Responding to Campaigning Activity Relating to Sponsors and Donors

Some cultural organisations will receive briefing and campaigning materials relating to particular sponsors, donors or philanthropic organisations from activist groups or concerned parties.

These communications may raise concerns about the activities or affiliations of funding partners and may encourage organisations to reconsider existing relationships.

Campaigning activity of this nature has become more common in recent years across a range of sectors, including arts, culture and heritage. Organisations may receive such communications directly by email, through social media campaigns, or via public letters.

The Charity Commission does **not issue guidance specifically about "responding to activism against a charity"** (e.g. campaigns targeting sponsors), but its existing guidance on **campaigning, political activity, and trustee duties** provides a clear framework that applies directly to these situations.

A summary of their position is as follows:

"Trustees must make independent, evidence-based decisions in the best interests of the charity, and must not act solely in response to external campaigning or public pressure."

Trustees of cultural charities should therefore ensure that any decision regarding sponsorship or donations is taken in the charity's best interests, following appropriate due diligence and governance processes. Decisions should not be made solely in response to external campaigning or public pressure.

The framework below provides general guidance to help charitable cultural organisations respond appropriately to campaigning activity targeting private sector fundraising sources or partnerships. However, the principles will be useful also for non-charitable cultural organisations and their leadership teams.

Responding to Campaigning Activity Relating to Sponsors and Donors
Framework:

1. Purpose

This framework provides guidance for cultural organisations about how to respond to external campaigning activity relating to sponsors, donors, or philanthropic partners. It supports trustees and senior leaders to:

- Make decisions in line with their legal duties
- Apply consistent governance and due diligence processes
- Manage reputational and financial risk appropriately

This framework aligns with guidance issued by the Charity Commission.

2. Scope

The framework applies to:

- All trustees and board members
- Executive leadership teams
- Fundraising, development and partnerships staff

It covers reference to all types of private sector funding including:

- Corporate sponsorships
- Individual donors
- Trusts and foundations
- Philanthropic partnerships

3. Core Principles

All decisions relating to sponsorship and donations should be guided by the following principles:

- 3.1 **Best interests of the charity**
  Trustees must act in the best interests of the organisation and its charitable purposes at all times.
- 3.2 **Evidence-based decision-making**
  Decisions should be based on verified information, proportionate risk assessment, and organisational context.
- 3.3 **Independence from external pressure**
  Decisions should not be made solely in response to campaigning activity, lobbying, or public pressure.
- 3.4 **Proportionality**
  Responses should be proportionate to the nature and credibility of concerns raised.
- 3.5 **Transparency and accountability**
  Decision-making processes and outcomes should be appropriately documented.

4. Governance Process

When campaigning activity or concerns are raised, organisations should follow a structured governance process:

Step 1: Acknowledge and log
- Record receipt of campaigning material or concerns
- Log source, nature of claims, and any supporting evidence

Step 2: Initial Assessment
- Assess whether the issue is:
  - Low, medium, or high risk
  - Reputational, legal, ethical, or financial in nature

Step 3: Escalation
- Determine appropriate level of review:
  - Operational (senior management)
  - Board or trustee level

Step 4: Due diligence review
- Reassess the partner, sponsor or funder using existing due diligence frameworks
- Identify any new or material risks

Step 5: Evidence gathering
- Verify claims made using independent sources
- Seek legal or specialist advice where appropriate

Step 6: Decision-making
- Consider options (see Section 6 below)
- Ensure decisions align with organisational policies and charitable objectives

Step 7: Documentation
- Record:
  - Evidence considered
  - Risks assessed
  - Rationale for decision

5. Due Diligence Standards

Organisations should ensure that due diligence processes are:

- Risk-based: Proportionate to the scale and nature of the partnership
- Consistent: Applied across all funding relationships
- Up to date: Reviewed periodically and when new concerns arise

Key areas for cultural organisations to assess are as follows:

- Legal and regulatory compliance
- Ethical considerations and alignment with mission
- Reputational risk
- Financial dependency or exposure

6. Response Options

Depending on the nature of concerns, organisations may consider:

- **6.1 No further action**
  - Where concerns are unsubstantiated or low risk.

- **6.2 Enhanced monitoring**
  - Continue partnership with increased oversight
  - Schedule periodic reviews

- **6.3 Further due diligence**
  - Commission additional research
  - Seek clarification from the partner
- **6.4 Partnership review**
  - Conduct a formal internal review against policy criteria
- **6.5 Modification of relationship**
  - Adjust the scope, visibility, or terms of partnership
- **6.6 Termination**
  - End the partnership where risks outweigh benefits

Decisions should reflect a balanced assessment of:

- Reputational impact
- Financial sustainability

7. Communications Approach

- **7.1 External communications**
  - Organisations may use a consistent holding response:

"Thank you for raising this issue. We take all concerns relating to funding partnerships seriously. Matters raised are reviewed through our governance processes in line with Charity Commission guidance."

Organisations should seek to avoid:

- Immediate reactive statements
- Commenting before internal review is complete

- **7.2 Internal communications**
  - Ensure alignment between trustees, leadership, communications teams and staff
  - Maintain confidentiality where appropriate

8. Roles and Responsibilities

The following responsibilities will apply in response to campaigning activity:

Trustees
- Provide oversight and final decision-making where appropriate
- Ensure compliance with legal duties

Executive leadership
- Lead assessment and recommendations
- Ensure processes are followed

Fundraising and partnerships teams
- Conduct due diligence
- Maintain records and relationship management

Communications teams
- Manage external messaging
- Monitor public and stakeholder response

9. Risk Management

Campaigning activity may create:

- Reputational risk
- Stakeholder pressure
- Operational disruption

Organisations should:

- Integrate these risks into existing risk registers
- Review crisis or issues management plans where necessary

10. Review and Continuous Improvement

Organisations should:

- Periodically review this framework
- Update fundraising and sponsorship policies as needed
- Incorporate lessons learned from specific cases