



Gift Acceptance Policy

Managed on behalf of Executive Director and Board by: Head of Resource Mobilisation

Approved by Board: 8 December 2018

1. Purpose

ActionAid Australia (AAA) believes that having a clearly articulated policy outlining the instances where we may or may not accept a gift or donation from a donor or prospective donor will allow us to live up to our values of being a transparent organisation, achieve our commitment to being an ethical fundraising organisation, and reduce any reputational risks or compromise the important work we do.

The Gift Acceptance Policy **links to the principles of ActionAid International's Global Corporate Engagement Framework** and will ensure that gifts accepted by AAA do not compromise or interfere with the broader federation's corporate engagement activities, be they fundraising, procurement or campaigning.

This Gift Acceptance Policy **complies with the Fundraising Institute of Australia's (FIA) Code of Conduct** and has been heavily informed by that policy to ensure the highest standards of ethical and transparent fundraising practices.

2. Scope

This policy applies to the following people:

- ActionAid Australia staff members, particularly those engaged in resource mobilisation and fundraising;
- ActionAid Australia donors and prospective donors;
- ActionAid Australia Board of Directors; and
- Partner organisations.

3. Definitions

In accordance with Australian Tax Office (ATO) guidelines, ActionAid Australia defines a gift as:

- A voluntary transfer of money or property where the donor receives no material benefit or advantage; and
- A gift of money or property, which includes financial assets such as shares.

For the purposes of this policy, ActionAid Australia will also consider a gift-in-kind of services or pro-bono support to be a gift.

4. When will a gift be refused?

A gift refusal could happen outright and prior to the receipt of a gift, and/or a gift may also be returned to the donor by ActionAid Australia should more information be learned about its source post-receipt.

5. Principles

The following principles will guide ActionAid Australia in its decision on whether or not to accept a gift:

- AAA will not accept any gifts from an organisation operating in any excluded industries in the **AAI Global Corporate Engagement Framework**, including the tobacco industry, the pornography industry, armaments industries, any non-Palestinian companies operating in the occupied Palestinian territories and current or recent campaigns targets; and
- AAA will not accept a gift when there is a reasonable belief that the donor is in vulnerable circumstances or lacks capacity to make a decision to donate; and
- AAA will not accept a gift when to do so would compromise the interests or objectives of ActionAid Australia; and
- AAA will not accept a gift where the activities of the donor are incompatible with the objectives of ActionAid Australia; and
- AAA will not accept a gift where the role of AAA would be limited to serve solely as a donor driven funding conduit to non-AAA project partners and/or where the objectives of the non-AAA partners do not align with AAA strategic and project objectives; and
- AAA will not accept a gift where the cost of accepting the gift would be greater than the value of the gift itself; and
- AAA will not accept a gift where there is reason to believe that accepting the gift will damage the reputation and brand of ActionAid; and
- AAA will not accept a gift where there is reason to believe that accepting the gift may result in litigation; and
- AAA will accept a gift through a Workplace Giving Program from a business that we would ordinarily not be able to accept a gift from, as AAA considers this to be a gift from the individual employee rather than the business. Matched gifts from the organisation under these circumstances, however, will not be accepted by AAA as this is a gift from the business itself.

6. Gift Acceptance Procedures

If AAA determines that it is unable to accept a gift from an individual or organisation, it will inform them immediately. Should the gift have already been received by ActionAid, it will be returned to the donor promptly. ActionAid will bear the cost of returning the donation.

A donor has the right to know why their gift is being refused and ActionAid will inform them of a reason. All donors will be treated with courtesy and respect regardless of whether or not their gift can be accepted.

If a donor is not satisfied with the reason for the non-acceptance, they may follow standard complaints procedures as outlined in [ActionAid Australia's Complaints Handling Policy](#).

ActionAid Australia will keep a register of any declined gifts. The register will include the date, gift amount, name of donor and the reason the gift was declined.

7. Monitoring and Review of Policy and Procedure

The Head of Resource Mobilisation is accountable to the ActionAid Australia Executive Director and Board for managing and maintaining this policy. All members of the Leadership Team are accountable for ensuring that their functional teams understand and adhere to this policy in their day-to-day work. Where compliance issues surface, Leadership Team members will work with staff to address these issues promptly. Any updates/revisions to the policy must be endorsed by the Executive Director and Leadership Team before being submitted to the Board for approval.

Changes to This Policy

Nature of Changes	Date of Board Approval
Policy first developed	8 December 2018