

RAWCS Fundraising Policy

JUNE 2024

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1. Introduction

1.1 Who we are

- 1.1.1 Rotary Australia World Community Service Ltd (RAWCS) is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC). We back doing good by supporting and facilitating a broad range of humanitarian and development projects, both in Australia and in developing countries. RAWCS administers three Tax Deductible funds:
 - Rotary Australia Overseas Aid Fund (RAOAF): This fund supports efforts by Rotary Clubs, Rotary Districts and other partners to deliver humanitarian assistance in developing countries. RAOAF focuses on both sustained development and immediate disaster response, working collaboratively with communities to deliver impactful, sustainable projects to meet identified needs.
 - 2. Rotary Australia Benevolent Society (RABS): RABS supports Rotary Clubs, Rotary Districts and other partners to respond to specific community challenges within Australia. It offers an avenue for wider community involvement through tax-deductible donations. The Rotary Australia Compassionate Grants Projects within RABS uses matching funds from donations, such as those provided by Dick Smith's Trust, to assist Australians facing hardship.
 - 3. Rotary Australia Relief Fund (RARF): This fund is dedicated to responding to national appeals and efficiently disbursing funds to appropriate aid projects. RARF's focus is on mobilising rapid support during national crises, such as natural disasters, providing a structured channel for public generosity to be transformed into effective aid. This fund acts as a hub for contributions from both Rotary and non-Rotary sources, ensuring swift and effective aid delivery to disaster-affected areas.

1.2 Purpose

- 1.2.1 This Fundraising Policy guides our fundraising practices and ensures we work with honesty, integrity, and accountability to our donors and partners. It provides the overarching framework and guidelines governing the fundraising activities outlined in our Fundraising Plan. Together, they form a complementary relationship, with the policy providing structure and the plan executing actionable steps towards fundraising success.
- 1.2.2 This Fundraising Policy reflects the National Fundraising Principles and should be applied in conjunction with relevant laws and regulations in each Australian state/territory.
- 1.2.3 This policy ensures we have the processes and procedures in place to ensure compliance with the Australian Council for International Development (ACFID) Fundraising Charter, which covers:
 - Fundraising compliance
 - Donor privacy
 - Policies for accepting and rejecting donations
 - Outsourced fundraising agencies
 - Images and messages used for fundraising
 - Ethical decision-making and approval processes.

1.3 Scope and Governance

- 1.3.1 This policy applies to RAWCS and all of its administered funds and subsidiaries referred inclusively within this policy as RAWCS.
- 1.3.2 This policy applies to all RAWCS staff, volunteers, Board members, committee members, suppliers and contractors. Within this policy all of these are represented by the term: "**our people**".
- 1.3.3 RAWCS program partners are also required to adhere to this policy.

1.4 Policy References

1.4.1 Related Documents

- Australian National Fundraising Principles
- ACFID Fundraising Charter
- ACFID's Mandatory Guidance on Financial Reporting
- ACNC Fundraising Hub https://www.acnc.gov.au/tools/factsheets/fundraising-hub
- Charity Fundraising and Vulnerable People <u>https://www.acnc.gov.au/tools/guides/charity-fundraising-and-people-vulnerable-circumstances</u>
- RAWCS Fundraising Plan
- RAWCS Code of Conduct
- RAWCS Child Safeguarding Policy and Code of Conduct
- RAWCS Commitment to Human Rights, Humanitarian Principles and Racial Justice Statement
- RAWCS Privacy Policy
- RAWCS Non-Development Activity Policy
- RAWCS Volunteer Policy
- RAWCS Communication and Transparency Policy
- RAWCS Whistleblower Policy and Procedure
- RAWCS Complaints Policy and Procedure

1.4 Definitions

Term	Definition	
Donation	Donation means a voluntary contribution or gift, whether in cash or kind.	
Donor	Any person or organisation making a donation to RAWCS.	
Bequest	A monetary or "in-kind" gift obtained through a person's will.	
In-kind	Non-monetary gifts given to an organisation.	
Fundraising Activity	All activities undertaken by or on behalf of RAWCS with the aim of soliciting or receiving donations	
Sponsorship	When one party agrees to do something in exchange for the financial or in- kind support of the other. The sponsor seeks and obtains something of value for the support given.	

