



ETHICS POLICY 2019

This policy sets out the standards of conduct that are expected from all Chisenhale Gallery representatives – its employees, trustees, and everyone else who works with the Gallery. It describes Chisenhale Gallery’s core values, which underpin every activity and includes ethical considerations in respect of receiving donations, codes of conduct for staff and artists, the organisation’s policy on fair pay, and expectations of how our employees should work together. It is our aim to at all times provide a safe, supportive and positive working environment for all, one based on collaboration and respect, and this policy has been developed with this core principle in mind.

This document should be read in conjunction with all other Chisenhale Gallery policies, including those on Equal Opportunities, Health and Safety and Safeguarding; as well as employment contracts and artists’ contracts where relevant.

Chisenhale Gallery is a registered charity, which receives approximately 25% of its annual income as public funding from Arts Council England. The remaining 75% is raised from a range of sources including grants from trusts and foundations, corporate sponsors and donations from individuals. As a charity, Chisenhale Gallery has a duty to be transparent and accountable, to use both the public and private funds it receives wisely, and to deliver its charitable aims for the benefit of the public.

Our Mission is:

Chisenhale Gallery supports artists to pursue new directions and to produce their most ambitious work to date. We enable audiences to experience this process of commissioning and producing art, and to learn from it through critical reflection, discussion and participation.

Our Vision is:

To be innovative, experimental and agile. To present an inspiring and challenging range of perspectives and art forms, based on rigorous research and strong curatorial vision.

Chisenhale Gallery’s ability to maintain a strong relationship of trust with its audiences, artists and funders is critical to its ability to fulfil this mission and vision. To achieve this, no individual should use their position here for personal gain or to benefit another at the Gallery’s expense, our mission, our reputation, or the public we serve. Nor should any individual act in a way that could be seen to compromise the independence and integrity of Chisenhale Gallery.

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1. CHISENHALE GALLERY'S CORE VALUES

Ambitious

- Striving for excellence across all aspects of our work
- Supporting artists to make their most ambitious work to date
- Commissioning and producing challenging work that other organisations couldn't, or wouldn't, do
- Taking risks to push the boundaries of contemporary art practice

Inclusive

- Striving to be representative, through the programme, our staff and our audience, of the diversity of UK society
- Being open to new and challenging perspectives, artforms and discourses
- International in our outlook, yet rooted in our local East London community

Supportive

- Placing artists at the centre of all our activities, enabling their professional development and providing extensive curatorial support
- Ensuring fair pay for artists, and all those who work with Chisenhale Gallery
- Enabling employees to develop their skills and expertise through training and mentoring
- Developing policies which will ensure that equality and fairness are embedded throughout our culture and activities

Engaged

- Both politically and socially
- Commissioning work that generates debate and sets agendas
- Providing opportunities for both artists and audiences to critically engage both with our work and the world around them

2. CODE OF CONDUCT FOR EMPLOYEES

This Code of Conduct applies to all employees, freelancers and casual workers, and to their conduct both within the organisation and when dealing with artists, participants, the public and other organisations as a representative of Chisenhale Gallery (the term “employees” will be used throughout this document but applies to all the above groups). The Code of Conduct does not affect an employee’s rights and responsibilities under the law; its purpose is to provide clear, helpful advice.

Contravention of this code may result in disciplinary proceedings, which could end in dismissal. For those individuals not falling within the scope of Chisenhale Gallery’s Disciplinary and Grievance Procedures (such as freelance workers), appropriate action will be taken, which may include the Gallery ceasing to work with them in future.

STANDARDS

Chisenhale Gallery employees are expected to provide the highest possible standard of service to the public, participants, and artists, and to treat their colleagues with respect. They are also expected to conduct themselves in a way that does not undermine the relationship of trust and confidence between themselves and the organisation.

Employees are expected to adhere to Chisenhale Gallery’s core values, which define the way the organisation works and how it plans to develop and wishes to be regarded by others. They must not conduct themselves in a way that brings Chisenhale Gallery, its employees, trustees, funders or partners into disrepute, or causes reputational damage.

Employees will be expected, without fear of recrimination, to bring to the attention of the Director or Deputy Director any potential grievances, improprieties or breaches of procedure by themselves or other Chisenhale Gallery employees.

All employees are expected to be accurate in recording their time at work, where this is a requirement, and to use the gallery’s Time off in-lieu (TOIL) Policy in good faith.

