

Managing Risks and Reputation in fundraising: Arts, Culture and Heritage

A COMPREHENSIVE GUIDE
AND TOOLKIT



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Risks and reputation in relation to fundraising

Context and purpose

The arts, culture and heritage sectors are inherently concerned with questions of values, responsibility and integrity. Artistic practice frequently explores identity, influence and our place in the world, which means that how work is funded matters deeply.

A Changing Funding Landscape

Over the past two decades, the UK cultural funding model has shifted significantly. Public investment remains essential, but sustained pressure in real terms has coincided with rising costs across areas such as energy, wages, buildings, touring, sustainability and accessibility. For many organisations, grant income and box office revenue alone can no longer meet the scale of need or ambition.

The Value of Private Support

Private funding through corporate partnerships, trusts and foundations, membership schemes and philanthropy helps to create a more diverse and resilient income base. Cultural organisations with multiple revenue streams are better placed to manage uncertainty, respond to shocks and plan for the future.

It also enables activity that other funding often cannot support, including new commissions, community programmes, capital investment and bold artistic work.

In many cases, private investment strengthens rather than replaces public funding, creating a balanced mixed economy that is stronger than either source alone.

Benefits Beyond Funding

Private support can also bring far more than just funding to the cultural sector. Partnerships may offer expertise, advocacy, volunteering, skills exchange, networks and access to new audiences. Businesses may contribute marketing capability or international reach; donors may become long-term champions; foundations may provide strategic insight and learning support.

This wider contribution can also strengthen places across the UK by supporting vibrant town and city centres, attracting visitors, boosting local economies and reinforcing civic identity.

Reputation and Responsibility

Alongside these opportunities, cultural organisations must carefully consider issues of risk and reputation. Decisions about fundraising sources can affect public confidence, stakeholder relationships and long-term sustainability. As charitable and public-facing institutions, organisations need to ensure that funding aligns with both their organisational purpose and regulatory responsibilities.

Purpose of This Report

This report explores how arts, culture and heritage organisations can approach fundraising confidently and responsibly. It aims to support effective decision-making, strengthen processes and policies, safeguard reputation, and enable organisations to secure the private sector investment that they need to thrive.

Guidance from regulators and funders on fundraising and donation acceptance

The Charity Commission for England and Wales has published guidance covering the acceptance and refusal of donations, fundraising conducted legally and responsibly, and trustees' duties in relation to fundraising.

In its [guidance](#) *Accepting, Refusing and Returning donations to your charity* (published 4 March 2024), the Charity Commission states:

“As trustees, your principal duty is to further your charity’s purposes. Your starting point should be to accept and keep a donation offered or given to your charity. This is because donations are important to successfully delivering your charity’s purposes...”

But sometimes you must refuse or return a donation, and in other circumstances you can decide that it is in your charity’s best interests to do this. Your decision will often be significant for your charity. You must always carefully balance all of the factors that are relevant to your charity’s circumstances...

Your decisions must be in the best interests of your charity.”

All activity undertaken by a charitable organisation, under the leadership of its board of trustees, must be carried out in furtherance of the charity’s stated purposes. This duty is clearly articulated in [CC20: Charities and fundraising – a guide to trustee duties](#), which states that trustees

“must make sure that everything your charity does helps (or is intended to help) to achieve the purposes for which it is set up.”

This principle is particularly relevant to fundraising, where decisions about accepting funding should be based not only on financial need, but also on charitable purpose, reputation, and maintaining public trust.

Cultural organisations that are charities must also be able to demonstrate public benefit, and trustees are required to make decisions that safeguard and advance this benefit.

Whilst fundraising decisions may have implications for an organisation’s operational capacity and reputation, trustees and senior staff must remain focused on their legal duties and commitments and ensure that decisions are made in the best interests of the charity.

Trustee decision-making on accepting donations

Trustees may decide to refuse or return a donation when doing so is in the charity’s best interests. Such decisions must be rational and reasonable, supported by clear evidence, and based on a balanced assessment of both short- and long-term risks and impacts.

The Charity Commission advises that trustees must:

- Identify the factors relevant to their charity and the specific decision, recognising that these may vary in nature and significance;
- Make a reasonable decision about what is in the charity's best interests in order to further its purposes; and
- Ensure that neither their own personal views, nor those of others, influence their decision-making.

Whilst trustees have responsibility for the charity's reputation, this must be balanced carefully against their primary legal duties and ability to fund and implement organisational activity.

Know your donor principles

Trustees must also apply “know your donor” principles, proportionate to the level of risk associated with accepting a donation, including its size, nature, and any potentially suspicious characteristics.

This includes ensuring that the charity has appropriate knowledge of the donor, such as:

- Who the donor is and what is known about them;
- Whether the charity has an established relationship with the donor;
- Whether additional identity or due diligence checks are required;

- Whether the donor is a UK taxpayer and whether Gift Aid can be claimed;
- The form in which the donation is being received (for example, cash, cheque, or bank transfer);
- Whether any public concerns have been raised about the donor or their activities, including the nature, timing, and outcome of any regulatory or police investigations; and
- Whether adverse publicity relating to the donor could damage the charity.

Trustees should also consider the nature of the donation itself and any conditions attached, including:

- The size of the donation;
- Whether it is a one-off gift, a regular donation, or the first in a series of anticipated future donations;
- Whether the donation forms part of a series of interest-free loans from sources that cannot be identified or verified;
- Whether the charity is receiving an unusual or substantial one-off donation;
- Whether any conditions are attached to the donation and whether these are reasonable;
- Whether the donation is conditional on specific organisations or individuals being used to distribute funds;

- Whether the donation is conditional on benefiting particular individuals, directly or indirectly;
- Whether the donation is made in sterling or another currency, including any requirement to return funds in a different currency;
- Whether the donor is based outside the UK, or whether the funds originate overseas, and whether the relevant country or region presents specific risks;
- Whether donations are received from unknown bodies, or from jurisdictions with weak financial regulation or legal frameworks; and
- Whether funds are received from a known donor via an unknown intermediary, or through an unusual payment mechanism.

If trustees have concerns, they should consider whether refusing the donation is in the charity's best interests.

Where checks indicate suspected criminal activity, trustees should consider reporting the matter to the police or other appropriate authorities and should assess whether a serious incident report to the Charity Commission is required.

Wider sector guidance

The above guidance applies mainly to charitable organisations. The other sources of expert knowledge and support available both to charitable cultural organisations and those organisations not registered as charities, are as follows:

The **Fundraising Regulator** provides additional guidance through the *Code of Fundraising Practice*, which sets standards for charitable organisations and third-party fundraisers across the UK. The Code addresses areas including appropriate fundraising behaviour, charities' responsibilities and ethical considerations.

Other sector bodies, such as the **Chartered Institute of Fundraising**, also offer general guidance. In addition, funders, including Arts Council England, have produced resources such as the *Practical Guide to Lawful Fundraising*, which was produced in 2018 in response to changes around data privacy and GDPR rules and which can be read in conjunction with Charity Commission and Fundraising Regulator guidance.

The 2025 **Independent Review** of Arts Council England (ACE) by Margaret Hodge, also cited the importance of ACE's role in ensuring that prevailing attitudes and practices in cultural organisations do not discourage corporations and individuals from donating to the arts.

Taken together, these sources help establish a clear and joined-up framework for addressing reputational considerations in fundraising, particularly within the arts, cultural and heritage sectors.

Creating a fundraising or gift acceptance policy

The below steps outline some practical methods of getting started, so that cultural organisations can develop a fundraising or gift acceptance policy which is grounded in UK charity governance regulation.

In charities, this process should be led by the Board of Trustees. In other types of organisations, a designated leadership team needs to take ownership.

Creating a fundraising or gift acceptance policy for mid-scale to large-scale cultural organisations

In larger-scale cultural organisations, or those with the resources to do so, it may be both feasible and prudent to create a committee to look at risks and reputation in fundraising and to oversee the implementation of an associated fundraising or gift acceptance policy. This will allow for an objective view, continual oversight of funding sources and monitoring.

Trustees are ultimately responsible for fundraising practices and must balance this process with the financial sustainability of the organisation, and their legal duties set out by the Charity Commission. All decisions should be made in an objective manner that ensures public benefit and aligns with organisational purpose and charitable objects as set out in your organisation's terms of reference.

A Board, committee, or process, could therefore be established to ensure that there remains a strong oversight of reputational concerns on an ongoing basis and to deal with issues as they may arise.

A suggested framework for creating such a fundraising or gift acceptance policy for mid-scale to large cultural organisations follows below:

1. Clarify purpose and scope

The first step is to agree **why** the organisation needs a policy and what it will cover. Most fundraising or gift acceptance policies focus on:

- The principles of acceptance, refusal and return of donations
- Sponsorship and partnerships (corporate and individual)
- Reputational risks
- Decision-making authority and escalation of decisions, i.e. to the Board

At this stage, organisations should confirm whether the policy applies to *all income streams* (including grants, sponsorship, individual donors and earned income), or only to specific areas. It should also be clear if it covers wider aspects of operations or investment, such as the organisation's existing suppliers or third-party contracts.

Guidance from the Charity Commission stresses that trustees are ultimately responsible for ensuring that fundraising decisions are made **in the charity's best interests**.

2. Anchor the policy in the organisation's charitable purpose

Effective policies are rooted in the organisation's **charitable purpose and stated public commitments** (for example on inclusion, environmental responsibility, or artistic independence).

This step usually involves:

- Reviewing existing charitable purpose and public commitment statements
- Identifying non-negotiable organisational principles (e.g. how the organisation protects artistic/curatorial independence)
- Clarifying areas where compromise may be acceptable

The aim is not to predict every future scenario, but to establish **clear reference points** against which fundraising decisions can be tested.

It is also important to consider potential wider reputational issues. Asking questions such as *'What impact might a certain funding partnership have on our reputation?'* can play a key role in an organisation's decision-making process.

