

# Ethical Fundraising Policy



<b>Document Title</b>	NQS7.55 Ethical Fundraising Policy	<b>Version</b>	3a
<b>Date Approved</b>	January 2024	<b>Date for Review</b>	August 2026
<b>Warning - Ensure you are using the latest version of this policy.</b>			
DCC-Network\All Organisation Information\DCC Policies\Quality Area 7- Leadership & Service Management			

## 1. Policy Statement

River Region Early Education is committed to ensuring that fundraising activities are carried out in an ethical manner and in line with the objects of the company as defined in its Constitution. As a charitable organisation registered with the Australian Charities and Not-for-profits Commission (ACNC), fundraising activities must be not-for-profit and for a charitable purpose.

## 2. Rationale

This policy identifies River Region Early Education's position on fundraising practice and documents the standards expected in raising funds.

## 3. Scope

This policy applies to all employees, including part-time, full-time and casual employees, Board members, volunteers and students.

## 4. Responsibilities

It is the responsibility of the Board to:

- Approve any fundraising activity or delegate this authority to the General Manager, and
- Show leadership in fundraising by seeking out fundraising opportunities and participating in fundraising activities in proportion to their ability to do so.

It is the responsibility of the General Manager to:

- Approve fundraising activities where delegated by the Board,
- Ensure the company has the authority to fundraise where this is needed,
- Ensure that responsibilities around record-keeping, expenses and reporting are met, and
- Oversee the management of fundraising activities or delegate this responsibility to a sub-committee, group or individual.

It is the responsibility of any person or committee delegated to manage fundraising to:

- Maintain a list of items, resources, equipment, activities, or infrastructure that services or the company would like to fund and prioritise based on need, impact, and capacity to fundraise,
- Obtain any required authorisation or licence and ensure compliance with responsibilities,
- Share information about fundraising activities, internally with administration and services as well as externally through promotion and stakeholder communication, and
- Complete funding acquittal requirements and internal reporting.

It is the responsibility of employees to:

## *Ethical Fundraising Policy*

- Contribute ideas to the nominated supervisor or fundraising committee as to items, resources, equipment, activities, or infrastructure that will provide benefit to children or families who attend the service where the employee works or another service, and
- Support fundraising activities in proportion to their ability to do so, including those that may directly benefit other services.

## 5. Definitions

**Authority to fundraise** – A licence provided by NSW Fair Trading that allows an individual or organisation to legally fundraise and imposes responsibilities around record-keeping, banking of funds and types of expenses. An authority lasts up to five years.

**Fundraising** – The collection of money from individuals, organisations, businesses, or foundations to support the charitable purpose of the company or another registered charitable organisation. Fundraising may be passive, for example through unsolicited donations, or active, for example through short-term activities or drives. Fundraising does not include fees for service.

## 6. Guidelines

Fundraising will adhere to the following standards.

### a) Charitable purpose

Fundraising, including when conducted on behalf of another registered charitable organisation, must contribute to the objects of the company, which are to:

- advance education by operating early childhood education services, including preschool to rural and regional communities,
- advance social and public welfare by offering childcare services and ancillary services to support rural and regional communities, and supporting vulnerable children in the community; and
- establish and maintain gift fund(s) for the acquisition, construction, or maintenance of a school building(s).

Fundraising will align with the company's not-for-profit status and will not distribute funds or assets directly or indirectly to members unless allowed under the Constitution.

Fundraising activities will not be undertaken if they may be detrimental to the reputation or community standing of the company.

### b) Ethical source

Financial contributions from companies, organisations, and individuals that the Board has reason to consider unethical or at odds with the purpose or values of the company will not be accepted.

Fundraising will not include direct solicitation of funds by telephone or door-to-door.

Fundraising activities should, as far as possible, align with *NQS2.14 Nutrition Policy*, *NQS3.21 Sustainability Policy*, and *NQS2.22 Physical Activity Policy*.

### c) Compliant with law

Fundraising in NSW is governed by NSW Fair Trading. Fundraising activities will:

- comply with all relevant legislation, and
- only be conducted in locations where the company is permitted by law to conduct those activities.

