

## Age UK Lancashire Ethical Framework

### 1. Introduction

Age UK Lancashire provides a range of services and support to older people across Lancashire via income from a range of contracts, grants, donations, legacies and fundraising. These are sometimes matters of judgement and it is therefore important that we have a set of ethical standards in place. Additionally, our stakeholders naturally expect the charity to operate in an ethical manner and this is integral to developing trust and demonstrating our integrity. Our actions and behaviour affect both the organisation and the people we work with. We recognise that if we do not uphold the trust people have in our organisation this could negatively impact our reputation, our work and that of our partners. It could also jeopardise our ability to deliver services and the public's generosity in supporting our work.

### 2. Our Overarching Statement

"Age UK Lancashire is committed to an ethical approach in all areas of our work. We strive to ensure our work is delivered with due care for the people we support and in all of the services that we provide. This framework sets out how we define specific and relevant ethical statements for the key areas of our work".

### 3. Purpose and aims

This framework sets out the area where we will use ethical standards to assess our work and decisions, ensuring that we take a consistent ethical approach across all of our operations. In order to be transparent and accountable about how we operate, we will publish this framework and any associated statements.

### 4. How is it applied

The function of the ethical framework is to provide guidance when policies and processes require ethical consideration in decision making and problem solving. The framework presents the Charity's position to all stakeholders, and assists in determining partnerships and relationships, highlighting that agreement in principle with the Age UK Lancashire Ethical Framework will be a requirement of any collaborations going forward.

The framework recognises the duality of the work we do and the need for interconnection with people on a number of principles and practices.

The key areas to which the framework applies are

- a) Working with people (service delivery and volunteer management)
- b) Fundraising (including corporate partnerships)
- c) Investments
- d) Environmental concerns (see environmental policy)
- e) Customer donations (see Gifts, Donations, Wills & Bequests Policy)

### 5. Responsibilities

The Board of Trustees is ultimately accountable for this framework.

The Senior Management Team are responsible for ensuring that the framework is implemented and applied in relevant decision-making and processes within their teams.

The wider Management Team are responsible for championing and implementing ethical decision-making in line with this framework within their areas of responsibility.

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## ETHICAL STATEMENTS

### Working with People - Ethical Statement

**This covers all the people we work with including our customers, staff, volunteer colleagues and other stakeholders.**

The Charity is committed to a person-centred approach in all areas of service. The principles of this approach are reflected in the statements that Age UK Lancashire recognises and acknowledges:

- **Individuality** *e.g. no discrimination*
- **Rights** *e.g. Human rights, rights to complain, confidentiality, accountability*
- **Choice** *e.g. choose services to best suit their needs with our support*
- **Respect** *e.g. honesty/candour i.e. where we are unable to help, we value feedback*
- **Privacy** *e.g. confidentiality, data, respect*
- **Partnership** *e.g. collaboration, agreement, quality, share same ethics – all sign up to ethical framework*

### Confidentiality

We work in accordance with the General Data Protection Regulations. Customer information provided in confidence is not used or disclosed in a form that might identify an individual without his/her consent, unless required to provide by law.

Find out more about how we use and manage your data at:

[www.ageuk.org.uk/lancashire/about-us/our-policies](http://www.ageuk.org.uk/lancashire/about-us/our-policies)

### Fundraising - Ethical Statement

1. We will comply with the Fundraising Regulator's Code of Fundraising Practice and its associated specific Rulebooks for all forms of Fundraising. We will observe the principles of the Fundraising Regulator's Fundraising Promise to be open, honest, fair and legal. Age UK Lancashire is committed to its charitable aims and fundraises to provide services to the people we support.
2. We will not compensate, whether through commissions, finders' fees, or other means, any third party for directing a gift, support or a donor to the charity and do not use external fundraisers. We will not undertake cold calling.
3. **Supporters**  
Age UK Lancashire respects the rights of its supporters to clear, truthful information on the work of the charity; to openly report how we spend donated and statutory monies and to manage donors' information responsibly.

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.

We will respect the privacy and contact preferences of all donors and we will respond promptly to requests to cease contact.

We take all reasonable steps to protect vulnerable people. Any staff member who contacts supporters receives training on how they should address and deal with vulnerable people. Safeguarding will be considered wherever we respond to any issues that have raised concern.

