



A Framework for Ethical Engagement and Communications with and about External Agencies and Companies, including Funders

Changing our world for the better
Project by project

FEL



Introduction

FEL Scotland's purpose is to support community-led climate action. Part of our role is to support communities and encourage co-ordination and collaboration across the region; approve membership; regularly send out information about funding and other opportunities to members; and engage with stakeholders on matters related to a just transition and climate action. In line with our core values (*sustainable, ethical, inclusive, responsive, connected, bold, practical, influential*) and our overall vision for a sustainable Forth Valley & Loch Lomond and the Trossachs National Park, we need to do this in ways that do not enable greenwash and/or miscommunication of the values of the network, whilst fulfilling the role we have as the Forth Valley Hub for Community Climate Action.

There are inevitable tensions between organisations/ groupings that broadly align with the ambition of supporting a Just Transition across our communities, those who are either not quite there yet, and those who appear to be opposed to or disinterested in it. FEL Scotland agrees that these tensions need to be navigated carefully and sensitively, respecting the wishes of members.

'This paper has been developed from the original NESCAN Hub Ethical Engagement and Communication Framework (<https://www.nescan.org/about>) and sets out the key principles and agreed framework for FEL to guide the determination of membership, gaining of funding, communications and information sharing etc. that FEL Scotland staff undertake. This paper is the product of several discussions between and among Board members, staff and Members.

FRAMEWORK FOR DETERMINING ENGAGEMENT

Principles

1. FEL Scotland exists to support community climate action. This includes, but is not limited to, climate activism.
2. FEL Scotland does not support greenwash¹, and will not promote or profit from it, but might seek pro-active and frank engagement with external companies/groups even if their values do not align with those of FEL Scotland.
3. Companies, organisations and groups need to be supported to change their activities and behaviours in positive ways and directions towards the Just Transition, and FEL Scotland has a role to play in providing this support.
4. FEL Scotland will act with transparency, so that Members know why decisions have been made the way they have.
5. FEL Scotland will act in good faith in all their interactions with members and others, mindful of its power as a gatekeeper of information and resources.
6. FEL Scotland acknowledges the agency of community groups and members and will seek to support and empower them to act as they see fit.

Responsibilities of FEL Scotland

1. Keep lines of communications with all members open to ensure member groups can inform FEL Scotland of any issues with external agencies or other members
2. Regularly (at least twice yearly) ask members by email and at Members' Meetings for updates on any positive relationships or disputes with external agencies
3. Attach the following disclaimer to all FEL Scotland communications:
 - a. *"FEL Scotland does not endorse or support the activities undertaken by all external organisations or funding sources, and the sharing of this information does not represent an endorsement of those external agencies, nor does it imply that the information/funding source meets*

¹ Greenwash is misleading, partial or deceptive information disseminated by an organisation in order to present an environmentally responsible public image

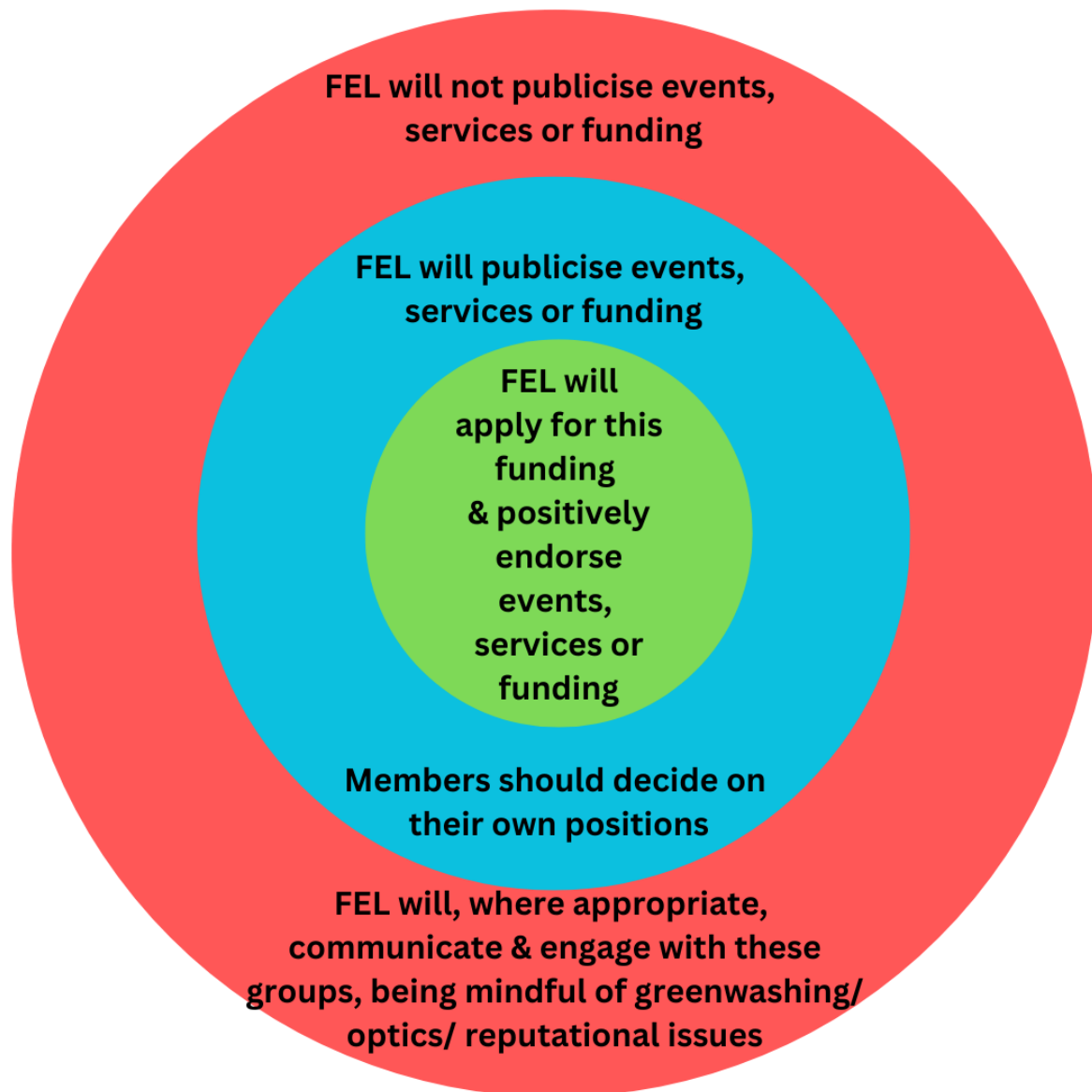
the ethical standards of all our members. Members are encouraged to contact FEL Scotland if they have any issues with any of the information contained in this communication.”