RELATIONSHIPS

Audiences and participants

Employees should always ensure they provide a courteous, efficient and impartial service to all groups and individuals, and must ensure that their actions follow the Gallery’s Equal Opportunities Policy. All stakeholders (including artists, participants and audience members) have the right to be treated with fairness and equality.

Media

Employees must not deal directly with the media unless they have been expressly authorised to do so by the Director. All media enquiries received by employees must be immediately referred to the Director or Curator: Commissions, without engaging with the journalist. Any article, publication, or interview given on aspects of Chisenhale Gallery’s programme or activity must be authorised by the Director.

Other employees

All employees have a responsibility to act in a way that ensures their colleagues are treated with dignity and respect. They are expected to adhere to the standards of behaviour set out in the Gallery’s Respect at Work Policy and in particular not to discriminate against colleagues. Mutual respect between employees is essential, and all relationships should be conducted on a constructive, courteous and professional basis.

Staff and managers have a mutual responsibility to ensure good working relationships. As part of this process, staff should carry out any reasonable and lawful requests that their manager makes and to do so to the best of their ability; and should behave courteously, reasonably and fairly in all dealings with their managers. Managers should endeavour to reasonably support staff in the proper performance of their duties, including offering assistance, where necessary, in working with other employees; and should behave courteously, reasonably and fairly in all dealings with staff.

All employees should respect their colleagues' working patterns and their time outside work. This will normally mean that employees should not contact their colleagues about work matters outside regular office hours (10am until 6pm, Monday to Friday), other than in exceptional circumstances.

Recruitment and other employment matters

Employees involved in recruitment should ensure that appointments are made solely on the basis of merit. It is unlawful for an employee to make an appointment, which is based on anything other than the ability of the candidate to undertake the duties required by the post.

To avoid any possible accusation of bias, employees should not be involved in an appointment where they are related to an applicant, or have a close personal relationship with them. All employees must disclose to Chisenhale Gallery any relationship known to exist between themselves and a candidate for an appointment of which they are aware.

Chisenhale Gallery recognises that employees who work together may have or form close personal relationships. While it does not wish to interfere with these personal relationships, the Gallery expects all employees to behave in an appropriate and professional manner at work. To ensure that potential problems are avoided, if the relationship is between a manager and an employee whom they line-manage, it should be declared to the Deputy Director. Chisenhale Gallery reserves the right, where such a relationship exists, to ensure that those concerned are not employed in a situation where one would be responsible for managing the other. Alternative mitigating measures may be introduced to ensure that appropriate reporting lines are in place.

Employees should not be involved in decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative, partner or someone with whom they have a close personal relationship.

CONFLICTS OF INTEREST

Employees should make every effort to ascertain any actual or potential conflict of interest and should report this to the Director. The Director will be responsible for managing any conflict of interest that may arise, once they have been notified of it.

Employees must not be involved either directly or indirectly in any other work (to include paid work and volunteering) that could conflict with the interests of Chisenhale Gallery – or be perceived to do so – without first obtaining authorisation from the Director. If an employee intends to carry out work for another organisation, they must first obtain authorisation from the Director. Carrying out other work without authorisation may result in disciplinary action being taken. This does not apply to freelance workers.

Any work undertaken on behalf of other organisations must be executed outside Chisenhale Gallery's normal office hours. Employees will be responsible for accounting for any additional income they earn through work for other organisations to HMRC through the Self Assessment process.

CONFIDENTIAL INFORMATION

Employees have a responsibility to protect and not disclose commercially sensitive information. They have a duty to maintain confidentiality and must not disclose any information obtained in the course of their employment to any third party for any unauthorised reason. Employees must not use any information obtained in the course of their employment for personal gain or benefit, nor should they pass it on to others who might use it in such a way.

Employees must not communicate confidential information or documents to others who do not have a legitimate right to know. Confidential information which is stored digitally must only be disclosed in accordance with the requirements of the General Data Protection Regulation (GDPR). A disclosure which complies with the requirements of the Whistleblowing Policy will be regarded as authorised disclosure.

INFORMATION TECHNOLOGY AND DATA SECURITY

Employees must ensure that they use technology professionally, appropriately and responsibly and follow Chisenhale Gallery procedures in relation to the use of technology and access to/storage of information in relation to the General Data Protection Regulation (GDPR).

