



## Ethics Policy

### 1. Introduction

Impact Arts aims to tackle inequalities in Scotland by supporting people who have experienced trauma, those living with poverty and those with few existing support networks. Our organisational values (Creative, Kind, Inclusive, Brave, Fun) and our charitable objectives underpin all that we do and the decisions that we make. We aim to be a responsible and ethical organisation and are committed to putting equalities and inclusion at the heart of everything we do.

There are sometimes matters of judgement to be made and it is therefore important that we have a set of ethical standards in place to guide our actions and decision making. The ethical standards as set out in this policy are the rules and guidelines we will follow to ensure our legal and ethical integrity.

We aim for all of our activities to be undertaken to the highest ethical standards which reflects our charitable status and our commitment to the people and communities we support. We understand that if we do not uphold the trust that people have in our organisation this could negatively impact on our reputation, our work and that of our colleagues. It could further risk our ability to deliver projects that support people, as well as our funders' generosity in supporting our work.

### 2. Purpose and aims

This policy sets the framework of ethical standards through which we will assess the following: *service delivery, any form of partnership, acceptance of funding (grants, donations, legacies, in kind support, agreement), investments or any contractual relationship including customers of our venue hire business The Boardwalk*, ensuring that we take a consistent ethical approach across all of our operations.

This policy aims to ensure that a robust set of processes and safeguards are in place to protect the people we support as well as our own organisational reputation and those partners and funders with whom we work. This document sets out the decision-making structure we will follow when ethical dilemmas arise and outlines our approach to relationships with investment partners/ funders to ensure clarity and openness for all of Impact Arts's stakeholders.

### 3. Income Generation, Fundraising & Partnerships

Impact Arts actively seeks opportunities to work together with external organisations and individuals to achieve shared objectives. However, it is vital that Impact Arts maintains its independence and does not allow any external partnership to bring Impact Arts' name into disrepute.

Impact Arts therefore accepts financial support from, and partnership working with, companies and individuals on the following conditions:

- There are strong grounds for believing that it will result in a benefit to Impact Arts' beneficiaries
- The Chief Executive and Trustees are satisfied that no adverse publicity will result from accepting such support



- There is no attempt on the part of the company or individual to influence Impact Arts' policy or actions either explicitly or implicitly
- Impact Arts does not endorse or approve the products or services of any company. A statement to this effect will be included alongside any branding or promotion associated with products
- Only Impact Arts will have direct access to its database and beneficiaries

#### **a) Charity Supporters & Donors**

Supporters have a right to expect us to provide clear, truthful information on our work, including reporting on how we spend the funding we are given and managing donors' information responsibly.

We will comply with the guidance issued by the Office of the Scottish Charity Regulator (OSCR), including in respect of openness and honesty with our supporters and members of the public.

We will respect the privacy and contact preferences of our donors. We will respond promptly to requests to cease contacts or complaints and act to address their causes.

#### **b) Fundraising Due Diligence**

We will undertake reasonable due diligence of donors, to ensure they don't hold views or are involved in activities that might be incompatible with our role and damage our reputation. In terms of donations, we will ensure that any gift is safe to accept and, in doing so, would be in the best interests of our charity. We will also consider issues, such as suspicious donations, or managing large anonymous gifts, or those from vulnerable individuals. See our **Tainted Donations Policy** for further information.

In line with OSCR guidance, any donations from an unknown or unverified source exceeding a financial threshold are expected to have a due diligence assessment completed. Trustees have approved that due diligence must be carried out on donations of £10,000 or more from individuals.

Impact Arts recognises that, in accepting funding from statutory bodies, it must consider the policy implications and obligations that might be tied to it and ensure that these do not contravene the aims of the Organisation.

Impact Arts seeks to raise funds from a series of charitable Trusts and Foundations, but recognises that, simply because these have been registered with The Charity Commission/OSCR does not mean that they are ethical givers. We therefore do not accept money from any charitable Trust where its source funding might run contrary to Impact Arts's aims, or if it is a requirement of grant receipt to advertise any company or organisation whose activities run contrary to our aims.

#### **c) Fundraising Commercial Partners**



We will not partner with any organisation that produces goods/ services or acts in a way that is contrary to our charitable objects, or values.

We will ensure that any commercial agreement represents a fair deal for the charity and:

- Clearly establishes what we expect to gain from it, prior to entering into an agreement
- Set up appropriate systems to monitor and review the partnership
- Take appropriate steps to identify and manage any risks
- Ensure from the outset that the expectations of both the charity and the company have been agreed
- Can be managed effectively and appropriately

#### **d) Restricted Donations**

If supporters wish their donation(s) to be used in a specific way, or for a specific purpose, they may make a restricted donation by providing written instructions with their donation. We will always respect this.

