
UNICEF AUSTRALIA

Statement and policy on Accountability and Transparency in Fundraising

June 2016 (second edition)

A. Purpose

This Policy sets out principles which the Australian National Committee for UNICEF abides by in the conduct of its fundraising activities and interaction with donors. It aims to provide:

- **protection for Australia** against breaches of international ethical fundraising guidelines,
- **protection for UNICEF Australia** against major reputational risks and breaches of the UNICEF Cooperation Agreement and
- **guidance for staff and Board members**

It seeks to do this by establishing clarity and transparency in Fundraising processes and decision making.

B. Legislative context

This Policy is governed by and should be interpreted in accordance with the State and Federal laws and regulations.

C. Application

This Policy applies to Board members and employees of the Australian National Committee for UNICEF. It should also be shared with third parties, e.g. contractors and consultants as applicable.

D. Definitions

'Board member' – a member of the Governing Body, also referred to as Director or Trustee.

'Employee' – a member of staff or management of the National Committee, permanent or temporary.

'Corporate' - means an entity incorporated under the Corporations Act 2001 (Cth) and established for the purpose of profit

'Organisation' - means an entity incorporated under Commonwealth, State or Territory legislation and established for a purpose other than profit.

'Donation' - means a voluntary contribution of money, property, goods or services to UNICEF Australia for the purpose of furthering UNICEF or UNICEF Australia's objects

E. Policy statements

1.1 The Australian National Committee for UNICEF is committed to ethical, accountable and transparent fundraising practices which build and maintain public trust and confidence, in keeping with the Code of Ethics and Professional Conduct of the Fundraising Institute of Australia, the code of practice of the Public Fundraising Regulatory Association, and as members of the Australian Council for International Development. These principles extend to and shall be explicit expectations of all fundraising suppliers working for UNICEF Australia

1.2 Every effort shall be made to raise unrestricted funds that offer UNICEF operational flexibility to meet the needs of children unless otherwise directed by UNICEF. However when donors request that donations are restricted funds shall, where accepted, be used for purposes consistent with the donor's intent, as indicated by the donor or as described or clearly referenced in relevant appeal material provided to the donor before the donation is accepted

1.3 All materials and other communications used for fundraising purposes and addressed to donors and the public shall clearly identify UNICEF Australia, and be accurate and truthful, and will not generalize about situations nor exaggerate the context of beneficiaries featured in communications, and shall raise funds in line with the mandate and mission of UNICEF Australia.

1.4 All fundraising material should follow the UNICEF Australia communication and branding guidelines and be consistent with the UNICEF Australia Child Protection Policy to ensure they portray children and their families in a dignified and respectful manner.

1.5 In accordance with applicable taxation legislation requirements, donors shall be provided with specific acknowledgments of their contributions as well as any other information to facilitate their compliance with such requirements

1.6 Fundraisers shall uphold high standards of professional behaviour and be aware of their responsibilities in carrying out fundraising activities. They shall be provided appropriate training and supervision to ensure understanding of their responsibilities under UA's specific mandate and requirements of applicable laws

1.7 Fundraisers will not target, nor allow suppliers to target vulnerable individuals or communities within Australia for donations or pledges of donations and will take all reasonable steps including reviewing fundraising site allocations for face-to-face and door-to-door fundraising to ensure this does not happen, in line with UNICEF Australia's Vulnerable Persons Guidelines

F. Guiding principles

UNICEF Australia applies a principles-based approach to its cooperation with the private sector. These principles are included in the United Nations Charter, in the United Nations Guiding Principles on Business and Human Rights, and elsewhere in the array of international standards and treaties guiding the mission of the United Nations.

UNICEF Australia's partnerships and collaborative relationships with the private sector shall adhere to a series of guiding principles as set out below:

Alignment with UNICEF's basic values: UNICEF's work is guided by the Convention on the Rights of the Child (CRC) and strives to establish children's rights as enduring ethical principles and international standards of behaviour, including across the private sector. Engagements with the private sector shall promote the values reflected in the CRC, as well as align with UNICEF's non-partisan, discrimination-free approach to collaborations.