This also applies to external facing technology including social media which, due to its nature, means that any comments posted about Chisenhale Gallery should be regarded as public, whether made in a work or private capacity and should not damage the reputation of the organisation, staff, artists or participants, or contravene the Gallery's Equal Opportunities Policy.

PERSONAL INTERESTS

Employees must declare any financial or non-financial interests that could be – or be perceived to be – in conflict with Chisenhale Gallery's interests. This may include membership of outside bodies in a personal capacity. In such cases employees should be mindful not to place themselves in a situation where their involvement or working contribution could compromise their continuing professional duty to Chisenhale Gallery's interests.

INTELLECTUAL PROPERTY

All employees must ensure that they comply with the stipulations in their contract of employment in relation to Intellectual Property.

EQUALITY

All employees must ensure that they comply with the Gallery's Equal Opportunities Policy, in addition to the requirements of the law.

USE OF FINANCIAL RESOURCES AND PROPERTY

Employees must ensure that they use all Chisenhale Gallery funds entrusted to them in a responsible and lawful manner, and should strive to ensure value for money. They should be aware of and adhere to Chisenhale Gallery's finance procedures, including procedures for signing off expenditure and selecting and vetting new suppliers.

Employees must not steal, wilfully damage or take off-site without permission, anything that belongs to Chisenhale Gallery. They must not use Chisenhale Gallery resources to recognise or reward colleagues without the approval of the Director.

HEALTH AND SAFETY

Employees are expected to ensure that a safe working environment is maintained and prevent the risk of injury to themselves and others in accordance with the Gallery's Health and Safety policy.

WHISTLEBLOWING

Chisenhale Gallery expects all employees, and others it deals with, who have serious concerns about the conduct of any aspect of its activities, to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

Any suspicion of wrongdoing will be treated seriously and will be reviewed and analysed in accordance with the Gallery's Disciplinary and Grievance Policy. Chisenhale Gallery will make every possible effort to protect employees from reprisals for making any complaints raised in good faith, and will take seriously any related complaints it receives.

GIFTS AND HOSPITALITY

Employees should never put themselves in a position where they could be accused of taking or offering bribes or inducements for personal gain.

Chisenhale Gallery understands that in the course of day-to-day business some employees may be offered gifts of significant value. Other than in exceptional circumstances, approved in advance by their line manager, employees may not offer or accept offers of gifts from individuals or companies with whom Chisenhale Gallery currently does, or might in the near future, conduct business. This does not apply to gifts of a token nature or of relatively insignificant value (less than £50), nor does it include hospitality accepted as part of work arrangements (for example, working lunches). Employees should talk to their line manager or the Deputy Director, if they are unclear as to what is acceptable.

Employees should notify their line manager of any personal invitations to non work-related events involving corporate hospitality, offered or given by any visitor, artist, business contact or potential contractor. Such invitations should only be accepted with line manager approval.

There may be some circumstances where hospitality is offered to events which will promote Chisenhale Gallery's interests and Chisenhale Gallery recognises that external networking for some departments is a core part of their work. In these cases employees should be clear in what capacity they are attending and inform their line manager.

Employees may only offer hospitality in the course of carrying out their work with prior approval from their line manager. Any such hospitality must be justifiable and not extravagant.

3. CODE OF CONDUCT FOR ARTISTS

Chisenhale Gallery places artists at the centre of all its activities. Our remit is to support the development of artists' practice, enabling the production of ambitious new work and presenting that work to new audiences. Chisenhale Gallery aims at all times to provide a safe, supportive and positive working environment for artists, one based on collaboration and mutual respect.

Chisenhale Gallery's employees provide commissioned artists with curatorial support, constructive critique, structured mentoring and production support, as well as fundraising support to enable the production of ambitious projects. Mutual respect between the Gallery's employees and artists is essential, and all relationships should be conducted on a constructive, courteous and professional basis.

All commissioned artists receive a commissioning fee that adheres to the Gallery's policy on fair pay. Contracts are entered into between the Gallery and commissioned artists, which set out responsibilities and expectations on both sides. Artists are expected to adhere to the stipulations of the contract and endeavour to fulfil all of the responsibilities detailed within it. In return artists can expect that Chisenhale Gallery will fulfil its obligations in relation to the contract.