2. Principles

RAWCS will adhere to the following principles when undertaking fundraising activities:

2.1 Ethical fundraising

- We will conduct fundraising activities with the highest ethical standards and transparency.
- We will **NOT** accept funding from corporations that are engaged in gambling.
- We will **NOT** accept funds with 'strings attached' that require us to do things that are not in line with our values.

2.2 Cultivate before asking

- We will first engage with the donors, cultivate relationship, inform, and educate them about RAWCS's mission before we ask for their donation.
- We will **NOT** ask for a donation if we have not undertaken a high-level assessment of values alignment (i.e., the prospective donor is not a gambling entity).

2.3 Donor privacy

- We will respect donor privacy, safeguard their contact information, and only publicly disclose their name should they have no objection to us doing so.
- We will only contact the donors at the time and through their preferred channels of communication.

2.4 **Personalising our ask**

- We will exhibit care and diligence by personalising our ask by customising the presentation to match the focus of the donor (unless our ask is for general donation).
- We will first review and understand the donor's area of focus (particularly for philanthropic and corporate foundations) to maximise the chances of success and respect donor time.

2.5 Exhibiting responsible behaviour

- We will explain our donor stewardship to each prospective donor.
- We will report, at regular intervals, the progress back to our donors.
- We will invite (where appropriate and applicable) our donors to visit the sites where their donations are put into good use.
- We will recognise our donors by sending them thank you notes and inviting major donors to RAWCS public events (if any). We will reward our major donors by giving them certificates or letters of appreciation.

2.6 For an individual engaged in fundraising activities on behalf of RAWCS, the following general principles apply:

- A fundraiser must **not** engage in activities that may harm RAWCS, a donor, a beneficiary or members of the public.
- A fundraiser must **not** engage in activities that bring the profession of fundraising into disrepute.
- A fundraiser must recognise their individual boundaries of competence and be truthful about their professional experience and qualifications.
- A fundraiser must **not** engage in any activities which conflict with their fiduciary, ethical and legal obligations to RAWCS.
- No fundraising personnel, whether directly or indirectly employed or volunteering, will accept commissions, bonuses or inducements for fundraising on behalf of RAWCS.

3. Fundraising Cycle

3.1 The fundraising process underpins our ability to deliver projects and programs. At RAWCS, we manage our fundraising activities in the following five clearly stipulated circles:



3.2 Research, identification, and qualification:

- Identification: At this initial stage, RAWCS identifies potential donors or supporters who may have an interest in our mission and the capacity to make contributions. Prospects can be individuals, corporations, foundations, government, or other entities.
- **Research**: Once potential donors are identified, RAWCS will conduct research to gather information about their backgrounds, interests, giving history, and capacity to give. This research helps in tailoring fundraising strategies, approaches, and our ask.
- Qualification: Each prospective donor would need to be qualified against RAWCS ethical fundraising principles to ensure that there is value alignment, and that the donation will not come with 'strings attached' that would require RAWCS to do things that are not aligned with its values.

3.3 Engagement and Solicitation:

- **Engagement:** This involves building relationships with the prospects. RAWCS will reach out to prospects to educate them about its purpose, causes, projects, and impact. Engagement activities may include meetings, tours, events, and personalised communication.
- **Solicitation:** When the time is right and prospects have shown interest and engagement, RAWCS will make specific fundraising requests.

