

FUNDRAISING & COMMUNICATIONS POLICY

Approval Date:	21 June 2022	Next Review Date:	June 2025
Responsibility:	Community Action Manager	Approved by:	ALWS Board

1. OVERVIEW

“Moreover, it is required of stewards that they be found faithful” 1 Corinthians 4:2 ESV

At ALWS we are committed to carrying out our work with integrity and in a manner consistent with our mandate, vision, mission and guiding principles. This applies not only in our programmatic work, but also in the way we fundraise, and communicate our work with supporters, partners and the communities engaged in ALWS-assisted programs. Integrity in all our fundraising and communication is critical to building and sustaining credibility, trust and confidence among donors, supporters and stakeholders.

2. GOAL

In all our fundraising activities and communications with the public ALWS will accord due respect to the dignity of the people whom we are seeking to serve, and represent us and our work in an open, honest, transparent and ethical manner consistent with ALWS’ *Guiding Principles*.

OBJECTIVES This policy exists to provide guidance on how the different types of fundraising and communications activities are carried out.

- ALWS may seek funding from the Australian Government and other funding partners where the conditions of such funding do not conflict with ALWS’ principles and policies approved by the ALWS Board of Directors.
- ALWS may join with other church or non-church agencies in a public appeal for funds for a specific emergency, including through Church Agencies Network Disaster Operations(CAN DO) and Emergency Action Alliance (EAA).
- ALWS may prepare and distribute public policy or research documents to its constituency, government or other partners on issues relevant to our mission and mandate.
- ALWS may engage in advocacy work on issues relevant to our mission and mandate, either in our own right or as part of a wider network or alliance.
- ALWS will disseminate information about results and lessons to all stakeholders: primary stakeholders, partners, donors and supporters.

3. GUIDING PRINCIPLES: ETHICAL DECISION-MAKING FRAMEWORK

The fundraising and communications activities carried out by ALWS are done so in accordance with the following principles. These form the ethical decision-making framework within which ALWS makes fundraising and communications decisions.

Accuracy, Respect, Truthfulness and Protection of Dignity

- ALWS will not engage in any fundraising activity that may harm donors, the people with whom we work, or any members of the public. Similarly, in our advocacy and public policy communications, we will take all reasonable steps to ensure the information and content will not create an adverse impact on the people we are working with and/or speaking on behalf of.
- ALWS respects individuals’ free choice to give, without pressure, harassment, intimidation or coercion. This includes, but is not limited to, home visits (See *Appendix 2 Thank you Visit Policy*). ALWS will:

- maintain a professional relationship with the donor in connection with any donation or bequest;
 - not prevent or discourage a donor from seeking independent legal advice in relation to a donation;
 - not prevent or discourage a donor from having a family member or other trusted advisor present with considering a donation; and
 - not, after obtaining a donation, change the conditions of the donation without first communicating with the donor any changes and gaining their consent for the change.
- In our advocacy work, if ALWS speaks as a representative of a person or group, we must obtain permission to speak on their behalf prior to any public initiative being taken, and a clear understanding obtained and records maintained on the scope of that authority. ALWS must also respect the right of the person or group to withdraw their permission, either verbally or in writing.
- The public materials ALWS uses for fundraising and communications (e.g. fundraising solicitations, advocacy campaign materials or other documents) shall be truthful, shall accurately describe its identity, values, purpose, programs, and needs, and shall only make claims which it can fulfil and/or are evidence-based. ALWS uses our *Communications Compliance Checklist* (Appendix 1) to guide this process.
- Fundraising solicitations should be timely and accessible through printed and electronic media, and easily available on the website.
- There shall be no material omissions or exaggerations of fact, no use of misleading photographs, nor any other communication which knowingly intends to create a false impression or misunderstanding. In addition, ALWS' advocacy-related communications will be based on accurate and reliable sources of information, including the perspectives of people affected by the respective advocacy issue. The analysis, findings and proposed actions will be based on the evidence, and presented in a manner which is transparent and can be justified to stakeholders who may inquire about the positions taken.
- Fundraising and communication materials shall not infringe on the intellectual property rights of others.
- ALWS will not, with the intention of creating a reputational or other advantage for itself, denigrate, make misleading or false statements in relation to or make comparisons with other ACFID Members, other agencies or entities in our communications with the public. ALWS recognises the risks to the sector as a whole if individual member NGOs develop a bad reputation. If there is a legitimate and well-founded concern about another NGO, complaint mechanisms available through ACFID's Code of Conduct Committee are to be used. In all of our public communications ALWS will accord due respect to the dignity, values, history, religion and culture of the people with whom it works, consistent with human rights principles, portraying them as active and positive agents in the aid and development process where this is the case. In its advocacy work, or that supported by or in cooperation with its partners, ALWS will support the empowerment of women, and those from marginalised and vulnerable groups, including those with a disability, to speak on their own behalf, and will provide appropriate resources and support where possible, to achieve this end. In addition, ALWS will seek to work with organisations representing people most affected by the particular advocacy issue, where possible and appropriate.
- ALWS will acknowledge domestic and international partners and alliances where appropriate. For DFAT acknowledgement, refer to *Appendix 4 Branding Guidelines for Australian Aid*.
- ALWS will seek to support partners and rights-holders to share their story, plans and vision in ways that will maximise ongoing support for the projects they have decided are most important to them, including where practicable:
 - Training in effective fundraising and communication
 - Feedback on resources produced by resource-gathering

