
AfP Marketing, Communications and Fundraising Policy

(October 2016)

This policy replaces Act for Peace's 2011 Communication and Fundraising Policy, Policy and Procedure on Public Statements and the Media, Communication with the Public, and Style Guide Policy.

Date of next review:

January 2019.

Executive Summary of Marketing, Communications and Fundraising Policy

The purpose of this Act for Peace (AfP) policy is to ensure that the marketing, communication and fundraising activities undertaken by staff and supporters are undertaken ethically and in line with the mission, vision, purpose and values of the organisation.

The policy complies with all relevant legislation, obligations under the ACT Alliance, the ACFID Code of Conduct, the FIA Code of Ethics and professional Conduct, and the Head of Agreement between AfP and DFAT.

This Policy applies to marketing, communications and fundraising materials and activities in all forms. It contains the following sections, which set out in detail how the policy will be implemented.

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1. Scope and Purpose

The purpose of Act for Peace’s (AfP) marketing, communication and fundraising activities is to empower passionate people to give, fundraise and take action to achieve safety, justice and dignity in communities threatened by conflict and disaster. These activities provide the funds AfP requires to carry out its work and fulfil its mission.

The purpose of this policy is to ensure AfP carries out these activities ethically, effectively, in line with its mission, vision, purpose and values, and in compliance with all relevant AfP policies, Commonwealth, State and Territory legislation and our obligations as an ACT Alliance member, a signatory to the ACFID Code of Conduct and the FIA Code of Ethics and Professional Conduct, our obligations to DFAT under our Head Agreement and Grant Order and best practice.

Compliance with this policy is essential to ensure AfP can continue to generate and sustain the funding it requires for its work, protect its beneficiaries, supporters, staff and volunteers, and manages organisational risk. It is also essential in order to enter into ongoing relationships of trust, confidence, mutual respect and accountability between AfP and its institutional donors, supporters, volunteers and beneficiaries.

This policy applies to the production of all marketing, communications and fundraising materials, and any associated activities, undertaken by AfP staff, representatives and volunteers whether in printed, electronic or verbal form. Where specified, some sections of this policy also apply to AfP’s implementing partners.

2. Applicable Standards and Guidance

As a member of the Australian Council for International Development (ACFID), and a signatory to the ACFID Code of Conduct, AfP is committed to meeting and exceeding the standards set out in the *ACFID Code of Conduct and will, on an annual basis conduct the required self-assessment of its work against the Code*. AfP also adheres to the *Fundraising Institute of Australia’s Principles and Standards of Fundraising Practice*, and the *Australian Direct Marketing Association’s Code of Conduct*.

As a member of the ACT Alliance, AfP is committed to upholding the standards set out in the *ACT Alliance Co-branding Policy, Communications Policy, and Public Information Disclosure Policy*.

AfP is committed to complying with the *DFAT Child Safeguarding Policy* and meeting its acknowledgement and publicity obligations under its *DFAT Head Agreement and ANCP Grant Agreement, and other institutional donor requirements as confirmed in Agreements and associated policies*. Compliance includes but is not limited to *financial controls, dedicated use of funds, child safeguarding, counter-terrorism and other core compliance measures*.

AfP also complies with all Federal, State and Territory fundraising legislation, and the *Australian Privacy Principles, and Payment Card Industry Data Security Standards*.

This policy should be read in conjunction with AfP's Value for Money Policy, Code of Conduct, Code of Good Practice, Child Safeguarding Policy, Risk Management Policy, Advocacy Policy, Counter-Terrorism and Complaints Policy.

3. Rationale

AfP recognises that passionate people, including AfP supporters and potential supporters, have an important contribution to make towards achieving safety, justice and dignity in communities threatened by conflict, disasters and displacement. This contribution can take the form of financial gifts, fundraising, volunteering, campaigning and advocacy activities, or a combination of these.

Act for Peace also recognises that institutional donors, including the Australian Government, other international governments, multilateral agencies, NGOs, philanthropic institutions and other entities are dedicated to working together to achieve sustainable humanitarian and development outcomes. Working together may include but is not limited to the provision of funding, collaboration on policy, research, and program implementation.

Effective marketing, communications and fundraising activities are required to initiate, sustain and increase this contribution, provide the funds AfP requires to carry out its work and fulfil its mission.

AfP also recognises that:

- Supporter and institutional donor relationships build over time. Most support given to charities is not one-off, and individuals and organisations often support a charity over a long period of time. The relationship between a charity and a supporter must be carefully nurtured and managed to maximise the support given to the charity over time.
- These relationships are based on trust. Ethical and sustainable fundraising, as well as being core to AfP's values, is also essential in order to enter into ongoing relationships of trust, confidence and mutual respect between AfP and its institutional donors, supporters, volunteers and beneficiaries.
- Fundraising costs money. Collecting stories, producing effective communications, reaching people with those communications and building relationships requires an investment of time, energy and money. When the return on investment from a fundraising activity is positive, the more that is invested in fundraising, the more money that is available for program work.
- Fundraising takes time. Because supporter and institutional donor relationships build over time, an investment in fundraising in one year may not deliver a positive return on investment for several years (this is the case for most regular giving acquisition activities in Australia, for example). Therefore, the 'fundraising ratio' of fundraising income vs expenditure in any given year is not a good indicator of the total return on investment of a fundraising activity. Lifetime value, or the fundraising income after costs over the entire time the supporter gives to the charity (often many years), is a much more effective measure of return on investment.
- Maximising the net fundraising contribution to programs, not minimising the cost of fundraising, will most effectively help AfP fulfil its purpose, its obligations to beneficiaries and its promise to donors. As an agency that is accountable to its stakeholders, AfP must ensure that it maximises its net contribution to programs within a fundraising ratio that is acceptable to stakeholders.
- Fundraising activities must be relevant and appropriate to the needs of those AfP seeks to assist. Accordingly, fundraising strategies must be aligned to AfP's Strategic Plan and current or future program Operational Plans. Fundraising objectives and strategies, including the planned mix of earmarked and non-earmarked funding, must align supporter and institutional

donor needs with the funding requirements of AfP's humanitarian, protection, advocacy and development programs.

4. AfP's Approach

AfP will develop effective marketing, communication and fundraising strategies that aim to maximise the contribution made by passionate people, including AfP supporters, potential supporters and institutional donors, towards achieving safety, justice and dignity in communities threatened by conflict and disaster

Strategies for raising funds with supporters will be informed by evidence and best practise, and benchmarked against past performance and the sector.

Strategies for raising funds with institutional donors will be informed by research into institutional donor policy and funding preferences.

In line with AfP's Value for Money Policy, these strategies will aim to maximise the lifetime value of AfP's supporter and institutional donor base at an acceptable return on investment, rather than minimum possible cost of fundraising. AfP recognises that good fundraising requires an investment of time, money and energy and it will strive to obtain an optimum balance between high productivity, effective outcomes, low cost, equitable distribution, and ethical practice.

AfP's overall investment in fundraising, and therefore its fundraising ratio will be approved by the AfP Commission during each strategic planning and budgeting cycle and reviewed annually by the Commission as part of the budget approval process. Rather than being fixed by policy, AfP's ratio will vary based on AfP's phase in the investment cycle. Ratios will be informed by sector benchmarks, and AfP will strive to have plans in place to bring its ratios in line with sector benchmarks.

AfP will be accountable to stakeholders and publish its overall expenditure on fundraising in its Annual Report and on its website. At all times, AfP will strive to ensure resources are used as effectively and efficiently as possible.