3.4 Monitoring and Evaluation:

- Monitoring: Once funds are raised from donors for a particular cause or projects, RAWCS will
 regularly track project activities, outputs, and progress toward project objectives. We will
 identify and address issues, challenges, and check if there are any deviations from the project
 plan. We will ensure that project activities are implemented according to the plan and budget.
- **Evaluation**: We will conduct periodic evaluations, such as the 6 monthly project audit reports and final project completion reports to evaluate project effectiveness, efficiency, sustainability, and impact.

3.5 **Reporting, Stewardship, and Involvement:**

- **Reporting**: We will regularly communicate project progress and results to donors who funded those projects. The reports will include both quantitative and qualitative findings to provide a comprehensive view of project performance. We will develop and use standard reporting formats that can be automated. We will put a 'human face' in our reporting to the donors, so they see how their contributions impact human lives.
- **Stewardship**: At regular intervals (such as at the time of sending project reports), we will express gratitude to our donors and reinforce the value of their support. We will also be transparent and upfront and report the 'good, the bad and the ugly' aspects of projects and not only report 'good' stories.
- **Involvement**: We will involve and bring our donors along the journey. This includes providing our major donors (i.e., non-Rotary donors such as corporates, philanthropists, and government) opportunities to visit projects they fund to see, for themselves, the project work in action.

3.6 **Recognition:**

• **Recognition and acknowledgment**: We will publicly recognise major donor contributions (unless advised otherwise), such as through our website, annual reports, or naming opportunities. We will also issue certificates of appreciation and plaques. We will develop a donor recognition chart that will stipulate the various levels and mechanisms through which we recognise our donors. Adequate and well thought out donor recognition will help with retention and donors returning in the future to fund new projects.

4. Disclosure of Fundraising and Administration Costs

- 4.1 In all cases we will distinguish fundraising costs from other administrative costs of running the organisation.
- 4.2 Where RAWCS publishes expenditure ratios, they will be in compliance with the Financial Reporting Implementation Guidance at C.2.2 in the ACFID Code of Conduct and the Financial Definitions at Section G of the ACFID Code of Conduct - Implementation Guidance.
- 4.3 Where information is published relating to administrative and fundraising expenditure, it will be accompanied by a note explaining how it has been determined.
- 4.5 At no time will we give the impression that fundraising has no costs or that aid and development programs have no administrative component. Where administrative and fundraising costs are supported by a particular donor or group of donors, it may be possible to make assertions such as "All funds received in conjunction with this fundraising initiative can be passed directly to Cambodia". However, even this assertion must recognise that there will be bank fees associated with that transfer at the very minimum. All fundraising activities incur a cost.

5. Fundraising Tools and Strategies

- 5.1 At RAWCS, we employ a range of tools and fundraising strategies to create documentational assets
 - to fundraise and bring our fundraising plan to life. We are committed to ensuring that our communications, including our website, promotional materials and fundraising letters:
 - are truthful and accurately represent the context, situation, proposed solutions and intended meaning of information;
 - reflect our commitment to human rights, humanitarian principles, racial justice, equity, diversity, and inclusion;
 - clearly articulate how funds will be used, highlighting as relevant, that specific examples may represent a broader potential use in similar activity;
 - avoid material omissions, exaggerations, misleading visual portrayals and overstating the need or what the supporter's response may achieve;
 - include RAWCS's name, address, ABN and purpose;
 - clearly state if there is a specific purpose of each donation;
 - do not contain depictions that are demeaning, discriminatory, pornographic or unduly violent towards a person or group or feature images of dead bodies or dying people;
 - only portray people in images or stories if free, prior and informed consent is obtained, and in the case of children, from their parents or guardians;
 - do not disparage or endanger the people they are portraying, or infringe on child protection policies, or show children in a naked and/or sexualised manner;
 - are not knowingly sent to a child without the consent of the child's parent or guardian;
 - do not disparage others or infringe on the intellectual property rights of others; and
 - do not claim or imply that professional fundraising activities are carried out at no cost.