Optimize and maximize private sector potential to achieve results for children: UNICEF Australia's collaborations with the private sector shall be based on awareness of and a strategic approach to the different opportunities that engagements may offer. In addition to potential to mobilize resources, the potential of companies to advocate for change, adopt child-friendly business practices, or co-develop innovative solutions for programme delivery shall be integral to UNICEF Australia's considerations around engagement with the private sector.

Best interest of the child: UNICEF Australia's private sector engagements shall be pursued by bearing in mind the well-being of children, apart and beyond the scope of specific collaborations. Keeping child rights and related areas of programming as the point of reference for any collaboration can help to avoid tensions and potential pitfalls that can arise from competing agendas. The potential impact on children that inaction or non-engagement might create shall also be of primary consideration.

Children's rights cannot be offset: While engagements with UNICEF Australia could help the private sector do well on one aspect of their responsibility to respect child rights, this action shall not compensate for child rights violations elsewhere.

Non-exclusivity, non-endorsement, no unfair competition: UNICEF Australia will not offer specific opinions, recommendations, seals of approval, or statements, nor will it take actions that are or can be perceived as endorsements related to any products and/or services. UNICEF Australia grants no partnership exclusivity and it shall not provide unfair market advantage to the private sector through its engagement.

G. Risk awareness versus risk avoidance

Risks are inherent to any UNICEF Australia engagement with the private sector. From the start of any collaborative relationship, UNICEF inevitably lends its reputation to the partnering company.

Reputation and brand equity are critical UNICEF assets, and the bases of its licence to operate, but these are also main drivers of donors' favorability to support the organization's work.

Risk is also an important strategic component of partnering with the private sector. In fact, it is increasingly clear that partnering is almost never a risk-free option, and that the mutual agreement of partners to share risks is often at the basis of a successful, win-win and lasting engagement.

Similarly, a partnership will benefit from each partner organization recognizing, mitigating and managing its own risks. It is, therefore, in the interests of each partner to be aware of its own concerns as well as the risks for each partner organization whenever possible.

As an organization considering a partnership approach to business, UNICEF shall always consider areas of potential risk, which may include:

Undermining UNICEF's integrity or mission: UNICEF Australia's long-standing practice has been to hold itself to the highest standards of integrity in the conduct of its work. Integrity risks can stem from choosing corporate sponsors and partners that do not align with these standards, which in turn would undermine the set of ethical principles that guide and sustain UNICEF's mission.

Inconsistency with UNICEF programmatic or advocacy efforts: If not carved around UNICEF's existing positioning and priorities, corporate engagement may, through its content or messaging, undermine the organization's ongoing advocacy efforts on specific child rights themes or on the impact of business on children's rights.

Negative impact on UNICEF reputation: Partnering with companies with questionable or negative track records may cause damage to UNICEF's reputation by simple association. This in turn may affect the credibility of the organization on specific and relevant issues related to child rights and business, hence undermining the organization's credibility as an advocate and expert on specific children's rights issues.

Conflicts of interest: Conflicts of interest can occur when corporate business interests outweigh the common interest of the partnership, therefore compromising the best interest of the child as primary consideration for an alliance. Conversely, a conflict of interest may arise when a decision or action serving the immediate interests of an engagement are at odds with UNICEF's broader and/or longer-term interests and objectives, hence resulting in an internal conflict of interest.

Loss of autonomy and neutrality: This is a challenge of any shared decision-making process, and requires UNICEF Australia to build consensus with partners and seek upfront their acceptance of the organization’s positioning and independence.

Direct or indirect negative impact on children: Corporate alliances, especially when involving direct association with (and indirect promotion of) commercial products, may ultimately have a negative impact on children if, for example, goods are directed to children and are not safe, or are made through supply chain practices which infringe on human or children’s rights.