3. Review legal and regulatory guidance

Before drafting, organisations should review relevant external guidance to ensure that the policy aligns with legal duties and sector standards. Common reference points include:

- Charity Commission [guidance](#) on Accepting, Refusing and Returning donations and the [Know your donor principles](#)
- Fundraising Regulator [Code of Fundraising Practice](#)
- Guidance from the Chartered Institute of Fundraising – [Acceptance, Refusal and Return – A Practical Guide to dealing with donations](#)
- Guidance from Arts Council England – [A Practical Guide to Lawful Fundraising](#)¹

A vital part of this examination is to also ensure that your trustees have a clear understanding of their legal responsibilities and for charities to ensure that the decisions that are made meet the Charity Commission's [public benefit](#) requirement.

This helps to ensure that the policy reflects the Commission's position that the *starting point is usually to accept donations*, whilst still allowing for refusal where reputational risks outweigh the benefit.

¹ NB Commissioned in 2018 in response to changing data privacy laws and the introduction of GDPR practices

Charity Commission aligned wording relating to their guidance on Accepting, Refusing and Returning donations, that you can use in your policy

In line with Charity Commission guidance, the charity's starting point is to accept and retain donations to further its charitable purposes. However, trustees may decide to refuse or return a donation where they have the legal power to do so and reasonably conclude that this is in the charity's best interests, having considered all relevant factors. Decisions will be appropriately documented, including the rationale for the outcome reached.

These sources need to be reviewed regularly, and organisations should keep an eye on any updates to guidance or legislation within the sector.

4. Identify key risk areas

Organisations then map **potential reputational risks**, informed by their organisational context and past experience.

This might include:

- Activities that could conflict with their organisation's stated public commitments
- Geopolitical or environmental sensitivities
- Naming rights and visibility issues
- Artist, audience, staff or community concerns

Many organisations use a risk-based approach, assessing the likelihood, severity, and mitigations, rather than relying on absolute "blacklists" (things that should be excluded or avoided which could include whole industries).

Creating a funding decision-making checklist may also be helpful (see page 18).

5. Consult internally and, where appropriate, externally

Strong policies are rarely written in isolation. Where possible, organisations might also seek to embrace open dialogue and encourage collaboration into the process. Consultation often includes:

- Trustees (often via a working group)
- Senior leadership and fundraising teams
- Staff representatives, artists or practitioners
- Key stakeholders or advisors
- Existing funders or donors

This stage helps to surface practical concerns, builds buy-in, and avoids policies that look strong on paper, but which are difficult to implement. It also ensures that stakeholders are aware of the organisation's legal obligations, as well as that all decisions are made in the best interests of the organisation. This means considering the views of individuals but recognising that achieving **a balanced organisational** view is the overriding consideration.

"Sharing decision-making can help build a reputation for transparency, drawing others to you and increasing their understanding of your work. In turn, this can increase the likelihood of a diverse set of people lending support, if and when needed." [What Next? Culture](#)

6. Define decision-making and governance

A robust policy clearly sets out:

- Who can approve fundraising relationships and partnerships
- When issues must be escalated and to whom e.g. Board of trustees
- How conflicts of interest are managed
- How decisions are documented

Many organisations specify thresholds (for example, high-value or high-risk donations requiring trustee approval) and outline how urgent decisions are handled. Some organisations will have a committee, panel or advisory group (including trustees) that will support decision-making processes around fundraising in real time.

This clarity protects both staff and trustees if decisions are later scrutinised in the media, or by funders or regulators.

7. Draft the policy in clear, plain-talking language

Fundraising policies work best when they are:

- Concise and practical
- Supported by examples or decision tests

Many organisations include short checklists or guiding questions to help staff apply the policy consistently.

8. Approve, publish and communicate

Once a policy has been devised, it is important to communicate this with your audiences, staff, donors, partners and other key stakeholders. Some organisations choose to make their policy (or a summary of it) available online, with a clear explanation of the reasoning behind the content of the policy. An example, is [Factory International's Brave Spaces Principles](#).

Once approved by trustees for cultural charities, or the designated leadership team in other types of organisational structure, organisations typically:

- Brief staff, freelancers and board members and other relevant stakeholders
- Integrate the policy into fundraising procedures and training

Transparency about **how** decisions are made can be as important as the decisions themselves.

9. Review regularly

Risks and reputational contexts change.
Best practice is to:

- Review the policy at least every year and remain reflective and responsive to both the operating environment and public and stakeholder opinion
- Revisit the policy after a major controversy or funding decision and in relation to regular horizon scanning and changes in the geopolitical environment
- Update the policy in response to legal or sector guidance changes

Regulators and funders such as Arts Council England increasingly emphasise ongoing governance review, rather than one-off policy creation.

In summary

An effective fundraising policy is most effective when it is:

- Risk-aware rather than reactive or too prescriptive
- Offers clarity and consistency
- Clearly governed and regularly reviewed

Creating a fundraising or gift acceptance policy for smaller-scale and grassroots cultural organisations or non-registered charities

For smaller-scale and grassroots cultural organisations or non-registered charities, the following framework to create a fundraising or gift acceptance policy is suggested.

Phase 1: Get started (1-2 short meetings)

1 Assign a leader to create the policy supported by a small working group

- Assign **one lead** (often the Director / Producer or fundraising lead).
- Create a **small working group**:
1 trustee + 1 staff member + (optional)
1 freelancer / artist representative.

Deliverable:

named lead + working group + timeline

2 Define what the fundraising policy covers

Keep it realistic. Decide whether the policy applies to:

- Donations (cash / in-kind)
- Individual donors
- Trusts & foundations
- Corporate sponsorship / partnerships
- Venue hires / Commercial relationships (optional)
- Naming rights (if relevant)

Deliverable:

one-paragraph scoping statement.

3 Agree your “non-negotiables”

Pick 3-6 principles for your fundraising policy linked to your organisational purpose and community / beneficiaries.

Examples include:

- Artistic or curatorial independence
- Inclusion and safeguarding
- Environmental responsibility
- Human rights / equality
- Transparency and accountability

Deliverable:

Create a short list of core principles, written clearly in plain English

Phase 2: Build a simple fundraising decision system

4 Choose your approach: checklist, or risk scoring

This might include:

- **Red lines (few)**: the basis or sources of funds you will not accept

- **Risk review:** how you will undertake due diligence on all other sources of funding

Deliverable:

A one-page fundraising decision test

Creating a funding decision-making checklist may be helpful (see page 18).

5 Create your fundraising “red lines” (keep it short)

Only include examples of types of funding that you definitely will not accept, for example:

- Funding tied to illegal activity
- Funding that restricts artistic / curatorial content or programming
- Funding that conflicts with safeguarding duties
- Funding requiring misleading branding or “endorsement”

Deliverable:

4-8 red lines as a maximum.

6 Add a quick “reputational risk” check

Develop five risk questions for your team to answer:

- 1 Does this source of funding align with our organisational purpose?
- 2 Could this funding harm trust with our community / beneficiaries?

- 3 Are there credible concerns about the funder’s activities?
- 4 What visibility comes with the funding (logos, naming, PR)?
- 5 If this funding or association became public tomorrow, could we defend it?

Deliverable:

Reusable checklist template.

7 Decide who decides (very important)

Smaller organisations need to be able to make decisions with speed and clarity, an example decision making framework may include:

- **Low risk / low value funding:** approved by Director / Producer
- **Higher risk or high value funding:** escalate to Chair / Director + one trustee (or full board if time allows)
- **Urgent decisions funding:** specify who can act quickly and how decisions will be recorded

Deliverable:

Simple approval thresholds for making funding decisions and escalation routes if required.

8 Add conflict-of-interest steps

- Require trustees / staff to declare conflicts, making it clear how conflicts might present themselves in your organisational context
- If someone has a conflict, they step back from the decision

Deliverable:

3-line process statement on managing conflicts

9 Document decisions

Keep a log of fundraising:

- Who / what funding has been received, pursued or declined
- What risks have been identified
- What decisions and rationale has the organisation undertaken for accepting or declining funding
- Any conditions or mitigations (e.g. no branding, limited visibility)

Deliverable:

A one-page “Donation & Sponsorship Decision Log”

Fundraising decision flowchart for mid-scale to large-scale cultural organisations

A fundraising decision flowchart – could be useful for your organisation to identify key risk areas for fundraising. The framework should be used alongside the step-by-step guide on how to create a Fundraising and Gift Acceptance Policy (see page 8) and the Fundraising and Gift Acceptance Policy template (see page 9).