6. Engagement with Donors

- 6.1 At RAWCS, we divide donors into the following three categories:
 - **Benefactors** those that donate \$1 to \$10,000 in a single financial year.
 - **Donors** those that donate between \$10,000 to \$500,000 in a single financial year.
 - Major donors those that donate above \$500,000 in a single financial year.
- 6.2 In all fundraising activities conducted by or authorised by RAWCS, the rights of donors will be protected. These rights, as they relate to the privacy of donors or potential donors and being consistent with the *Privacy Act 1988*, including the right to:
 - have their names deleted or suppressed from mailing lists, including those that RAWCS intends to share;
 - all mail-outs to existing or prospective donors are to include "unsubscribe" options which will then permanently remove an individual from that list, should that be their wish;
 - be informed about the purposes for which funds are being raised and be able to access information on programs supported by their donation.
- 6.3 We are committed to treating our donors with respect and complying with their wishes in relation to their giving and communications preferences. All our people responsible for receiving and processing donations shall:
 - respect and value all those who donate to RAWCS Australia;
 - ensure donation processes are secure and transparent;
 - build trusting relationships with regular donors and partners;
 - respect donors' wishes not to make a donation;
 - give donors the chance to opt out of communications.

- comply with donors' communication preferences, including when and how to be contacted;
- comply with donors' wishes in relation to the type or frequency of donation requests;
- comply with donors' requests for information regarding program and administration costs and how donations are used;
- ensure donors' information is secure and their privacy protected;
- ensure a donor has given consent prior to any public recognition of their gift;
- encourage donors to seek independent financial advice before leaving a bequest, major gift, or any gift that might adversely impact their financial situation;
- not seek donations from people RAWCS knows are in financial difficulty;
- communicate respectfully and professionally with those who request a refund; and
- respond proactively to any issues arising in regard to donation refunds.

7. Donation Refunds

- 7.1 We expect that anyone wishing to donate consider their decision carefully and check donation amounts during transactions.
- 7.2 We recognise that it is possible to make an error when making on line donation or for the donors to change their mind about the donation made. It can also occur that an error can be made by RAWCS Australia or our financial institution.
- 7.3 We will endeavour to refund donations in accordance with the following principles:
 - if an error is made in making on line donation or if the donor changes their mind, we will honour all requests for refund that are made in writing within 30 days of the date the donation was made;
 - the written refund request should include the details of the initial transaction including date, donation amount, donor's name, ID, receipt number and the nature of the error.;
 - requests for refund can be sent by email or mail: Email: <u>info@rawcs.com.au</u>
 Mail: Rotary Australia World Community Service Ltd PO Box 7066, Norwest NSW 2153
- 7.4 We will fully examine all requests for refund and endeavour to ensure that genuine errors are rectified, however we are under no obligation to give refunds and the decision on refunds will be at RAWCS's discretion.
- 7.5 If we adjust an amount, the original receipt issued for the incorrect amount will become invalid and a new receipt will be issued for the amount of the adjusted donation.
- 7.6 RAWCS reserves the right to pass any refund transaction charged onto the donor. Refunds will be returned using the original method of payment if donation has been made by credit card, the refund must be credited to that same credit card. Should an error be made by RAWCS or our financial institution(s), a refund of the full amount will be made once we are notified of the error in writing.

8. Donation and Gift Refusal

8.1 RAWCS may decide at its absolute discretion to decline a donation. The CEO is authorised to accept or refuse a gift, after responsibly considering the consequences of accepting or refusing the gift, and consulting with the Board.