White washing: White washing (also referred to as “blue washing” when specifically related to UNICEF) may occur if a company communicates about its engagement with UNICEF Australia by presenting biased data or partial information with the intention of masking bad business practices or improving its own reputation without action to substantiate it.

Financial risks: The materialization of a reputational risk may have repercussions for UNICEF’s ability to leverage key resources for children, such as pledge donors, as the loss of public credibility may affect the propensity of people to donate.

H. Types of donations

1.8 Anonymous donations will be accepted; however significant anonymous donations (to the value of \$ 50,000 or more) may be subject to a risk assessment (see 2.1.1)

1.9 Donations from corporate and corporate-related organisations (including entities which are legally, nominally or otherwise clearly or publicly related to a corporate) with the specific exclusionary criteria of zero tolerance status must not be accepted or solicited in any way, in accordance with the UNICEF *Guidelines and Manual for Working with Business Alliances*. Any unsolicited donations in this category must be reported to the UNICEF PFP and returned to the donor entity in a timely manner.

UNICEF Australia will not engage in funding interactions, strategic partnerships, or co-branded collaborative efforts with business or philanthropic sector entities directly involved in the following:

	<p>ARMAMENTS</p> <p>Companies manufacturing/distributing anti-personnel landmines, cluster bombs, or conventional, nuclear, or chemical/biological weapons, missiles, or rockets.</p>
	<p>ALCOHOL</p> <p>Companies manufacturing alcoholic drinks, with special conditions applicable to contributions in kind in the context of fundraising events targeting adults^[1].</p>

^[1] For the purpose of this document, the expression ‘light alcoholic beverages’ refers to drinks with alcohol percentage by volume (ABV) below 20 per cent.

	<p>TOBACCO</p> <p>Companies manufacturing tobacco, and companies which have a product base and/or brand identity that is focused on tobacco and/or smoking-related products (e.g., electronic cigarettes, tobacco-branded merchandise).</p>
	<p>GAMBLING</p> <p>Companies directly engaged in gambling operations. This category includes stand-alone casinos, casino hotels, riverboat casinos, bingo halls, gambling machine manufacturers, lottery services, Internet gambling services, bookmaking and other gambling services. This category excludes hotels and cruise lines with auxiliary gambling operations. It also excludes national lotteries, or other games of chance with <u>charitable</u> objectives.</p>
	<p>ADULT CONTENT</p> <p>UNICEF will not engage with products, services, or companies for which core business is the provision and/or promotion of content suitable only for individuals aged 18 and up^[2]. Other products suitable solely for adults (e.g., social cause documentaries) will be assessed on a case-by-case basis, and so will products with age appropriateness below 18 and above 12 (e.g., videogames).</p>
	<p>VIOLATING UN SANCTIONS AND THE UN SECURITY COUNCIL RESOLUTIONS</p> <p>Companies engaged in activities inconsistent with United Nations Security Council Sanctions, Resolutions, and similar measures.</p>
	<p>MANUFACTURERS OF BREAST MILK SUBSTITUTES (BMS) VIOLATING THE CODE</p> <p>BMS manufacturers engaging in market place practices found in violation of the International Code of Marketing of Breast Milk Substitutes. In addition, UNICEF will not seek direct association with infant-feeding products used as alternative to exclusive breastfeeding (e.g., baby bottles).</p>

	<p>Companies repeatedly found responsible for human and labour rights violations, major environmental abuses, or systematic corruption practices will be also excluded from partnering with UNICEF. A risk assessment will be used to determine materiality, gravity, frequency, impact, and corporate response to such controversies.</p>
	<p>Depending on the intersection of existing business practices with children rights, the assessment will support UNICEF to determine whether or not a company could be considered for a non-funding child rights and business type of engagement (CRB) aimed to mitigate negative impact on children.</p>

1.10 Donations from political parties should not be accepted. Donations from politicians and civil servants may be accepted, and are subject to the same ethical considerations as donations from other individuals.

