

# **Management of Corporate Sponsorship**

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## **Auditor-General's Foreword**

Corporate sponsorship is sought and used by a number of Commonwealth agencies to obtain additional resources with which to support specific activities or programs. In addition, the success and the public exposure of an activity can be enhanced by sponsorship.

Corporate sponsorship can be provided as cash or as in-kind sponsorship, where the sponsor provides a product or a service. The value of sponsorship arrangements can vary from a few hundred dollars to several million dollars. A sponsorship agreement can last from a few hours, for a specific event, to a partnership of several years between agency and sponsor. In most cases the receipt of corporate sponsorship enables the agency to increase the scale or the scope of the sponsored activity, conduct it at a reduced cost to the agency or allow for additional expertise or assistance to improve its quality.

The purpose of this guide is to provide a framework to assist those agencies that already manage sponsorship activities, as well as those which are considering seeking corporate sponsorship. The framework outlined is not

intended to be a constraint on agencies pursuing corporate sponsorship. Opportunities for sponsorships are often limited only by the creativity of the personnel involved. The guide aims to help agencies to provide a sound administrative foundation for their corporate sponsorship program. It can also be used as a basis to review their current management of sponsorship activities.

A range of Commonwealth and State agencies and private sector organisations worked with the ANAO to develop this better practice guide. The ANAO appreciates the time, energy and expertise which they extended to this project.

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Auditor-General

## **What is corporate sponsorship?**

The term 'corporate sponsorship' is used in this guide to refer to a situation where a Commonwealth agency provides some benefit to a private sector company, corporation or other Commonwealth entity in exchange for money, goods or services to support the activities of that agency.

The benefits of being a corporate sponsor include the exposure of the sponsor's name or logo as a supporter of the agency activity. This activity may attract a larger or different audience from that which the sponsor might target in its normal advertising and could also include opportunities to use the sponsored activity to entertain clients for promotion of the sponsor's organisation. The association of the sponsor with the broader public interest of a government-funded agency can increase the loyalty of the sponsor's stakeholders - its shareholders, staff and customers - as well as providing the opportunity for the sponsor to present its name and products to a wider market.

The benefits an agency can receive from corporate sponsorship include:

- the injection of resources, either directly as cash sponsorship or indirectly as in-kind sponsorship. This may reduce the costs to an agency of performing a particular activity or allow for enhanced program delivery and/or expansion;
- providing funding for publications, conferences or other special activities that promote the program and/or agency;
- providing the program or agency with an opportunity to develop better working relationships with stakeholders; and
- promoting the public profile of a program or agency to a wider- than-normal audience. This may include increasing general community awareness of a program or agency and its activities.

The major risks for an agency to consider in its management of corporate sponsorship include:

- perceptions of improper conduct;

- the potential to embarrass the agency, and possibly the Government, through associating a Commonwealth activity with an inappropriate sponsor (that is, one whose activities or purpose may exhibit a degree of tension with Government policy) or one of poor repute. This may be balanced against specifically seeking sponsorship from a company seeking to rebuild its reputation;
- undertaking an activity on the basis of the promise of corporate sponsorship which then does not materialise;
- breaching Government accounting requirements;
- undervaluing its corporate sponsorship program to potential corporate sponsors; and
- not being cost-effective.

In evaluating these risks, an important consideration is whether the sponsorship arrangement would survive critical public scrutiny. It is also worth noting that, because of the uncertainty attached to such an arrangement, particularly in making accurate projections of revenue accrued and incorporating this revenue into the annual budget cycle, corporate sponsorship can change the risks associated with managing an agency.

The ANAO recognises that a wide variety of sponsorship arrangements currently exist across the Commonwealth, agencies have different experiences in the management of corporate sponsorship and their management frameworks for their programs are in differing stages of development. This better practice guide is thus not intended to be prescriptive but to outline key issues for agencies to consider in effectively managing the risks associated with corporate sponsorship. The key issues include:

- corporate sponsorship policies and guidelines;
- risks associated with corporate sponsorship;
- probity;
- strategic planning;
- sponsorship agreements;
- effective resource management;
- monitoring and review of performance of sponsorship programs; and
- reporting and accounting.