- 8.2 We may refuse donations or gifts if:
 - we have reason to believe that the supporter is in vulnerable circumstances or lacks capacity to make a decision to donate;
 - they impose or imply conditions that would limit, or appear to limit, RAWCS's ability to carry out its purpose fully and impartially;
 - there are real or apparent conflicts of interest between the purpose, values and objectives of RAWCS and those of the supporter, or the supporter's policies or activities are incompatible with those of RAWCS;
 - they are from individuals or organisations involved with gambling or weapons;
 - they have the potential to adversely affect RAWCS's reputation or result in an adverse reaction from existing or potential supporters;
 - the cost of accepting the donation/gift would be greater than the value of the gift;
 - there is reason to believe that accepting the gift may give rise to litigation;
 - they are known to be the proceeds of criminal activity or obtained by illegal means; or
 - they are indirectly given and routed through an unauthorised third party by an individual or organisation restricted by this policy (NB: RAWCS may authorise or deauthorise third parties at any time).

9. Distribution of Donated Goods (Both in Australia and Overseas)

- 9.1 All our people have a responsibility to honour the intent of goods that are donated in Australia for charitable purposes. RAWCS does not and will not condone the misappropriation or on-selling of the donated goods either in Australia or other countries for personal gain or to other organisations for commercial profit.
- 9.2 The donated goods must be distributed for community and personal use at no charge or fee by the organisation or the Rotary Club receiving them. Due diligence must be undertaken to distribute the donated goods in accordance with the charitable intent.

10. Sponsorships

10.1 This Fundraising Policy also applies to sponsorships. We endeavour to establish clear expectations with sponsors through memorandums of understanding, regular engagement and impact reporting. We are committed to a positive reputation and upholding its values, and may therefore decline sponsorships where there may be a conflict of interest or that may lead to adverse publicity. Any proposed sponsors should have an appropriate public image and product and not carry an unreasonable cost associated with the sponsorship.

11. Roles and Responsibilities

Roles	Responsibilities			
National Board of Directors	 Guiding governance and culture of RAWCS through strategic leadership Ultimate accountability for our organisational policies Guiding the governance and culture of CA through strategic leadership Approving this policy and holding the CEO accountable to how effectively this policy is implemented 			
CEO	 Ensuring our procedures, practices, plans and operations align with this policy. Provide an annual report on compliance with the ACFID Fundraising Charter to the Board. 			
National Manager Projects & Volunteers	 Ensuring all project participants are aware of, and comply with this policy. Fostering a culture of integrity by actively promoting and supporting whistleblowing channels to report unethical behaviour or policy violations. 			
All our people	 Ensuring that your actions are in line with this policy, and that your work reflects the Guiding Principles and Policy Commitments above. Not encouraging others (directly or indirectly) to breach this policy. Reporting any breach to your manager/supervisor. 			

12. Policy Distribution

12.1 We will ensure that all our people are notified of and made aware that they are required to follow the policy.

13. Monitoring and Review

- 13.1 As a requirement of its membership of ACFID the National Board of Directors will require an annual report from the CEO on compliance with the ACFID Fundraising Charter.
- 13.2 We are committed to continuous improvement to our policy, procedures and practices. This policy will be reviewed at least every three years by the CEO and approved by the National Board of Directors to ensure it is working in practice and updated to accommodate changes in legislation or circumstance.

14. Appendices

- 14.1 Appendix A ACFID Fundraising Charter
- 14.2 Appendix B National Fundraising Principles

15. More information

15.1. If you have a query about this policy or need more information, you can contact us via:

- email: <u>info@rawcs.org.au</u>
- phone: +61 2 8833 8306
- post: Rotary Australia World Community Service Ltd 25/1 Maitland Place Maitland Place Norwest NSW 2153 Australia

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Appendix A: The ACFID Fundraising Charter

The ACFID Fundraising Charter



Australian Council For International Development

The ACFID Fundraising Charter requires that Members will have processes and procedures in place to ensure that:

- Decisions to accept or reject donations support the purpose of the organisation.
- Legislative requirements for fundraising are met.
- The privacy of Donors, consistent with the Privacy Act, are met.
- Free, prior and informed consent is obtained for all images and stories.