- Demonstrating how fundraising and communication resources are ultimately used in communications
 - Engaging and interacting with partners and individuals to ensure accurate communication and fundraising materials
- The following protocols will be observed where fundraising, communications, research, evaluation and donor and supporter purposes include primary stakeholders' images and stories (refer also to the ALWS *Image Library Policy* and *Appendix 3 Declaration of Informed Consent*):
 - primary stakeholders in images and stories will be informed of what the image or story is being used for and their prior permission gained through accessible procedures (in local languages, in written form where feasible, or else a note written confirming verbal consent was obtained);
 - the origin of the images and stories will be known and recorded, and necessary copyright releases held and credit given in material where they appear;
 - the use of images and messages will protect the safety and rights of the people represented, and will not in any way endanger them, nor their environment. Advice on risks related to using images and case studies from partners will be sought;
 - where possible, the use of images and stories is jointly defined with the primary stakeholders' involvement;
 - Where possible, copies of materials containing images or stories of primary stakeholders are provided to those stakeholders
 - images will not be visually altered and direct quotes will not be significantly changed or edited after they have been obtained to alter meaning and context;
 - No geo-tags will be stored with any images;
 - where necessary, a competent translator fluent in both the primary stakeholder's language and English will be used.

These images and stories will:

- present primary stakeholders accurately, respectfully, in an honest and dignified manner (materials will not feature dead bodies or dying people);
 - put a human face on or give a personal and truthful story about the impact of a disaster, or the difficulties stemming from an injustice;
 - present messages of potential change;
 - present a balanced picture of the needs, accomplishments and achievements of primary stakeholders, portraying them in activities which reflect their daily lives;
 - be used to appeal for support on the basis of justice and humanity
 - emphasise respectful and truthful accounts of issues, story, purpose of the appeal and experience of the people affected, and the environment, context and complexity of a situation;
 - portray the diversity of primary stakeholders;
 - contribute to a positive understanding of development.
- Where images of children are used in fundraising and communications material, the ALWS *Child Safeguarding Policy* must be referred to.
 - Fundraising materials will not be sent knowingly to children (under the age of 18) unless they have been requested or are part of a school fundraising activity.

Protection of Privacy

In our fundraising and communications activities ALWS will ensure:

- donor/supporter names are deleted from mailing lists in a timely manner, if requested;

- 'opt out' clauses are included in fundraising material;
- mailing lists of individuals are not shared with other organisations, without the prior consent of the supporter/donor/s;
- a donor has given consent prior to any public recognition of their donation;
- donors/supporters are informed about the purposes for which funds are being raised;
- donors are provided with information on the application of their donation, or this information is available on the request of a donor;
- that otherwise these activities are compliant with the ALWS *Privacy Policy*.

