

## Luminate - Ethics Statement

### What is our Ethics Statement?

As a charity, Luminate has a number of principles – or values – that govern our work. This Ethics Statement outlines the behaviours within our organisation which ensure that our values are implemented and maintained.

There are other documents which overlap with this, for example our Code of Conduct, and these are referred to where they apply.

### Who we are

[Luminate](#) is Scotland's creative ageing organisation. We work to ensure that older people's creativity can flourish whatever their circumstances, experience, interests and ambitions. As a professional arts organisation, we have a strong focus on artist-led work.

### Values

As a charity, we are committed to:

- **Putting our beneficiaries first:** the cause we work for – that is, the right of older people to access culture and creativity – is at the heart of everything we do. The views and experiences of older people are considered throughout our work.
- **Integrity:** we uphold the highest level of organisational integrity and personal conduct at all times.
- **Openness:** we make sure that our funders and supporters, and the wider public, can see and understand how we work and how we spend their funds.
- **Right to be safe:** everyone who works with us, or comes into contact with us, should be treated with dignity and respect, and should feel that they are in a safe and supportive environment.

*The principles above are based on NCVO charity ethical principles,*

<https://www.ncvo.org.uk/help-and-guidance/running-a-charity/charity-ethical-principles/>

In addition Luminate has its own organisational principles, which are outlined in our Business Plan:

1. **Rights-based:** we believe that everyone has the right to take part in creative activities regardless of age, as part of a full, enjoyable and fulfilled life
2. **Collaborative:** our projects and activities are co-designed and co-led with communities, artists and other partners

3. **Challenging perceptions:** we recognise the diversity of older people's experience, and challenge negative stereotypes about ageing
4. **Inclusive:** we recognise that there is inequity in access to the arts, and we strive to address this by collaborating with diverse communities
5. **Reflective:** we learn from our work, and we share our learning with others

Luminate is politically neutral, which means that we do not align with or support any political party, group or ideology. Our programme enables diverse views and voices to be explored through the arts and creativity.

## **How do we implement both sets of principles?**

### **Our programme**

In our programming decisions we will:

- Be considered, reflective and learning-focused. We will reflect on our learning from research and from consultation with older people and collaborators. We will also prioritise activities that enable further learning, both for Luminate and for others.
- Collaborate with partners – whether communities, artists, cultural or care organisations – in the planning and delivery of our work.
- Listen to the views and experiences of older people, and to those of our collaborators, and take these into account.
- Prioritise engagement with older people who face barriers in accessing the arts, and offer activities to older people at no or low cost as far as possible, to help reduce those barriers.
- Have a focus on work that challenges the negative stereotypes that exist around ageing and older people.
- Be open to debate about the content of our programme, and ensure that debate is honest, transparent and respectful of everyone involved.

### **Partnerships, collaboration and support**

We are supported by Creative Scotland, a range of trusts and foundations, and other public sources. We are grateful to every organisation and individual who supports us, and we know that we could not operate without this support. In our decisions about who to work with, we follow these principles:

- We have honest and transparent relationships with all our funders, collaborators and other supporters.
- We are independent of those who support us financially.
- We exercise due diligence in our decisions about funding applications and donations, and in our approaches to identifying organisations to collaborate

with. We are consistent and transparent in these decisions. Our process is outlined below.

### **Our people**

Luminate is a charity governed by a Board of voluntary trustees with a small salaried staff; we also frequently contract freelance professionals including artists.

We have a Code of Conduct which applies to everyone who works for Luminate regardless of whether they are staff, freelancers or volunteers. There are additional requirements for trustees. Expected behaviours are aligned with the principles outlined at the start of this document, and openness, honesty and respect are central.

We have a range of HR policies which inform our approach to recruitment and to working with our staff. We also have a Fair Work statement which you can read [HERE](#).

### **Our impact on the planet**

We care about the impact that our work has on the planet, and you can read our environmental statement [HERE](#).

### **Income generation and partnerships – risk management and due diligence**

This due diligence process applies to work with all supporters and collaborators, including:

- Donors (both individuals and organisations)
- Sponsors
- Supporters including charitable foundations
- Other corporate/commercial partners
- Key programme delivery partners

When deciding whether to apply to a funder, accept a donation or collaborate with an organisation or individual, the Board and staff have a duty to demonstrate to the Office of the Scottish Charity Regulator (OSCR) that we have acted in the best interests of the charity, and that any connection with another organisation or individual does not compromise our ethical position, harm our reputation, nor put future funding at risk.

