

The Northern Lights Community Choir



Ethical Policy

1. Purpose

This policy seeks to cover the ethical issues and social responsibility within the operation of the Charity including fundraising and social media. All Choir trustees have a responsibility to be aware and have a thorough understanding of the ethical issues referred to in this policy.

In exceptional and specific circumstances, the Trustees of the Board may refuse to accept a donation or sponsorship from a particular source where:

It would be unlawful to accept;

or

There is significant risk that harm may be caused to the Northern Lights Community Choir and that the balance of that harm will outweigh the benefit to the charity of accepting the donation or sponsorship.

Definitions

‘Unlawful’ is defined as follows:

1. *Illegal proceeds*: where there is suspicion of money laundering or that the gift is the proceeds of crime.

2. *Conflict with charitable aims*: if acceptance of a donation or sponsorship interferes with CWNN's ability to fulfil its legal charitable aims or statutory obligations.

'Harm' is defined as follows:

1. *Undue influence*: if acceptance of a gift or sponsorship might lead to an undue and inappropriate third party influence on corporate or artistic decisions of the Charity

2. *Risk to income*: if acceptance of a gift or sponsorship is likely to lead to the loss of other donations or income to at least the value of the donation

3. *Risk to reputation*: if by accepting a gift or sponsorship the Northern Lights Community Choir will incur a level of criticism from the press, public or any other relevant community of professionals resulting in serious damage to our reputation

4. *Risk to artistic integrity*: whereby accepting a gift or sponsorship the Northern Lights Community Choir may reduce the quality or variety of artists or public figures willing to work with us

5. *Risk of severe disruption*: if accepting the gift is likely to lead to protests at events or rehearsals, which would disrupt member activities, or negatively impact on the experience of our audience or participants

2. Supporters

a. The Northern Lights Community Choir respects the rights of its supporters to openly report how we spend donations and to manage donors' information responsibly.

b. We will comply with the Charity Commission and UK law in every respect, including those regarding openness and honesty with our supporters and members of the public.

c. We will respect the privacy and contact preferences of all donors. We will respond promptly to requests to cease contacts or complaints and act as best we can to address their causes, in accordance with the Data Protection Act 2018 and General Data Protection Regulations 2018 (GDPR).

3. Refusals

The Northern Lights Community Choir will not accept financial support from, or enter into a partnership with, any third party involved with activities which would be in direct conflict with the best interests of the charity, contractors or our choir members. This list was created in consultation with our members and includes, but is not limited to, third parties involved in:

- The manufacture of alcohol
- The manufacture of tobacco
- Debt collection companies
- Pay day loan companies
- Gambling companies or bookmakers
- Arms trading
- Companies directly involved in tenant evictions/repossessions

4. Acceptance criteria

The Northern Lights Community Choir must also ensure that it complies with relevant legislation, including legislation on data protection, money laundering and bribery, as well as following government guidance in relation to acts of terrorism and political activity.

The Northern Lights Community Choir will not accept donations where:

- The donor is known to be associated with criminal sources and/or illegal activity.
- Accepting the donation would cause harm to Choir with No Name, as defined in this policy.
- The donation has been identified as suspicious (such as large or multiple donations received directly into the charity's bank account from an unidentifiable source).
- The company or individual intends to link a donation with an attempt to influence the policy or activities of the Northern Lights Community Choir either explicitly or implicitly, beyond the charity's objectives as set out in the organisation's constitutional documents.

- The independent status of the Northern Lights Community Choir is in any way compromised by fundraising activities.

5. Corporate partners and major donors

The Northern Lights Community Choir will execute donor due diligence checks in accordance with our due diligence procedure on all new corporate partners and major donors before soliciting large donations (over £5,000 or £1,000 if there is a marketing element to the partnership) or agreeing to a partnership, to ensure that their personal or business practices aren't in direct conflict with the best interests of the charity or its beneficiaries, or if by accepting donations or partnerships there is potential for reputational damage of the charity.

6. Reporting Concerns

a. The responsibility of the judgement on whether the Northern Lights Community Choir should escalate a donation concern lays first with the Chair, then should be escalated to the board who decide on refusal.

We will make every effort to discuss concerns as quickly as possible and record all decisions. The ultimate decision lies with the chair of the board.

b. If a concern has been escalated to board level, trustees will ensure that their decision is in alignment with Charity Commission guidance.

c. Trustees should immediately report any suspicious or criminal activities relating to donations to both the police and Charity Commission.

7. Use of donations

If supporters wish to make a donation to a specific area of the Northern Lights Community Choir (ie. food at rehearsals) they may make a restricted donation by providing explicit instructions to this effect with their donation. We will always respect this.

8. Use of Social Media platforms and publicity

The charity will utilise Social media and website to

- Increase the Charities Profile

- Drive fundraising opportunities
- Provide a way to respond to key issues as they happen
- Communicate to members

All platforms utilised by the Northern Lights Choir can only be used for the purpose outline above. Similarly, advertisting at concerts and events will be restricted. The only advertising permitted will be the use of logos where the choir has received sponsorship for choir activities.

No trustee, Choir Director, Contractor or Choir member may use the Charity's website or social media platforms to promote or advertise their own business interests or promote activities which would benefit them financially. In the event of such a breach the Chair will carry out an investigation. The Chair has a right to immediately remove any uploaded material which is considered to be in breach of this policy. The Chair will report to the board and the board will determine whether any further action needs to be undertaken.