

COVE PARK

Cove Park Ethical Fundraising Policy

Created September 2023

Updated April 2026

Next Review April 2027

1. Introduction

The purpose of this Ethical Fundraising Policy is to guide Cove Park's fundraising efforts to support our mission and achieve our charitable objectives, while ensuring all income generation aligns with our values and is carried out with due diligence.

Cove Park is a registered Scottish charity, reference number SC029530. As a Regularly Funded Organisation, Cove Park receives public funding from Creative Scotland which equates to just under 25% of its annual budget.

All of Cove Park's programmes, as well as remaining overheads, are fundraised for through a range of sources including:

- Funding from charitable trusts and foundations
- Donations and the patronage of individuals
- Membership programmes including a general Supporters, Friends & Patrons scheme, American Associates of Cove Park and Argyll Associates
- Partner organisations for collaborative projects
- Sales from prints & editions

As a charity, Cove Park has a duty to be transparent and accountable, to use both the public and private funds it receives wisely, and to deliver our charitable aims for the benefit of its constituents.

Our Ethical Fundraising Policy is designed to help us decide how to balance the needs of our organisations with the rights of donors, funders, and other stakeholders, whilst remaining true to our values. All our operational and governance policies are subject to ongoing revision in the light of experience gained during their implementation. This policy will be reviewed annually.

2. Mission, Objectives & Values

Cove Park's mission is to support the creative and professional development of artists, researchers, and creative practitioners so that new ideas, projects, and strategies for change can be explored. Our aim is to contribute to the diversity and strength of Scotland's cultural ecology by making possible the production of outstanding new work and ensuring this work is of benefit to local, national, and international communities. By providing a supportive and dynamic space for risk and experimentation, the programmes we deliver create the foundations for ambitious thinking and imaginative freedom.

Our values underpin every aspect of our work, from the delivery of Cove Park's residencies, creative learning, and public engagement programmes to the care of our natural environment and our commitment to working sustainably. We are a small professional team dedicated to delivering Cove Park's vision and mission, guided by these five values:

Collaborative – working in partnership with others to share skills and resources and build community locally, nationally, and internationally.

Open – being receptive, inclusive, and transparent, welcoming new ideas and approaches to contemporary creative practice and society.

Ethical – working responsibly, sustainably, and mindfully, ensuring our programme is accessible to all and supports integrity.

International - supporting international collaboration for our local and national communities, recognising the importance of cultural dialogue, exchange, representation, and solidarity in promoting connection and understanding, and finding common ground through shared experiences.

Ambitious – helping artists to achieve their aims, creating a context for experimentation and testing ideas, making possible imaginative, innovative, and high-quality work.

3. Role of the Board of Trustees

Cove Park's Board of Trustees has legal responsibility for the organisation's overall governance and strategic direction of Cove Park, developing Cove Park's aims, objectives and goals in accordance with the governing document, legal and regulatory guidelines. It is responsible overall for the future success of the Cove Park ensuring its long-term financial sustainability. The Board acts collectively and corporately, with care, diligence and skills, in the best interests of Cove Park.

The Board oversees Cove Park's policy and approach regarding fundraising and income generation. Trustees should be aware of key policies on accepting donations and when necessary, will play a role in the decision-making process where issues of high risk are identified.

In all cases, fundraising efforts will be considered in line with our statutory obligations and charitable aims with reference to the Code of Fundraising Practice as required by OSCR.

4. Process

4.1 Donations and the patronage of individuals

For donations over £5,000, all donors will be subject to a risk assessment.

The risk assessment comprises a search of publicly available material, designed to highlight potential areas of controversy or concern that do not align with Cove Park's values, ethos and objectives. This will usually involve a combination of news searches on Google (or a similar web search engine), and a registry check (with Companies House data). The risk assessment will be conducted by the Programmes & Communications Producer.

If any areas of concern are found, as in a misalignment of institutional values with the potential donor (refer to section 6.1), the findings of the risk assessment will be shared with the Director, who will refer to The Board of Trustees (see Referrals to the Board of Trustees).

Wherever practical, this process will take place before a donation is secured.

4.2 Partner organisations for collaborative projects

Cove Park actively seeks partnerships with external organisations to achieve shared objectives. However, Cove Park always maintains its independence and will seek to end partnerships where Cove Park is brought into disrepute or is at risk of being brought into disrepute. Partnerships with external organisations do not express or imply Cove Park's endorsement of the external organisation, its activities or its policies.

Appropriate partnerships and revenue will be accepted for any projects that support Cove Park's mission and values. Organisations in sectors that have attracted negative press attention, or a business involved in a highly publicised trial, may be examined for suitability.

As partnerships are developed, if any areas of concern are found, the findings of the risk assessment will be shared with the Director, who will refer to Fundraising & Development Subcommittee of the Board of Trustees.

4.3 Funding from charitable trusts and foundations

Donations and grants of any size from charitable foundations registered with the appropriate regulatory authorities, will not normally be subject to review.