Donation / Sponsorship Offered

1	<p>Best Interests Starting Point</p> <p>Is there a reason why accepting this donation might not be in the charity's best interest?</p> <p>The Charity Commission's starting point is that charities should generally accept and retain donations to further their purposes.</p>	<p>If Clear Reason No - Decline</p>
2	<p>Purpose and Public Benefit Test</p> <p>Would accepting the donation further the charity's purposes and public benefit?</p> <p>Consider: Alignment with charitable objectives, benefit to beneficiaries, delivery of artistic cultural or educational outcomes</p>	<p>NO - Decline</p>
3	<p>Legal and Regulatory Test</p> <p>Is the donation lawful and compliant with charity law or other legal duties?</p> <p>Check: Legality of the source, safeguarding, equality & health & safety duties, restrictions on political activity</p>	<p>Uncertain - Seek Legal Advice</p> <p>NO - Decline</p>
4	<p>Relevant Factors Assessment (with reputation as one of several considerations)</p> <p>Is there a risk that accepting this donation could damage the charity's reputation or undermine public trust & confidence?</p> <p>Consider: credibility or concerns, likely reaction of stakeholders, impact on fundraising, partnership & delivery</p>	<p>Medium Risk - Mitigation</p> <p>High Risk - Decline</p>
5	<p>Conditions and Independence Test</p> <p>Are there conditions attached that could compromise the charity's independence, governance or ability to pursue its purposes?</p>	<p>Conditions manageable - Proceed with mitigation</p> <p>Fail Test - Decline or Negotiate</p>
6	<p>Proportionality and Mitigation Test</p> <p>Can any risks be managed reasonably?</p> <p>Possible mitigations: Limiting visibility, time-limited acceptance, clear separation from decision making, transparency in communications</p>	<p>Risks not manageable - Renegotiate or Decline</p>
7	<p>Trustee Decision and Escalation</p> <p>Is this decision within delegated authority?</p> <p>Decision-makers should ensure they are sufficiently informed, take account of relevant considerations, disregard irrelevant factors, manage conflicts appropriately and reach a decision that is rational and reasonable in the circumstances.</p>	<p>Low Risk - Executive</p> <p>Significant Risk - Chair and Trustee</p> <p>High Risk - Whole Board</p>
8	<p>Record the Decision</p> <p>Has the decision and rationale been recorded?</p> <p>Record: Risks identified, benefits considered, alternatives explored, reasons for decision making</p>	<p>Only proceed if recorded</p>
<p>Final Trustee Sense Check – Can trustees reasonably justify this decision as being in the charity's best interests if challenged?</p>		

Fundraising decision flowchart for small-scale and grass-roots cultural organisations

Donation / Sponsorship Offered

- | | | |
|--------------------------|---|---|
| <p>1</p> <p>↓</p> | <p>Any reason that it might NOT be in our organisation's best interests?</p> | <p>Yes –
Pause and Assess</p> |
| <p>2</p> <p>↓</p> | <p>Does it further our charitable purposes and public benefit (or organisational purpose if not a charity)?</p> | <p>NO – Decline</p> |
| <p>3</p> <p>↓</p> | <p>Is it lawful and compliant with our duties?</p> | <p>NO – Decline
Uncertain – Seek Legal Advice</p> |
| <p>4</p> <p>↓</p> | <p>Could it reasonably harm our organisation's trust or reputation?</p> | <p>Yes – Discuss with
Chair / Trustees</p> |
| <p>5</p> <p>↓</p> | <p>Any conditions affecting independence or delivery?</p> | <p>Yes –
Renegotiate or Decline</p> |
| <p>6</p> <p>↓</p> | <p>Can we justify this funding as reasonable and proportionate</p> | <p>NO – Decline</p> |
| <p>7</p> | <p>Record decision and rationale</p> | |

Governance, Collaboration and Reputational Risk

Roles and Responsibilities

Trustees hold ultimate responsibility for governance and oversight within arts organisations. However, decision-making related to fundraising is often complex and contextual. As such, effective governance depends on a collaborative relationship between trustees, executive leadership and, where appropriate, wider organisational stakeholders.

Policies, Frameworks and Organisational Culture

Clear policies and agreed frameworks can provide an important starting point. Organisations benefit from having defined principles, decision-making processes and escalation routes that help clarify roles, responsibilities and thresholds for Board involvement. Such frameworks can support consistency, transparency and confidence when difficult situations arise.

However, policy alone is unlikely to resolve complex reputational questions. Organisations also need a culture that enables open discussion, shared reflection and constructive challenge.

Collaborative Decision-Making Between Boards and Executives

Whilst final approval may rest with the full Board, executive leaders often hold critical operational knowledge, stakeholder relationships and contextual understanding that is essential to building a full picture. Good practice therefore involves a joint approach, where trustees and staff help to identify issues, assess implications, present options, articulate risks and advise on potential organisational impact. This helps ensure that Board decisions are informed, realistic and grounded in the lived context of the organisation.

Maintaining clarity about respective responsibilities remains important. Trustees retain ultimate accountability for governance, fiduciary oversight and reputational stewardship. Executives contribute professional expertise, operational insight and an understanding of how decisions may affect staff, artists, audiences and partners. Governance is often strongest where these different perspectives are brought together in a relationship characterised by mutual trust, transparency and respect for respective roles.

Navigating Internal Disagreement

Arts organisations should also recognise that reputational decisions may generate strong and sometimes conflicting responses across the organisation. Questions relating to politics, identity, freedom of expression, social justice or organisational values can be highly personal and emotionally significant for staff, leadership and trustees alike. Disagreement is therefore not necessarily a sign of organisational failure; in many cases, it reflects the complexity of the issues being considered.

For this reason, organisations may benefit from establishing approaches for navigating internal disagreement constructively. This could include:

- Setting expectations for respectful dialogue and behaviour;
- Being transparent about how decisions are reached;
- Clarifying the distinction between consultation and decision-making authority;
- Creating appropriate opportunities for staff concerns and perspectives to be heard;
- Supporting managers and leaders to facilitate difficult conversations;

- Recognising the emotional impact that contentious issues may have on individuals and teams;
- Reinforcing safeguarding and well-being principles whilst maintaining effective governance processes.

Maintaining Trust Through Complexity

The aim should not be to eliminate disagreement or achieve unanimity in all circumstances. Rather, organisations should seek to create conditions in which differing views can be expressed and navigated thoughtfully, in ways that preserve trust, organisational relationships and confidence in governance processes, even where consensus is not possible.

Financial vetting and due diligence of funders

Financial vetting and due diligence of funders helps cultural organisations to ensure that fundraising is lawful, appropriate, and in the organisation’s best interests, whilst protecting public trust and confidence. The level of scrutiny should always be proportionate to the size of the gift, the visibility of the funder and the level of risk.

Due diligence is a range of reasonable and practical steps that can be taken to assess the legitimacy, credibility and suitability of a range of organisations, individuals, processes and activities. In relation to fundraising, due diligence means *“carrying out proper ‘checks’ on those individuals and organisations that give money to, or receive money from, the charity, including partners and others that are contracted to work with it”*.²

Due diligence is a usual part of a potential partnership between a cultural organisation and sponsor or funder – it helps to create the parameters for a successful partnership and to provide the building blocks for the relationship to grow into the future.

Effective due diligence will protect an organisation from issues of reputational damage, deviation from organisational purpose, and financial instability (if funding needs to be withdrawn).

This Due Diligence Framework should be used alongside the step-by-step guide on how to create a fundraising and gift acceptance policy (see page 8), the fundraising decision flow chart (see page 18) and the creation of your fundraising and gift acceptance policy (see page 8).

² https://assets.publishing.service.gov.uk/media/65df4106b8da63b345c861e9/Chapter_2_Due_diligence_monitoring_and_end_use_of_funds.pdf

1. Take a risk-based, proportionate approach

Not every funder requires the same level of scrutiny. Cultural organisations typically apply:

- **Lighter checks** for small, low-risk donations
- **In-depth checks** for large gifts, corporate sponsorship, naming rights, or funders linked to higher-risk sectors or jurisdictions

This aligns with Charity Commission guidance that trustees should take **reasonable steps**, not exhaustive investigations.

An approach could include due diligence relating to:

Donations from individuals or organisations of £x or more

- Organisations can stipulate what size of donation will be subject to due diligence, rather than committing to assessing all donations regardless of size. For example, the Gate Theatre stipulates that any donation over £5,000 will be subject to public record research. This ensures that the organisation's due diligence requirements are manageable.

All partnership proposals

- Before entering any formal partnership or contract, an organisation might stipulate that it will conduct checks and research on the potential partner. This can ensure that organisations do not work with partners whose practices contradict their own standards.

Organisations should also outline what implementation of the Due Diligence Framework will prevent and why this is important to the ongoing credibility and security of the organisation.

Organisations should outline what will be assessed through due diligence checks and how the checks will be performed (e.g. reviewing annual reports and accounts, checking records with regulators like Companies House etc). This process should also be informed by the [Know your donor key questions](#) and [Know you donor – checklist](#) from the Charity Commission (see page 5).

Organisations should also outline who in the organisation will conduct and review the due diligence checks. For example: *Due diligence checks will be performed by the Senior Management Team and will be reviewed by the Board of trustees.*

Organisations should establish basic parameters for accepting or refusing donations based on these lines of investigation. Examples could include:

- Refusing donations from organisations whose historical or current activity do not align with the organisation's purpose or stated public commitments
- Refusing donations from individuals who qualify for Charity Commission automatic disqualification.

2. Identify the funder clearly

Before accepting funding, confirm:

- The **legal name** of the individual or organisation
- Country of incorporation or residence
- Company or charity registration number (where relevant)
- Beneficial ownership (for companies or trusts)

This prevents confusion between similarly named entities and reduces fraud risk.

3. Check lawful sources of funds

Cultural organisations should take reasonable steps to ensure that funds are not:

- The proceeds of crime
- Linked to money laundering or sanctions breaches

Common checks include:

- UK Companies House records
- Charity Commission register (for charitable funders)
- Basic sanctions lists (e.g. **UK sanctions regime**)

For high-value gifts, some organisations request a **source of funds declaration**. A source of funds declaration is a statement (sometimes a form) where you explain exactly where the money you are using came from.

It is commonly requested by banks, solicitors, mortgage lenders, accountants and investment firms, to help prevent fraud and money laundering.

A simple version might include the following:

DONOR SOURCE OF FUNDS DECLARATION

Donor name:

Address:

Donation amount:

Date:

Source of funds (please tick or describe):

Employment income / savings

Business income

Sale of property or assets

Investment returns

Inheritance

Gift from family member

Other (please specify):

Declaration

I confirm that the funds being donated are from legitimate sources and are not the proceeds of crime, fraud, or any illegal activity. I understand that the charity may carry out appropriate due-diligence checks and may request additional information if required.

I also confirm that this donation is made freely and does not create any obligation for the charity beyond its stated mission.

Signature:

Print name:

Date:

Some cultural organisations may also wish to undertake **Politically Exposed Persons (PEP)** screening. This is a compliance check used by banks, charities, financial firms and some businesses, to identify people who may present a **higher risk of bribery or corruption** because of the public positions that they hold, or have held.

It is part of anti-money-laundering (AML) regulations in the UK and many other countries.