Accountability

- ALWS shall be accountable for all fundraising activities and will maintain sound and detailed financial records for this purpose, including the capacity to issue receipts for all donations received.
- Where an appeal is oversubscribed ALWS will either: distribute surplus funds in accordance with what has been advised in the fundraising material will occur in such an eventuality; allocate the funds to a subsequent phase of the same intervention (e.g. rehabilitation phase of an emergency response); return the donation under advice to the donor; or seek donor's permission for the reallocation of their donation to another aid-related purpose.
- ALWS will report back to donors in a timely manner on how their donations have been used: the percentages of their contributions that go to overseas programs, to administrative costs and to offset fundraising expenses.
- ALWS will be transparent about fundraising costs, including making our *Annual Report* freely available online and in hard copy by request.
- ALWS is committed to the *ACFID Fundraising Charter* and ensures our fundraising practices are consistent with the Charter; this commitment is published on our website. We are also guided by the *Fundraising Institute of Australia Code of Practice*.
- ALWS will publicly disclose any actual conflict of interest that may arise in undertaking any advocacy work on specific issues.
- ALWS will be accountable in our decisions to accept or refuse donations according to the following criteria:

ALWS will accept donations provided that:

- a. The purpose for which the donation is given is directly related to ALWS' Mission, Goal and Objectives; and
- b. ALWS and our partners can practically achieve the purpose for which the donation was given.

ALWS may refuse a donation where it is clear that:

- a. ALWS has a reasonable belief that the donor is in vulnerable circumstances or lacks capacity to make a decision to donate; or
- b. The activities of a donor are directly opposed to the Mission, Guiding Principles and Policies of ALWS and its partners, or not in the interests of those whom we seek to assist; or
- c. The activities of a donor are incompatible with the Goal and Objectives of ALWS; or
- d. The cost to ALWS of accepting a donation will be greater than the value of the donation itself; or

- e. Acceptance of the donation will directly lead to a net decline in the asset base of ALWS; or the funds originate from a source, or in a manner, which is not in keeping with the values, and principles of the organisation; or
- f. There is reason to believe that accepting the donation may give rise to litigation; or
- g. The offer of a donation is dependent upon the fulfilment of certain conditions by ALWS, where the conditions are:
 - (i) contrary to the taxation status of ALWS regarding receipt of a donation (if any);
 - (ii) in itself, contrary to the Mission, Goal and Objectives of ALWS;
 - (iii) in itself, contrary to the current policies or work priorities of ALWS; or
 - (iv) requires ALWS to first spend its own money or resources.

4. SCOPE

This Policy applies to all personnel – Board members, employees, volunteers, contractors, and consultants

5. IMPLEMENTATION & RESPONSIBILITIES

- ALWS will regularly review our fundraising and communications practices and materials to ensure compliance with our policies, the *ACFID Code of Conduct*, state/territory charities/fundraising legislation and our own values. This will include the completion of the *Communications Compliance Checklist* (refer Appendix 1), which involve staff across Communications, Programs, Safeguarding and Finance (where applicable) and which must be approved by the Executive Director (or his/her delegate) or the Community Action Manager before the commencement of each relevant public communications piece we undertake or participate in.
- ALWS has a Communications Focal Point – the Community Action Manager - whose responsibilities include monitoring the implementation of the Policy.
- ALWS provides training for the Community Action team on organisational protocols for Policy implementation, Fundraising Institute of Australia *Code of Practice* and the *ACFID Fundraising Charter*. We also provide training and practical guidelines to the Programs team and partners on appropriate ways to collect and use information, images and stories.
- ALWS has an Image Library Curator whose responsibilities include reviewing images and text for compliance with ACFID Quality Standard 6, Commitment 6.2.
- ALWS Community Action team involves the Programs team in decisions regarding images and messages for fundraising appeals.
- Any complaints about ALWS' Fundraising and Communications materials will be addressed through the *ALWS Complaints Policy*. These details are available to the public on the ALWS website.
- ALWS has a commitment to work with our partner organisations to ensure that they also meet implementation and compliance requirements of this policy.