In line with our Risk Management Policy, AfP will aim to maintain a balanced fundraising portfolio with a range of income streams and a diverse supporter and institutional donor base that balances risk and return.

In line with our Code of Conduct and this policy, AfP's marketing, communications and fundraising activities will adhere to the highest standards of transparency, accuracy, truthfulness and integrity. AfP will regularly and proactively report back to its stakeholders on its projects and activities, and the outcome and impact of its activities including detailed financial reports. It will make detailed information about the agency and its work publicly available on the AfP website, including its strategic plan, and many of its policies and processes. AfP will also ensure its stakeholders are able to hold AfP to account through maintaining key accountability documents on its website, including its behavioural *Code of Conduct for Staff*, *Code of Good (organisational) Practice*, and Complaints Policy and procedures. AfP is committed to sharing any other information about its projects and activities (with the exception of confidential and commercially sensitive information) on request.

In line with our approach to sustainable and transformative development, AfP believes that local people are best placed to identify the challenges faced by their communities and create solutions that work. Accordingly, in all AfP communications, we will endeavour to frame our work as empowering local partners, communities and individuals to achieve change in their own communities. AfP's partners and beneficiaries on the ground will be the heroes of its stories - passionate, dignified, resilient people modelling the values and behaviours to which AfP and its supporters aspire, not images that degrade or insult the dignity of those we seek to assist, nor paint them as hopeless or dependent objects of charity.

AfP will ensure that all marketing, communications and fundraising activities have clear objectives that align with its strategic goals, are effectively planned, and implemented to a high standard. AfP will regularly monitor and evaluate the progress of these activities, and adapt its approach to maximise their effectiveness.

5. AfP Policy Objectives and Indicators to Measure Progress towards Objectives

AfP's Marketing and Communications checklists must be completed before any marketing, fundraising or communications materials are published or shared with external stakeholders. The checklists include summaries of AfP's key policy and compliance requirements relating to communications, fundraising and branding as well as checks to ensure accuracy and best practise standards for the specific channel and communications activity to which the checklist relates.

Compliance with AfP's policies is a requirement and any staff or volunteers found to have breached these policies will be subject to appropriate performance management or disciplinary procedures.

6. Communications and Marketing

6.1. Transparency, accuracy, integrity and ethics

AfP is committed to accurate and transparent communication with its stakeholders. It will proactively make available information to its stakeholders which is accurate, accessible and timely.

AfP's marketing, communications and fundraising materials (including printed, electronic and verbal communications) will be truthful, ethical and reflect its vision, purpose and values, and the values of the ACFID Code of Conduct.

Images and messages used in AfP communications will be accurate, timely and relevant. Facts or statements will be checked for accuracy with the relevant program staff member (for program related facts) before publication, or sourced from reputable up to date sources and the source referenced in the communication. There will be no material omissions or exaggerations of fact, and no communication which would tend to create a false impression or misunderstanding. However, names and other information which could lead to the identification of or location of vulnerable people featured in images will be altered to ensure adequate protection.

AfP will ensure that its use of images and messages portraying women and men, boys and girls in its communications respects the dignity, values, history, religion and culture of the people portrayed. Images and messages of women and men, boys and girls will present them in a dignified, respectful manner, portraying them as equal partners in the development process. Images and messages will honestly portray the diversity of local people including age, disability and other marginalised groups.

Images and messages will honestly convey the context and complexity of the situations in which local people live.

Key figures in images will be provided with information regarding how the image will be used and their permission obtained. They will have the right to deny either the taking of or use of their image without negative repercussion. Origins of any images used will be known and any necessary permissions, including copyright releases, be held. Care will be taken to ensure that the identification of or use of images of local people will not endanger the people they portray.

6.2. Child Safeguarding

This section should be read in conjunction with AfP’s Child Safeguarding Policy 2016, which describes AfP obligations in full and mandatory requirements for staff such as the Child Safeguarding Code of Conduct and mandatory, immediate reporting obligations. This excerpt on relates to photographing, filming and using images of children.

Anyone photographing or filming a child or using children’s images for AfP-related purposes, must:

- Sign and confirm they have read and understand AfP’s Child Safeguarding Code of Conduct.
- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child.
- Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child and maintain evidence of this informed consent. As part of this they must explain how the photograph or film will be used. All tools, templates and checklists must include the words ‘child AND¹ parent or guardian’ and the word ‘informed’ before consent. Individuals must be informed of what the photo will be used for, how long it will be kept and how the individual can ask for the photo to be removed.
- Ensure photographs, films / videos and other mediums representing children do so in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.
- Use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.
- Where AfP engages third parties to collect images of children, AfP retains responsibility for ensuring appropriate collection and use of those images.

6.3. Branding and visual identity

A strong brand is an essential pre-requisite for attracting and maintaining public support for AfP’s work, and AfP will achieve the greatest impact when all its communications build on and reinforce each other, adding to its overall brand awareness and equity. As a result, all AfP communications must follow the *AfP Visual Identity Guidelines*. This is to ensure all its communications convey a consistent brand personality and are instantly identifiable as coming from AfP.

All AfP communications must use the common visual identity system and feature the AfP logo. In addition, AfP has a co-branding requirement to always identify as part of the NCCA and as a member of the ACT Alliance. AfP identifies its membership of the ACT Alliance by featuring the ACT Alliance logo in its strapline and logo lock up.

AfP identifies as part of the NCCA on all communications by featuring the line “The international aid agency of the National Council of Churches in Australia” on the cover of all communications. In very limited circumstances, where space does not allow for the effective use of all branding elements (such as social media icons or certain coalition publications), the AfP logo may be used in isolation. These guidelines have been approved by the ACT Alliance Secretariat and the NCCA in order to meet our co-branding responsibilities.

All AfP products (such as the Christmas Bowl or the AfP Ration Challenge) must be instantly recognisable as run by AfP, and the best interest of the brand as a whole must always take priority

¹ The word ‘AND’ must remain in capitals to confirm both parties.

over what works best visually for an individual product or piece of communication. As such, all products must use the AfP visual identity system and other branding elements.

Published URLs must always be www.actforpeace.org.au/productname (never www.productname.org.au). Where possible, all new products must be called, and referred to in marketing materials, as ‘the AfP *Product Name*’ (e.g. the AfP Ration Challenge) rather than given a stand-alone name.

Branding is also a key mechanism for enhancing the visibility of the Australian Government’s international development and aid initiatives. Correct branding maximises recognition of the development role played by the Australian Government and increases the accountability and transparency of Australia’s aid program.

AfP must in all publications, promotional and advertising materials, public announcements, events or activities featuring programs funded by DFAT, acknowledge the support of DFAT. In Australia, this should be in the form of the statement “AfP gratefully acknowledges the support of the Australian Government” and the DFAT crest logo where appropriate. The Australian Aid Identifier must not be used in Australia.

The Australian Aid Identifier must be used to brand all aid and development activities delivered overseas with support from the Australian Government. The AfP logo should also be used, and the logo of a partner government, implementing partner, managing contractor, NGO or multilateral organisation may also appear alongside the Australian Aid Identifier, however the Identifier should be in the most prominent place. An exemption for not applying branding may be granted by the Head of Mission or the Communications Section at DFAT if there is compelling case or an identified security risk.

All new Australian aid-funded projects and initiatives should be branded with the Australian Aid Identifier. Wherever practical, the previous (AusAID) Australian Aid Identifier should be replaced progressively and sensibly. Formal signage for completed projects, such as foundation stones or commemorative plaques, should not be altered.