Additionally, Chisenhale Gallery expects all artists that it works with to adhere to the same standards as its employees with regard to the Gallery's Respect at Work Policy, a copy of which is appended to artists' contracts. Particularly, Chisenhale Gallery expects artists to communicate with its staff in a way that respects their working patterns and their time outside work. In turn, Gallery staff must show the same respect for the artists with whom they are working.

Through the procedures set out in the Respect at Work Policy, any artist who feels they have been treated unfairly by any person representing Chisenhale Gallery, or that they have been subjected to bullying or harassment, may raise either an informal or formal complaint through the same process as Chisenhale Gallery employees.

4. RESPECT AT WORK POLICY

Chisenhale Gallery aims to provide a safe, supportive and positive working environment for all, based on collaboration and respect. It is the right of everyone working with Chisenhale Gallery, from commissioned artists to members of staff (including employees, casual and freelance workers), to work without fear of bullying or harassment. Chisenhale Gallery is committed to providing an environment in which all individuals can work effectively. It is the duty of all individuals to treat their colleagues with dignity and respect and to conduct working relationships in a manner that is courteous and professional at all times.

Chisenhale Gallery is opposed to harassment and bullying in every form. Everyone working with the Gallery is responsible for their own behaviour in this regard. Any threatening, aggressive or bullying behaviour, as well as any harassment, unwanted sexual attention or behaviour, may result in disciplinary action. If a complaint is brought to the attention of the Gallery, it will be investigated and appropriate action taken wherever warranted.

This policy applies to all those who work with Chisenhale Gallery in both paid and voluntary capacities – its employees, trustees, commissioned artists, casual workers and freelancers. It applies both at work and in other work-related settings, for example at work events taking place offsite, or at social events involving Chisenhale Gallery staff and artists.

WHAT IS BULLYING AND HARASSMENT?

Bullying is not defined in law, but it includes offensive, intimidating, or malicious behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient, and coercing others into inappropriate behaviour. It may be by an individual against another individual, or involve groups of people.

Harassment is unwanted conduct which has the effect of violating another person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for a person with a protected characteristic under the Equality Act 2010. Harassment can also apply even if the individual isn't a member of the particular protected group but is perceived to be. Both a single incident or persistent behaviour can amount to harassment.

Protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including national origin and nationality)
- Religion or belief
- Sex
- Sexual orientation

In cases of harassment, both the employer and the individual found to be carrying out the harassment may be liable to pay compensation to the victim.

Both bullying and harassment can be verbal, physical or non-verbal conduct, such as emails, texts or social media content.

Part of a manager's role is to allocate work to meet objectives and assess how that work is being done. This may involve giving legitimate and reasonable instructions or raising justifiable concerns or

criticisms regarding conduct and/or performance. Performance management does not constitute bullying or harassment when carried out in a constructive and respectful way.

Examples of bullying or harassing behaviour include:

- Spreading malicious rumours, or insulting someone, either verbally or by behaviour (for example by copying emails that are critical about someone to others who do not need to know, ridiculing or demeaning someone in front of their colleagues – picking on them or setting them up to fail)
- Exclusion or victimisation
- Unfair treatment
- Overbearing supervision or any other misuse of power or position
- Unwelcome sexual advances (see definition of Sexual Harassment below)
- Making threats or comments about job security without foundation
- Deliberately undermining a competent worker by overloading and constant criticism
- Preventing individuals progressing by intentionally blocking promotion or training opportunities.

Sexual harassment is unwanted and unwelcome words, conduct, or behaviour of a sexual nature that has the purpose or effect of creating an embarrassing, hostile, degrading, humiliating, or offensive environment for the recipient. This constitutes a misuse of personal or institutional power and a form of discrimination based on a person's sex or gender identity.

Sexual harassment is behaviour that is uninvited and unwelcome by the recipient (even if there has been some previous relationship). Whether or not the harasser intended to be offensive is irrelevant, the limit of acceptable behaviour is up to the recipient to decide.

Sexual harassment is often linked with misuse of power or position. It can be a way of asserting superiority.

Sexual harassment can include:

- Making unnecessary and unwanted physical contact;
- Giving unwelcome personal gifts;
- Leering;
- Catcalling or wolf-whistling;
- Derogatory comments;
- Unwelcome comments about a person's body or clothing;
- Asking questions about a person's sex life;
- Engaging in unwelcome sexual propositions, invitations, and flirtation; or
- Making somebody feel uncomfortable through displaying or sharing sexual material.