For the United Kingdom: This means charities regulated and scrutinised by the Charity Commission for England and Wales, the Office of the Scottish Charity Regulator, and the Charity Commission for Northern Ireland.

For the United States of America: This means tax-exempt, non-profit corporations or associations recognised under section 501(c)(3) regulated and scrutinised by the Internal Revenue Service (IRS) and the relevant state Attorney General.

For Europe: In the absence of any equivalent regulatory framework covering Europe, the European Foundation Centre (EFC) has openly published its principles of good practice to which all affiliated organisations have to adhere.

However, in exceptional circumstances, a registered charitable foundation may be subject to an initial screening (as above).

If any areas of concern are found, the findings of the initial screening will be shared with the Director, who will refer to Fundraising & Development Subcommittee (see Referrals to the Fundraising & Development Subcommittee)

4.4 Referrals to the Fundraising & Development Subcommittee

Where deemed necessary, as laid out above, the Director will consult with at least two board members before taking decisions on accepting funding.

The confidential advice and opinions of individuals who have knowledge of the specific funders and/or context in which they operate, commercially or personally, may also be sought.

If deemed necessary, the Director and subcommittee members may decide to take a secondary review by the full Board of Trustees.

The Board of Trustees will act and rely on the material put before it but may require further research to be conducted before it takes a decision. Professional search firms and international due diligence providers may be used if deemed appropriate by the Board of Trustees.

Minutes will be kept of the discussions and key points, together with the research material, reports and supporting documents. These will be stored electronically on Cove Park's server, in accordance with the organisation's Data Protection Policy.

The Board of Trustees retain overall responsibility for decisions regarding the acceptance and refusal of donations.

5. Accepting Funds & Donations

5.1 Cove Park may not accept funds in circumstances when:

- The donation is made totally anonymously, through an intermediary who is not prepared to identify the donor to anyone at Cove Park.
- The donor/funder has acted, or is believed to have acted, illegally in the acquisition of funds, for example when funds are tainted through being the proceeds of criminal conduct, or is subject to sanctions.
- When acceptance of the funds would, in the judgment of the Board of Trustees, significantly damage the effective operation of Cove Park in delivering its mission and in accordance with its values, and/or whether because such acceptance would:
 - Harm Cove Park’s relationship with residents, partners, other donors, audiences or stakeholders
 - ‘Harm’ could arise where acceptance of the funds:
 - interferes with or has the potential to interfere with Cove Park’s ability to fulfil its charitable aims, statutory obligations, or other objectives.
 - negatively impacts the wellbeing of our staff or residents.
 - jeopardises existing and future relationships with donors and supporters.
 - Creates unacceptable conflicts of interest.
 - Materially damage the reputation of Cove Park
 - Detrimentally affect the ability of Cove Park to fulfil its mission in any other way than is mentioned above
- The donation comes from an individual or organisation which is in direct conflict with our mission, vision, and values, and could compromise who we are and what we do. Circumstances where this may apply include, but are not limited to:
 - Fossil fuel companies and companies that benefit from fossil fuel investment
 - Companies that are known to discriminate against people or violate human rights
 - Weapons manufacturing companies

5.2 When considering a partnership, Cove Park will retain the right to decline funds if:

- The actions of the funder are damaging to the institution, its reputation or its beneficiaries
- The reputation or activities of the funder risks discouraging other funders
- Acceptance might give the impression that the funder expects the institution, or anyone associated with it to perform some function or activity improperly, or to confer upon them some form of advantage
- The cost of servicing the donation is greater than its value, or unreasonable in terms of its size or impact on the work of the institution
- The offer of support is tied to a particular project or activity which reflecting the institution’s objectives, is nevertheless impractical

- There is suspicion of money laundering or any other illegal activity.

6. Risk Assessment

When carrying out a risk assessment, potential indicators of 'harm' will be identified by organisational research, and recorded as part of the assessment process. Such indicators could include:

- The source of a donation or funding is alleged to have participated in illegal activities, including financial crime, or has previously been found guilty of such crime.
- The source of a donation or funding is found to be listed on international or legal exclusion lists.
- A donor's professional, personal or network status would incur a noteworthy conflict of interest.
- The source of a gift or sponsorship is affiliated with present or past actions that would be liable to incite protest from Cove Park's supporters, stakeholders, and the public.
- The financial origin of a gift or sponsorship is suspected to be illicit.

Risk assessments will consist of an overview of publicly available information. Sources of publicly available information include Companies House, 192.com (UK Electoral Roll and Directory Enquiries), and information that has been published in articles / newspapers and social media. In order to protect subject rights, risk assessments shall clearly distinguish between allegation and fact, and shall ensure all research is corroborated across multiple sources.

Respecting Cove Park's responsibility to safeguard its prospects' data rights, risk assessments shall be produced at the earliest opportunity prior to the acceptance of funding and only shared with those making decisions on the risk. Information will be stored and treated in compliance with Cove Park's privacy policy.

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