Responsibilities of Members

1. Let FEL Scotland staff know if and when you are in dispute with a developer, energy company, public body, etc. so that FEL Scotland can take this into consideration in any communications and information sharing
2. Let FEL Scotland staff know if and when you have a positive relationship/engagement with another body, including other FEL Scotland members, so that FEL Scotland can take this into consideration in any communications and information sharing
3. Let FEL Scotland staff know if any unethical behaviour or activities (such as links to modern slavery, greenwash, etc.) of an external group or agency comes to light, so that FEL Scotland can share this information with others
4. Let FEL Scotland staff know if you have any absolute red lines/no-go businesses/companies

FEL Scotland's Model of Engagement – the FEL Onion

This model serves to illustrate the different types of engagements and interactions that FEL Scotland staff will have with different types of stakeholders and external agencies.



Key for layers (recognising that the lines are blurry!):

- Central/green ring: clear alignment of ethics and values
- Blue ring: funding may come from larger energy companies, when the money comes from/ is focused on community benefit from renewables, or from other agencies/groups that support community action; FEL Scotland staff will make decisions on a case-by-case basis, based on information available to them at the

time (note, this information can change with time, and therefore decisions may be adapted to reflect this)

- Outer/red ring: the primary purpose of these businesses is the extraction of fossil fuels, and/or organisations that have a reputation for greenwashing and no viable plan to decarbonise

As our work to support a Just Transition progresses, we want to see more and more organisations, agencies and groups aligning with the values and principles of FEL Scotland. FEL Scotland, therefore, wants to see the centre of the Onion grow, with the outer layers reducing. If the Just Transition is successful, we should, at some point in the future, have all companies and agencies in the North East region sitting comfortably within the green core. This means that FEL Scotland staff are likely to have increasing engagement with companies clearly in the red zone and will have due regard of the reputational risks associated with this. Members support this activity and will raise any specific issues with staff as and when they arise.

Making difficult decisions

FEL Scotland and Members agree that there will be some difficult questions to ask or decisions to be made about the boundaries of the different rings of the Onion. This will be increasingly the case as more and more companies and external bodies seek to adopt the language of Just Transition and Community Benefit, even if their wider actions are not congruent with this. FEL Scotland staff will consider such cases on merit and be transparent about how decisions about the passing on of information are taken.

The FEL Scotland Board will regularly review the operation of this framework, seeking input and feedback from members on a regular basis.

Funding decisions

Members are clear: there is an important distinction between engagement with an external agency and accepting funding from that agency. The bar for funding is high,

given the values and principles FEL Scotland holds. Engagement should be possible even with agencies whose primary purpose is the extraction of fossil fuels.

FEL Scotland will maintain the highest possible standards when accepting money for its own activities. FEL Scotland will retain control of the distribution of the funding it receives, so as not to be controlled by an external body. This will become increasingly important as funding options diversify.

FEL Scotland Membership

FEL Scotland receives applications from a variety of individuals and groups. As a climate action charity there will be some restrictions on the types of membership we can support:

Individual membership:

- Membership applications from individuals will be accepted with very few restrictions.

Community group membership:

- Membership applications from groups will be accepted if the group aligns with FEL Scotland values, and if they are community based within the region.

Organisational membership:

- FEL Scotland will thoughtfully review all membership applications from companies, agencies, and political parties to ensure they align with our values before approval.

Considerations for future work on this issue

As indicated above, this will be an ongoing conversation within FEL Scotland and with FEL Scotland members. We want to retain flexibility and agility as the context within which we operate changes. There have been several suggestions made that could be explored further about how FEL Scotland engages with and seeks funding from external agencies:

- A standard Memorandum of Understanding (MoU) that external agencies agree to (like an accreditation system) in order to have their information and funding circulated to Members (this would require significant work, so is not feasible at this stage)
- Linked to or separate from the MoU point could be a standard method of assessing ESG (Environmental, Social and Governance) statements, but FEL Scotland does not have the capacity for this at this stage
- Pro-active engagement with Red Zone companies: when resources and capacity allow, this might be an important strand of work, but FEL Scotland is not at this stage yet

FEL Scotland would like to thank NESCAN for allowing us to access and redevelop their original NESCAN Hub Ethical Engagement and Communication Framework.