1.11 UNICEF Australia will maintain the confidential nature of donor records and data relating to doors will not be sold to any third party, in line with UA's privacy policy

^[2] For the purpose of this document, 'adult content' refers to services and/or products containing or promoting graphic sexual content, realistic violence, strong language or gambling.

I. Complaints

Donors can contact UNICEF Australia via phone or through its website to raise any concerns or make a complaint to the National Committee in relation to its conduct of fundraising activities

J. Procedures

Contribution evaluation

2.1 In the case of an unsolicited corporate contribution or other offer of support (including volunteer-led fundraising activities), the Director of Fundraising is responsible for determining whether a contribution should be accepted or declined when it is believed that UNICEF's mission, vision, priorities, good name or community standing could be at risk by acceptance of the gift or offer of support. Due consideration should be given to legislation and its evolution with respect to a possible legal obligation to accept donations and wherever possible the donor should be screened in order to inform decisions.

2.1.1 The Chief Executive should be directly informed of any such material contribution (single gifts of \$50,000 or more) and may request an initial risk assessment.

2.1.2 On a weekly basis, the Executive Management Team (EMT) have access to, for review, a report of all donations of \$20k or more, from all donor types, received within the previous month to satisfy themselves that policies are being followed. This report will be generated by the Operations Teams within UNICEF Australia and no donations shall be omitted.

2.1.3 The Chief Executive may delegate responsibility for risk-assessing a donation to the respective Department Heads, who will follow the screening processes below.

Screening

2.2 In keeping with the UNICEF due diligence process revised in 2015 from the original Corporate 'UNICEF Guidelines and Manual for Working with the Business Community' (2001) and 'Briefing Note on Screening Criteria for the Development of Corporate Partnerships' (May 2011)], corporate and foundation will be screened prior to a donation being solicited or in a timely fashion when a donation is received. The revised due diligence (2015) is contained in appendix 1 which contains revised criteria and process highlights.

2.3 In addition, in the case of emergency gifts, there is scope for a possible engagement with excluded sector provided there is minimal defined visibility. The same screening process will be adhered to but expedited for a decision within 48 hours to ensure funds can be efficiently deployed towards the emergency relief.

2.4 All such approaches to companies and related organization shall be screened both internally and externally, in accordance with the process outlined in Appendix 3, using the template provided

in Appendix 2.