AfP, partner organisations, managing contractors, NGOs or multilateral organisations and their staff must not use the Australian Government crest or the Australian Aid Identifier on any stationery, including business cards, as this can incorrectly imply that the organisation acts with the authority of the Australian Government or that staff are Australian Government employees.

6.4. Mandatories

AfP’s mailing address, freecall number, email address, website url and ABN must be included on all communications (except in very limited circumstances, where space does not allow for the effective use of all mandatories above, such as stickers, where the ABN and website URL only can be used).

6.5. Privacy and data security

Privacy is very important to AfP and it is committed to collecting, storing and using personal, sensitive and credit card information responsibly. All AfP marketing, communication and fundraising activities must comply with AfP’s Privacy Policy and data handling procedures (which are guided by the Australian Privacy Principles) and PCI legislation.

Appropriate security measures (including encryption of internet transactions in accordance with industry standards) must be put in place to ensure that donations and supporter’s information is secure at all times.

AfP’s Privacy Collection Notice must be clearly printed near to the point of data capture in all printed communications where data is collected, and read out when data is collected over the phone. A link to

AfP's Privacy Policy must be displayed near to the point of data capture where data is collected online and in all direct-marketing emails from AfP.

As stated in AfP's Privacy Policy, supporters have the right to have their names deleted or suppressed from AfP's mailing lists, and any mailing lists that it has shared. Supporters are also be permitted to refuse to make a donation; limit to a certain amount, the frequency of communications (including fundraising solicitations); not be communicated with via mail, phone or other technology; or not receive printed material concerning AfP. Any such requests must be processed promptly by AfP.

Supporter's personal information about their identity, their donations and the organisations to whom they donate are protected and must not be disclosed to a third party without the consent of the supporter.

6.6. Annual Report

AfP's annual report is a key part of its accountability to all stakeholders. A written annual report will be produced and be made available to AfP's stakeholders including its members, staff, volunteers, supporters, partner agencies, institutional donors and members of the public.

The annual report will provide AfP's stakeholders with:

- A description of AfP's purpose, objectives/aims and values;
- A plain language summary of AfP's income and expenditure and overall financial health;
- A description of the most significant aid and development activities undertaken during the reporting period and their impact;
- Information about evaluations into the effectiveness of and the learning from aid and development activity conducted by AfP.
- A report by the management and/or the governing body;
- Financial statements prepared in accordance with the requirements of the ACFID Code of Conduct;
- A statement of commitment to full adherence to the ACFID Code of Conduct;
- Identification of the ability to lodge a complaint against AfP and a point of contact;
- Identification of the ability to lodge a complaint for breach of the ACFID Code of Conduct with the ACFID Code of Conduct Committee and a point of contact;
- Financial statements prepared in accordance with the Financial Definitions at Section G of the ACFID Code of Conduct;
- A reference to the availability of the full financial report (if the full financial report has not been included in the annual report);
- An audit report on the Code of Conduct Summary Financial Report or, if the full financial report has been included in the annual report, on the full financial report.

Within 5 months of the end of AfP's financial reporting period, it will lodge a copy of its audited annual report and a copy of its annual full financial statements (if not included in the annual report) with DFAT and the ACFID Code of Conduct Committee.

AfP will also ensure that in any references to financial performance, stakeholders are made aware of their right to access AfP's full financial reports.

6.7. Media releases, media advisories and public statements

AfP engages with the media in order to raise awareness and inspire action on issues and activities relating to our purpose.

AfP will only release statements in its own name, and will not issue statements on behalf of the Member Churches of the NCCA.

All AfP media releases, media advisories and public statements must be approved by AfP's Marketing and Communications Director and comply with AfP's Marketing, Communications and Fundraising Policy. If the Marketing and Communications Director, or their delegate, is uncontactable approval may be sought from the AfP Executive Director.

In addition, any media releases, media advisories and public statements that include an AfP policy position must be approved by the AfP Executive Director.

Media releases or public statements relating to DFAT funded initiatives will acknowledge DFAT support. Media releases, articles or other formal statements prepared by AfP relating to DFAT funded initiatives which expressly or impliedly comment adversely on DFAT's role in the initiative will be strictly subject to the prior written consent of DFAT. AfP shall not associate the Commonwealth or DFAT in any way with any adverse comment it may make about governments in recipient countries; and as far as practical AfP will keep DFAT and the relevant Australian diplomatic mission advised of matters relating to public and media relations associated with DFAT funded initiatives.

6.8. Social media

Social media networks are important two-way channels of communication between AfP and its supporters, other stakeholders and the general public. The interactive nature of these channels should be reflected in AfP's social media communication strategies, and they should not be used as exclusively one-way or broadcast channels.

AfP will appoint a person to review and moderate its social media channels/pages and ensure compliance with this policy, AfP's Child Safeguarding Policy, AfP's Privacy Policy, and other relevant AfP policies.

Any new AfP social media pages must be approved by the AfP Marketing and Communications Director before being published.

Information on AfP's social media pages must be regularly updated, reviewed for accuracy and timeliness, and incorrect or out dated information removed.

Comments and posts by users should be moderated. Publically posted feedback, queries, questions or suggestions - positive and negative - should be responded to promptly. Moderation should be transparent, and negative feedback should only be removed if it is offensive or malicious. Offensive comments, links to offensive material or any post or comment that would endanger AfP's staff, supporters, partners or beneficiaries should be promptly removed. Complaints received via social media should be handled in accordance with AfP's complaints handling procedures.

Advertising on social media channels must not be targeted at people under the age of 18 (unless as part of a school fundraising initiative), comply with AfP's Privacy Policy, and all relevant legislation, including privacy legislation.

6.9. Direct mail

Mail is an important channel for communicating with our stakeholders. If mail is returned to AfP, an attempt should be made to determine why the mail has been returned and appropriate action taken where possible (e.g. address updated to new address). If no reason can be determined for the return,

or the supporter has requested to be removed from the mailing list, then no further mail should be sent to that individual.

If AfP becomes aware that a supporter is deceased, the supporter's record should be immediately updated and excluded from all mailing lists.

If requested, details of the source from which AfP obtained an individual's contact information must be provided to that individual within 7 days from the date the request was received.

6.10. Telemarketing

Telemarketing workplace

When undertaking a telemarketing campaign, AfP must ensure that it, or the organisation or corporation conducting the telemarketing campaign provides an appropriate physical environment for the making of telemarketing calls by telemarketers.

An appropriate physical environment must comply with the requirements of industrial relations and occupational health and safety legislation and any relevant State or Territory awards.

Training

Before the start of a telemarketing campaign, AfP must ensure that it, or the organisation or corporation conducting the telemarketing campaign has done the following:

- a) ensured that it, or the organisation or corporation is licensed to conduct the telemarketing campaign and perform telemarketing operations;
- b) engaged appropriately skilled staff to conduct recruitment, training and supervision of telemarketers;
- c) conducted a training program of at least 30 minutes duration, including as a minimum, training in all items described under the sections below on professional conduct, appropriate manner when talking to children, contact times, identification and call termination for any staff member, telemarketer and volunteer undertaking telemarketing;
- d) put in place supporter follow-up procedures including donation receipts in accordance with the relevant section of this policy;
- e) ensured that AfP has its name, address and telephone number listed in a telephone directory or, if a new listing, its telephone number is available through a directory assistance service; and calling line identification is enabled; and
- f) informed the telemarketers about the provisions of the Do Not Call Register and the Telecommunications (Do Not Call Register) (Telemarketing and Research Calls) Industry Standard 2007 as they apply to AfP and or the organisation making the calls. This can be accessed at the Australian Communications and Media Authority website.