All fundraising materials will be truthful and:

- Include the organisation'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, Members 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.
- Members are identified as the beneficiaries of the funds.
- Contractors are clearly identified.

Images and messages used for fundraising will not:

- Be untruthful, exaggerated or misleading (e.g. not doctored, created as fiction or misrepresenting the country, etc.).
- 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.

Members have a clear ethical decision-making framework in place which aligns with the values of their organisation and the Code and includes:

- A commitment to portraying affected people in a way that respects their dignity, values, history, religion, language and culture.
- A process that integrates a range of key staff in the organisation (e.g. communications, planning, child protection and CEO) in decision-making where appropriate
- Clear responsibilities for approval for public use of images and messages.
- A process which recognises and balances both donors and affected people but which gives primacy to the primary stakeholders.

Appendix B: National Fundraising Principles

National Fundraising Principles

On 10 February 2023, Treasurers from Australian jurisdictions met as the Council on Federal Financial Relations and agreed to a set of National Fundraising Conduct Principles. The principles will harmonise the requirements for how charities conduct fundraising across Australia.

For more information you can access the <u>Agreement Reached on Reform of Charitable Fundraising Laws</u> - <u>Joint Media Release here.</u>

National Fundraising Principles

When conducting fundraising activities, charitable organisations must ensure that their employees, volunteers, contractors and anyone else who they engage or arrange to raise funds on their behalf:

- 1. Always explain the purpose of their charity and the purpose to which the funds raised will be applied in ways that are appropriate for the audience.
- 2. Always be clearly, and individually, identifiable by the public (including to display identification that contains the individual's name, whether they are a volunteer, employee or acting in some other capacity for a charitable organisation or commercial fundraising organisation, and that organisation's name and contact details).
- 3. Always make and keep written records of fundraising activities that can be easily read and understood.
- 4. Always acknowledge and comply with a:
 - refusal to make a donation;
 - request not to receive future solicitations (including marketing and promotional materials);
 - request to be contacted at a more convenient time or by a different means; and
 - request to limit the number, type or frequency of solicitations.
- 5. Never conduct door-to-door or telephone fundraising activity at the following times:
 - before 9 am or after 5 pm on a weekend;
 - before 9 am or after 6 pm (door-to-door) or 8pm (telephone) on a weekday; or
 - on a public holiday, unless the public holiday is closely connected with a fundraiser's charitable purpose.
- 6. Never mislead, deceive or knowingly use false or inaccurate information when fundraising.
- 7. Never place undue or unreasonable pressure on a person when fundraising, or act unconscionably in any way to obtain a donation.
- 8. Never exploit the trust, lack of knowledge, lack of capacity, apparent need for care and support, or vulnerable circumstances of any donor.
- 9. Always make it clear whether a donation is a one-off or an ongoing donation, and clearly explain how to end an ongoing donation.

10. For commercial fundraisers engaged to fundraise for a charitable organisation, never accept a donation without having explained that they are part of an organisation that makes a profit from fundraising as well as how they are paid.

At all times, charitable organisations must:

- 11. Conduct all reasonable due diligence when engaging third parties to assist, support or deliver fundraising activities on its behalf.
- 12. Make and keep written records of the total funds raised and the purposes for which funds are applied.
- 13. Take all reasonable measures to protect the health, safety and wellbeing of fundraisers employed or directly engaged by them, as well as members of the public, when fundraising.
- 14. Establish and maintain a complaints process that allows for proper investigation and redress of fundraising complaints that may be made by the public and encourage anyone with concerns about a fundraising activity conducted by or on behalf of the charity to contact them.
- 15. Ensure information covered by the *Privacy Act 1998* (the Act) is collected, used and managed in accordance with the Australian Privacy Principles where required under the Act.
- 16. Always ensure remuneration to commercial fundraisers engaged to fundraise for a charitable organisation is not excessive when compared to money or goods received for the charitable purpose of the fundraising.