Responsibilities

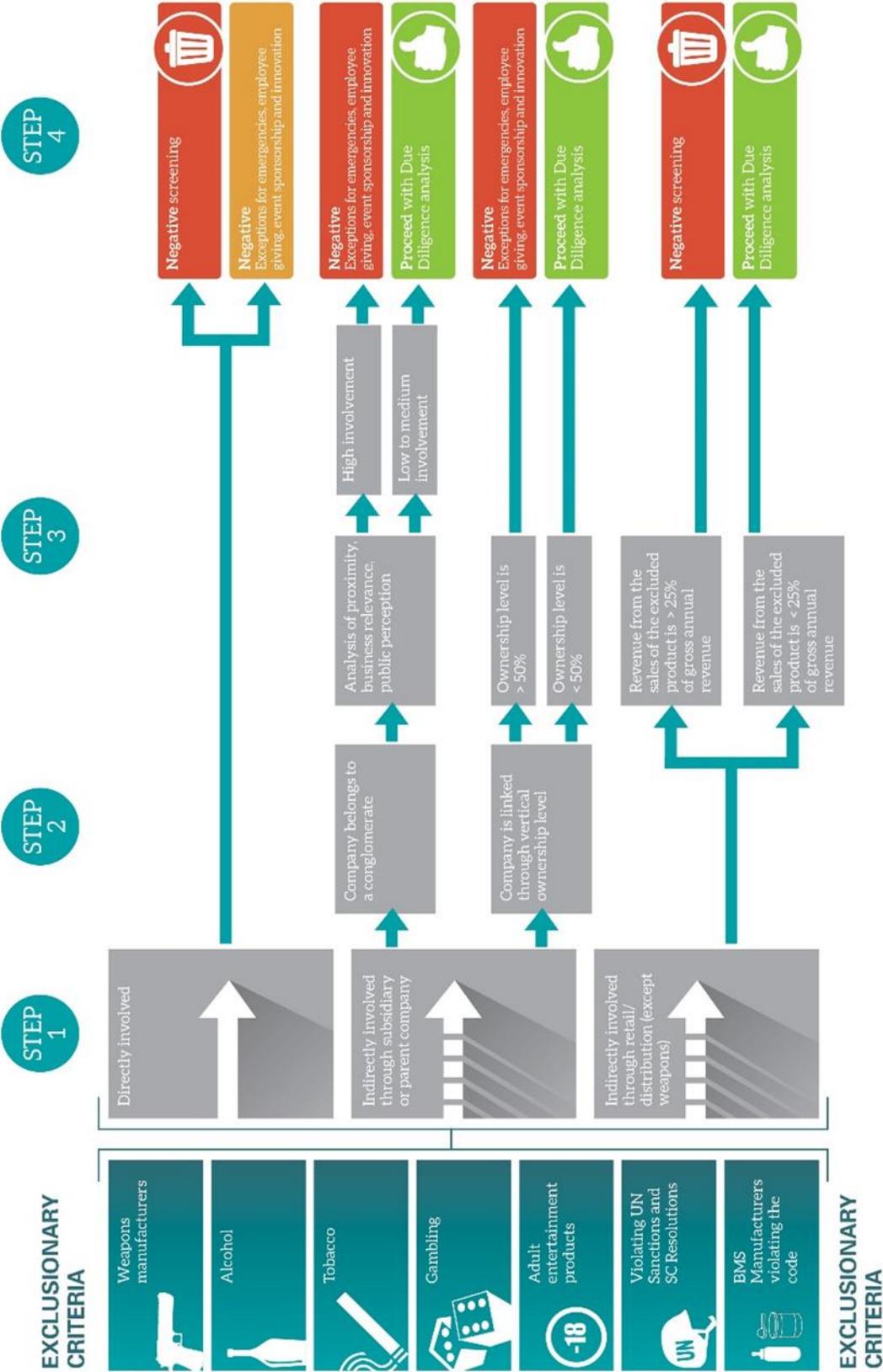
- 3.1 It is the responsibility of the Executive Management Team to ensure the effective implementation of this Policy, and it is the responsibility of Director of Fundraising to maintain this Policy and any associated documents.
- 3.2 It is the responsibility of the Director of Fundraising to ensure reporting to UNICEF Private Fundraising and Partnership Division (PFP) of any unsolicited donation that has been received from a corporate entity which falls under the specific exclusionary criteria, and that any such donation is returned to the corporate entity in a timely manner.
- 3.3 It is the responsibility of all Directors and senior staff to ensure that screening is undertaken in strict confidence and with due respect for the supporter and potential supporters, and that the process is limited and confidential.

I. Review

- 4.1 This Policy is scheduled for review annually. The review will be conducted by the Executive Management Team at UNICEF Australia, with particular input from the Head of Communications and Head of Corporate Partnerships.

Information about this policy

Version	Date	Comments	Author/s	Approved By	Review Date
V1	June 2014		Michael Newsome, Director of FR & Communications	EMT & Board	May 2016
V2	June 2016		Michael Newsome, Director of FR & Communications	EMT & Board	June 2017



UNICEF Australia: screening process for new corporate partnerships/related donations:

Company details:

Submitted by:

Name of company/related organisation:

Deadline:

**Short summary of partnership or donation:
(Include if national/multi-country and communications expectations)**

Expected fundraising income:

Geneva screening:

Screening result:

Any additional feedback/caveats:

Have PFP been involved in discussions:

Media Risk Assessment form for companies

Date of assessment:

Assessed by:

Media screened:

Summary of tone of media coverage over past five years

List of principal areas of negative coverage

Overall grading of media risk (HIGH/MEDIUM/LOW) and why:

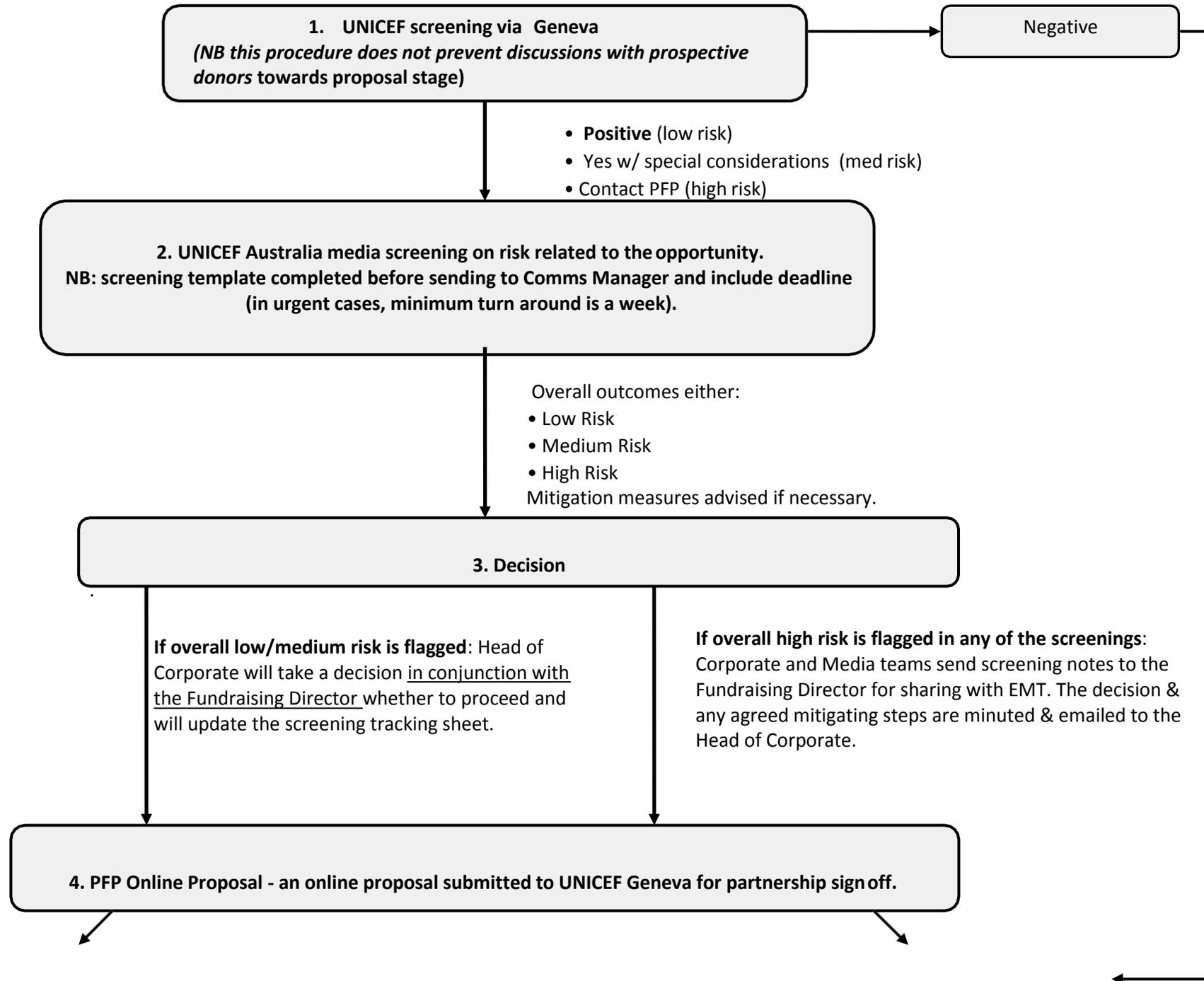
How could any media risks be mitigated?

Final recommendations to Corporate team:

Decision:

If high risk, date discussed by EMT

Decision, including any mitigation factors necessary



Approved

Declined