#### **e) Funding Avoidance Criteria**

As a charity we have a duty not to decline opportunities or funding which will help us achieve our charitable objectives without good reasons for doing so. When making a determination, we will consider the extent to which a potential funder or partner has taken positive steps to mitigate or resolve past issues of concern.

Impact Arts will not accept any funding from companies directly involved in activities that run contrary to its overall charitable objectives / vision / aims. We will not knowingly accept financial support or partnerships with companies involved with any of the following activities:

*Animal testing; human rights abuses; manufacture of environmentally hazardous products or chemicals; military contracts; arms/ ammunition, mining; delivering nuclear power; debt of developing countries; third world marketing; the manufacture of tobacco or water pollution.*

This guide is not exhaustive and will be reviewed regularly. All decisions will be investigated and interrogated on a case by case basis.

We also reserve the right to refuse donations, work or partnerships from those who are known to instigate or promote views of an inflammatory or derogatory nature concerning any of the protected characteristics which could be deemed counter to our organisational values and [Equalities, Diversity & Inclusion Policy](#).

If a due diligence assessment presents an ambiguous situation, this can be escalated to the Finance & HR Committee or full Board of Directors. These decisions are not binding on future engagements, e.g. if a particular request was turned down it does not automatically mean we would not work or engage with them in the future.

#### **f) Funding Acceptance Criteria**

When deciding whether to accept any particular donation, the Chief Executive and Trustees have a duty to demonstrate to the Scottish Charity Regulator (OSCR) that they have acted in the best interest of the charity, and that association with any particular donor does not



compromise Impact Arts' ethical position, harm its reputation or put future funding at risk. Impact Arts complies with all relevant legislation, including money laundering rules, the Bribery Act and OSCR guidance, including terrorism and political activity.

Impact Arts would therefore not accept any of the following where the donation:

- Was known to be associated with criminal sources and/or illegal activity
- Would help further a donor's personal objectives, which conflict with those of Impact Arts
- Would lead to a significant decline in support for Impact Arts, and so risk a fall in the resources available to fund its work or damage its longer-term fundraising prospects
- Would otherwise impact adversely on Impact Arts' reputation
- Is inconsistent with Government policy

#### **g) Recording Income Generation and Funding Decisions**

A record of discussions and decisions that are made in relation to ethical income generation and funding decisions will be retained in a tracker document which will outline a clear rationale for the decision that was made.

### **4. Protecting and Respecting Charity Beneficiaries**

How we represent our beneficiaries, in our communications, is always respectful of them and portrays them in the way they would wish to be seen. We will only use personal information that they have given consent for and for the purposes they have agreed and will not disclose anything that might put them at risk, particularly children and vulnerable people.

### **5. Customers**

Impact Arts has a significant number of customers for our charitable services and also for room rentals and events at The Boardwalk. We aspire for all of our customers to share our charitable aims and will actively promote these to attract customers who have shared values. We recognise however that from time to time, customers may wish to hold events that are not in line with our values or Equalities, Diversity and Inclusion Policy. In such instances, careful consideration will be taken to ensure that we are not discriminating against any customer but that we are taking steps to protect our reputation and that of our venue.

### **6. Purchasing**

Our procurement principles embed value for money as a defining principle, whilst ensuring wherever possible that our procurement activity is sustainable to society, the environment and economy. Impact Arts will not knowingly purchase goods and/or services produced and delivered under conditions which involve any form of abuse or exploitation of third parties.

Examples (not exhaustive) of such abuse and exploitation includes:

- The use of child labour
- Failure to pay employees a living wage



- Working hours are excessive
- Evidence of any form of inhuman, unreasonable or discriminatory treatment of employees

Impact Arts expects suppliers to accept responsibility for labour and environmental conditions under which products are made and services are provided and to make written statement of intent regarding the company's policy.

Furthermore, we will aim to prioritise purchasing from local suppliers who share the same environmental and social beliefs as ourselves.

## 7. Further Points

This Policy is meant as a working guide for Impact Arts. Any final decisions will be governed by the Board of Trustees. It is the duty of the Board to advise of any potential conflicts of interest with regards to funding or partnerships, and for the Board to act in the best interests of Impact Arts at all times.

## 8. Data Protection Act 2018

The organisation will treat all personal data in line with obligations under the current data protection regulations.

Version Control			
Version	Author(s)	Date	Changes Undertaken
1	Fiona Doring, Mairi McLaren, Maria Boyle	12/07/2023	Full Policy Review
2	Maria Boyle	10/01/2024	Addition of Data Protection Act section
3	Fiona Doring	27/01/2025	Addition of Recording Income Generation and Funding Decisions section  Replaced 'third world debt' with 'debt of developing countries'.  Addition of section on Customers