Sexual harassment does not necessarily occur face to face and can be in the form of emails, visual images, social media, phone or text messages etc.

WHAT ARE THE RESPONSIBILITIES OF PEOPLE WHO WORK FOR AND WITH CHISENHALL GALLERY?

Everyone has a responsibility to ensure that bullying and harassment do not occur. Everyone who works with Chisenhall Gallery in any capacity is expected to demonstrate respect for their colleagues whilst at work and not harass or bully anyone.

If a colleague, artist, contractor, visitor or other third-party subjects you to bullying or harassment, you should report it in the way described below. Chisenhall Gallery will do what it possibly can to support you and prevent it from happening again.

If you see a colleague being bullied or harassed, you should report it to your line manager or another senior member of staff. Line managers have additional responsibilities to ensure that this policy is implemented, related complaints are investigated and dealt with effectively.

WHAT TO DO IF YOU FEEL YOU ARE BEING HARASSED OR BULLIED

If you feel that you are being harassed or bullied, we encourage you to report it to your line manager or if your manager is the person you are complaining about, to their line manager.

Should you feel that these options are inappropriate, you should report the matter to the chair of Chisenhale Gallery's Board of Trustee.

WHAT WILL HAPPEN IF I RAISE A COMPLAINT OF BULLYING OR HARASSMENT?

If you make a complaint, the person who receives it will hold an initial meeting with you to find out the details and discuss whether you want the matter to be dealt with informally initially, or by using a formal procedure. Confidentiality will be expected from all parties involved in the process.

Chisenhale Gallery will make every possible effort to protect employees from reprisals for making any complaints raised in good faith, and will take seriously any related complaints it receives.

If the complaint is about a contractor or other third party (someone who is not employed by Chisenhale Gallery), we will do what we reasonably can to prevent it from recurring, which may include ceasing to do business with the contractor or company.

WHAT IF I DECIDE I WANT TO MAKE AN INFORMAL COMPLAINT?

You may want to try to resolve the problem informally by explaining to the individual concerned that their behaviour is unwelcome and should stop. If you wish, you may do this with support from a colleague or your line manager.

If you decide to try to resolve the problem informally, it is a good idea to keep notes or a diary of any incidents of bullying or harassment and your attempts to resolve matters. If this does not resolve the problem, these notes may help the Gallery to investigate, should you decide later to take things further.

If you choose the informal route, you may not want Chisenhale Gallery to take any action. Although we will normally follow your wishes, if we believe that your welfare, health or the safety of others may be at risk, or for other overriding reasons, we may decide to investigate. This could involve approaching the alleged bully or harasser. You will be notified first if this is the case, and every effort will be made to protect you from reprisals.

After an informal complaint there will normally be three possible courses of action:

- Taking no further action at that stage, but keeping the situation under review, enabling the person making the complaint to seek further advice in the future if necessary;
- Asking the person who has been accused of the bullying or harassment to stop the offending behaviour and, again, keeping the situation under review; or
- Escalating to a formal complaint, following the Gallery's Disciplinary and Grievance Procedure.

WHAT IF I WANT TO MAKE A FORMAL COMPLAINT?

If you feel that attempts at informal resolution have not worked or you feel that the incident was so serious that you do not want to try for informal resolution, then you should follow Chisenhale Gallery's Disciplinary and Grievance Procedure.

In order to relieve the pressure on one or both parties, to reduce the risk of further incidents and to prevent victimisation, Chisenhale Gallery may decide to suspend the alleged harasser. Suspension under this procedure does not assume guilt, nor does it constitute part of the disciplinary procedure, and the employee will remain on full pay. Temporary redeployment of one or both parties may also be considered if this is thought to be a viable option.

WHAT IF I WANT TO REMAIN ANONYMOUS?

We actively encourage people to put their names to complaints. Anonymous complaints are much harder to investigate and fewer assurances can be given about what action will be taken after they have been raised.

Anyone who receives an anonymous complaint should refer the matter to the Deputy Director. The seriousness of the issue and the likelihood of confirming the allegation from attributable sources will be taken into account when deciding what action will be taken.

5. FAIR PAY POLICY

Chisenhale Gallery is committed to paying all its employees, casual workers, freelancers and artists in line with best practice.

