

Invisible Dust Ethical Fundraising and Gift Acceptance Policy

Context and Objective of Policy

Invisible Dust is a registered charity (1171156) and company limited by guarantee (07403737). The charity's objects ('Objects') are for the public benefit:

- a) The promotion of arts, in particular through (but not limited to) the production and public exhibition of high quality works of visual and digital art informed by scientific study on subjects including (without limitation) Sustainable Development and the protection, enhancement and rehabilitation of the environment, and
- b) The advancement of education, in particular through (but not limited to) the production and delivery of workshops, seminars and lectures for the general public on subjects including (without limitation) sustainable development and the protection, enhancement and rehabilitation of the environment. In this Article sustainable development means that which meets the needs of the present without compromising the ability of future generations to meet their own needs

Invisible Dust actively seeks opportunities to work together with external organisations and individuals to achieve shared objectives to fulfil its statutory obligations and charitable aims. Fundraising plays a central role in meeting the organisation's objective of maximising income to support and sustain its activities and ambitions. Invisible Dust has a duty and desire to be sensitive to the general concerns of the public, and the people it works with, regarding ethical issues of fundraising. It recognises the need to conduct its fundraising responsibly, mitigating potential reputational, financial, or actual risk that may result from accepting gifts or sponsorship. This document outlines Invisible Dust's policy and process for accepting gifts and sponsorship, and managing associated risks. The policy applies to gifts and sponsorship in cash and in kind.

Parameters of policy

Invisible Dust's Trustees must, under general principles of charity law, take decisions as to whether to accept or refuse gifts or sponsorship, in the best interest of the organisation. Trustees must not allow individual or collective views on political or ethical issues, not directly related to the interests of the organisation, to affect their judgement when making these decisions.

Invisible Dust's management and trustees are therefore prohibited from allowing their personal political or moral beliefs to influence their judgements about gifts or sponsorships and whether the organisation should reject them. The organisation limits its judgments to the potential harm caused to the organisation by unethical sources of funding, rather than the potential harm done to society by alleged illegal or unethical activities of companies and individuals.

Risks

Invisible Dust will carry out fundraising in compliance with the Fundraising Regulator's Code of Fundraising Practice, exceeding these standards wherever possible. Risks of not managing the ethical issues of fundraising include:

- Reputational damage arising from association with organisations (including for sponsorship, cause-related marketing, affinity marketing and products / services) or individuals perceived to be engaged in unethical activities

- Actual damage to the commissioned artworks or venues hosting Invisible Dust's projects / exhibitions arising from protests against Invisible Dust's association with such individuals or organisations
- Acceptance of tainted donations and consequential reputational damage arising from complicity with illegal activities
- Financial loss arising from a failure to effectively manage relationships with potential donors or sponsors
- Failure to carry out Invisible Dust's statutory obligations as a result of relationships with donors or sponsors

Policy

Invisible Dust is proactive in seeking out companies, individuals, trusts and foundations that are ethically driven and leaders in environmental thinking and practice, and that share Invisible Dust's values and vision regarding the environment and climate change.

Invisible Dust is actively engaged in fundraising and receives voluntary and corporate support from a variety of sources. The organisation considers each gift and sponsorship on its own merits. There are occasions when it is not possible for the organisation to accept a gift or sponsorship.

Invisible Dust will always refuse a gift or sponsorship if:

- A. It would be unlawful to accept it (eg the organisation is aware that the gift or sponsorship comprises the proceeds of crime), or
- B. There is a significant risk that acceptance may cause harm to the organisation, and any such harm is likely to be disproportionate to the benefit the organisation will derive from acceptance of the gift or sponsorship.
- C. The conditions attached to accepting the gift or sponsorship outweigh its value to the organisation.

'Harm' could arise:

1. Where acceptance of a gift or sponsorship interferes with or has the potential to interfere with, Invisible Dust's ability to fulfil its charitable aims, statutory obligations, or other objectives.
2. Where acceptance of a gift or sponsorship and any terms attached to it might lead to an undue and inappropriate third-party influence, or impression of such influence, on organisational decisions.
3. Where the acceptance of a gift or sponsorship would substantially damage Invisible Dust's reputation among its supporters and the public at large, or incur criticism from the press, public, or any other relevant community of professionals.
4. Where the gift comes from a company directly involved in activities that run contrary to Invisible Dust's charitable objectives, vision and aims, especially activities that negatively impact on the environment and climate change. These include, but are not limited to, companies involved with any of the following activities: fossil fuels; aeronautics; animal testing; genetic engineering; human rights abuses; intensive farming; manufacture of environmentally hazardous products or chemicals; military contracts; mining; nuclear power; third world debt; the manufacture of tobacco; and water pollution.
5. Where by accepting a gift or sponsorship, existing and future relationships with donors and supporters will be jeopardised.
6. Where there is the risk of the donor or sponsor not being able to honour the gift or sponsorship in full or in part.
7. Where the acceptance of a gift or sponsorship could give rise to an inference of complicity with illegal activities.

Anonymous Donations

Besides low-level donations received via cash donation boxes or Invisible Dust's JustGiving page (or similar platforms), the organisation is not able to accept genuinely anonymous donations because such donations prohibit a proper risk assessment. The identity of donors who prefer to give anonymously must be known to the Artistic Director, Development Manager, Trustees or the Chair.

Policy in Practice

The Development Manager operates the policy under delegated authority from the Board of Trustees, who retain overall responsibility for decisions relating to the acceptance of gifts or sponsorship. The Development Manager will carry out a risk assessment on all prospective gifts or sponsorships, exercising due diligence to seek assurance that the acceptance of gifts or sponsorship is in the best interests of the organisation. Risk assessments will also be carried out for repeat gifts or instalment payments of existing gifts or sponsorship.

In the case of repeated gifts or sponsorships, or gifts given in instalments, the previous risk assessment shall be updated to include any significant areas of concern that may have arisen since the previous assessment was carried out.

The Development Manager will undertake risk assessments, raising any concerns with the Artistic Director, who will judge whether an unacceptable degree of risk is attached to a proposed gift or sponsorship. If the outcome of a risk assessment is considered unsatisfactory or if a gift has the potential to cause harm to the organisation, the Artistic Director will decide whether a rejection is appropriate in the first instance. Where there remains some doubt over the potential harm to the organisation, the matter will be referred first to the Chair and, if necessary, the Board of Trustees. All gifts or sponsorship of a value of £100,000 or more will be considered by the Artistic Director and Board of Trustees as a matter of course prior to initial acceptance or signing of contract.

In exceptional circumstances the Board may recommend that advice be sought under s110 Charities Act 2011 on the issue of whether to accept, decline or return a gift.

Risk assessments will not be performed on funding received from public bodies such as Arts Council England or statutory bodies such as the National Lottery Heritage Fund.

Risk Assessment

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

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

In seeking to limit its exposure to risk the Trustees of Invisible Dust are committed not to establish partnerships with individuals or corporate entities whose primary enterprise involves activities which may harm the organisation or its objectives.

Research

In order to compile Risk Assessments and make informed decisions, the organisation shall undertake its own research into the origin of potential gifts or sponsorships. The Development Manager will pursue these assessments responsibly, taking care to present their findings without bias. In exceptional circumstances Invisible Dust's Artistic Director may choose to commission additional, freelance or external research.

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

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

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