### **Setting an agency's corporate sponsorship policy**

Agencies that routinely use corporate sponsorship benefit from the efficiencies of having policies and guidelines in place to guide and coordinate their management. Policies and guidelines can:

- provide guidance to those seeking sponsors on behalf of the agency or program;

- clarify the boundaries within which corporate sponsorship activities take place in an agency; and
- provide a unified sense of direction across the agency in sponsorship matters.

Effective policies and guidelines do not constrain efforts to attract corporate sponsorship but instead ensure better coordination of effort. The extent of the detail contained in the policy will be determined by the scale of sponsorship activity in the agency. The policy will, ideally, articulate the degree of importance that the agency places on corporate sponsorship.

An agency's corporate sponsorship policy should be aligned with the agency's other key policies and plans, including strategic plans, business plans and the agency's code of conduct. Those agencies which have not developed a code of conduct might consider establishing an appropriate code, specifically including the management of corporate sponsorship and addressing issues of probity.

In some agencies there is a legislative requirement for policy to be determined by an agency Board or Council. Where this requirement is not present, the importance of the policy will be reinforced if, once developed, it is considered and endorsed by the agency's Board or Council.

Particular issues which should be included in the corporate sponsorship policy or guidelines are:

- the risks associated with corporate sponsorship; and
- probity.

These two areas are highlighted below.

### **Risks associated with corporate sponsorship**

In conducting an analysis of risks to the agency, consideration should be given to the risks associated with corporate sponsorship. An agency's risk management planning and controls should also relate to corporate sponsorship.

There are two particular risks associated with an agency's use of corporate sponsorship:

- the potential for conflict of interest between the agency and the corporate sponsor and the risk that, rightly or wrongly, this may be perceived to have occurred; and
- the possibility of the agency's activities being influenced by the sponsor.

Public perception of any conflict of interest or undue influence can present as great a risk to the agency's reputation as its occurrence in reality.

### **Conflict of interest**

When considering entering into an agreement with a particular sponsor, agencies may like to consider the following:

- will association with the sponsor lead to any conflict with the broader policies, practices and objectives of the Commonwealth?
- will association with the sponsor lead to any conflict with the policies, practices and objectives of the agency?
- is the agreement likely to lead to criticism from the general public or the media?

To avoid a possible conflict of interest, or any perception that one is present, agencies:

- could request potential sponsors to identify any real or perceived conflict of interest during the agreement negotiations;
- could examine the past and current commercial activities of the potential sponsor;
- should exercise great caution before entering into a sponsorship agreement with any party which may be subject to regulation by the agency; and
- should consider the national and international corporate connections of the potential sponsor.

### **Influence by sponsors**

Because of the possible perception that agency activities may have been influenced by the receipt of corporate sponsorship, agencies will need to give careful thought to the following:

- naming rights of sponsored activities;
- the inference of ownership of sponsored activities;
- agency endorsement of the sponsor's product or services;
- whether representatives of corporate sponsors or of sponsoring foundations should be on an advisory committee or management body of an agency;. and
- any other limitation, or appearance of limitation, of the agency's ability to carry out its functions fully and impartially.

### **Probity**

The same ethical standards which are applied to any other activity undertaken by an agency should be applied to corporate sponsorship. However, the risks associated with corporate sponsorship can be higher than those associated with normal agency activities. Consequently, a commensurately higher level of testing under ethical standards should be applied. If there are any doubts about the ethics of a proposed sponsorship agreement the test is whether or not the arrangement would withstand critical public scrutiny. In general, relations between agencies and corporate sponsors need to be conducted in a transparent manner and be able to stand up to public scrutiny and preserve public trust.

Codes of conduct establish the standards of behaviour expected of staff and provide assistance to staff in solving any ethical dilemmas they face. Ethical

principles are a proactive form of fraud prevention. Codes of conduct can help to prevent corruption by alerting staff to behaviour that could potentially be corrupt or perceived as corrupt by others. To this end, the most useful codes of conduct include examples that are directly relevant to the particular functions of the agency.

Where an agency develops a code of conduct this should include issues of probity relating to the management of corporate sponsorship. Areas on which guidance could be provided include:

- avoiding and disclosing any real or apparent conflicts of interest;
- agency rules regarding offers of gifts or benefits to Commonwealth Officers. Definitions and directions on personal benefits and appropriate parameters can be provided by the Board or Council when considering the sponsorship policy or code of conduct; and
- what action an officer should take if he or she thinks fraud or corruption has occurred.