The Gallery pays all its casual workers – currently including Events Staff, Front of House Staff and the Cleaner – in line with the London Living Wage and is committed to act on changes to hourly rates within six months of any changes announced to the London Living Wage rate.

Pay for salaried employees is based on benchmarking across the visual arts sector. All salaries are reviewed on an annual basis, with proposals drafted by the Director and Deputy Director. When an inflation-related increase is agreed by the Board of Trustees, this applies to all salaried employees.

Pay rates for freelance workers are also based on relevant benchmarking. Rates will be altered as necessary to maintain competitiveness with other similar organisations and any increases to freelance rates have to be approved by the Board of Trustees.

Chisenhale Gallery is committed to paying artists in line with guidelines produced by AN-The Artists Information Company and adopted as the standard of best practice by Arts Council England. These guidelines set out banded fees rates for commissions of new work and for exhibitions of existing work, both for solo presentations and group exhibitions, based on an organisation's overall annual spend on its exhibitions programme.

Currently, Chisenhale Gallery pays artists the following fees:

Commissions fee: £3,000, to include participation at a minimum of three events (usually one Patrons' event, one public talk and one event for schools or young people).

Freelancers who participate in the gallery's *Engagement Programme* are paid a standard £150 for delivering a public talk or workshop.

6. DONATIONS POLICY

The purpose of the Donations Policy is to enable Chisenhale Gallery to raise funds by active and effective means, while at all times balancing the benefits against the potential reputational risks. The policy is designed to ensure due diligence and an appropriately documented, fast and efficient process which is both effective and ethical. At all times Chisenhale Gallery's staff and Trustees should be asking the question: "Are there any good reasons why Chisenhale Gallery should not accept a donation from this source?".

DEFINITIONS

'Donations', for the purposes of this policy, includes all donations, benefactions, endowments, legacies, pledges and other forms of giving that are voluntary transfers by a donor of money or other assets, made with philanthropic intent for the benefit of Chisenhale Gallery. After receipt, Chisenhale Gallery must own the donation in full and any work, project or intellectual property that results. The donor may not retain any explicit or implicit control over a gift after acceptance by the Gallery and there must be no contractual conditions attached to the donation.

For the purposes of this policy, givers of donations are referred to as 'funders' or 'donors', and this should be interpreted as including all associates of the funder/donor.

INITIAL AND FURTHER SCREENING

For donations of over £5,000 (the current level at which a donor is named for their support), all donors and potential donors will be subject to an initial screening comprising a search of publicly available material, designed to highlight potential areas of controversy or concern. Wherever practical this process will take place before a donation is secured, to avoid the potential reputational damage of refusing a donation.

The initial screening will normally involve a combination of adverse news searches on Google (or a similar web search engine), and a registry check (with Companies House data and/or reasonably accessible international registries). The initial screening will be conducted by the Development team, with the findings reviewed by the Director, who may request more detailed research and/or that a full review should be undertaken including referring the matter to the board of trustees. Professional search firms and international due diligence providers may be used if deemed appropriate. The confidential advice and opinions of individuals who have knowledge of the specific funders and/or context in which they operate, commercially or personally, may also be sought.

The screening process described above will not apply for contributions below £5,000 or those that are made through publicly accessible processes, for example if an unsolicited donor signs up to the gallery's Friends and Patrons' Programme through the website. Currently, unsolicited donations may be received online up to the value of £2,500.

CORPORATE SPONSORS AND PARTNERS

All corporate sponsors and partners providing support of £5,000 or more will be subject to the same initial screening of publicly available information mentioned above. This screening will be focused on the company and its activities, with particular reference to any activity that might be a source of reputational or ethical risk, such as pending major court cases and prominent allegations. Standard checks will be made in relation to the company's sector, its corporate register and listed company details in country of origin and of its parent or associated companies, if relevant, and more generally in relation to its regulatory jurisdiction.

DISTINCTION BETWEEN ALLEGATION AND FACT

The Director and Development team should distinguish between mere allegation, rumour or speculation on the one hand and confirmed fact or legal finding on the other, treating the former with caution although not disregarding it totally if they consider that negative public perception alone carries a reputational risk for Chisenhale Gallery, irrespective of the underlying truth.

RECORDS

All advice and research material received in respect of individual donors, institutional funders, corporate sponsors and partners, as well as any conclusions or views as to the prudence of accepting the potential funding expressed by Chisenhale Gallery employees or trustees, and all information concerning countries or their regimes gathered in the context of this donations policy will be retained on file on the Gallery's server. Notes will be made and retained digitally if discussions have been oral and not in writing.