A Politically Exposed Person is someone entrusted with a prominent public function, such as: a head of state or government, senior politicians, high-ranking military personnel, supreme court or constitutional court judges, ambassadors and directors of state-owned companies. Screening often covers close family members (spouse, partner, children and parents), known close associates and business partners.

In conducting due diligence checks, organisation's must adhere to legal, regulatory, or any other code of good practice pertaining to the organisation.

For example:

- [Charity Commission for England and Wales](#) Guidance, [OSCR](#) in Scotland, and [CCNI](#) in Northern Ireland
- [Fundraising Regulator](#)
- Charity Commission guidance on [Due Diligence, Monitoring and Verifying the Use of Charitable Funds](#)
- General Data Protection Regulations (GDPR).

Organisations should take time to review legal and regulatory guidance to make sure that their processes and practices are compliant.

Some cultural organisations may also seek access at their own cost to respected databases to carry out due diligence checks such as [LexisNexis WorldCompliance data](#).

4. Review public records and media coverage

A structured open-source media check is standard practice. This could include:

- Recent news coverage
- Regulatory investigations or fines
- Court cases or enforcement actions
- Credible NGO or watchdog reporting

This helps to identify reputational risks that could reasonably affect public trust.

5. Assess financial stability and legitimacy

For corporate funders or major donors, consider:

- Recent annual accounts or filings
- Financial solvency and trading status
- Whether the organisation is a going concern

This protects against accepting funds that may later be withdrawn or challenged.

6. Consider sector-specific and reputational risks

Arts organisations will often also consider areas including:

- Environmental impact
- Human rights concerns
- Labour practices
- Alignment with artistic or curatorial independence

These checks should relate clearly to the organisation's purpose and stated public commitments and should be applied consistently.

7. Document findings and decisions

Good governance requires a clear audit trail; this should include areas such as:

- What checks were carried out
- What risks were identified
- Who reviewed and approved the decision/s
- Any mitigation applied (e.g. limited branding)

This protects staff and trustees if decisions are later questioned.

The process should also integrate with an organisation's own conflicts of interest policy and the Charity Commission's [guidance](#) to trustees on managing conflicts.

8. Escalate higher-risk cases

Where significant risks are identified:

- Escalate to senior leadership, or trustees, or to a fundraising committee
- Seek legal or professional advice if necessary
- Consider refusing or returning the donation if the risks outweigh the benefits

This reflects Charity Commission expectations that **trustees retain oversight of high-risk decisions.**

9. Keep due diligence under review

Due diligence does not end at the acceptance of funds; organisations will need to:

- Monitor long-term funders and sponsors
- Revisit checks if circumstances change
- Include review points in multi-year partnerships

This is especially important for corporate sponsorship and naming agreements.

Organisations should record information about how they will monitor and update due diligence checks. This could include a commitment that:

- Relevant guidance will be reviewed annually and updates to guidance will be applied to the policy.
- The process for conducting due diligence checks will be reviewed annually by the trustees and updated as required to remain effective and relevant.

- Due diligence checks will be performed again on existing partners, if new guidelines or processes have been implemented since the last check.

It is also important to keep a record of the dates, times, people involved, and rationales for both the drafting of the original document and any revisions that are made. This ensures that the development of the document is clear to see and review.

10. Communication and Training

It is worth updating staff, trustees, volunteers and relevant stakeholders on the rationale and process for due diligence checks and ensuring that training and guidance is provided for individuals engaged in this work.

What due diligence looks like in practice (case examples)

Every organisation will set their own standards for due diligence. The approach should be reasonable, consistent and proportionate to risk.

Simple case examples might include the following:

Due diligence for a smaller donor (£500):

- Confirm identity
- Basic online check
- Record decision

Due diligence for a corporate sponsor (£50,000):

- Companies House check
- Media and sanctions screening
- Review accounts
- Trustee approval
- Written agreement with exit clause/s

Draft Template for creating an organisational Due Diligence Policy

The below text provides template headings for an organisational Due Diligence Policy.

Each section of the template builds on the more detailed discussion above, which can be used to add the relevant detail for your organisational context.

1. Purpose

- State why due diligence is necessary and what due diligence checks will help your organisation to ensure / safeguard / achieve.

2. Scope

- State the circumstances in which due diligence checks will be conducted and the reasons why these circumstances have been selected.

3. Compliance

- Acknowledge that the organisation must comply with relevant regulatory and legal guidance.
- Document what guidance this policy adheres to and which frameworks you are working to.

4. Process

- Detail how due diligence checks will be conducted for each of the circumstances outlined in Section 2.
- Explain why this process has been developed and what considerations went into creating the framework for due diligence.

5. Review

- Detail the ways in which the policy will be reviewed.
- Identify the staff or groups responsible for the review process.

Approval and Implementation

This Due Diligence Policy has been approved by the Board of trustees of (Organisation Name) and is effective from (Date). All staff, volunteers, and trustees are expected to adhere to this policy.

Signed: (Chair of the Board of trustees)

Date:

Revised and Updated:

Risk-tiered due diligence framework

Some cultural organisations may wish to adopt a risk-tiered due diligence framework to help them set out a **proportionate approach** to financial vetting and due diligence on funders, based on **risk, value and visibility**. It supports trustees and staff to take reasonable, consistent steps to protect public trust and act in the charity's best interests.

An amended version for your cultural organisation could be created which could also be combined into the due diligence framework outlined above (see page 27).

Optional wording for policies

“The charity applies a risk-tiered approach to due diligence of funders. The level of scrutiny applied will be proportionate to the size, nature and visibility of the funding, and any associated legal or reputational risk. Decisions will be recorded and escalated appropriately in line with Charity Commission guidance.”

How to use this framework

1. **Assign a risk tier** to the funding offer
2. **Carry out the checks listed for that tier**
3. **Escalate** where risks are identified
4. **Record** the decision and rationale

Overview of risk tiers

Tier	Typical funding	Risk profile	Approval
Tier 1 – Low risk	Small donations, low visibility	Minimal reputational or legal risk	Staff / Executive
Tier 2 – Medium risk	Larger gifts, visible support	Some reputational or operational risk	Executive + Trustee
Tier 3 – High risk	Major gifts, sponsorship, naming rights	Significant reputational / legal risk	Full Board

Tier 1 – Low-risk funding

Examples

- Small individual donations
- Local fundraising events
- Donations below an agreed threshold

Risk characteristics

- Low value
- No public visibility
- No conditions attached

Due diligence checks

- Confirm identity (where known)
- Basic online sense-check (no obvious red flags)
- Ensure donation is lawful

Decision-maker

- Director / Producer / Fundraising lead

Record

- Brief note of acceptance (date, amount, decision-maker)

Tier 2 – Medium-risk funding

Examples

- Larger individual donations
- Trusts and foundations
- Local or regional corporate sponsors
- Funding with branding or acknowledgment

Risk characteristics

- Moderate value
- Public association with the organisation
- Possible conditions or expectations

Due diligence checks

- Confirm legal identity and registration (e.g. Companies House / Charity Register)
- Review recent media coverage and public reputation
- Check for regulatory action, litigation or sanctions (basic screening)
- Review any conditions attached to the funding
- Assess alignment with organisational purpose

Decision-maker

- Executive + Chair or nominated trustee

Mitigation options

- Limit branding or naming
- Time-limit the agreement
- Add exit or review clauses

Record

- Summary of checks undertaken
- Risks identified and mitigations
- Rationale for decision

Tier 3 – High-risk funding

Examples

- Major donations or sponsorships
- Naming rights
- Multi-year or strategic partnerships
- Funders linked to high-risk sectors or jurisdictions
- Politically sensitive or contested funders

Risk characteristics

- High value
- High public visibility
- Potential reputational or legal concerns

Due diligence checks

- All Tier 2 checks
- Source of funds review (where appropriate)
- Sanctions and politically exposed persons (PEP) screening
- Review of financial stability (accounts, filings)
- Assessment of human rights / environmental / other concerns where relevant
- Legal advice (where appropriate)

Decision-maker

- Full Board of Trustees

Mitigation options

- Reduced or no public branding
- Clear separation from artistic or curatorial decision-making
- Contractual safeguards and exit clauses
- Time-limited acceptance with review points

Record

- Detailed decision paper
- Trustee discussion and resolution
- Clear statement of best-interests reasoning

Escalation triggers (apply at any tier)

Escalate to the **next tier** if:

- Credible concerns emerge during checks
- Circumstances change (e.g. changes in a sponsor's strategy or policy)
- The public visibility of the funder or partnership increases
- Staff, artists or communities raise serious concerns

Ongoing monitoring

For **Tier 2** and **Tier 3** funders:

- Review relationships every six months or annually
- Reassess if new information emerges
- Document reviews and outcomes

Template for creating a Fundraising or Gift Acceptance Policy

A suggested template for creating a fundraising or gift acceptance policy for mid-scale to large-scale cultural organisations follows below. The template is illustrative only and organisations may wish to develop a fundraising or gift acceptance policy using some, or all, of its headings.

Each section of the template builds on the more detailed discussion above, which can be used to add the relevant detail to the headings for your organisational context.

Fundraising or gift acceptance policies for mid-scale to large-scale cultural organisations will usually be structured and overseen by formal committees and the Board of trustees and will be accompanied by adequate due diligence and associated risk scoring.

Organisations should also be mindful that declining a donation may create reputational or relationship risks of its own. Clear policies, consistent decision-making and thoughtful communication can help ensure that decisions to refuse support are understood as governance decisions rather than as reactive or inconsistent responses.

Fundraising or Gift Acceptance Policy Template for mid-scale and large-scale cultural organisations

1. Introduction

Outline details about your organisation, its work and purpose and explain how this policy supports your organisation to fundraise.

2. Purpose

Set out how the organisation will raise funds, manage reputational risk, and comply with trustee duties e.g:

Trustees are legally responsible for overseeing fundraising and this policy aligns with legal obligations set out by the Charity Commission of England and Wales and by the Fundraising Regulator.