See Appendix 1 for additional considerations

#### **4. Refusals**

We have a responsibility to raise funds/increase our reach, relevance and awareness in the interests of our charitable purpose. We will withdraw from any relationship, sponsorship or initiative which we believe to go against our values Age UK Lancashire or which goes against the interests of our beneficiaries and stakeholders.

We will not undertake business with companies or individuals who participate in activities which act in a way which goes against our values or our aims, or which could cause detriment to the charity's reputation. Given the complexity of corporate/external ownership and the varying degrees of potential relationships that we may develop with an external party, any decision to refuse a donation/support or engage in a fundraising activity or joint venture, will be taken on a case-by-case basis.

The responsibility of the judgement on whether Age UK Lancashire should refuse a donation lies with our Senior Management Team and/or ultimately our Board of Trustees where needed.

Where we have accepted a donation from a donor (anonymous or not) in good faith but later learn that it contravened this statement, we will return the money, issue a statement and take any further action needed. The decision to return the money will be taken by the Senior Management Team and/or the Board of Trustees where needed.

#### **5. Use of Donations**

All donations will be used to further the work that Age UK Lancashire undertakes. With respect to anonymous gifts, we will restrict information about the external party to only those staff members with a valid business reason for knowing.

### **Investments - Ethical Statement**

#### ***NB – This statement forms part of the wider Investment Policy***

1. Age UK Lancashire's investment policy is:
  - To protect the value of our investments while seeking an appropriate return.
  - Not to invest directly in any company with a significant interest in any activity that runs contrary to Age UK Lancashire's charitable objectives and mission.
2. The main investment portfolio is managed by Equity General, overseen by FARC and our Board of Trustees. FARC reviews their performance on a quarterly basis, and against the performance of comparable funds annually.

Investments are also held with Lloyds Bank and Flagstone.

3. Decisions about whether to invest in a specific company are taken by our Investment Manager in line with this policy and the Investment Policy. Where there is any concern or ambiguity, the issue is considered by FARC initially, and ultimately the Board, if necessary.

### **Alignment with Mission and Values:**

- **Accept:** Donations from individuals, organizations, or businesses whose values and objectives align with Age UK Lancashire's mission and values.
- **Avoid:** Donations from sources that contradict or compromise our mission and core values.

### **2. Ethical Sources:**

- **Accept:** Donations from sources with a track record of ethical conduct, transparency, and legal compliance.
- **Avoid:** Donations from sources associated with illegal activities, human rights violations, or unethical practices.

### **3. Financial Transparency:**

- **Accept:** Donations from sources willing to provide transparent information about the source of funds and the purpose of the donation.
- **Avoid:** Donations from sources that insist on anonymity or provide insufficient information about the origin of funds.

### **4. Avoiding Conflicts of Interest:**

- **Accept:** Donations that do not create conflicts of interest within Age UK Lancashire or compromise its independence.
- **Avoid:** Donations that could compromise our ability to make impartial decisions or serve its beneficiaries' best interests.

### **5. Social and Environmental Responsibility:**

- **Accept:** Donations from environmentally and socially responsible sources that align with the charity's commitment to sustainability.
- **Avoid:** Donations from sources that have a negative impact on the environment, society, or vulnerable communities.

### **6. Political and Ideological Neutrality:**

- **Accept:** Donations from individuals or organizations without expectations of political or ideological influence over Age UK Lancashire's activities.
- **Avoid:** Donations that come with explicit political or ideological strings attached.

### **7. Due Diligence:**

- **Accept:** Conduct due diligence on potential major donors to ensure that their wealth has been acquired legally and ethically.
- **Avoid:** Reject donations from individuals or entities with questionable or illegal sources of wealth.

### **8. Legal and Regulatory Compliance:**

- **Accept:** Ensure that all donations adhere to legal and regulatory requirements in the charity's operating jurisdiction.
- **Avoid:** Reject donations that may lead to legal or regulatory violations.

**9. Rejection and Return Policy:** - Establish a clear policy for rejecting or returning donations that later prove to be inconsistent with the charity's ethical guidelines.

**10. Regular Review:** - Periodically review and update the donation acceptance framework to adapt to changing circumstances and ethical considerations.