REFERRALS TO THE BOARD OF TRUSTEES

The Board of Trustees retain overall responsibility for decisions regarding the acceptance and refusal of donations. As such, where the Director feels that the results of the initial screening conducted by the Development team should be further reviewed, the Director should consult with at least two board members before taking decisions.

In the case of donations above £50,000, either from individual donors, institutional funders, or corporate sponsors and partners, these must be reviewed and discussed by the full Board of Trustees at a board meeting, with decisions recorded in the minutes of the meeting.

The Board of Trustees shall consider all potential donations referred to it by the Director in accordance with the following principles of ethical fundraising. Chisenhale Gallery will not accept funds in circumstances when:

- The donation is made anonymously, through an intermediary who is not prepared to identify the donor to anyone at Chisenhale Gallery;
- The donor has acted, or is believed to have acted, illegally in the acquisition of funds, for example when funds are tainted through being the proceeds of criminal conduct; or,
- When acceptance of the funds would, in the judgment of the Board of Trustees, significantly damage the effective operation of Chisenhale Gallery in delivering its mission, whether because such acceptance would:
 1. Harm Chisenhale Gallery's relationship with other donors, partners, visitors or stakeholders;
 2. Create unacceptable conflicts of interest;
 3. Materially damage the reputation of Chisenhale Gallery; or,
 4. Detrimentally affect the ability of Chisenhale Gallery to fulfil its mission in any other way than is mentioned above.

The Board of Trustees will act and rely on the material put before it by the Director but may require further research to be conducted before it takes a decision. Minutes will be kept of its discussions and key points, together with the research material and reports and supporting documents. These will be stored electronically on Chisenhale Gallery's server, in accordance with the Gallery's Data Protection Policy.

DONATIONS FROM CHARITABLE FOUNDATIONS

Donations and grants of any size from charitable foundations registered with the regulatory authorities in the UK, North America, and European Foundation Centre (EFC) affiliated organisations, will not normally be subject to a full review by the Board of Trustees and can be progressed on the signing of an appropriate agreement with the funder.

For the United Kingdom this means charities regulated and scrutinised by the Charity Commission for England and Wales, the Office of the Scottish Charity Regulator, and the Charity Commission for Northern Ireland. For the United States of America this means tax-exempt, non-profit corporations or associations recognised under section 501(c) regulated and scrutinised by the Internal Revenue Service (IRS) and the relevant state Attorney General. For Canada this means charities regulated and scrutinised by the Canada Revenue Agency (CRA). In the absence of any equivalent regulatory framework covering Europe, the (EFC) has openly published its principles of good practice to which all affiliated organisations have to adhere.

Exceptionally, the Director may refer a registered charitable foundation to the Board of Trustees where the results of the initial screening suggest to the Director that there is a possible ethical or reputational risk to Chisenhale Gallery which ought to receive the attention of the Board, in particular, any area of risk associated with any founder or trustee of such a foundation.

RESTRICTED GIFTS

Subject to the provisions of this policy, Chisenhale Gallery:

- May accept unrestricted gifts, including those made with an expression of wishes that the gift be used for a particular purpose within Chisenhale Gallery's objects;
- May accept gifts restricted for particular projects, provided those purposes are in line with Chisenhale Gallery's core values, within the Gallery's charitable objects and capable of being carried out;
- Will not accept gifts that are too difficult or costly to administer or gifts that are restricted for purposes outside the purposes of Chisenhale Gallery.

Where a gift is proposed to be made for restricted purposes, the Director will consider, prior to accepting such a donation, whether the proposed project would be an appropriate project for Chisenhale Gallery in the circumstances including:

- Whether the proposed project is an effective way of furthering Chisenhale Gallery's objects;
- The intended impact of the proposed project;
- The anticipated financial cost of involvement in the proposed project;
- The impact the proposed project would have on Chisenhale Gallery's reputation;
- Whether the proposed project could be carried out in a manner that is lawful and consistent with relevant guidance; and
- The means by which useful results of any research will be disseminated.

If the Board of Trustees is satisfied that the project proposed is eligible, it will consider whether in all the circumstances accepting such a restricted donation would be in the best interests of Chisenhale Gallery.