## *Ethical Fundraising Policy*

Where the company raises more than \$15,000 gross in a financial year from any fundraising appeal, it must have an authority to fundraise from NSW Fair Trading. ACNC registered organisations are automatically eligible but must submit an application and comply with the following responsibilities:

- Records must be kept for seven years.
- Money received must be paid into a trust account before expenses are deducted.
- Lawful and proper expenses cannot include payment for conducting the fundraising and must not be more than 50% of funds raised.

Under NSW Community Gaming legislation, an authority to hold a lottery or raffle is only required where the prize pool is more than \$30,000.

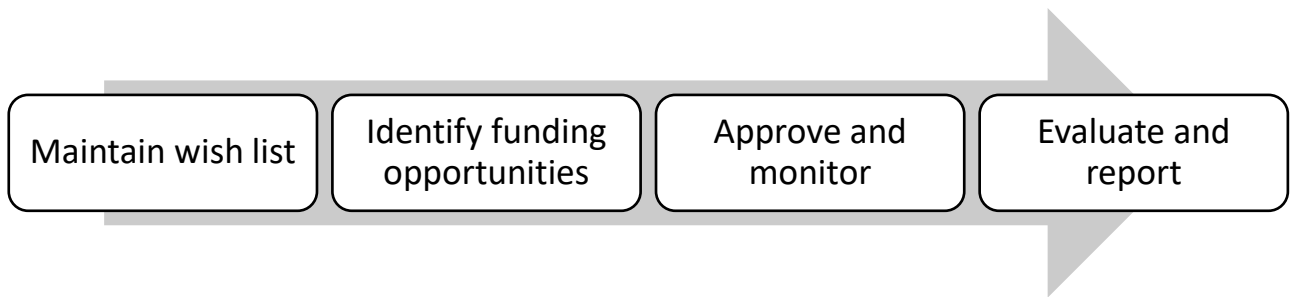
The handling and use of personal information obtained during fundraising activities must comply with *NQS7.6 Privacy and Confidentiality Policy* and Privacy Act 1988 (Cth).

### **d) Transparent and accountable**

Any communications to the public made while carrying out a fundraising activity shall be truthful and not deceptive or misleading.

- Fundraising material will clearly state the purpose for which the fundraising appeal is being conducted and will include a statement that, if the funds raised exceed the amount needed for the stated purpose, those funds will be applied in accordance with River Region Early Education's mission and purpose.
- All funds raised via fundraising activities will be applied in accordance with the statements included in fundraising material.
- River Region Early Education will report to its members, stakeholders, and donors on the outcomes of fundraising activities and on the expenditure of these funds.

## 7. Procedure



### a) Maintain wish list

A wish list is a list of items, resources, equipment, activities, or infrastructure that services or the company would like to fund.

Wish List items can be identified by any employee by:

- Discussing the item/activity with their Nominated Supervisor or supervisor, and
- Completing *NQS7.55B Fundraising Wish List Form* for the Nominated Supervisor to present to the Leadership Team (or Fundraising Committee).

The Leadership Team (or Fundraising Committee if delegated):

- Requests contributions to the wish list from educators and administration staff twice a year using *NQS7.55B Fundraising Wish List Form*, and
- Discusses wish list items at two subsequent Leadership Team meetings and agrees on prioritisation that considers urgency of need, impact, and potential contribution of individual services in fundraising activities.

### b) Identify funding opportunities

Funding opportunities include:

- Grant funding, and
- Fundraising activities, including drives, raffles, events and sponsored activities.

The Quality Coordinator and General Manager oversee the identification of grant funding opportunities. This is done by:

- Monitoring grant databases such as Our Community Funding Centre, Australian Government Grant Connect and NSW Education website,
- Consulting the Fundraising Wish List for relevant items,
- Completing *NQS7.55A Fundraising Proposal Form* for any relevant grant funding opportunities, and
- Tabling the proposal at a Leadership Team meeting for discussion.

