



ETHICAL FUNDRAISING POLICY

Policy number:	2.02	Version:	2024V4
Responsible Person:	Chief Financial Operations Officer	Approval date:	October 2024

INTRODUCTION

ASHM seeks funding and support from individuals, organisations, trusts, foundations and government agencies in order to carry out ASHM's mission. The Board of ASHM is committed to ensuring that fundraising activities are carried out in an ethical manner and that funds only come from approved sources.

This policy applies to the Board, casual, permanent and contract staff, consultants and volunteers.

PURPOSE

ASHM is endorsed as a Deductible Gift Recipient (DGR) by the Australian Taxation Office (ATO) to accept tax-deductible gifts of money and property in Australia and overseas. The purpose of this document is to identify ASHM's position on fundraising practice and to document the standards expected in raising funds from the community.

DEFINITIONS

Fundraising: the act of collecting or producing money for a particular purpose, especially for a charity.

POLICY

ASHM's guiding fundraising principle is that we will only use techniques that we would be happy to be used on ourselves.

ASHM's fundraising activities will conform to standards set by:

- the Australian Charities and Not-for-Profits Commission (ACNC) Act 2012 and ACNC Governance Standards;
- Australian Consumer Law;
- other State and Territory laws which apply to charity, not-for-profit or fundraising entities and;
- the Australian Council for International Development Code of Conduct (ACFID).

ASHM will conduct our fundraising activities in accordance with ASHM's policies including, but not limited to, our:

- Privacy Policy
- Child Protection Policy
- Promotional Material Policy

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- Conflict of Interest Policy
- External Complaints Policy
- Anti-Fraud and Corruption Policy.

In doing so, the organisation will adhere to the following standards:

- Fundraising activities carried out by ASHM will comply with all relevant laws.
- Any communications to the public made in the course of carrying out a fundraising activity shall be truthful and non-deceptive.
- All monies raised via fundraising activities will be for the stated purpose of the appeal and will comply with the organisation's stated mission, purpose and strategy.
- All personal information collected by ASHM is confidential and is not for sale or to be given away or disclosed to any third party without consent.
- Nobody directly or indirectly employed by or volunteering for ASHM shall accept commissions, bonuses or payments for fundraising activities on behalf of the organisation.
- Fundraising activities should not be undertaken if they may be detrimental to the good name or community standing of ASHM.
- Financial contributions will only be accepted from companies, organisations and individuals the Board considers ethical.
- Free, prior and informed consent will be obtained for use of all images and stories in fundraising activities.

Acceptance or Rejection of Donations

Any decision to accept or reject funds must be based on:

- the relevance of the donation to ASHM's objectives and
- supporting our charitable purposes, where the donation is made as a tax deductible donation.

To the extent to which it is possible to determine, ASHM will not accept funds which have been derived from:

- illegal purposes,
- political parties
- conduct which is not condoned by the organisation, including through the sale of tobacco and gambling; and
- other activities which are deemed to be out of step with ASHM values, code of conduct or which might realistically be seen to be disreputable
- other individuals or organisations which are deemed to be out of step with ASHM values or code of conduct, or where there is a risk of reputation damage amongst stakeholders or there is apparent or real conflict of interest.

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All donations will be assessed and reviewed to confirm they comply with this policy, and approved or rejected accordingly, as follows:

- <\$3,000. Finance (typically these will be donations of speaker fees)
- <\$10,000. CEO
- <\$25,000. FRMA
- >\$25,000. Board

Fundraising Materials

All fundraising materials will be truthful and:

Include the organization's identity, including name, address, ABN and purpose;

Accurately represent the context, situation, proposed solutions and intended meaning of information provided by affected people;

Clearly state if there is a specific purpose of each donation;

Avoid material omissions, exaggerations, misleading visual portrayals and overstating the need or what the donor's response may achieve.

If outsourcing fundraising activities, ASHM will ensure that:

- Contracts are in place which meet all relevant legislative and regulatory requirements;
- Specific expectations, responsibilities and obligations of each party are clear and in writing;
- ASHM is identified as the beneficiary of the funds; and
- Contractors are clearly identified.

Images and messages used for fundraising will not:

- Be untruthful, exaggerated or misleading;
- Be used if they may endanger the people they are portraying;
- Be used without the free, prior and informed consent of the person/s portrayed, including children, their parents or guardians;
- Present people in a dehumanised manner;
- Infringe child protection policies and in particular show children in a naked and/or sexualised manner;
- Feature dead bodies or dying people;
- Images will not be used contrary to any Intellectual Property.

RELATED POLICIES

2.01 Conflict of Interest

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2.04 Gifts and Benefits Policy

2.08 Industry Sponsorship Policy

2.13 Code of Conduct

2.16 Non-Development Activities Policy

2.22 Transparency Policy

3.11 Privacy Policy

3.12 Money Laundering and Anti-Terrorism Policy

3.14 Confidentiality Policy

8.01 Promotional Material Policy

AUTHORISATION

ASHM Board

HISTORY

Version	Approved Date	Comments/ Amendments
2018v1	10-04-2018	First version
2021v2	10-11-2021	New Template and 3-year update
2024 v4	October 2024	Statement removed from policy "No general solicitations shall be undertaken by phone or door to door". Limits updated.

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ETHICAL FUNDRAISING PROCEDURE

Procedures number	2.02	Version	2024v1
Responsible person	Chief Finance and Operations Officer	Approval date	October 2024

RESPONSIBILITIES

The Board is responsible for the implementation and review of this policy.

All Board members, casual, permanent and contract staff, volunteers and contractors are responsible for adhering to this policy.

PROCEDURES

A working group will be formed to oversee major fundraising tasks. This group will report regularly to the CEO and the Board, when required.

All fundraising activities will undergo a form of due diligence and risk analysis before they can be forwarded to the Board for approval.

All fundraising activities must have the prior Board approval, as recorded in Board meeting minutes.

A statement estimating income and expenses will be prepared prior to the commencement of any new fundraising activity that may present a financial risk to ASHM. Fundraising activities should not be undertaken if they will expose the organisation to significant financial risk.

Donations can be given with a request for the funds to be restricted for specific purposes. Gifts of \$3,500 per annum or over can be allocated to a particular program. Unless gifts are specifically requested for a particular purpose or program, gifts under \$3,500 per annum are subject to ASHM's discretion in terms of use and may be allocated as deemed appropriate by ASHM.

Where appropriate, the supporter's intentions for a donation will be sought and documented and ASHM will seek to honour those intentions while considering the organisational needs and strategy.

RELATED DOCUMENTS AND FORMS

A guide to the Australian Consumer Law For fundraising and other activities of charities, not-for-profits and fundraisers, 2017

Fundraising and the Australian Consumer Law - a summary | Australian Charities and Not-for-profits Commission (acnc.gov.au)

ACFID Code of Conduct Commitment 8.1 We source our resources ethically.

AUTHORISATION

ASHM CEO

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