Documents which may provide assistance to agencies include:

*Ethical Standards and Values in the Australian Public Service, (1996)*  
MAB/MIAC

*Guidelines on Official Conduct of Commonwealth Public Servants, (1995)*  
PSMPC

*The Essentials - APS Values & Standards of Conduct, (1997)* PSMPC

*Practical Guide to Corruption Prevention - Module 3, Code of Conduct, ICAC.*

The agency's internal audit branch, by undertaking regular reviews of internal controls, can help ensure that principles are being applied in a robust and proactive fashion.

Other points which could usefully be addressed in a corporate sponsorship policy are:

### **1. Definitions and objectives**

- Definition of sponsorship
- Policy objectives
- the ways in which corporate sponsorship can assist the agency to meet its objectives

### **2. Administration of sponsorship arrangements**

- Delegation of responsibility for sponsorship within the agency:
- governance requirements for the corporate sponsorship program, including the level of detail and the timing for providing agency management with reports on performance;

- who is responsible for general or day-to-day matters relating to sponsorship;
- who is responsible for developing sponsorship proposals and approaching sponsors; and
- who approves agreements with corporate sponsors and at which point Ministerial approval, if applicable, must be obtained.
- How corporate sponsorship agreements will be administered and monitored within the agency, including:
  - internal control mechanisms;
  - maintaining records of sponsorships; and
  - ensuring that contractual obligations are met by both parties.
- The extent of Board or Council involvement in corporate sponsorship matters. Such matters may include:
  - using Board or Council members to approach potential sponsors;
  - whether the Board or Council will have a sub-committee to oversight sponsorship and/or fund-raising; and
  - ethical considerations for Board or Council members, perhaps similar to those of company directors, particularly to ensure that no conflict of duty occurs where the member is involved with sponsors or may belong to another Board or company.
- The place, if any, for a supporter group, such as a group of Friends, its place in fundraising activities and its relationship to the agency's corporate sponsorship program.

### **3. Funds raised by corporate sponsorship**

The policy should include a statement on how funds raised from corporate sponsorship are to be managed and treated for accounting purposes. Such funds are public money and, where material, should be included in the public accounts.

The policy can outline any restrictions that apply to the use of sponsorship moneys. An example would be that encumbered sponsorship funds can be spent only as stipulated in the agreement.

The policy can also include reference to those funds expended to generate sponsorship. Such moneys might be provided from general funds or from funds generated by sponsorship, as approved by the Council or Board of the agency. Any restrictions on the size of the budget used to generate sponsorship can also be specified.

### **4. Restrictions on sponsorship**

An outline of the limitations on the extent to which corporate sponsors can involve themselves in the activities of an agency should be set out in the policy. Such limitations may include:

- Sponsorship should not be allowed to influence the goals, strategic direction or integrity of the agency. For example, sponsorship should not be accepted on the

condition that a core function or activity of the agency is performed in a specific way that may be in conflict with the agency's broad objectives. Understood and correctly managed, this should not inhibit agencies from being able to respond to ideas or suggestions from sponsors.

- Areas of agency business that are not open to corporate sponsorship or where naming rights are not available.
- Certain industries or types of sponsors from which the agency considers it is inappropriate to accept sponsorship.
- The extent and form of corporate identification allowable in exhibitions and publications; for example, including only those references to the sponsor that are appropriate to the exhibition's or publication's theme.
- The conditions under which sponsors may use the agency's image, logo and name.
- Quality standards expected from in-kind sponsorship; for example, that the agency will not accept products which it does not want simply because they are offered as in-kind sponsorship.
- Sponsorship raising should not compromise the process of purchasing or tendering, which should comply with Commonwealth purchasing guidelines. If agencies decide that they will support their sponsors by, for example, purchasing their particular products, given an assessment of the full costs and benefits of the arrangements, they should consider including a statement about this in the annual report.
- The extent to which sponsors might have access to an agency's mailing list, membership list or databases.

## **5. Guidelines for assessing potential sponsorship projects and attracting sponsors**

An agency's corporate sponsorship policy will benefit from including clear guidance on who an agency may consider approaching as a potential sponsor and how this is to be done. There is a risk that the agency's name could be brought into disrepute through an ill-considered sponsorship arrangement. Consideration could be given as to whether the agency will offer a company exclusive sponsorship rights in certain cases and under what circumstances an agency might approach an existing sponsor's competitor.