Outline where the responsibility for fundraising sits (i.e. with the Board of trustees and a Fundraising Committee).

Outline your approach to acceptance of funds, for example:

In line with Charity Commission guidance, the charity's starting point is to accept and retain donations to further its charitable purposes. However, trustees may decide to refuse or return a donation where they have the legal power to do so and reasonably conclude that this is in the charity's best interests, having considered all relevant factors. Decisions will be appropriately documented, including the rationale for the outcome reached.

3. Scope

The scope of the policy will depend on the fundraising activities of your organisation. It may include:

- Details of the types of fundraising that the policy covers (e.g. trusts and grants, individuals)

The policy should also be clear about what it does not include or relate to (e.g. wider aspects of operations or investment)

4. Guiding Principles

- Outline your approach to fundraising and artistic / curatorial independence here.
- Detail that trustees have established a fundraising (gift acceptance) policy so that staff and partners share a common understanding about approaches to fundraising.
- Outline the organisation's approach to risk identification when developing fundraising approaches.
- Provide clarity about your approach to working with donors and that fundraising activities must treat donors fairly and with respect.

- Detail how the organisation protects artistic / curatorial independence and that sponsors, partners and third parties do not determine artistic content.

In this section, you should outline any major issues that your organisation has identified as part of the development of this policy.

For example, you may want to say that the key issues considered when developing this policy were:

- Compliance with charity law and best practice in fundraising
- Outline governance of the policy, as well as delegated responsibility for day-to-day management of the policy
- Make reference to any other organisational policies that are relevant, for example, an organisational acquisition or loans policy for artworks.

5. Due Diligence and Risk Assessment

Make it clear how the organisation will carry out due-diligence checks on donors and partners and identify associated risks.

Be clear about the red lines that you have identified (i.e. funding you will not accept).

Integrate alignment of the policy with any associated Due Diligence frameworks that your organisation has in place (see page 27).

Make it clear what your approach to due diligence is, for example, we will:

- Conduct proportionate checks on the financial and reputational background of donors before accepting gifts
- Verify the source and nature of donations
- Ensure that donors are not subject to sanctions or restrictions
- Document risks, mitigation actions, and decisions in writing

Outline where enhanced due diligence will be required, for example:

- High-value gifts
- Complex corporate structures
- Overseas donors
- Politically exposed persons
- Gifts carrying conditions

If there are other codes of good practice your organisation adheres to, outline them here e.g. [General Data Protection Regulations \(GDPR\)](#).

6. Acceptance and Refusal of Donations

The organisation will maintain written criteria for assessing that funding is:

- Compatible with organisational purpose and stated public commitments
- Likely stakeholder perception of the relationship including but not limited to trustees, staff, audiences, artists, partners (adapt as required)

The organisation's fundraising policy should describe its approach to due diligence, risk assessment and decision-making, including any thresholds for escalation to senior leadership or trustees. It should also set out the standards and expectations that apply to different income streams.

Consistent with Charity Commission guidance, trustees should ensure that decisions relating to the acceptance, refusal or return of funding are informed, proportionate and made in the charity's best interests. Decisions outside routine practice should be documented, including the rationale for the decision. This section could include reference to areas such as:

- **Accurate Representation:** We will accurately represent our organisation and the intended use of donated funds. We will be truthful, respectful and concise in communications.
- **Informed Consent:** We will ensure that donors provide informed consent for their contributions and understand how their funds will be used –

consent is defined as “freely given, specific, informed and unambiguous indication of the individual's wishes.”

- **Avoiding Pressure:** We will avoid placing undue pressure on potential donors and respect their decision to donate or not.

Organisations could also consider reference, where relevant, to adhering to codes of good practice such as:

[The Code of Fundraising Practice from the Fundraising Regulator](#)

7. Governance Structure

Outline how the organisation will structure its oversight of the policy, for example, it will:

- Establish clear lines of responsibility for scrutinising proposed donations
- Create a committee or delegate authority to key individuals to review reputational risks

Be clear that trustees will ensure that necessary risk assessments are carried out and that the organisation will remain alert to any suspicious or unusual fundraising activity.

8. Reputational Risk

Ensure that you outline your awareness that activities and partnerships can generate reputational risk for your organisations and its funders. As such, the organisation will:

- Evaluate public perception of its funding sources
- Consider alignment with funding sources that reflect its organisational purpose and stated public commitments
- Review fundraising decision-making at board level

Outline any circumstances where you may choose to decline funding and the associated decision-making process for doing so, for example, declining funding from sources involved in illegal or unethical activities.

Outline that you may pause or decline a partnership or funding whilst you review the associated risks involved.

9. Monitoring and Review

Add some information here about how you will monitor the policy. Be specific. Include who will monitor the policy and how often.

For example:

- We will regularly monitor and evaluate our fundraising practices to ensure compliance with this policy.
- We will undertake monitoring annually with trustees and the Senior Management Team on X date.
- The policy will be reviewed annually and updated after any major funding decision, or as required to remain effective and relevant.

10. Transparency

Be clear that you will communicate openly about the organisation's fundraising practices to maintain public trust and to comply with sector standards.

11. Communication and Training

It is worth adding that you have shared the policy with the staff, trustee, and volunteer teams and have provided some training in relation to its implementation. You could say:

- This policy will be communicated to all staff, volunteers, trustees, artists and relevant stakeholders.
- Training will be provided to ensure understanding and compliance.

Concerns about how this policy has been applied can be raised via **(complaints email / process)**.

We will respond within **(x)** working days.

12. Approval and Implementation

This Fundraising Policy has been approved by the Board of trustees of **(Organisation Name)** and is effective from **(Date)**. All staff, volunteers, and trustees are expected to adhere to this policy.

Signed: (Chair of the Board of trustees)

Date:

Revised and Updated:

Fundraising or Gift Acceptance Policy Template for smaller-scale and grassroots cultural organisations or non-registered charities

For smaller-scale and grassroots cultural organisations or non-registered charities, the following framework to create a fundraising or gift acceptance policy is suggested.

Small-scale and grassroots cultural organisations will usually adopt a risk-based approach to fundraising which will be overseen by trustees or leadership committees.

This template can be adapted for your organisational context, including the likely risks related to fundraising and to cover different scenarios as they may occur.

1. Introduction

Outline details about your organisation, its work and purpose and explain how this policy supports your organisation to fundraise.

2. Purpose

Detail the purpose of the policy, for example, to ensure that funds are raised legally, responsibly, and in line with trustee responsibilities.

3. Due Diligence

Make it clear how you will conduct due diligence checks and that your approach will depend on the size of funding, source and individual circumstances. Detail your approach here.

Explain any red lines and your decision method/s for accepting or declining funding.

If appropriate, outline how the organisation protects artistic / curatorial independence.

4. Donor Checks

Outline your approach to due diligence and any additional due diligence that you will undertake on funding sources when needed, for example, when:

- A donation is unusually large
- A donor requests anonymity
- Funds originate from overseas
- Conditions are attached

Such checks could include:

- Confirming donor identity
- Understanding the source of funds
- Checking for sanctions
- Recording decisions

Be clear that you may pause or decline a partnership or funding whilst your organisation reviews the associated risks involved.

5. Reputational Alignment

Make it clear that the organisation will accept support only from donors whose activities align with its organisational purpose and stated public commitments.

Outline here what best practice means for your organisation against the different income streams that you are seeking, including how you will treat donors and respond to their wishes.

6. Refusing Donations

Detail that refusals of funding are exceptional and will be clearly documented with reasons given.

7. Trustee or Leadership Team Oversight

Be clear that trustees (for charities) remain legally responsible for fundraising and will ensure they can justify their approach to good practice.

Outline your structure for leadership oversight of the policy if your organisation is not a charity.

8. Communication

The policy will be shared with staff, freelancers and visiting artists (adapt accordingly).

Concerns about how this policy has been applied can be raised via (complaints email / process). We will respond within (x) working days.

9. Review

This policy will be reviewed annually by the trustees and after any major funding decision and will be updated as required to remain effective and relevant.

10. Approval and Implementation

This policy has been approved by the Board of trustees of (Organisation Name) and is effective from (Date). All staff, volunteers, and trustees are expected to adhere to this policy.

Signed: (Chair of the Board of trustees or designated leadership member)

Date:

Revised and Updated:

Testing and communicating your fundraising or gift acceptance policy

Testing the policy

Organisations can test their fundraising or gift acceptance policies through scenario planning via test cases. For example:

- A business sponsor
- A high-profile donor
- A partnership that might come with conditions (branding / programming requests)

Exploring different test cases can support revision of the policy and simplification where required.

Communicating the policy

Organisations might assess how they will handle external communications around funding decisions and what support they may need, for example, specialist PR support if faced with media scrutiny for a particular funding decision, partnership or association. A response will need to be considered in conjunction with the relevant sponsor or funder.

Public interest in how cultural organisations are funded is legitimate and is likely to occur. The objective is to ensure that organisations respond with confidence, clarity and integrity,

whilst protecting staff wellbeing, maintaining public trust, and demonstrating sound governance.

When responding publicly in the area of risk and reputation, arts organisations might be guided by four themes:

1. We take decisions seriously

Example:

“We take all funding decisions seriously and consider them carefully through established governance and due diligence processes.”

2. Our organisation requires sustainable funding

Example:

“As a charity, we rely on a mix of public, earned and private income to support our artistic, educational and community work.”

3. Decisions are made in the organisation’s best interests

Example:

“Our trustees are responsible for ensuring that decisions support the organisation’s charitable purposes and long-term sustainability.”

4. We respect public interest and dialogue

Example:

“We recognise that people hold strong views on these issues and we welcome thoughtful discussion.”

