

## Ethical Fundraising & Funding Policy

### Purpose

The purpose of this policy is to provide Culture & Business Scotland (C&BS) with guidance on fundraising and fund giving in an ethical manner.

This document sets out the decision-making course that the charity will follow if ethical dilemmas arise and outlines its approach to relationships with investment partners to ensure clarity and openness for all C&BS's stakeholders.

C&BS's Ethical Fundraising & Funding Policy is reviewed regularly and held by the Board of Directors.

### Background

Our vision is for a Scotland where culture thrives, is celebrated, and enriches social, civic, and economic life.

Our mission is to be the connector between the culture and business sectors:

- to enable, inspire and support exciting and mutually beneficial cross-sector relationships;
- to build knowledge, skills, and expertise where they are needed most;
- to champion the impact and value of cultural experiences on all of our lives.

### Rationale for fundraising for the organisation and funding given by the organisation

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Culture & Business Scotland is a company limited by guarantee and registered in Scotland (SC406905) and a Scottish Charity (SC042631). Our registered office is Thorn House, 5 Rose Street, Edinburgh EH2 2PR.

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To help deliver our work and fulfil our charitable aims, we aim to develop a sustainable funding base made up of public funding combined with investment and donations from corporate partnerships, trusts & foundations, and philanthropic individuals.

We also award funding to cultural organisations through the Culture and Business Scotland Fund (C&BS Fund) to enable them to build partnerships with businesses who wish to support them.

## Context

We actively seek opportunities to work with external organisations and individuals to achieve our vision.

When deciding whether to accept any investment or donation, the Board of Directors of C&BS, supported by the CEO and SMT, has a duty to demonstrate to the Office of Scottish Charity Regulator (OSCR) that it has acted in the best interests of the charity, and that association with any investor or donor does not compromise C&BS's ethical position, harm its reputation, or put future funding at risk.

## Acceptance criteria

C&BS complies with all relevant legislation, including money laundering rules, the Bribery Act 2010 and OSCR guidance.

We therefore accept financial support based on five core principles:

1. It must support the aims of C&BS;

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2. It should not damage our integrity or reputation;
3. It should not impinge on our independent status;
4. It should not have undue influence on our policies or actions, either explicitly or implicitly;
5. It should not come from an organisation or individual that participates in practices that are counter to our values, aims, or mission, as defined in the avoidance criteria of this policy.

## Avoidance criteria

Our Chief Executive and/or Board of Directors will review donations, partnerships, and sponsorships (in adherence to our Financial Procedures and Scheme of Delegation) individually, on a case-by-case basis, and there is not a specific list of requirements and exclusions.

However, they have a duty to demonstrate to OSCR that they have acted in the best interests of the charity, and would therefore not accept support where the investment, donation, partnership, or sponsorship:

- was known to be associated with criminal sources and/or illegal activity including fraud, tax evasion or money laundering;
- was from an organisation engaged in modern slavery or human trafficking;
- would require C&BS to advertise any company or organisation whose activities run contrary to our values, aims, objectives or purpose;
- is from any source that is counter to or inconsistent with the policies of key funders of C&BS.

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- is from any source directly involved in activities that conflict with our values including those engaged in activities or policies that promote prejudice;
- would bring the work and name of C&BS into disrepute;
- would lead to a possible decline in financial support for C&BS from other sources, and thereby risk a fall in the resources available to fund its work.
- would lead to a possible decline in engagement with C&BS by potential beneficiaries of its work, and thereby risk the value and reach of the organisation.

If a gift or offer of investment support is turned down, a careful record of the Board's decision, and the reason for it, must be kept.

C&BS will not accept anonymous corporate donations.

We may accept anonymous individual or trust donations where there has been a rigorous third-party due diligence process, to ensure that C&BS is not potentially compromised.

We will make reasonable and appropriate attempts to identify any individual or organisation that offers financial support, particularly where significant sums are being donated, or the circumstances of the donation or investment give rise to notable risk. To do this, research will be carried out using a range of publicly available sources, which may include the Electoral Register, Companies House, the OSCR register, media reports and company websites.

If a supporter or investor makes themselves known to us but wishes to remain anonymous, these wishes will be honoured where the donation or investment carries no significant reputational risk.

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## C&BS Fund

When distributing funds to a culture organisation that has submitted a successful application, we will ensure that the terms and conditions of this offer include agreement with, adherence to and implementation of this Ethical Fundraising & Funding Policy by the award recipient.

When undertaking assessment of C&BS Fund applications, we will consider the ethical funding position of both the culture organisation applicant and the business sponsor and only make an award if satisfied that both align with the Ethical Funding Policy of the charity and the Scottish Government, who is the key funder of this programme.

## C&BS Marketplace

When assessing applications from culture organisations who wish to participate on the C&BS Marketplace, we will consider the ethical funding position of the application and accept the organisation if satisfied that it aligns with our Ethical Fundraising & Funding Policy.

When brokering relationships between culture and business organisations, we will ensure not to introduce any business organisations to culture member organisations or C&BS Marketplace suppliers if they meet any of our avoidance criteria.

## Ethical purchasing and use of services

We will not knowingly purchase goods and/or services produced and delivered under conditions which involve any form of abuse or exploitation of third parties. Evidence (not exhaustive) of such abuse and exploitation includes:

- the use of child labour;

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- the failure to pay employees a living wage;
- where staff working hours are excessive;
- when there is evidence of any form of inhuman, unreasonable, or discriminatory treatment of employees.

When we purchase products and services, we will do so in accordance with our procurement policy and procedures. This means we will:

- endeavour to ensure that we source materials, products, and agencies' services for the best possible value;
- protect our charity's reputation;
- aim to work with organisations that reflect our own values and ethical standards.

This policy is meant as a working guide for C&BS, and changes may only be made with the explicit approval of the Board of Directors.

Signed and dated:

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