Guidance could be given in the policy on those circumstances where it is appropriate to approach existing sponsors to sponsor other programs in the agency and whether existing sponsors can be given an opportunity for a first refusal when new sponsorship opportunities arise. Some thought may also need to be given to occasions when activities are sponsored by more than one company. For example, where a program requires more than one sponsor, each sponsor should be made aware of the involvement of the other and the possibility that sponsors may be able to dovetail their involvement.

## **6. Benefits to sponsors**

Several agencies which manage large or growing corporate sponsorship programs have successfully designed categories of sponsorship, where a different scale of benefits is offered in return for the different levels of support provided by the sponsor. Categories of sponsorship can be approved by the agency Board or Council and CEO, and should be regularly reviewed.

The authority to offer specific packages of benefits and involvement to sponsors can simplify sponsorship negotiations and ensure equity and consistency in the benefits the agency provides to sponsors. Different sponsorship packages offered to sponsors can be developed so as to ensure value to both the sponsor and the agency. Additional benefits might also be negotiated for each separate sponsorship agreement. The emphasis, however, should always be on maximising the Commonwealth's interests.

## **7. Accountability mechanisms**

The policy should include reference to how information about the nature and extent of sponsorship agreements will be made available to Parliament and the public. For example:

- inclusion in annual reports;
- a list of the agency's corporate sponsors prominently and publicly displayed; and
- a list of sponsors in agency publications or on stationery.

## **8. Evaluation methods to assess the outcomes of sponsorship projects**

Agencies will wish to assess the outcomes of sponsorship projects for two major reasons:

- to gauge their own performance; and
- to provide information to sponsors as to the success of the sponsorship from the sponsor's perspective.

For internal assessment of corporate sponsorship activities, agencies could consider including regular budget status reports, monitoring of workloads and monitoring of expenditure outlaid on seeking potential sponsors and on servicing existing sponsors.

Many sponsors like to receive regular reports, often against predetermined criteria or performance indicators, on the activities they have sponsored. Agencies have access to numerous methods for assessing the results of sponsored activities, which can be used for both internal reporting and external reports to the sponsor. The methods chosen will in part depend on the sponsor and the type of relationship that exists between the agency and the sponsor. Possible quantitative and qualitative measures that could be used include:

- whether the contract was fulfilled;

- the extent to which the sponsor took up the offered benefits, e.g. tickets to an exhibition;
- a qualitative assessment of the activity;
- the number of people who participated in the sponsored activity, whether or not the target audience was reached and how many from this audience participated in the sponsored activity;
- whether general awareness regarding the activity was raised in the community;
- the amount of publicity generated by the sponsor in addition to the sponsorship;
- measurements of media exposure and publicity received;
- a comparison between the amount and type of sponsorship gained against that which was sought;
- projects which did not proceed because sponsorship was not obtained;
- cost/benefit reporting; and
- sponsorship awareness surveys.

Resources will need to be allocated in the budget for assessment of outcomes, particularly if market research is to be undertaken. It is important to identify the performance information required by the agency or the sponsor when initially planning sponsorship activities within the agency and again at the point when the agency enters into individual sponsorship agreements.

Sponsors will often conduct their own evaluation of the sponsored activity, separate from that of the agency.

## **Strategic planning**

The boundaries within which corporate sponsorship operates in an agency will be established by the policy statement. The strategic plan for corporate sponsorship can outline the way in which the policy is to be implemented during a given planning period.

Opportunities for sponsorship should be incorporated into the agency's planning process, particularly, where appropriate, into its business plans and individual project plans. Ideally, a strategic plan for corporate sponsorship will be part of, and linked to, the agency's overall planning process and management information systems. This is central to good corporate governance for an agency.

Planning for corporate sponsorship involves two levels: overall planning of the agency's corporate sponsorship program and the planning of corporate sponsorship for individual projects. Ideally, the strategic plan for corporate sponsorship will identify sponsorship objectives, opportunities, quantify the resources required and identify strategic directions to increase sponsorship revenue.

One section of the plan can provide a general outline of the tangible benefits that an agency is able to offer to a corporate sponsor. These benefits may be combined

into packages or offered as discrete items. The planning process can quantify the benefits that sponsors can receive in return for certain levels of sponsorship. This analysis is important to ensure that the agency does not undervalue itself in individual projects.

