



International Centre for Missing & Exploited
Children, Australia Ltd
(ABN 86 645 682 828)

Ethical Fundraising Policy

Version 1 – 15 May 2024

1. Introduction

We are endorsed as a Deductible Gift Recipient (DGR) by the Australian Taxation Office (ATO) to accept tax-deductible gifts of money and property in Australia.

We are committed to operating with the highest ethical standards in all aspects of our activities, including fundraising.

In this Policy, **Donation** means a voluntary gift or contribution of any kind including money, goods or services.

2. Purpose of this policy

This policy outlines the principles and practices that guide our fundraising activities and decisions. This helps safeguard the status of the organisation as a registered charity and ensures we stand up to scrutiny by all our stakeholders and the community.

This policy applies to all fundraising activities conducted by and on behalf of ICMEC Australia, including all ICMEC Australia employees, contractors, interns, employees of labour hire organisations, and Board directors. Non-staff fundraising activities are subject to the approval of our Chief Executive Officer.

3. Policy principles

We will adhere to the following principles when conducting our fundraising activities:

- (a) **Compliance with relevant laws and regulations:** Fundraising activities will only be conducted in locations where we are permitted by law to conduct those activities. Any fundraising activity carried out online will be conducted from a location where we are permitted to conduct fundraising. If our fundraising campaign is broader than the State or Territory in which it is authorised to fundraise, we will consider whether further permissions are required and obtain any authorities necessary to undertake the relevant fundraising activity. We will comply with the following laws:
 - Charitable Fundraising legislation in each state and territory;
 - Australian Consumer Law (*Competition and Consumer Act 2010* (Cth));
 - *Privacy Act 1988* (Cth);
 - *Spam Act 2003* (Cth); and
 - *Do Not Call Register Act 2006* (Cth).
- (b) **Transparency and Accountability:** We will be transparent about our fundraising activities, including how Donations are used, governance structure, and financial statements. We will be accountable to our donors and the public for the use of their resources. This includes maintaining accurate records of Donations and making them available upon request. We will hold donated money on trust in a separate bank account.
- (c) **Respectful and Ethical Practices:** We will not use fundraising methods that are coercive, misleading, or exploit vulnerable individuals. We will adopt fundraising best practices, including striving to offer donors various options to donate, ensuring accessibility and choice.

- (d) **Donor Privacy:** We will protect the privacy of our donors and use their information only for the purpose for which it was provided unless explicit consent is obtained. We will maintain appropriate cyber security measures to protect donor information from unauthorized access or misuse.
- (e) **Sustainability:** We strive to build long-term relationships with our donors, fostering trust and understanding of our mission and impact.
- (f) **Ethical partnerships:** We will carefully manage any actual and perceived reputational or ethical risks from accepting Donations that would or perceived to be detrimental to our mission.
- (g) **Adherence to existing organisation's policies:** We will conduct our fundraising activities in accordance with our related policies and guidelines including, but not limited to the following:
- Non-conduit Policy
 - Code of Conduct
 - Investment Committee Charter and Policy
 - Privacy Policy
 - Conflicts of Interest Policy
 - Risk Management Framework
 - External Communications.
- (h) **Training:** We will continually train staff in the principles of this policy to ensure they understand and comply with the ethical fundraising principles and practices outlined in this policy.

4. Policy in practice

- (a) We welcome Donations from a variety of sources that satisfy the following:
- (i) That are not linked to a requirement for us to endorse any products, services, or policies.
 - (ii) For a specific activity, provided the activity is directly related to our mission and is practically achievable by us.
 - (iii) On the clear understanding that the donor can have no influence over our communications freedom, including our position as a neutral and apolitical not-for-profit organisation in advocating for the protection of children.
- (b) We may choose to reject the following types of Donations:
- (i) Likely to impose or imply conditions that would limit, or appear to limit, our integrity, impartiality, and ability to carry out our mission and vision, which dictate our positions or priorities, or ability to speak out against practices that are harmful to children.
 - (ii) Where there is the potential to adversely affect our reputation and impartiality or result in an adverse reaction from existing or potential donors and other supporters after responsibly considering the consequences of the refusal.

- (iii) Where the Donation is known and/or believed to be directly generated by the proceeds of human rights abuses, labour rights violations, predatory or payday lending, crime, weapons, firearms and munitions or slavery.
- (iv) Donations from businesses in any of the following sectors that our Chief Executive Officer considers there is actual or perceived reputational or ethical risk such that accepting the Donation would be detrimental to the achievement of our mission (note: the list below is intended to be illustrative rather than exhaustive):
 - a. Adult entertainment / pornography
 - b. Gaming / gambling
 - c. Alcohol
 - d. Tobacco.
- (v) Funds from another party (including any third-party payee) on the basis that it is to be transferred to another party (even a third-party payee) for any purpose not connected with our purposes (see our non-conduit policy).
- (vi) And any other reasons, that our Chief Executive Officer in its absolute discretion decides to decline the Donation, after responsibly considering the consequences of the refusal.

5. Ownership, monitoring and review of policy

- a) Our Board owns this policy, with appropriate delegation provided to our Chief Executive Officer to exercise operational discretion in the scenarios covered in earlier sections.
- b) Regular updates on our fundraising activities will be provided to our Board, including tabling of meeting minutes at Board meetings.
- c) Our Board is responsible for reviewing this policy regularly (minimum every 2 years) to reflect best practices and changing circumstances of the organisation.
- d) Any updates and revisions to this policy must be approved by our Board.

6. Complaints Process

- a) If any person has a complaint relating to the principles and practices in this policy or our compliance with this policy, please contact us using the contact details below: info@icmec.org.au.

7. Revision history

	Approved by:	Date:	Version
Approval and adoption of policy	Board	June 2024	1.0