Sample statements might include the following information:

Short statement:

“We are aware of concerns raised regarding one of our funding partnerships. We take all such matters seriously. As a charity, we have clear governance processes for assessing funding relationships, including consideration of our charitable purposes, public benefit and reputational factors. We are reviewing the points raised and will respond further if appropriate.”

Fuller statement:

“As an independent charity, we rely on a range of income sources including public funding, earned income and private support to sustain our artistic, curatorial and public programme.

All significant funding relationships are considered through formal governance processes, including due diligence and trustee oversight where appropriate.

We recognise that views differ on these matters and respect the strength of feeling some have expressed. Our responsibility is to make decisions that support our charitable purpose, maintain public trust and ensure the long-term sustainability of the organisation.

We remain committed to transparency, artistic independence and serving our audiences and communities.”

Stakeholder Communications

Depending on the circumstances, organisations may wish to communicate directly with:

- Staff
- Trustees
- Major supporters
- Key artists / partners
- Public funders
- Local stakeholders where relevant

These instances also give chance for organisations to review and develop their processes in relation to risks and reputation, considering areas such as:

- What happened?
- Were our policies clear enough?
- Were trustees sufficiently briefed?
- Did staff feel supported?
- Was due diligence proportionate?
- Do we need stronger scenario planning?

Risk and Reputation linked to Corporate volunteering in cultural organisations

Corporate volunteering often appears low-risk as it is framed as ‘staff volunteering’ rather than fundraising or sponsorship. In practice, however, it can function as a corporate partnership benefit, ESG activity, relationship-building mechanism, or route into wider sponsorship, so it should be assessed within the same governance framework as other corporate support.

This is because stakeholders may perceive the charity as endorsing or legitimising the company and if the company’s activities conflict with the charity’s purpose and stated public commitments, the partnership may undermine credibility.

There is no specific Charity Commission guidance related solely to corporate volunteering, but trustees should apply the Commission’s wider principles of acting in the charity’s best interests, considering reputational impact, being properly informed, managing risk and documenting decisions.

How Corporate Volunteering should be assessed

Corporate volunteering should usually be assessed as an in-kind donation / partnership.

Trustees / senior staff should ask:

Strategic Value

- Does this partnership advance our charitable purposes?
- Will staff time spent to develop the partnership outweigh the benefit?

Reputational Considerations

- Will stakeholders question the relationship?
- Is there conflict with our organisational purpose or stated public commitments?
- Could the company use our name / logo publicly?

Practical Delivery

- Who supervises volunteers?
- Health & safety?
- Insurance?
- Safeguarding checks?
- Accessibility?

Equity / Inclusion

- Is the volunteering meaningful?
- Are stakeholders and beneficiaries comfortable with the arrangement?

Communications Control

- Can the company publicly market the activity?
- Must approval be sought for publicity?

Different types of corporate volunteering will carry different levels of risk, for example, a staff gardening day with no access to or involvement of beneficiaries, will likely be low risk, whereas volunteers working with vulnerable beneficiaries without controls may be considered high risk.

Recommended Policy Position for Cultural Organisations

As outline above, cultural organisations should treat corporate volunteering as partnership income in kind.

This means undertaking proportionate diligence on:

- Who the company is
- What the company wants
- What the charity gains
- What reputational signal is created

Include corporate volunteering inside your:

- Gift Acceptance Policy
- Partnerships Policy
- Risk & Reputation Framework
- Safeguarding Procedures
- Brand / Logo Permissions Policy

Suggested wording:

Corporate volunteering offers can provide valuable support, skills and engagement opportunities. The organisation will assess such offers in line with charitable purpose, operational benefit, reputational considerations, safeguarding requirements, and public trust.

Corporate Volunteering Risk Assessment Template for Cultural Organisations

Purpose

The organisation welcomes appropriate corporate volunteering support where it advances our charitable purposes and delivers clear benefit. Offers will be assessed proportionately, taking account of operational value, reputational considerations, safeguarding requirements, and public trust.

Section 1: Basic Details

Organisation receiving support:

Corporate organisation:

Main contact at corporate:

Proposed activity:

- Team volunteering day
- Skills-based volunteering
- Mentoring / employability support
- Event support
- Community project delivery
- Premises / maintenance support
- Other:

Proposed date(s):

Number of volunteers:

Location:

Internal lead officer:

Section 2: Strategic Benefit Assessment

How does this activity support our purpose or stated commitments?

- Supports charitable purpose directly
- Supports community engagement
- Supports learning / participation
- Supports organisational capacity
- Supports staff development
- Limited strategic relevance
- Unclear

Comments:

Estimated value to organisation:

Comments:

Section 3: Resource and Delivery Assessment

Staff time required to manage programme:

Comments:

Will supervision be required?

Yes No

Are materials / equipment costs involved?

Yes No

Could activity disrupt normal operations?

Yes No

Net benefit after internal costs likely to be:

Positive
 Neutral
 Negative / uncertain

Comments:

Section 4: Reputational Risk Assessment

Risk Threshold Guidance

Low Risk

Local employer, practical support, limited publicity, clear benefit.

Medium Risk

National brand, meaningful publicity, moderate scrutiny potential, some operational burden.

High Risk

Controversial sector, likely organised criticism, mission conflict, safeguarding complexity, reputational sensitivity.

Is the company associated with sectors likely to create scrutiny?

- Fossil fuels
 Gambling
 Tobacco
 Arms / defence
 Adult entertainment
 Extractives / environmental controversy
 Labour rights controversy
 No known concerns
 Other:

Could the relationship conflict with our organisational purpose or stated public commitments?

Yes No Possibly

Could staff, artists, audiences or communities challenge the partnership?

Likely Possible Unlikely

Is the company likely to publicise the relationship prominently?

Yes No Unknown

Overall reputational risk

Low Medium High

Comments:

Section 5: Safeguarding and Conduct

Will volunteers interact with children or vulnerable adults or other beneficiaries?

Yes No

DBS / safeguarding checks required?

Yes No

Will volunteers require conduct briefing?

Yes No

Accessibility / inclusion considerations identified?

Yes No

Any known behaviour or culture concerns relating to company?

Yes No

Comments:

Section 6: Communications and Brand Use

Can the company use our name / logo publicly?

Yes – approved with conditions

No

To be agreed

Is media coverage expected?

Yes No

Is joint messaging required?

Yes No

Is there risk of perceived endorsement?

Yes No Possible

Comments:

Section 7: Due Diligence Check

Basic checks completed:

- Website review
- Companies House / legal status review
- News / media search
- ESG / controversy review
- Existing relationships known
- Internal stakeholder concerns checked

Comments:

Section 8: Overall Assessment

Summary of benefits

Summary of risks

Recommended decision

- Approve
- Approve with conditions
- Escalate for senior review
- Decline

Conditions (if applicable)

- No logo use without approval
- Safeguarding checks required
- Limited publicity
- Staff supervision required
- Review after pilot activity
- Other:

Section 9: Authorisation

Completed by

Date

Approved by

Escalated to Trustee / Committee (if required)

Yes No

Risk and Reputation linked to Venue and Room Hire in cultural organisations

Cultural Organisations can also encounter reputational risks in terms of earned income activities such as space and room hire.

It may be useful to develop a separate policy to support decision-making in this area.

Template for Venue and Room Hire Policy in cultural organisations

1. Purpose of this Policy

The organisation welcomes the use of its spaces by external individuals, groups and organisations where this supports our charitable purposes, public engagement, community access and financial sustainability.

Income from venue hire can be an important part of our balanced funding model, helping to support artistic, educational and community activity.

At the same time, venue and room hire arrangements may create operational, legal or reputational risks. This policy sets out a clear, fair and proportionate framework for assessing requests to hire or use our organisational spaces.

The aim is to support confident decision-making, protect public trust, and ensure that use of our premises is consistent with our responsibilities as a charity / cultural organisation.

Charitable arts organisations may also wish to reference that they are following Charity Commission [guidance about events on a charity's premises](#) (sections 10.10 and 10.11).

2. Scope

This policy applies to (delete as required):

- Room hire
- Conference and meeting space hire
- Corporate hospitality bookings
- Private receptions and dinners
- Filming and photography hire

- Community use bookings
- Ticketed external events
- Fundraising events hosted by third parties
- Political, campaigning or advocacy events
- Partner-led public programmes using our spaces
- Any other temporary external use of organisational premises

3. Guiding Principles

When assessing bookings, the organisation will seek to balance:

A Organisational Purpose and Public Benefit

Whether the proposed use supports or is compatible with our artistic, educational, cultural or community purposes.

B Financial Sustainability

Whether the booking provides appropriate income or strategic value.

C Safety and Operational Practicality

Whether the event can be delivered safely and effectively.

D Reputation and Public Trust

Whether the booking may reasonably create reputational harm, undermine confidence, or create confusion about endorsement.

E Fairness and Consistency

Whether other bookings would be treated in a similar way.

4. Important Clarification

Hiring a space does **not automatically imply endorsement** of the hirer's views, products or activities.

However, the organisation recognises that public perception may differ, particularly where events are high-profile, politically sensitive, controversial, or heavily branded.

For this reason, some bookings may require additional review.

5. Standard Booking Criteria

All bookings will normally be assessed against (delete as required):

- Legal compliance
- Safety and licensing requirements
- Capacity and staffing
- Technical feasibility
- Accessibility considerations
- Financial viability
- Alignment with venue rules and conditions of hire

6. Reputational Risk Assessment Criteria

Additional review may be required where a booking involves one or more of the following:

A Politically Sensitive or Campaigning Activity

- Party political events
- High-profile lobbying activity
- Events relating to live geopolitical conflicts
- Highly polarised public policy debates

B Commercial or Sector Sensitivity

Organisations associated with:

- Fossil fuels
- Gambling
- Tobacco
- Arms / defence
- Adult entertainment
- Significant environmental controversy
- Serious labour or governance concerns

C Risk of Public Disorder or Protest

- Strong likelihood of organised protest
- Credible security concerns
- Significant disruption to audiences or staff

D Conflict With Organisational Purpose

Where the proposed event appears materially inconsistent with the organisation's charitable purposes, or stated commitments.

