‘regulated’ campaign activity under the Lobbying Act 2014 and will therefore not register as a non-party campaigner with the Electoral Commission. Regulated campaign activities are, in summary, activities that can reasonably be regarded as intended to influence people’s voting choices. Full guidance from the Electoral Commission can be found [here](#). Related risks in relation to our ongoing campaign activities will be closely monitored in the course of the regulated period.
- 5.4. We will continue to take opportunities to speak out on relevant issues, both as Barnardo’s, and in partnership with others, following the principles and ways of working set out in Part 1 of this Policy. We will also seek to keep our direct influencing and public statements in line with our published ‘[Barnardo’s Manifesto](#)’.
- 5.5. We will take additional care to ensure that in doing so we minimise the risk of being seen to be aligned with any political party and to avoid the risk of any appearance that we are engaging in ‘regulated’ activity.

Part 3: Links with other policies

6. This policy should be read with reference to the [Social Media Policy](#) – noting that content posted on social media channels, either owned by Barnardo’s or colleagues’ personal accounts – are likely to be the source of greatest reputational risk.

Appendix 1: Framework for decision making

When do we speak out?

To note, this framework has been updated to include reference to the Strategy and Theory of Change, which were not published at the time the original version was approved by the Board.

This is a guide for communicating about issues that could be deemed controversial and are likely to pose reputational risk in the current political and media environment.

The following questions should be considered and responded to before preparing to speak out on a potentially controversial issue:

- 1) How does the issue link to our Strategy and Theory of Change, our Charitable Objects, our purpose and our values?
- 2) Do we have a strong or developing evidence base – ideally from our services?
- 3) Do we have specific examples of children and young people's lived experience?
- 4) What positive difference do we expect to make by speaking out?
- 5) Are we best placed to do this?

Consider: - could we do this more effectively in partnership (if that's not already the proposal)? - Are others better placed?

- 6) What are the risks of not doing it?

A. Based on the above, are we satisfied this is the right thing to do and is in the best interests of the charity?

- 7) 7. Is there a substantial risk of reputational harm, and what would the 'worst case' look like? (i.e. a risk of substantive private or especially public criticism - in the media, on social media, by decision-makers, from donors and other stakeholders, and/or from the public)
- 8) 8. If so, how will we mitigate these risks, and what would the 'best case' look like?

B. Based on the above, are we satisfied that the benefits outweigh the risks?

Approval and decision-making processes

For speaking out on an individual issue considered likely to be controversial (limited communications activity), approval is required from one of the following. Individuals listed determine whether to escalate further at each point in the process:

- Head of External Communications & Engagement
- Director of Strategy & External Affairs
- Other relevant leadership colleagues
- CEO

For engaging in a substantive project/programme and speaking out over a concerted period on an issue that is likely to be highly controversial and to post significant reputational risk, as above, and then:

- Discuss with the Executive Team
- Inform Chair/Deputy Chair Trustees
- Consider whether to inform Charity Commission proactively