

# Ethics Policy

Guidance for the acceptance or refusal of sponsorship and donations

## INTRODUCTION

Complicité is a theatre company and an arts organisation with a strong commitment to operating ethically, committed to ensuring that the politics of the work we make are reflected in how we make it.

This document sets out to ensure that a consistent approach to due diligence and an appropriately documented, fast and efficient process is established, to enable the team to fundraise both effectively and ethically.

The position of this policy is not to accept donations/sponsorship that are judged unethical or capable of putting the reputation of Complicité at risk. It also requires staff and Trustees to acknowledge the important role that common sense plays in considering whether to accept certain donations.

### Charitable objectives:

- To present Signature and Associate productions that represent artistic quality and innovation and that are developed through our core values of collective enquiry, co-creation and representation.
- To grow our Creative Engagement Programme to broaden and deepen our engagement, particularly with schools and with under-represented groups across our communities.
- To embed diversity and representation at all levels – within the core Company, our collaborators, participants and audiences.
- To be an innovator in the use of creative media in the Company's work.
- To better understand the Company's audiences through data gathering and analysis.
- To extend audience reach and depth of engagement, through the artistic programme, partnerships and communications.
- To develop a new vision for the Company to support its next stage of evolution.
- To develop a sustainable business model that will support the company into the future.

### The Way Forward

- Complicité has established an impartial Ethics Committee, whose purpose is to make recommendations on potential gifts.
- The Executive Director will use the criteria listed below to determine when to refer potential gifts to the Ethics Committee.
- The Executive Director is responsible for providing the Ethics Committee with the fullest possible information to aid their decision-making.
- The Ethics Committee is responsible to ensure that Complicité does not accept a gift that would place the organisation at unacceptable risk.
- The ultimate decision to accept or refuse a gift will remain with the Ethics Committee. This applies to gifts of cash, donations, sponsorship and in-kind gifts/services.

- It is recommended and expected that **ALL** Ethics Committee members participate in the process of considering gifts.

### **Ethics Advisory Group: terms of reference**

Purpose	To consider potential gifts referred to it by the Executive Director in accordance with the principles set out in this document, taking into account the amount of publicity the donor/sponsor may require.
To be advised by	Two board members: Martha Awojobi, Emma Stevenson
Working method	<ul style="list-style-type: none"> <li>• To act and rely on material put before it by the Executive Director;</li> <li>• To request the Executive Director to conduct further research if deemed necessary;</li> <li>• To consider in detail potential gifts referred by the Executive Director; specifically, whether the potential gift may present ethical or reputational risks to Complicité</li> </ul>
Meetings	Discussions can take place on the phone or, should the question be particularly complicated, a meeting may be deemed necessary.

### **Procedure for urgent advice**

Often, the team will require a speedy response to queries and the urgent advice of the Ethics Committee will be required. In these circumstances, the Executive Director will ensure that the members of the Ethics Committee receive the required research and information by the most time-efficient means possible.

### **Refusal of a gift**

Should a gift be refused, the Executive Director in consultation with the Committee need to consider:

- The wording of the refusal to the potential donor, so that it is sensitive and considerate
- Who signs the refusal letter – usually to be signed by the Chair of the Board;
- How to respond to the potential donor, should they wish to know the specifics of why their gift was refused.

### **Areas of concern**

- In line with our environmental policy, we would never accept money from a fossil fuels company or another company that, in the view of our Ethics Advisory Group, are making considerable negative impacts on the environment
- Evidence of illegal or unethical activity;

- Finance from sovereign states that are consistently criticised for their approach to human rights, including freedom of expression, oppression of minorities, slavery, and gender discrimination;
- Donations from individuals that have strong associations with such states
- Commercial organisations in fields such as pharmaceutical, oil & fossil fuels, tobacco, banking, alcohol and the manufacture & trading of weapons that have attracted unfavourable press;
- Donations from individuals that have strong associations with these sectors
- Donations/sponsorship that present an unacceptable conflict of interest;
- Anonymous donations, when Complicité is dealing with an intermediary

#### **Further guidance**

- Institute of Fundraising 'Acceptance, Refusal & Return. A Practical Guide to Dealing with Donations' [here](#)

This policy was updated in September 2023 and will next be reviewed in September 2025, unless changes to legislation or Complicité's policy require it to be reviewed sooner.