Professional conduct

All telemarketers must at all times comply with the following requirements:

- a) comply with the FIA Principles of Fundraising Practice;
- b) clearly provide a supporter with an opportunity to accept or decline an invitation to make a donation;
- c) accept a refusal by a supporter of an invitation or offer to make a donation and must do so courteously and promptly;
- d) accept a request by a supporter not to be solicited by telephone or other means;
- e) accept a request by a supporter not to receive AfP promotional materials;

- f) accept a request to provide printed promotional materials to the supporter;
- g) offer to call back a supporter at a more convenient time;
- h) not make outbound telemarketing calls by using a recorded message in any form unless the supporter is informed that the telemarketing call is a recorded message and has the ability to clear the line promptly;
- i) not record a telemarketing call or use a recorded message in a telemarketing call unless the supporter consents;
- j) train telemarketers about AfP's work and the telemarketing campaign;
- k) give telemarketers a script to use when calling supporters,
- l) include in the script words to the effect: "if you wish, you may opt out of receiving any further calls from AfP" and including instructions on opting out.
- m) if requested to do so by any person, provide details of how to make a complaint about the telemarketing call including details of how to make a complaint to the FIA.

Times at which telemarketers can contact supporters

Telemarketing calls must be made at times in accordance with the requirements of relevant Commonwealth, State and Territory legislation. This refers to the time or public holiday at the supporter's present location.

Where a telemarketer has not received any response from a supporter they may continue to attempt to contact that supporter.

Note: Section 5 of the Telecommunications (Do Not Call Register) (Telemarketing and Research Calls) Industry Standard 2007 sets out the times that telemarketing calls can be made.

Telemarketer and AfP identification

A telemarketer immediately after the telemarketing call commences must:

- a) provide the supporter with the telemarketer's first name;
- b) provide the supporter with the name of the organisation on whose behalf the telemarketing call is being made (i.e. AfP); and
- c) provide the supporter with the purpose of the telemarketing call, including an accurate description of AfP's activities and intended use of the donation.

A telemarketer must further provide the following information to a supporter during the telemarketing call immediately upon request:

- a) AfP's contact details, including a telephone number and street address; and
- b) the name of the person who is responsible for handling supporter complaints for telemarketing.

A telemarketer must further provide the following information to a supporter during the telemarketing call or within a reasonable time after the telemarketing call, not exceeding 30 days, upon request:

- a) details of the source from which AfP obtained the supporter's contact information; and
- b) further details concerning activities undertaken by AfP.

If a supporter requests a copy of AfP's constitution or annual report, the telemarketer should advise the supporter how to obtain them.

Termination of telemarketing calls

A telemarketer must ensure that the supporter terminates the telemarketing call before the telemarketer (unless the supporter has abused the telemarketer, in which case the telemarketer may terminate the telemarketing call before the supporter, after advising the supporter that the telemarketer will do so).

A telemarketer must ensure that the supporter's telephone line is released within five seconds of the supporter hanging up.

Calling line identification

A telemarketer must not block the transmission of the calling line identity to a calling number display of a supporter who receives the telemarketing call.

Answering machines

If a telemarketer leaves a telemarketing message on a supporter's answering machine, the message must include:

- a) AfP's name and contact details;
- b) a free call or other fixed line number charged at the standard national rate which the supporter can use to call the telemarketer during normal business hours.

Telemarketers should not leave telemarketing messages on mobile phones unless the supporter has given prior consent to the use of a mobile phone.

Dialling equipment

Telemarketers must not use random or sequential dialling equipment to generate telemarketing calls.

Telemarketers must ensure their dialling equipment uses a minimum ring time of 15 seconds before the telemarketing call is discontinued or unanswered.

Telemarketers must ensure that, if a live operator does not take the telemarketing call, the equipment should abandon the telemarketing call and release the line within two seconds from when the line is picked up.

Telemarketers must ensure that the dialling equipment does not abandon more than 5% of connected telemarketing calls for each telemarketing campaign during a 24 hour period.

Telemarketers must ensure that, where a number has received an abandoned telemarketing call, any further telemarketing calls to that number within the next 72 hour period is handled by a live operator.

For each telemarketing campaign, telemarketers must maintain an archive of dialler statistics to show compliance with this policy. The archive must include:

- a) the number of telemarketing calls attempted;
- b) the number of live telemarketing calls;

- c) the number of telemarketing calls passed to a live operator;
- d) the number of live telemarketing calls abandoned by the dialling equipment.

Telemarketers must maintain this archive for at least 12 months.

6.11. SMS

SMS is a communication channel with a high level of cut-through. As a result it should be used sparingly and with care to avoid a sense of intrusion on behalf of the recipient.

AfP's Privacy Policy must be followed and the relevant Privacy Collection Notice displayed at the point of phone number collection. Marketing SMS messages must only be sent to those phone numbers that have opted-in to receive them. Procedures for unsubscribing from SMS communications must be included on all messages.

AfP must disclose to supporters the cost of messages sent by the supporters when using premium rate numbers and should explain to supporters how and when they will be billed, taking into account that various billing methods exist for SMS.

In competitions and prize draws, AfP should provide a clear and simple method of viewing any terms and conditions and should publish the identity of the promoter within the SMS competition.

Verifiable parental consent should be obtained before communicating via SMS with any child (under 18) and expert legal advice should be sought beforehand.

6.12. Collection, storage and use of stories, photos and video

AfP's story gathering guidelines must be followed when collecting, storing and using stories, photos and videos of AfP beneficiaries or supporters. This policy is designed to ensure AfP always respects the dignity, values, history, religion and culture of the people portrayed; ensure that the people portrayed, especially children, are protected and not endangered in any way; and ensure that our communications are factually accurate, truthful and not likely to deceive or mislead any person.

Collection

All people (staff, contractors or volunteers) who undertake the collection of stories, photographs or video of AfP beneficiaries are required to sign the AfP Code of Conduct and NCCA Child Safeguarding Policy prior to collecting material and abide by all local customs, observances and traditions. Criminal record and reference checks must also be made and the results kept on file. A detailed story gathering brief, which includes AfP's story gathering guidelines and permission requirements, must be prepared before each trip to the field and shared with the partner who is hosting the trip and arranging interviews with case studies.

Key figures in images (and the child 'and' parent or guardian if the figure is a child) must provide 'informed consent' for the use of the image before images are captured. Details must be given as to how and where their image may be used. Evidence of this permission must be recorded via one of the following means:

1. Field notes recording the name and location of the subject and date permission was granted.
2. A photograph of the subject / community holding a sign giving permission in English and a language spoken by the subject.
3. A written permission form signed by the subject, and / or a parent or guardian, recording the name and location of the subject and date permission was granted.

Records of 'informed consent' and the usage of material agreed must be filed with the image(s) and kept on record until the image is destroyed.

Storage

All AfP images should be securely digitally stored (e.g. using a secure online image library) for use by AfP staff in communications. Only images which are compliant with AfP's image and child safeguarding guidelines must be uploaded, names of children and vulnerable adults (and anyone else on request) changed and any identifying information of children and vulnerable adults (and anyone else on request) including their location must be removed before being uploaded.

Use

Images and video can only be used in AfP publications in accordance with AfP's image and child safeguarding guidelines. Images should always accompanied by a photo credit, and where possible, a descriptive caption. Editing checklists are used to ensure compliance with the guidelines.