6. RELATED DOCUMENTS

Internal

Child Safeguarding Policy

Policy on Prevention of Bullying & Sexual Harassment

Complaints Policy

Image Library Policy

Image Library Process

Communications Compliance Checklist (Appendix 1: Communications and Fundraising Policy)

Thank You Visit Policy (Appendix 2: Communications and Fundraising Policy)

Declaration of Informed Consent (Appendix 3: Communications and Fundraising Policy)

Branding Guidelines for Australian Aid (Appendix 4: Communications and Fundraising Policy)

Privacy Policy

Guiding Principles available at < <https://www.alws.org.au/about-us/> >

External

ACFID Code of Conduct (Revised 1 January 2019) available at < <https://acfid.asn.au/code-of-conduct> >

ACFID Fundraising Charter (August 2018) available at <https://acfid.asn.au/sites/site.acfid/files/resource_document/The%20ACFID%20Fundraising%20Charter_Aug%202018.pdf>

DFAT Child Protection Guidance Note Use of Images and Social Media (January 2017) available at <<https://dfat.gov.au/international-relations/themes/child-protection/Documents/Images%20and%20Social%20Media.pdf> >

Fundraising Institute of Australia Code of Practice (1 June 2018) available at <<https://fia.org.au/wp-content/uploads/2018/12/CodeFINAL-2018.6.28-GR.pdf>>

7. REVIEW

The policy will be reviewed every three years, or earlier should organisational learning or sector best practice demand it.

7.1 Record of Policy Review and Version History

Version No.	Date Approved	Approved By	Description of Changes
1.0	1 July 2015	ALWS Board	
2.0	17 Mar 2016	ALWS Board	<p>Three additional bullet points under Principles 4.1 related to fundraising causing no harm; respecting individuals' free choice to give; not knowingly sending fundraising materials to children unless requested as part of a school fundraising activity.</p> <p>Two additional bullet points under Principles 4.4 related to reporting back to donors; being transparent about fundraising costs.</p> <p>One additional bullet point under Principles 4.6 related to addressing complaints about materials through the <i>Complaints Policy</i>.</p>
3.0	7 Mar 2019	ALWS Board	<p>Document control table added. Pronoun use changed from third person to first person to create greater sense of ownership e.g. 'its' to 'our'.</p> <p>Changes made in accordance with ACFID guidance contained in the <i>Code of Conduct Good Practice Toolkit</i> related to Quality Principle 6 and associated commitments.</p> <p>Rationale expanded to include reference to integrity, credibility, trust and confidence.</p> <p>Section 3 Function renamed Scope. Additional bullet point related to dissemination of information about results and lessons learned.</p>

			<p>Section 4 Principles renamed Ethical Decision Making Framework: Principles.</p> <p>4.1 Bullet points extended. Protocols for using images and stories extended.</p> <p>4.2 Advocacy and Public Policy is not a principle. Bullet points under this section reassigned to other relevant principles.</p> <p>New 4.2 renamed Protection of Privacy</p> <p>4.6 Acceptance and renewal of donations is not a principle. Bullet points under this section reassigned to new 4.3 Accountability.</p> <p>4.6 Implementation and compliance is not a principle. Renumbered as section 5. Additional bullet points related to responsibility for policy implementation and monitoring; provision of training; Image Library Curator responsibilities; involvement of Programs Team in decisions re images and message for appeals; working with partner organisations to meet requirements of the policy.</p> <p>Section 6 Related documents added.</p> <p>Section 7 Review clause added to give scope to review earlier than every 3 years. Table added to document policy review and version history.</p>
4.0	13 Nov 2020		<p>Section 4.1 – partner acknowledgment dot point added</p> <p>Section 4.1 – reference to Appendix 3 added</p> <p>Section 6 – Appendices 3 & 4 and PSEAH policy ref added</p>
	20 Nov 2020		<p>Appendix 1 CCC – changes to process, when CCC required, and who can approve</p>
5.0	June 2022		<p>Changes made to align policy more closely with the ACFID Fundraising Charter and the FIA Code of Practice.</p>