



# HUMAN RIGHTS AT SEA

## PARTNERSHIP POLICY

Date Adopted: August 2020

Renewed: October 2025

### Policy Statement

Human Rights at Sea (HRAS) CIC is committed to work with all volunteer donors and funding partners that do not undermine its vision, mission, and core values.

### Scope

Relationships with donors and implementing partners. Both are referred to as 'partners' in this policy. This includes core funding provided by Human Rights at Sea International (HRASI) Ltd.

### Ethics Principles

HRAS's ethics principles: Beneficiaries First, Ethical Culture, Transparent & Accountable, Outward Facing Risk, Due Diligence and Code of Conduct, inform this policy. Please read the HRAS Ethics Policy (weblink) in conjunction with this Policy.

### Standards

HRAS will accept lawful voluntary donations (including gifts in kind), funding contracts and work with implementing partners unless there is reason to believe that by doing so, risks harm to beneficiaries, and/or compromises the organisation's independence or the perception of the independence of its work, and/or will cause significant damage to HRAS's integrity and/or reputation. Partnerships will be reviewed on a case-by-case basis. Where necessary, legal advice may be sought.

Where value exceeds £10k or has significant risks, donations/contracts will be signed off by the Founder / President with supporting advice by senior management.

### Prohibited sectors

There are certain industries which HRAS will not knowingly enter contract or partnership with because it believes that these industries or practices fundamentally undermine HRAS's mission and values. All contracts with partners will include this policy and require partners to confirm they are not within the below prohibited list.

1. The sale or export of arms or strategic services to governments which systematically violate the human rights of citizens, or where there is internal armed conflict, or major internal political and/or regional tensions leading to recorded human rights abuses, or where the sale of arms may jeopardise regional peace and security.
2. Production or publication or broadcast of adult entertainment.
3. Over 10% of turnover is arms manufacture.
4. Over 10% of turnover is tobacco products.

### Prohibited Practices:

HRAS will not accept any funds where:

1. The donor requires HRAS to purchase goods or services from the donor.



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2. The donor being involved in direct executive decision-making as to the application of the donation, other than a restriction as to its general application e.g. specific project funding under agreed terms of reference (ToR), or Memorandum of Understanding (MoU).
3. Where the sole purpose is to enable Person A to transfer funds to person B where the transfer has been agreed by Persons A and B. This is known as 'conduit' funds.

HRAS will conduct due diligence on donations over GBP £10,000 or equivalent value to avoid partnerships with organisations which:

1. It is unclear as to the provenance of the funds and/or where the funds could be from an illegal or illicit source or activity. Where this is not clear, HRAS will take all reasonable steps to assure itself that donations of funds, or goods and services in kind, are from legitimate sources and/or are the property of the donor.
2. Breach existing UK banking requirements and/or embargoes or sanctions pursuant to the UK Sanctions Regulation
3. Condone non-interference, lobbying or application of influence by whatever means to compromise the organisation's independent position, objectives and core values (Transparency, Clarity, Accountability).
4. Risk harm to beneficiaries, and/or compromise the independence of the work, and/or cause significant damage to HRAS's integrity and/or reputation.
5. Are at the time are included in the UN Security Council Sanctions Consolidated List (weblink to <https://www.un.org/securitycouncil/content/un-sc-consolidated-list> )
6. Participate in nationally and internationally accepted unlawful tax practices.

## Roles and Responsibilities

**The Founder, President and/or designated senior management** have overall accountability for this policy. It is the responsibility of senior management to ensure partners are screen against the above standards. The management is responsible to ensure the below risk management process is followed.

## Commitments, Controls and Processes.

### Risk Management Process

Donations are assessed against the above standards. Donations above £10,000, or with significant risks, are subject to majority trustee approval, noting objections. This Policy and the Ethics policy will be shared with the partner prior to contractual agreement. Approval will specify the review period for the relationship. The default period is three (3) years.

### External disclosures of breaches of policy

Breaches of this policy which require reporting externally should first be reported to the Trustees. Breaches such as gifts of cash where HRAS cannot verify the origin of funds will be reported to the National Crime Agency. This does not apply where the donor is known to HRAS but wishes to remain anonymous.

### Complaints

HRAS values feedback from supporters and the public and takes comments seriously. Please



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see the Whistleblowing and Complaints Policy for more information on how to report a complaint.

**Definition**

'Implementing partners': a contracted relationship, including pro bono, to work on behalf or in partnership with HRAS.

ENDS.