6.13. Disclosure of fundraising and administration costs

Any use by AfP of expenditure ratios (e.g. percentage of funds spent on administration and fundraising costs) will truthfully and transparently disclose all costs incurred in the donation program.

AfP will not give the impression that fundraising has no costs nor that aid and development programs have no administrative component. If using financial ratios, AfP will comply with ACFID's Financial Reporting Implementation Guidance, and accompany any use of ratios with a note explaining how these have been determined.

6.14. Respect for other NGOs

AfP will ensure that its public communication is respectful of other NGOs. It will not denigrate other agencies, or make inaccurate or misleading public statements regarding other agencies. Any communication regarding another NGO will be factually accurate and will not intentionally or otherwise mislead. AfP will not make statements about other NGOs with the intention of creating a reputational or other advantage for itself.

7. Fundraising

7.1. All fundraising communications

AfP will abide by all applicable fundraising legislation, including the relevant provisions of the Competition and Consumer Act 2010 (Cth) and State or Territory equivalent legislation, (in particular those sections relating to misleading and deceptive conduct and false and misleading representations);

AfP is committed to adhering to best practice standards in fundraising, and will comply with the Fundraising Institute of Australia's Code of Ethics and Professional Conduct and Principles and Standards of Fundraising Practice.

Fundraising solicitations by or on behalf of AfP will be truthful, will accurately describe AfP's identity, purpose, programs, and needs and will only make claims which AfP can fulfil.

Fundraising materials and solicitations will, in particular, avoid material omissions, exaggerations of fact, misleading visual portrayals and overstating either the need or what a supporter's response may

achieve. Solicitations will accurately portray intended recipients, their situations and the potential solutions.

Promotional materials will not be sent knowingly to children under the age of 18 unless they have been requested in connection with a School Fundraising Activity.

Supporters will be provided with a written or email receipt for their donation in accordance with the relevant Commonwealth, State or Territory legislation. Supporters must give prior approval before any recognition of their donation is made public.

Supporters must never be subjected to undue influence, harassment, intimidation or coercion when solicited for a donation; and supporters should be advised to seek independent advice where if AfP staff have reason to believe that a donation may affect the supporter's financial position, taxable income, or relationship with family members.

Supporters should be presented with an overview of how the donation process works; information on how to cancel enrolment and obtain a refund (for recurring donations); and information on the security measures used to protect the supporter's information and their donation.

For recurring donations, the supporter should be informed that they may change the amount or frequency or cancel their donations at any time and how to make such changes.

Where a supporter or institutional donor provides their details, AfP will maintain a record of each donation received; the name of each supporter and the amount of each donation.

Any donations pledged by telephone should be recorded, and if not fulfilled should be followed up within a reasonable time after the call.

7.2. Use of funds

Supporters will be informed about the purposes for which funds are being raised and be able to access information on programs supported by their donation.

AfP's fundraising solicitations will clearly state if there is a specific purpose for the donations. In public fundraising for a specific purpose, AfP will have a plan for handling any excess funds and make this known through the use of notifications presented near the point of donation.

Funds contributed by institutional donors will be used for the purpose set out in the signed agreement with the donor.

AfP will maintain financial records that enable substantiation of application of supporter funds and will provide this on request.

After obtaining a donation, AfP will not change the conditions of the donation without first communicating with the supporter any changes to the donation.

If a supporter requests their donation is used for a specific purpose other than a current, approved fundraising appeal, the request will be brought to the attention of either the AfP Programs and Policy Director (for donations below \$20,000) or the AfP Executive Director (for donations above \$20,000) who will decide whether to accept or refuse the donation (see 7.4. Acceptance and refusal of donations).

7.3. Fundraising for emergencies

AfP will follow AfP's Emergency Response Procedures when deciding whether or not to launch a fundraising appeal for a specific emergency and the scale of that appeal. Funding appeals may be aimed at supporters, the public and institutional donors.

AfP will follow AfP’s emergency fundraising guidelines when fundraising for emergency situations.

A realistic fundraising target should be set, taking into account the needs of the program. Once the target is reached, AfP must stop soliciting funds until the situation has been further assessed by the AfP Emergency Response Management Team.

Solicitations should accurately portray projects that the emergency appeal funds are being raised for and make this clear through the use of a notification presented near the point of donation.

7.4. Acceptance and refusal of donations

The purpose of the policy on Acceptance and Refusal of Donations is to give AfP clear guidelines to make consistent decisions regarding the acceptance and refusal of a donation from a supporter or organisation. This policy clause does not apply to grants awarded by institutional donors for which AfP has lodged an application. AfP must ensure that decisions to accept or reject a donation support AfP’s purpose.

The decision on whether to accept or refuse a donation must be taken by the AfP NCCA Commission, unless authority has been delegated as prescribed below:

All donations over \$500,000	AfP-NCCA Commission
Donations between \$20,000 and \$500,000 where a) conditions are attached, e.g. the supporter has requested the donation is used for a specific purpose other than a current, approved fundraising appeal; or b) the donation is from a company, institution, organisation or high-profile individual	AfP Executive Director
Donations below \$20,000 where conditions are attached, e.g. the supporter has requested the donation is used for a specific purpose other than a current, approved fundraising appeal	AfP Programs and Policy Director

On the basis of the evidence available to them, the authorised decision maker must consider whether AfP’s purpose will be best met by accepting or refusing the donation and decide accordingly. They must take in to account AfP’s legal obligations, any reputational risks to the agency and any potential adverse reaction from existing or potential supporters.

The authorised decision maker may accept a donation for a specific activity conducted by AfP provided that that specific activity is:

- a) directly related to AfP’s purpose; and
- b) is practically achievable by AfP or its partners.

The authorised decision maker may refuse a donation for where it is clear that:

- a) the activities of the supporter are directly opposed to AfP’s purpose, policies (including policies prohibiting money laundering and the funding of terrorism) or against the best interest of AfP’s beneficiaries; or
- b) the activities of the supporter are incompatible with AfP’s purpose; or

- c) the cost (whether a direct, indirect or opportunity cost) to AfP of accepting the donation will be greater than the value of the donation itself; or
- d) acceptance of the donation will directly lead to a net decline in the asset base of AfP; or
- e) the offer of a donation is dependent upon the fulfilment of certain conditions by AfP, where the conditions are: (i) contrary to the taxation status of AfP regarding receipt of a donation (if any); (ii) in itself, contrary to AfP's purpose; (iii) in itself, contrary to the current policies or work priorities of AfP; or requires AfP to first spend its own money or resources.

The authorised decision maker must demonstrate that the evidence they used to form their decision to accept or refuse the donation relates to AfP's purpose. In particular, evidence must be provided where: a) it is not immediately clear what purpose the proposed donation would be used for; b) large sums of money or property are involved; c) there is reason to believe that the decision taken may expose AfP to litigation; or d) there is the threat of negative publicity to AfP by the refusal of a donation.

7.5. Receipts

A receipt should be sent to all supporters informing them of the details of their donation (unless the donation is anonymous or the supporter's contact details are missing). The receipt can be sent by email or mail and should include:

- (i) the date of the donation;
- (ii) the amount of the donation;
- (iii) the supporter's name and contact details;
- (iv) AfP's Australian Business Number
- (v) the frequency of the donation;
- (vi) the payment method agreed by the supporter; and
- (vii) sequential numbering.

The receipt should be sent to the supporter within three business days after the donation is received by AfP.

7.6. Grants

Ethical conduct

When applying for a Grant, a Fundraiser must not offer to any Fund any gift of monetary value from any person or entity.