E Brand / Endorsement Risk

Where marketing may imply sponsorship, partnership or endorsement by the organisation.

7. Decision-Making Levels

Low-Risk Bookings

Routine commercial or community hires may be approved by delegated staff under standard procedures.

Medium-Risk Bookings

Bookings with some sensitivity should be reviewed by senior management.

High-Risk Bookings

Bookings with significant reputational, legal, safeguarding or security implications

should be escalated to senior leadership and, where appropriate, trustees or a designated committee.

8. Factors Considered in Higher-Risk Cases

The organisation may consider the:

- Nature and purpose of the event
- Identity and track record of hirer
- Whether views are lawful
- Likelihood and scale of disruption
- Impact on staff, artists, audiences and communities
- Potential confusion about endorsement
- Income and strategic value
- Whether mitigations can reduce risk
- Duties relating to freedom of expression, equality and charity law (where relevant)

9. Conditions of Hire

The organisation may approve bookings subject to conditions, including:

- Clear disclaimer in reference to endorsement
- Approval of marketing materials using venue name / logo
- Security requirements at hirer cost
- Behaviour and conduct standards
- Insurance requirements
- Capacity limits
- Stewarding obligations
- Restrictions on filming or publicity
- Compliance with safeguarding procedures
- Payment in advance

10. Grounds for Declining a Booking

A booking may be declined where:

- It would be unlawful
- Safety risks cannot be managed
- It is operationally unfeasible
- It presents disproportionate reputational risk
- It is likely to seriously undermine public trust
- It materially conflicts with our organisation's charitable purposes
- Hirer refuses reasonable conditions
- There is a credible risk of harassment, hate speech or serious disruption

Declining a booking does not imply judgement on all views of the hirer; it reflects the organisation's responsibility to manage its own duties and risks.

11. Political Neutrality and Public Debate

As a cultural organisation, we may host a wide range of lawful views, debates and discussions. We are not required to agree with all participants.

However, we are also not obliged to host every request, particularly where risks are disproportionate or the event is inconsistent with our responsibilities.

12. Communications and Public Statements

Where a booking may attract scrutiny, the organisation may:

- Prepare holding statements
- Clarify the nature of the hire arrangement
- Explain that venue hire does not equal endorsement
- Explain the decision-making process
- Communicate directly with stakeholders where appropriate

Only authorised spokespeople may comment publicly.

13. Record Keeping

For medium and high-risk bookings, the organisation will retain records of:

- Request details
- Risk assessment
- Decision rationale
- Approvals
- Conditions imposed
- Any incidents arising

14. Review and Appeals

The organisation may review decisions where new information emerges.

Unsuccessful applicants may request reconsideration where material facts were not previously available.

15. Equality, Inclusion and Respect

The organisation is committed to lawful equality, dignity and respectful treatment. Decisions will not be based on protected characteristics, but may consider behaviour, conduct, legality, and impact.

16. Suggested Internal Risk Traffic Light

Green

Routine booking with no significant concerns.

Amber

Potential sensitivity requiring senior review.

Red

High-profile controversy, serious protest risk, legal complexity or major brand implications.

17. Example Disclaimer for External Events

This event is independently organised by the hirer. Venue hire does not imply endorsement of the views, products or activities of the organisers by (Organisation Name).

18. Final Principle

The organisation seeks to be open, welcoming and financially sustainable, whilst exercising responsible stewardship of its spaces, reputation and public trust. Decisions will be made thoughtfully, proportionately and consistently.

Cultural organisations and protest policies

Political Activity

Cultural charities operate within a legal and governance **framework** that places clear limits on political activity. Under UK charity law, charities must not exist for a political purpose and cannot campaign for or against a political party, government, or specific political outcome, including positions on international conflicts.

However, charities are permitted to engage with political and geopolitical issues where this activity is **clearly connected to, and supports, their charitable purposes**. For cultural charities, this can include artistic programming, education, debate or public engagement that explores issues such as geopolitical events, provided the activity does not amount to political advocacy and remains focused on artistic, cultural or educational objectives.

Whether an organisation *should* adopt a public political stance is therefore **a matter of judgement rather than permission**: trustees must consider whether doing so advances the charity's aims, serves the public benefit, and protects trust and confidence in the organisation. In practice, many cultural charities choose to facilitate artistic expression and dialogue on contested issues rather than endorsing a single political position, as this approach allows them to uphold freedom of expression whilst remaining compliant with charity law and their governance responsibilities.

Protests within cultural organisations

However, whatever an organisation's stance, we need to recognise that cultural organisations occupy a distinctive position in public life. They are spaces for creativity, debate and challenge, and have long played a role in reflecting and responding to social and political change. As a result, at times, they may attract protest associated with their artistic programming, as well as in relation to funder relationships. In this context, having a clear and proportionate approach to managing protest is not about limiting freedom of expression, but is about ensuring that expression can take place safely, lawfully and without causing harm.

Protest policies provide clarity for staff, artists, audiences and visitors about how the organisation will respond when protest occurs. Without an agreed framework, decisions are more likely to be made reactively, placing individual staff members under pressure and increasing the risk of inconsistent or disproportionate responses. Clear policies help ensure that responses are calm, fair and defensible, even in highly charged situations. They also allow for good communications with sponsors or donors, as protest may also have implications for their safety and reputation as well.

Importantly, protest policies do not exist to silence dissent. Most cultural organisations explicitly recognise the right to peaceful protest and freedom of expression as fundamental democratic principles.

A well-designed policy distinguishes between **peaceful expression and actions that disrupt performances, endanger people, or compromise the safety of artworks and spaces**. This distinction allows organisations to support protest in appropriate contexts, whilst still fulfilling their duty of care.

Cultural organisations also have legal and safeguarding responsibilities that extend beyond freedom of expression. They are responsible for **safeguarding** staff, artists and audiences; protecting collections and equipment; and meeting contractual obligations to performers, funders and partners. Protest policies help organisations to balance these responsibilities with their commitment to open dialogue, ensuring that one does not come at the expense of the other.

In addition, clear protest policies can protect freedom of expression by reducing ambiguity. When expectations are set in advance, for example, about where protest can take place, how it can be conducted, and how concerns will be handled – individuals are less likely to be arbitrarily restricted or unfairly treated. Transparency supports trust, even where disagreement exists.

Finally, protest policies acknowledge that cultural organisations do not operate in a vacuum. Social and political contexts can change rapidly, and issues that once sat outside an organisation's remit may suddenly become highly visible. Having an agreed framework enables organisations to respond consistently over time, rather than redefining boundaries under pressure.

In this sense, protest policies are not instruments of control, but tools of stewardship. They help cultural organisations maintain spaces where expression, challenge and debate can continue – whilst ensuring that those spaces remain safe, accessible and sustainable for everyone who uses them.

A template for developing such a policy is outlined below.

Please note that some organisations frame these as safety, conduct, or operational policies, so as to avoid them being interpreted as 'anti-protest'.

Creating a Protest Management Policy

A suggested framework for creating an organisational Protest Management Policy follows below:

Step 1: Be precise about purpose

Avoid framing the policy as “anti-protest.”
Instead define it as covering:

- Safety and duty of care
- Protection of audiences, staff and artists
- Continuity of artistic / curatorial activity
- Lawful use of space

This avoids the organisation appearing politically motivated.

Charitable arts organisations may also wish to reference that they are following Charity Commission [guidance](#) to help charities navigate difficult circumstances.

Step 2: Distinguish protest from disruption

A defensible policy clearly separates:

- **Peaceful expression** (outside venues, petitions, statements)

From:

- **Disruptive actions** (interrupting performances, damaging property, intimidating staff)

This distinction is crucial both legally and reputationally.

Some wording you may use follows below:

“The organisation respects the right to peaceful protest but does not permit actions that endanger people, disrupt performances, or compromises the safety of artworks, staff, artists or audiences.”

Step 3: Define where protest is and isn't permitted

Most cultural organisations specify:

- **Permitted areas** (e.g. outside buildings, public forecourts)
- **Restricted areas** (auditoriums during performances, backstage, galleries with vulnerable works)

Step 4: Set clear staff responsibilities

This may include:

- Who leads during a protest
- When front-of-house staff intervene
- When security or police are contacted
- How artists / curatorial staff are supported

This protects staff from being left to improvise, or to be reactive under pressure or media scrutiny.

Step 5: Include a proportionality principle

State explicitly that the organisation's responses will be:

- Proportionate
- Lawful
- Non-discriminatory

This helps defend decisions if challenged publicly.

Step 6: Align with organisational purpose and stated public commitments

Policies should reference:

- Right to freedom of expression
- Respect for peaceful dissent
- Commitment to dialogue where possible

Step 7: Approve at board level

Ensure Board approval for the policy, this:

- Ensures legal backing
- Protects staff decisions
- Demonstrates governance maturity

Many controversies escalate precisely because policies are informal or unapproved.

Step 8: Train and rehearse

A policy is ineffective unless:

- Front-of-house staff understand it
- Managers know the agreed escalation routes where protest occurs
- Leadership has agreed public messaging

Ensure that staff and trustees undertake some scenario-based training to model different situations where protest may occur.

In summary

- Most cultural organisations **do not ban protest**
- They regulate **where, how, and when it happens**
- The strongest policies are framed around **safety, integrity, and governance**
- They're deliberately framed as **protest-management and safety policies**, not "anti-protest"

Creating a Protest Management Policy for mid-scale and large-scale cultural organisations

The below text provides template headings for an organisational Protest Management Policy.

Each section of the template builds on the more detailed discussion above, which can be used to add the relevant detail for your organisational context. The template can be adapted to include the likelihood and risks of protest to your organisation and to cover different scenarios as they may occur.

1. Purpose

This policy sets out how the organisation manages protests, demonstrations and other forms of disruption on or in connection with its premises, events and activities.