In pursuing corporate sponsorship, agencies will need to guard against losing sight of the cost-effectiveness of sponsorship activity. In designing a scheme, the benefits to be provided to a potential sponsor will, ideally, be fully costed in both real and opportunity cost terms. This information should be furnished to the appropriate manager as a background to developing individual sponsorship proposals and agreements.

As corporations can, and do, offset the cost of corporate sponsorship through claiming them as a legitimate business expense, agencies may like to consider taking this into account in pricing benefits available for different levels of sponsorship. No promise of tax deductibility should be made to potential sponsors but agencies can recommend to sponsors that they consult with their own legal and/or accounting advisers about this matter.

Corporate sponsorship plans can include specific detail such as:

- objectives and related actions for seeking sponsorship;
- identifying and prioritising projects to receive sponsorship;
- targeting of sponsorship proposals; that is, what companies will be approached for how much and what this will be used for;
- strategies to be followed to endeavour to attract sponsors;
- monitoring and evaluation of the process and program; and
- opportunities for development of long-term partnerships in addition to one-off sponsorship.

Strategic sponsorship plans can identify those projects where success or failure to obtain sponsorship might dictate when or how the project will be delivered.

Corporate sponsorship targets can be incorporated into agency plans, including:

- a revenue target;
- a target for sponsors for specified projects; and
- development of sponsorship plans for additional revenue-raising activities.

## **Sponsorship agreements**

Agreements between the agency and the corporate sponsor should be in writing, in the form of an exchange of letters between the sponsor and the agency or by formal contract. The decision on which to use should take account of the size or significance of the sponsorship and be based on the risk associated with the specific sponsorship agreement.

As a matter of policy, agencies should consider setting a threshold amount for agreements to be set down in a formal contract. Agencies may also specify that

formal contracts be drawn up for sponsorships extending over a certain period time, for example one year.

Agencies should consider involving the agency's legal officer or adviser in drawing up the contract or letters of agreement. The officer signing on behalf of the agency must have the appropriate delegated authority. Prior to signing, it may also need to be established that the sponsor's signatory possesses the capacity to bind the organisation.

Although sponsorship agreements will vary according to the particular circumstances involved, the following framework could be considered:

- an outline, including the timing, quantity and quality, of deliverable benefits from the sponsor to the agency. This may include adjustments in line with economic indicators, such as the Consumer Price Index;
- an outline of the deliverable benefits from the agency to the sponsor. For example, deliverables provided to the sponsor may include invitations to functions, the use of agency facilities at a special sponsor's rate or special tours of the sponsored exhibition or activity;
- any personal benefits to be made available to associates or the staff of the sponsor;
- the term of the sponsorship and any conditions regarding renewal;
- contingency arrangements to address such things as a change in circumstances; for example, a change in legislation or a change in business performance;
- financial accountability requirements;
- an undertaking from the sponsor that it will not interfere with the general or artistic integrity of the agency;
- the ways in which sponsors will be publicly acknowledged;
- arrangements for any return of sponsorship funds if the sponsored activity is cancelled or concluded before the end of the agreed period; and
- any other special conditions which may apply.

Where an agency has legislative provisions which require it to seek Ministerial approval prior to entering into contracts, such provisions should be adhered to.

Incorporation of performance objectives in contracts could also be considered.

## **Effective resource management**

As an agency sponsorship program grows, it can be cost-effective to allocate staff to manage and coordinate sponsorship activities within the agency. The appointment of a sponsorship or development coordinator can be an efficient way to manage the program and, in particular, can free up demands on the time of the CEO.

The duties of a sponsorship or development coordinator might include:

- devising and managing a sponsorship budget;
- monitoring developments in the corporate sector to identify potential sponsors and to shortlist those who could offer a good match or fit for a potential project or activity available for sponsorship;
- assisting in the development of proposals to put to potential sponsors;
- coordinating and making approaches to potential sponsors;
- assisting with the servicing of existing sponsorship arrangements;
- targeting and liaising with private and public sector organisations
- coordinating, implementing and monitoring the agency's sponsorship plan;
- ensuring that sponsorship obligations are met; and
- developing and improving the use of relevant data.

As a development or sponsorship coordinator will usually be accountable for a set budget, those agencies with such officers are generally better able to quantify the costs associated with managing a corporate sponsorship program.