A Fundraiser must not make express or implied statements to the effect that AfP will obtain a Grant as a result of the Fundraiser's application until the outcome is announced by the Fund.

Grant procedure

A Fundraiser must appropriately consult with AfP management to ensure the proposed grant application is in full accord with AfP's current strategic and financial directions.

The cost benefit to AfP should be assessed according to a written plan set before applying for the grant.

The Grant procedure should include the following criteria: a) Planning; b) Administration; and c) Evaluation

Planning a Grant

A Fundraiser should comply with the key steps to make a Grant application which are:

- When applying for a Grant,
 - a) establish a proposal consistent with AfP's purpose, including the objectives, the rationale and the expected results; and
 - b) prepare a budget as detailed below

- After the award of a Grant,
 - c) implement, monitor, evaluate and report on the activities and outcomes delivered with the grant funding, in accordance with the agreed requirements stipulated in the grant agreement.

To avoid making Grant applications which will not be considered, a Fundraiser should not make Grant applications that:

- a) do not meet the guidelines for the Grant application; or
- b) are made to a Fund or Organisation whose purpose or activities are not consistent with AfP's,

If the Grant making Organisation or Fund requires AfP to enter into an agreement, the Fundraiser must comply with the requirements of the agreement, subject to the law and AfP's policy requirements, which prevails in the event of a conflict.

Budget

A budget must be set before making the application for a Grant. A Fundraiser must ensure that all expenses incurred in the budget are lawful and comply with AfP's policies.

7.7. Bequests in wills

Fundraising solicitations and guidance produced by AfP on how to leave a bequest should recommend that supporters seek independent legal advice. The guidance should also recommend that if a supporter chooses to include a bequest section in their will, the bequest in the will should: a) state the full legal name of the organisation, or that the bequest is given to the Christmas Bowl appeal; and b) use appropriate words to indicate the type of bequest.

All AfP staff, contractors or volunteers should ensure:

- a) they maintain appropriate arm's length relationships with supporters in connection with any bequest or proposed bequest;
- b) supporters are not subjected to undue influence, harassment, intimidation or coercion when approached for the granting of a bequest ('undue influence' includes any improper conduct by a fundraiser which has the effect of influencing a supporter to make a bequest or sign any legal document which the supporter otherwise would not do).
- c) supporters are not prevented or discouraged from seeking independent legal advice in relation to a bequest;
- d) written acknowledgement and receipt of a bequest is provided to a supporter's executor or legal personal representative; and
- e) where a bequest is a specific bequest, a supporter's executor or legal personal representative is informed of how AfP intends to use that bequest.

f) any conflict of interest is declared

AfP must observe a supporter's request to:

- a) have a family member or legal personal representative present;
- b) obtain independent legal advice;
- c) exclude any form of public recognition for their bequest if they choose to remain anonymous.

AfP personnel must not:

- a) agree or request to be appointed as an executor of the supporter's will or trustee of the supporter's estate and must not suggest to the supporter that any member or officer of AfP be appointed as an executor of the supporter's will or trustee of the supporter's estate.
- b) offer to financially compensate a supporter for preparation of a will (AfP may compensate a legal practitioner for the preparation of the will of a supporter provided that this is disclosed in writing to the supporter before compensation is paid and the will is drafted). This does not replace the need for a supporter to obtain independent legal advice if they so choose.
- c) benefit personally from the supporter's bequest in any way.

AfP may provide a supporter with a list of legal practitioners who provide legal services in connection with wills and bequests, provided that AfP does not endorse the services of a particular law firm. A list may be obtained from the relevant State or regional Law Society or other appropriate organisation. This does not replace the need for a supporter to obtain independent legal advice if they so choose.

AfP may organise a will drafting service for potential supporters or organise a fundraising activity with the purpose of encouraging potential supporters to draft and sign wills which include bequests provided that AfP inform supporters in writing that:

- a) supporters may obtain independent legal advice;
- b) supporters have no obligation to make a bequest to AfP in exchange for hosting the fundraising activity;
- c) supporters have no obligation to finalise their will at the fundraising activity.

AfP may provide a supporter with a model bequest. This will be provided to the supporter as guidance only and will not replace the need for a supporter to obtain independent legal advice. Any breach of this section by AfP staff will constitute professional misconduct.

AfP personnel must not disclose to an unauthorised person within the agency, or any third party, any details of the supporter's will except for the bequest to AfP or beneficiaries other than AfP under the will. This does not prevent AfP personnel from disclosing all necessary details to a legal or financial adviser for the purpose of obtaining legal or financial advice in connection with the bequest.

7.8. Events

All AfP events must comply with the FIA Standard of Events Fundraising Practice.

7.9. School fundraising activities

All school fundraising activities must comply with the FIA Standard of School Fundraising Practice.

7.10. Face to face fundraising

All face to face fundraising must comply with the FIA Standard of Face to Face Fundraising Practice.

7.11. Workplace giving

All AfP workplace giving must comply with the FIA Standard of Workplace Giving Fundraising Practice.

7.12. Street collections

When street collections are conducted, staff must be informed of the collection and ensure that AfP's street collection procedures and all Commonwealth, State and Territory legislation and regulations are followed. These include:

- a) Collecting permits will be obtained from the relevant authority where necessary, and remittance requirements of the permit fulfilled.
- b) Collectors will be identified, read and sign, the relevant sections of AfP's Child Safeguarding Code of Conduct, and be issued with documentation confirming their bona fides and whether they are volunteers, paid staff or AfP agents or contractors.
- c) Supervisors will obey the law regarding supervision of children, not be in charge of more children at a time than the number prescribed by relevant legislation.
- d) Compliant collecting materials (buckets, collecting tins etc.) will be provided, appropriate records kept and appropriate cash handling procedures followed, including:
 - a. Tamper proof seals used on collection tins and buckets.
 - b. At least two people present while money is counted.
 - c. Tins and buckets only left in areas where people can watch over them. For example, if in a café, they must be placed on the counter, in schools they should be placed at the reception.
 - d. All tins or buckets distributed by AfP must be returned after use. Records must be kept of all collecting tins and buckets distributed, including contact details of recipients, the number of items, the date sent and the date returned.

7.13. Fundraising in aid of AfP

Many passionate people choose to give their time and energy to raise funds in aid of AfP's work. In doing so they are making a valuable contribution to achieving safety, justice and dignity in communities threatened by conflict and disaster.

This policy clause relates to activities in which people give their time to fundraise 'in aid of' AfP, as distinct from fundraising activities outsourced to paid suppliers to raise funds 'on behalf of' AfP which is covered by clause 7.15 below.

Any person raising funds in aid of AfP should not incorrectly imply that they represent AfP or that they are an employee of AfP. They should not make statements, sign contracts or take on liabilities in AfP's name. The following activities are not permitted to be conducted in aid of AfP without prior written approval from AfP:

- Raffles
- Cash collections
- Competitions
- Prize draws
- Street stalls
- Games of chance
- Trade promotions

- Door knocking or street collections
-

It is the responsibility of any person raising funds in aid of AfP to ensure they fundraise safely and legally. They must ensure they appropriately manage risks, comply with all relevant Commonwealth, State and Territory legislation, and ensure that they are covered by adequate Public Liability Insurance if relevant.

Where required by legislation, councils or venues, people raising funds in aid of AfP must carry copies of permits and/or a letter of authority to fundraise from AfP whilst fundraising.