Grant funding and fundraising opportunities can be identified by any employee by:

- Discussing the opportunity with the Quality Coordinator and/or General Manager, and
- Completing *NQS7.55A Fundraising Proposal Form* on request for presentation to the Leadership Team (or Fundraising Committee).

The Leadership Team (or Fundraising Committee if delegated):

- Requests identification of fundraising ideas from educators and administration staff twice a year using *NQS7.55A Fundraising Proposal Form*,

## *Ethical Fundraising Policy*

- Discusses fundraising proposals at two subsequent Leadership Team meetings (or as needed) and agrees on prioritisation that considers urgency of need, impact, and potential contribution of individual services in fundraising activities.

### c) Approve and monitor

The approval of fundraising activities is managed by the Board or delegated to the General Manager in line with the *NQS7.5 Delegations Policy*.

Approval of a fundraising activity is as follows:

1. The Leadership Team (or Fundraising Committee or General Manager) endorses an activity and notes this on *NQS7.55A Fundraising Proposal Form*,
2. The General Manager approves the proposal (if required) and notes this on *NQS7.55A Fundraising Proposal Form*,
3. The General Manager presents the proposal to the Board for approval.

The General Manager will oversee the management of fundraising activities and may delegate this responsibility to an individual, or the Leadership Team (or Fundraising Committee).

The individual or group managing the fundraising activity:

- Ensures that correct authorisation is obtained,
- Informs administration of the fundraising activity and any actions required,
- Ensures that record-keeping, receipt and expenditure of funds and handling of personal information are compliant.
- Oversees or conducts the promotion of the fundraising activity, where relevant, through social media, email, print and radio media, printed collateral, and/or newsletters and ensures that promotional material clearly states:
  - the purpose for which the fundraising appeal is being conducted, and
  - that any funds excess to that purpose will be used in accordance with River Region Early Education's mission and purpose, and
- Reports on progress to Leadership Team meetings as relevant.

### d) Evaluate and report

The General Manager will oversee the evaluation and reporting of fundraising activities and may delegate this responsibility to the Leadership Team (or Fundraising Committee).

The responsibilities for evaluation and reporting are to:

- Discuss the outcomes of the grant funding or fundraising activity at a Leadership Team meeting and ensure funds raised have been applied in accordance with the statements included in fundraising material,
- Complete funding acquittal requirements and lodge by the required deadline,
- Notify members, stakeholders and donors of the outcomes of the fundraising activity through individual letters and/or social media, email, print and radio media, printed collateral, and/or newsletters, and
- Include outcomes of the grant funding or fundraising activity in Board reports.

### e) Audit and compliance

Nil

## 8. Relevant Legislation, Regulations and Quality Standards

Legislation / Regulation	
NSW	Charitable Fundraising Act 1991 and Charitable Fundraising Regulation 2021
NSW	Community Gaming Act 2018 and Community Gaming Regulation 2020
Cth	Privacy Act 1988
Education and Care Services National Regulation	
National Quality Standards	
2.1.3	Healthy eating and physical activity are promoted and appropriate for each child.
3.1.1	Outdoor and indoor spaces, buildings, fixtures and fittings are suitable for their purpose, including supporting the access of every child.
3.1.2	Premises, furniture and equipment are safe, clean and well maintained.
3.2.2	Resources, materials and equipment allow for multiple uses, are sufficient in number, and enable every child to engage in play-based learning.
3.2.3	The service cares for the environment and supports children to become environmentally responsible.
Child Safe Standards	

## 9. Related Documents

Doc #	Document Title
NQS2.14	Nutrition Policy
NQS3.21	Sustainability Policy
NQS2.22	Physical Activity Policy
NQS7.6	Privacy and Confidentiality Policy
NQS7.5	Delegations Policy

## 10. Document Control

Doc #	Doc Title	Version	Approved	Next Review
	Fundraising Policy	1	Feb 2014	Feb 2017
NQS7.55	Fundraising Policy	2	April 2019	April 2022
NQS7.55	Ethical Fundraising Policy	3	August 2023	August 2026
NQS7.55	Ethical Fundraising Policy (minor change due to name change)	3a	Jan 2024	August 2026