We respect the right to peaceful protest. We do not permit actions that disrupt performances, endanger people, or compromise the safety of artworks, staff, artists or audiences.

This policy exists to ensure:

- The safety of audiences, staff, artists and visitors
- The protection of artworks / displays, buildings and equipment
- The integrity of performances, exhibitions and public programmes
- Compliance with legal and contractual obligations

This policy supports trustees' duties to act in the best interests of the charity, protect its reputation and assets, and manage risk in line with Charity Commission guidance. Decisions made under this policy will be lawful, non-discriminatory, and recorded. The organisation recognises freedom of expression and peaceful protest, whilst maintaining its duty of care to staff, artists, audiences and visitors, and protecting its assets and artistic / curatorial integrity.

2. Scope

This policy applies to:

- All organisational premises (public and non-public areas)
- Performances, exhibitions, rehearsals and events
- Staff, freelancers, artists, curators, contractors and visitors

It covers protests by members of the public, staff, artists, curators or third parties.

Decisions taken under this policy must be made in the charity's best interests, be proportionate to the risk, and be recorded (including rationale, alternatives considered, and any mitigating actions).

The organisation protects artistic / curatorial independence. Sponsors, partners and third parties do not determine artistic content. Protest management decisions are separate from programming decisions.

3. Principles

The organisation's response to protest will be:

- Lawful
- Proportionate
- Non-discriminatory
- Consistent

The organisation supports peaceful protest where it does not compromise safety, access, or artistic / curatorial activity.

The policy is implemented in accordance with relevant law, including health and safety duties, safeguarding responsibilities, and equality obligations.

Responses will be consistent, non-discriminatory, and informed by our Equality, Diversity and Inclusion commitments. As such:

- The same rules apply to all protest regardless of cause, our guidance on respectful interaction is as follows (insert guidance here)
- If someone believes they are being treated unfairly the escalation is as follows (insert guidance here)

Reference to the following areas may also be included:

- Data protection (if filming / recording protestors)
- Licensing conditions (venue / event licensing)
- Contractual duties to artists and audiences

4. Definition of protest and disruption

Peaceful protest may include:

- Leafleting or holding placards in designated public areas
- Silent protest outside buildings
- Petitions or statements of concern

Disruptive actions include:

- Interrupting performances or exhibitions
- Entering restricted or backstage areas
- Actions that intimidate staff, artists or audiences
- Damage or risk to artworks, buildings or equipment
- Unauthorised banners, flags or demonstrations within auditoria or galleries

5. Permitted and restricted areas

Permitted (subject to safety assessment):

- Public external areas
- Foyers or shared public spaces where access and safety are maintained

Restricted:

- Auditoria during performances
- Exhibition spaces where artworks / displays may be at risk
- Backstage, dressing rooms, offices, plant rooms
- Any area designated by security or duty management

6. Roles and responsibilities

Front of House and Visitor Services

- Monitor activity and report concerns
- Do not engage in debate or negotiation

Duty Manager / Senior Manager

- Assess risk and determine response
- Authorise any intervention or escalation

Security

- Manage access and safety
- Liaise with police where necessary

Senior Leadership

- Oversee decision-making
- Approve public statements

7. Escalation and response

Responses may include:

- Verbal request to cease or relocate activity
- Temporary suspension of access
- Removal of items or individuals
- Involvement of police or emergency services

We will contact emergency services only where there is a safety risk or unlawful activity or if there is a credible threat to the organisation and its people, criminal damage or serious disruption.

All actions must be documented.**Our records will record areas such as:**

- Date / time
- Incident summary
- Actions taken and by whom
- Safety considerations
- Communications issued
- Follow-up actions (support, review)

8. Staff and artist / curator welfare

The organisation will:

- Prioritise staff and artist / curator safety
- Provide support following incidents
- Ensure that no individual is required to manage protest alone

Where children or vulnerable adults are present, safeguarding considerations take priority and the safeguarding lead must be informed where appropriate. Insert named safeguarding lead here.

9. Communications

All public statements regarding protest will be coordinated through the Communications team and will be consistent with ensuring public benefit and trust.

Staff and artists should not make public statements on behalf of the organisation unless authorised.

The organisation should inform the sponsor or donor about any protest or risk of protest at the earliest opportunity.

Concerns about how this policy has been applied can be raised via (complaints email / process). We will respond within (x) working days.

10. Review and governance

This policy is approved by the Board and reviewed every year, or following any significant incident.

The board receives a quarterly summary of incidents and learning (even if “none”).

11. Approval and Implementation

This policy has been approved by the Board of trustees of (Organisation Name) and is effective from (Date). All staff, volunteers, and trustees are expected to adhere to this policy.

Signed: (Chair of the Board of trustees)

Date:

Revised and Updated:

Creating a Protest Management Policy for smaller-scale and grassroots cultural organisations or non-registered charities

For smaller-scale and grassroots cultural organisations or non-registered charities, the following framework is suggested to support organisations to create a Protest Management Policy.

The template can be adapted for your organisational context, including the likelihood and risks of protest and to cover different scenarios as they may occur.

1. Why this policy exists

We respect people's right to express views and protest peacefully.

This policy helps us keep people safe and ensures our work can continue without disruption or harm.

We do not permit actions that disrupt performances, endanger people, or compromise the safety of artworks / displays, staff, artists, curators or audiences.

The organisation protects artistic / curatorial independence. Sponsors, partners and third parties do not determine artistic / curatorial content. Protest management decisions are separate from programming decisions.

2. Where this policy applies

This policy applies to:

- Our venue or workspace
- Performances, rehearsals and events
- Staff, freelancers, artists, curators, volunteers and visitors

3. What we support

We support:

- Peaceful protest
- Lawful expression of views
- Respectful disagreement

The policy is implemented in accordance with relevant law, including health and safety duties, safeguarding responsibilities, and equality obligations.

4. What we cannot allow

We do not allow:

- Disruption of performances or workshops
- Actions that make people feel unsafe
- Damage or risk to people, equipment or artworks / displays
- Entry into non-public areas

5. If a protest happens

Step 1: Pause and assess

- Is anyone unsafe?
- Is the activity peaceful or disruptive?

Where children or vulnerable adults are present, safeguarding considerations take priority and the safeguarding lead must be informed where appropriate. Insert named safe-guarding lead here.

Step 2: Refer to the policy

- Calmly explain boundaries if needed
- Ask people to move to a safe / public area if appropriate

Step 3: Escalate if necessary

- Contact the designated lead (Artistic Director / Producer / Chair)
- Call security or emergency services only if safety is at risk or if there is unlawful activity

No staff member is expected to manage a protest alone.

6. Who decides

- Day-to-day decisions: Director / Producer
- Serious risk or reputational issues: Chair + one trustee

All significant incidents will be recorded in an incident log.

7. Communication

We aim to be calm, respectful and factual. Only the designated lead will speak publicly on behalf of the organisation.

Concerns about how this policy has been applied can be raised via (complaints email / process). We will respond within (x) working days.

8. Values statement

We believe in dialogue and freedom of expression, but we also have a duty of care to our community, artists / curators and audiences.

9. Review

This policy will be reviewed every year, or after any major incident.

The board / leadership receives an annual summary of incidents and learning (even if “none”).

10. Approval and Implementation

This policy has been approved by the Board of trustees of (Organisation Name) and is effective from (Date). All staff, volunteers, and trustees are expected to adhere to this policy.

Signed: (Chair of the Board of trustees or designated leadership member)

Date:

Revised and Updated:

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

Resources for Arts, Culture and Heritage Organisations

The following provides a further list of resources for further reading and research:

Regulator, Funders and Best Practice Guidance

The Charity Commission for England and Wales

- A non-ministerial department of His Majesty's Government that regulates registered charities in England and Wales and maintains the Central Register of Charities. Its counterparts in Scotland and Northern Ireland are the [Office of the Scottish Charity Regulator](#) and the [Charity Commission for Northern Ireland](#).
- The Charity Commission England and Wales publishes guidance on [Fundraising](#). This guidance covers:
 - ✓ acceptance and refusal of donations
 - ✓ fundraising legally and responsibly
 - ✓ a trustee guide to fundraising

Fundraising Regulator

The Fundraising Regulator is the independent voluntary regulator of charitable fundraising in England, Wales and Northern Ireland. It is funded by a levy on the largest fundraising charities.

The Fundraising Regulator:

- Sets, maintains and promotes the standards for fundraising in the [Code of Fundraising Practice](#) and publishes guidance to support the code.
- Investigates [complaints about fundraising](#) taking action as necessary.
- Maintains a public [Fundraising Directory](#) to show which organisations have committed to the code and excellent fundraising.
- Enables people to stop direct marketing contact from fundraising organisations by using the [Fundraising Preference Service](#) (FPS); and
- Allows organisations that [Register](#) with the Fundraising Regulator to display the [fundraising badge](#) on their fundraising material.

Central Government

- [GOV.UK – Charity Fundraising: a guide to trustee duties](#)

Chartered Institute of Fundraising

- This is the Chartered body which represents fundraisers in the UK. It has various guidance and reports available, including:
 - [Creating a Donations Acceptance and Refusal Policy](#)
 - [Researchers in Fundraising Handbook](#)
 - [Treating Donors Fairly](#)
 - [Developing a Fundraising Strategy](#)

Arts Council England

- Arts Council England is the national development agency for creativity and culture. Its mission is to support artists, arts organisations, libraries and museums to flourish, innovate and deliver excellent work, and to support everybody across the country to access that work and develop their own creativity. It does this through direct investment, developmental support and advocacy.
- Alongside commissioning this work on Managing Risks and Reputation in Fundraising, Arts Council England has produced resources such as the [Practical Guide to Lawful Fundraising](#), which was produced in 2018 in response to changes around data privacy and GDPR rules and which can be read in conjunction with Charity Commission and Fundraising Regulator guidance.