7.14. Payment Card Industry Data Security Standards

The Payment Card Industry (PCI) Data Security Standard (DSS) is a set of requirements designed to ensure that organisations that process, store or transmit credit card information maintain a secure environment in order to reduce credit card fraud. The requirements cover procedures, policies, networks, software design, architecture, and other security protective measures.

The PCI Standard is mandated by major card brands and administered by the Payment Card Industry Security Standards Council. It applies all organisations that process, store or transmit credit card information.

Compliance with the PCIDSS is important for the following reasons:

- To protect supporter’s card details and prevent fraud
- To prevent damage to AfP’s reputation and trust
- To prevent a suspension of AfP’s banking services
- To prevent expenditure on rectifying a security breach (it costs a lot more to rectify than prevent)
- It is a mandatory requirement

AfP will maintain robust procedures to ensure compliance with the PCIDSS, including the twelve high-level DSS requirements listed below. AfP will provide adequate training on these procedures to all relevant staff, contractors and others where necessary, and enforce adherence to these procedures.

AfP will implement the following requirements:

Control objectives	PCI DSS requirements
Build and maintain a secure network	1. Install and maintain a firewall configuration to protect cardholder data
	2. Do not use vendor-supplied defaults for system passwords and other security parameters
Protect cardholder data	3. Protect stored cardholder data
	4. Encrypt transmission of cardholder data across open, public networks
Maintain a vulnerability management program	5. Use and regularly update anti-virus software on all systems commonly affected by malware
	6. Develop and maintain secure systems and applications
Implement strong access control	7. Restrict access to cardholder data by business need-to-know

measures	8. Assign a unique ID to each person with computer access
	9. Restrict physical access to cardholder data
Regularly monitor and test networks	10. Track and monitor all access to network resources and cardholder data
	11. Regularly test security systems and processes
Maintain an information security policy	12. Maintain a policy that addresses information security

Validation of compliance is performed annually, either by an external Qualified Security Assessor that creates a Report on Compliance for organisations handling large volumes of transactions, or by Self-Assessment Questionnaire for companies handling smaller volumes.

Because compliance validation requirements vary based on the number of credit card transactions processed per year, AfP will monitor the total number of credit card transactions it processes and review its PCI compliance requirements annually.

Currently, AfP must:

- On a quarterly basis: complete a PCI security scan performed by an Approved Scanning Vendor.
- On an annual basis: complete a PCI compliance Self-Assessment Questionnaire.

7.15. Outsourcing

AfP will be responsible for all fundraising activities outsourced to a third party and will put all such contracts and agreements in writing. Contracts will specify the expectations, responsibilities and obligations of each party. Contractors will sign relevant compliance documentation, including but not limited to the AfP Child Safeguarding Code of Conduct, Privacy Policy and Confidentiality Agreement.

AfP will ensure that all contracts for fundraising meet the applicable legislative and regulatory requirements. Suppliers must be registered with appropriate regulators and comply with relevant Commonwealth, State and Territory legislation, regardless of their physical location. They must also comply with FIA Principles and Standards of Fundraising Practice.

AfP will ensure that any form of fundraising undertaken by a third party clearly identifies AfP as the beneficiary of the funds, and whether the third-party fundraiser is engaged either as a volunteer, employee or contractor of AfP.

If AfP engages a supplier to conduct a fundraising activity, the supplier should ensure that their employees or volunteers do not receive a percentage of the funds raised, do not undertake a fundraising activity that requires percentage-based payment, and operate in accordance with recognised quality management systems.

If AfP engages a supplier to conduct a telemarketing activity, the supplier should charge AfP an hourly rate or for the number of telemarketing calls completed.

If AfP engages an electronic fundraising supplier (EFS), such as a peer-to-peer fundraising platform, to take donations on its behalf, the EFS must provide reports on an agreed date for an agreed period. The report must include:

- a) a ledger record containing all donations received; all fees charged by the EFS to AfP including credit card fees, bank fees and administration fees; and all payments made to AfP by the EFS.

- b) any statistical and demographic data concerning the supporters that the EFS has agreed to provide; and
- c) the name of each supporter and the amount of each donation.

AfP's contract with the EFS must require that the EFS:

- a) is registered with appropriate regulators as required by Commonwealth, State or Territory legislation and complies with appropriate legislation;
- b) cannot claim that it is a Deductible Gift Recipient if it does not have that status;
- c) will have no legal control over any donations to AfP made through a service provided by an EFS and cannot prevent donations passing to AfP by claiming a legal right including a lien or set-off over the donations;
- d) identifies full details of all fees to be paid, including payment terms, by AfP for the service, including details of how refunds for cancelled donations are to be paid;
- e) reports in accordance with the relevant State or Territory legislation to AfP about the supporter, statistical and demographic data processed by the EFS;
- f) assumes liability for completion of the donation transaction before the donation passes to AfP;
- g) monitors and does not knowingly allow inappropriate content (i.e., sexual or violent content) on their website;
- h) complies with current privacy legislation;
- i) assumes liability for protection of the supporter's personal information and transaction details;
- j) undertakes to advise AfP immediately if there is a security breach and to take immediate action to remedy the security breach;
- k) complies with AfP's branding and visual identity requirements on the EFS's website; and
- l) complies with FIA's Principles and Standards of Fundraising Practice.

8. Advocacy and campaigns

Advocacy consists of activities undertaken to change the systemic and structural causes of poverty and disadvantage which may include popular campaigning, lobbying, research, policy positions, alliances and use of the media. It may occur both in Australia and globally. It includes the application of a set of strategies 'conducted as part of an agency's overall predominant purpose' (ATO).

Where AfP takes on an advocacy role in Australia or globally, either alone or in partnership with others, it will:

- be done from an evidence based position and will include the perspectives of those affected.
- be transparent about the basis of the claims that underpins its advocacy.
- disclose any conflicts of interest.
- only claim to be representative when that authority has been clearly established.
- take all reasonable steps to protect the safety and rights of affected local people during or following an advocacy campaign.

- aim to empower those most affected by the issue in local communities to advocate for themselves.
- seek to work with organisations representing people most affected by the issue, where possible and appropriate.

For more information on AfP's approach to advocacy, see the Advocacy Policy.

9. Compliance with this policy

Compliance with AfP's Marketing, Communications and Fundraising policy, and other policies relating to the accuracy, timeliness and accessibility of information, will be enforced through:

- Staff and volunteer inductions, training and the mandatory signing of AfP's Code of Conduct, and Child Safeguarding and Privacy Policy.
- Marketing & Communications checklists, which must be completed before communications are published.
- Performance management / disciplinary action taken against staff and volunteers should they fail to comply.

All staff and relevant volunteers and contractors must sign AfP's Code of Conduct, and the NCCA Child Safeguarding Code of Conduct, Confidentiality Agreement and Privacy Policy on commencement of their role. Staff and volunteers must receive appropriate inductions, which include training on AfP's key policy and compliance requirements relating to communications, fundraising and branding (which meet or exceed DFAT, ACFID and FIA publicity, communications and child safeguarding requirements and Australian privacy legislation).

AfP's Marketing and Communications checklists must be completed before any marketing, fundraising or communications materials are published or shared with external stakeholders (except for social media posts). The checklists include summaries of AfP's key policy and compliance requirements relating to communications, fundraising and branding as well as checks to ensure accuracy and best practise standards for the specific channel and communications activity to which the checklist relates.

Compliance with AfP's policies, including our Code of Conduct is a requirement and any staff or volunteers found to have breached these policies will be subject to appropriate performance management or disciplinary procedures, including suspension and dismissal.