### ***Context and principles***

Luminate complies with all relevant legislation including money laundering rules and the Bribery Act 2010. We therefore seek and accept financial support, undertake wider income generation activities and enter into collaborations, based on five principles:

- It must support the charitable objects and vision of Luminate;

- It should not damage our integrity or reputation;
- It should not compromise our independent status;
- It should not have undue influence on our policies, programme or any other element of our work;
- It should not come from an organisation or individual that participates in practices that are not aligned with our vision, aims or organisational principles.

We are sensitive to the concerns and views of our communities, and as an organisation we are committed to ensuring equity, diversity and inclusion, and to addressing the climate emergency.

### ***How we make decisions***

We recognise that donations and partnerships can pose legal, financial, reputational and ethical risks, so we reserve the right not to proceed with a collaboration nor accept a donation if:

- The organisation or funding source is believed to be associated with criminal sources and/or illegal activity of any sort.
- The organisation or source is involved in activities that conflict with Luminate's values, including those engaged in activities or policies that promote prejudice;
- It would require us to advertise an organisation whose activities are contrary to our charitable objects, vision, aims and organisational principles;
- The organisation or funding source is inconsistent with the policies of our key supporters, including Creative Scotland and Age Scotland;
- It could bring the name of Luminate into disrepute;
- It could lead to a possible decline in support for Luminate from other sources, resulting in a risk of reduced resources to support our work;
- It could lead to a possible decline in engagement with Luminate by potential beneficiaries of our work.

We will not accept anonymous corporate donations. We may accept anonymous individual donations where there has been a due diligence process, to ensure that Luminate is not compromised. We will make reasonable efforts to identify any individual or organisation that offers anonymous financial support, particularly where significant sums are involved. If a supporter makes themselves known to us but wishes to remain anonymous, these wishes will be honoured as long as the donation or grant carries no reputational risk.

We will not accept donations or sponsorship in form of foreign currencies, or cryptoassets, due to our limited resources in verifying and managing these incomes.

We take extreme care in relation to donations from, and collaborations with, people or

organisations involved in activities that are contrary to our values, and we may review relationships with organisations whose core activities are in conflict with these.

Due diligence is not limited to the point of engagement. Luminate will review on-going relationships if concerns arise, including new information about a donor, sponsor or partner's activities, reputation or financial position that may compromise or conflict with Luminate's values.

### ***Process of Due Diligence***

In all cases the financial, reputational, legal or ethical risks of accepting a donation or sponsorship must be balanced with the risks associated with refusing the donation.

We will review donations, other income generation activities and collaborations on a case-by-case basis. Luminate's Board of Trustees has ultimate responsibility for the organisation, and delegates authority to the Director to apply the principles outlined in this statement; any cases that are judged to be contentious will be referred to the Finance & Risk Subcommittee of the Board.

To ensure transparency and accountability, we keep records of:

- All due-diligence checks undertaken on donors, funders and partners;
- The rationale for accepting or declining donations, partnerships and funding, including any identified risks and how they were mitigated;
- Any concerns raised during the course of a partnership, and documents associated with any review;
- Advice sought from legal or regulatory bodies where relevant.

Records will be retained in accordance with Luminate's data-retention and privacy policies.

### ***Income generation***

Luminate will carry out a due diligence check on all donations or funding applications over £1,000 that are new to us, or if they have not supported us in the last 5 years. We will also carry out a due diligence check on any new income generation collaborator.

This check will involve research into the financial, legal and reputational position of potential donors or partners, using publicly available material and taking legal advice should this be deemed necessary. We will use our best efforts to assess each donation or potential donation, and in our research will distinguish between confirmed fact and speculation/rumours. We do not disregard speculation, rumour and allegation however, if public perception carries a reputational risk to Luminate.

In our diligence process, we use the guidance provided by the Charity Commission for

England and Wales which can be found here: [Charity Commission due diligence guidance](#). Any donations or income generation partnerships that raise concerns will be considered on a case-by-case basis by the Director and where necessary the Finance & Risk Subcommittee of the Board. All due diligence conclusions on donations, fundraising applications or income generation partnerships over the value of £5,000 (whether estimated or confirmed) will be shared for information with the Finance & Risk Subcommittee of Luminate's Board.