The skills required by a sponsorship or development officer include:

- proven communication, presentation, negotiation and sales skills;
- knowledge of the sponsorship marketing industry;
- business acumen and a capacity to relate to people in business;
- creative flair in identifying potential sponsors to match them with agency activities or projects;
- strong sense of ethics;
- good knowledge of the agency;
- excellent corporate research skills;
- knowledge of government purchasing guidelines; and
- persistence, patience and an achievement focus.

External organisations specialising in sponsorship, such as marketing or advertising firms, could be used as an alternative to, or in addition to, in-house staff, particularly by those agencies embarking on a corporate sponsorship program. This can be a means of tapping into a range of people with skills and expertise; getting an informed, external opinion on the value of the agency's value to potential sponsors, and getting creative advice on sponsors who may have potential synergy with agency programs and may not have existing sponsorship commitments.

Effective resource management requires agencies to monitor the overall costs and benefits of their corporate sponsorship program. This should include quantifying the costs associated with attracting and servicing sponsors, the cost to the agency of providing direct benefits to sponsors and the time spent by sponsorship/development staff, curatorial staff and agency executives. If an agency uses volunteers, the resource implications for their management may also need to be considered.

An efficiency ratio could be used by agencies to determine how cost-effective they have been in raising sponsorship. This ratio, most clearly expressed as a percentage, is the cost of raising sponsorship to the actual sum raised. The lower this ratio, the more efficient the agency has been in obtaining sponsorship. The Fundraising Industry of Australia has set a benchmark of 10-15 per cent, but found in a recent survey that the average efficiency ratio was 22 per cent. (Footnote 1). The ratio could be used to determine the efficiency of individual sponsorships and the sponsorship program as a whole.

## **Monitorin and review of performance**

To assist in managing and improving performance of their sponsorship programs, agencies should review individual sponsorship agreements, and the corporate sponsorship program as a whole, on a regular basis. Such reviews can include:

- consideration of appropriate performance indicators which have previously been agreed upon with management;
- preparation of regular status reports and sign-offs on:
  - active sponsorships
  - sponsorship contracts;
  - projects requiring sponsorship
- conducting evaluations of sponsorship arrangements to feed back into the development of agency policy on sponsorship; and
- maintenance of a database of past, current and prospective sponsors.

Evaluation of individual projects and the program as a whole needs to be linked into regular reviews of the corporate sponsorship policy and will assist managers to determine where adjustments to the policy may be required.

## **Reporting and accounting**

Reporting mechanisms can assist in ensuring that the agency's dealings with corporate sponsors are highly transparent and that public accountability is satisfied. Agencies should consider how they will report their corporate sponsorship activities to Parliament in their annual reports and the level of detail appropriate for the disclosure of benefits they receive from corporate sponsorship in their annual financial statements.

Cash, in-kind or contra sponsorship, and the receipt of services from sponsors all meet the definition of revenue and should be reported in accordance with the appropriate accounting concepts and standards.

In-kind sponsorship should be reported in the financial statements as assets at their fair value with a note to the accounts of assets that they were received free of charge. 'Fair value' is defined as the amount that would be exchanged between a willing buyer and a willing seller. The ANAO considers that, in most circumstances, it should be possible to value in-kind sponsorship with a reasonable degree of accuracy.

If a sponsor is, for some reason, reluctant to have contributions disclosed, this does not prevent recognition in the financial statements. It may need more careful wording of the note disclosure but the reporting agencies are public bodies that should be open to scrutiny.

It is not necessary to record sponsorship as a separate line item under revenue unless it is material and significant to the agency. Materiality, however, is not necessarily only a matter of numbers. The source, conditions and the importance the agency places on its sponsorship program also need to be considered.

Another avenue for disclosure is the agency's annual report to its Minister and the Parliament, which could include a list of providers and details of all forms of corporate sponsorship, while still meeting any commercial-in-confidence imperatives.

The essence of accountability is transparency and openness. Public confidence will be gained through simple explanations of the nature, purpose and outcomes of corporate sponsorship and clear demonstrations that there are benefits to both sides. Such an approach will also engender confidence and trust in what is essentially a partnership arrangement and minimise any ethical concerns.

### **Footnote 1**

Lyons, *Fundraising in Australia. A Survey of Current Effort* (page 28).