Annex 1. AfP Policy Objectives and Indicators to Measure Progress towards Objectives

OBJECTIVES	ACTIVITIES	INDICATORS
<ul style="list-style-type: none"> AfP continues to generate and sustain the funding it requires for its work. 	<ul style="list-style-type: none"> AfP develops and maintains effective marketing, communication and fundraising strategies, informed by evidence and best practise, and benchmarked against past performance and the sector. AfP maintains a balanced fundraising portfolio with a range of income streams and a diverse supporter and institutional donor base that balances risk and return. 	<ul style="list-style-type: none"> Fundraising income available for program work is sustained or increases year on year.
<ul style="list-style-type: none"> In the course of its marketing, communications and fundraising work, AfP protects its beneficiaries, supporters, staff and volunteers, and manages organisational risk. 	<ul style="list-style-type: none"> AfP maintains Marketing and Communications checklists and guidelines which ensure compliance with this policy. 	<ul style="list-style-type: none">
<ul style="list-style-type: none"> In the course of its marketing, communications and fundraising work, AfP acts ethically, effectively, in line with its mission, vision, purpose and values. 	<ul style="list-style-type: none"> AfP maintains Marketing and Communications checklists and guidelines which ensure compliance with this policy. 	<ul style="list-style-type: none">
<ul style="list-style-type: none"> AfP complies with all relevant Commonwealth, State and Territory legislation and our obligations as an ACT Alliance member, a signatory to the ACFID Code of Conduct and FIA Code of Ethics and Professional Standards, our obligations to DFAT under our Head Agreement and Grant Order. 	<ul style="list-style-type: none"> AfP maintains Marketing and Communications checklists and guidelines which ensure compliance with this policy. AfP Conducts the annual ACFID Code of Conduct Self-Assessment. <ul style="list-style-type: none"> On a quarterly basis: complete a PCI security scan performed by an Approved Scanning Vendor. On an annual basis: complete a PCI compliance Self-Assessment Questionnaire. 	<ul style="list-style-type: none">

Annex 2. Resource and Reference List

General resources and references

- The Association for Data-driven Marketing and Advertising (ADMA)
 - <https://www.adma.com.au>
- Fundraising Institute Australia
 - https://www.fia.org.au/data/documents/Resources/Principles_Standards/Code_of_Ethics_and_Professional_Conduct_Web01_June_11.pdf
 - https://www.fia.org.au/data/documents/Resources/Principles_Standards/Standard_of_Charitable_Telemarketing_Fundraising_Practice.pdf
- Australian Communications and Media Authority
 - <https://www.donotcall.gov.au/>
 - <http://www.acma.gov.au/Industry/Broadcast/Community-radio-and-TV/Codes-of-practice-and-compliance>
- Australian Council for International Development
 - <https://acfid.asn.au/code-of-conduct>
- Public Fundraising Regulatory Association
 - <https://www.pfra.org.au/>
- The Australian Charities and Not-for-profits Commission (ACNC)
 - <http://www.acnc.gov.au/>
 - http://www.acnc.gov.au/ACNC/Manage/Ongoing_Obs/ACNC/Edu/On_obgtns.aspx
- Australian Competition & Consumer Commission
 - <https://www.accc.gov.au/>
- The PCI Security Standards Council
 - <https://www.pcisecuritystandards.org/>
- The Office of the Australian Information Commissioner (OAIC)
 - <https://www.youtube.com/user/OAICgov/feed>

State and Territory Resources and References

NSW

- Charitable fundraising activities in NSW are regulated by the Charitable Fundraising Act 1991.
- Charitable Fundraising Regulation 2015 (NSW).
- Department of Fair Trading
 - <http://www.fairtrading.nsw.gov.au/>
 - http://www.fairtrading.nsw.gov.au/ftw/Cooperatives_and_associations/Charitable_fundraising.page
- Liquor & Gaming NSW - the Department of Justice
 - <https://www.liquorandgaming.justice.nsw.gov.au/Pages/gaming/competitions.aspx>
 - <https://www.liquorandgaming.justice.nsw.gov.au/Pages/gaming/public-lotteries.aspx>
 - https://www.liquorandgaming.justice.nsw.gov.au/Documents/gaming-and-wagering/competitions/gofc_fs_gratuitous_lotteries.pdf
 - https://www.liquorandgaming.justice.nsw.gov.au/Documents/gaming-and-wagering/competitions/gofc_fs_consumers_trade_promo_lotts.pdf
 - <https://www.liquorandgaming.justice.nsw.gov.au/Pages/gaming/competitions/games-of-chance.aspx>

- https://www.liquorandgaming.justice.nsw.gov.au/Documents/gaming-and-wagering/competitions/gofc_fs_consumers_trade_promo_lotts.pdf
- Local Council permits for cash collection and street fundraising – various / when required.

VIC

- Fundraising Act 1998 (VIC)
- The Victorian Commission for Gambling and Liquor Regulation (VCGLR)
 - <http://www.vcglr.vic.gov.au/>
 - Declaration as a community or charitable organisation application must be lodged no less than 21 days before the gaming activity is carried out as stated in the *Gambling Regulation Act 2003* (the Act). The declared community and charitable organisations (database) is an up-to-date listing of organisations that have been approved by the VCGLR.
 - <http://www.vcglr.vic.gov.au/home/gambling/new+applicants/community+and+charitable+gaming/>
- Local Council permits for cash collection and street fundraising – various / when required.

ACT

- Collections Manual:
 - <https://www.accesscanberra.act.gov.au/ci/fattach/get/46881/1435120479/redirect/1/file/name/Charitable%20collections%20practice%20manual.pdf>
- Licensing:
 - https://www.accesscanberra.act.gov.au/app/answers/detail/a_id/1549/kw/charity%20collections#!tabs-2
- The ACT Gambling and Racing Commission
 - http://www.gamblingandracing.act.gov.au/_data/assets/pdf_file/0009/746577/Trade-Promotion-Lottery-Information-and-Conditions.pdf
- Local Council permits for cash collection and street fundraising – various / when required.

NT

- Northern Territory Government
 - <https://nt.gov.au/industry/gambling/lotteries-community-gambling>
 - Competitions are considered a trade lottery.

SA

- SA Consumer and Business Services. The Collections for Charitable Purposes Act 1939 ('the Act') provides for the control of persons soliciting money or goods for certain charitable purposes. A Collections for Charitable Purposes Licence does not authorize the conduct of fundraiser lotteries. Further information regarding lotteries can be found on the major lotteries page.
 - <http://www.cbs.sa.gov.au/licensing-and-registration/charities/>
 - <http://www.cbs.sa.gov.au/licensing-and-registration/lotteries/>

WA

- WA Department of Commerce
 - <https://www.commerce.wa.gov.au/consumer-protection/charities-code-practice>
- Charitable Collections Licensing

- <https://www.commerce.wa.gov.au/sites/default/files/atoms/files/charitablecollectionslicensing2.pdf>
- Department of Racing, Gaming and Liquor
 - http://www.rgl.wa.gov.au/docs/default-source/gaming/trade_promotion_lotteries.pdf?sfvrsn=6

TAS

- Tasmania Consumer Affairs and Fair Trading
 - http://www.consumer.tas.gov.au/_data/assets/pdf_file/0019/113275/F_and_I_Collecting_for_a_charity.pdf
- Department of Treasury and Finance
 - <https://www.treasury.tas.gov.au/domino/df/df.nsf/714a9215f1fdf2dfca25798f00012c71/e3f7b3e63e47240fca257d8200177220?OpenDocument>

