

Ethical Fundraising Policy

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Acceptance Certificate:

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1. Background

It is desirable for non-profit organisations like SWOP to have a diverse range of income sources. This is to avoid being dependent upon one source alone, e.g. a government grant or contract. Additional income sources from fundraising could include grants, donations, crowdfunding, membership dues, special events, sales of merchandise or services, and community-business partnerships. Good fundraising can foster a sense of belonging among supporters.

SWOP is committed to ensuring that all fundraising activities are carried out in an ethical manner.

SWOP Executive Committee members have the responsibility of ensuring the survival and continuation of the organisation. This includes responsibility for funding the activities of the organisation. While the operational aspects of fundraising may be delegated to SWOP staff, the Executive Committee retains the responsibility for the strategic oversight of fundraising, including inspiring, demonstrating leadership on, and conveying the importance of, fundraising activities for the benefit of SWOP and NSW sex workers.

2. Policy Statement

This policy applies to anyone who fundraises on behalf of SWOP, including Executive Committee members, permanent, casual and contract staff, volunteers, contractors, subcontractors, the employees of contractors and subcontractors, students, trainees and apprentices. In the remainder of this policy, these groups will be collectively referred to as 'staff'.

The purpose of this policy is to identify SWOP's position on fundraising practice and detail the expected standard the organisation should uphold when raising funds, or supporting others in raising funds. This policy explains ethical fundraising more broadly, as well as addressing specific considerations when fundraising for NSW sex workers. It also addresses questions staff might have about fundraising for others using SWOP's name.

3. Guiding Principles

The guiding principle of SWOP's ethical fundraising policy is that SWOP will only use techniques that we would be happy to have used on ourselves as sex workers. Given that what is considered a desirable fundraising technique changes over time, this policy speaks in general terms rather than prohibiting specific styles of fundraising, including styles which have currently lost favour, like general solicitations by door or phone. Instead, when designing a fundraising initiative, one should consider carefully: would I like it if someone used this approach on me today? When considering this, one should also take into account that the people we are approaching may not know of, or support, SWOP.

It is paramount that fundraising by SWOP, and in particular fundraising executed by SWOP employees, does not create barriers to delivering SWOP services. For example, we must carefully consider whether offering a SWOP membership form to sex workers on every outreach could impact their likelihood to access our services. If SWOP staff consider a fundraising initiative might damage their ability to deliver our core work, SWOP might instead consider options. For example, if it's determined that offering membership forms on

every outreach could create barriers to service delivery; SWOP could instead hold an annual month-long membership drive in the lead up to our Annual General Meeting (AGM).

Fundraising initiatives also should not take up essential time and capacity that SWOP needs to deliver our services. If fundraising activities will take up time and organisational capacity, it is essential to first perform a cost benefit analysis that ensures the monies, time and capacity that will be redirected from regular SWOP services for fundraising are repaid or recouped. This analysis should set out the costs, including employee hours, required to run the fundraising initiative and balance them against the expected income that the initiative will generate. Other benefits of the initiative (e.g. advocacy) can also be considered. The analysis should be performed with your line manager, and requires CEO sign-off.

To comply with relevant NSW Fair Trading legislation we must take all reasonable steps to ensure that total expenses payable do not amount to more than 50% of the gross proceeds. In all other forms of fundraising, such as the sale of goods and services, the return must be fair and reasonable.

3.1. Fundraising for Others

As a community-based organisation, SWOP is also likely to be asked to support other fundraising ventures. These might include promoting fundraisers for SWOP's organisational partners, or sharing links to crowdfunding initiatives from creative ventures, organisations, and individual sex workers. SWOP staff can only support other fundraising ventures with the approval of the SWOP Chief Executive Officer (CEO).

SWOP must carefully consider whether there is benefit to both the community and SWOP before supporting campaigns for other people and organisations. As a general rule, SWOP should only share fundraising requests that have obvious community benefit, rather than individual benefit. In addition, SWOP should consider whether supporting the initiatives of others might damage SWOP's reputation with, or remove good will from, our supporters. Questions to ask include: what impact will there be on SWOP if this crowd-funded project doesn't deliver?

SWOP should also consider how many times we have asked our supporters to donate already this year, and any potential impacts sharing these requests may have on any fundraising initiatives we have planned in the future. SWOP's own fundraising should be prioritised over fundraising for other organisations and projects.

3.2. Fee for Service

Fee for service models are becoming increasingly popular in our sector. Most non-profits who use a fee for service model continue to receive grant based funding, but become less dependent upon it. This can result in a healthier, more straightforward (less encumbered) organisational planning process.

When assessing whether to charge a fee for service, SWOP should consider whether:

- collecting fees is practical
- access to SWOP services by NSW sex workers might be hampered by the charging of fees
- our central mission is subverted by offering these services (for example, by diverting our attention away from NSW sex workers and toward more lucrative fee-paying clientele).

Moving to charging for a service is easiest if SWOP substantially updates and improves an existing service, perhaps by adding certification. SWOP fees for service might incorporate a tiered fee structure, for example a sliding scale where sex workers receive training for free; core organisations who serve sex workers pay a small fee; and profit-based corporations are charged a higher fee.

3.3. Accepting Grants and Donations

Accepting grants and donations from individuals, companies and other organisations is at the CEO's discretion. The CEO should consider, in consultation with the Executive Committee, whether there is a good brand fit between SWOP and prospective donors.

SWOP may decline a donation if the donor is incompatible with SWOP's mission and values, or if they are fundamentally incompatible with the broader values of the communities we serve. Care should be taken if deciding to decline donations based upon community values, as these values can shift over time, and may vary between diverse communities of sex workers. An example of a valid reason to decline a donation might be if the donor was trans-exclusionary.

3.4. Accepting Bequests

It is the right of people making bequests to determine how their donation is used, and this may include selecting a group that this money is spent on. However, SWOP has limited capacity in terms of accommodating specific requests. Therefore anyone planning to leave a bequest to SWOP, should contact SWOP before finalising their will/testament to ensure that SWOP is able to comply with their final wishes.

4. Ethical Fundraising Procedures

4.1. Fundraising Practices

SWOP, including staff soliciting fundraising on our behalf, should be truthful and accountable in all fundraising endeavours. This includes disclosing who SWOP is, and how any fundraised monies will be used. This also includes immediately ceasing solicitation of a prospective donor who appears to view the solicitation as harassment or is feeling undue pressure.

4.2. Duty to Donors

SWOP donors, be they individuals, organisations and businesses, have the right to:

- an official receipt detailing the amount of their donation
- choose to remain anonymous
- request to be removed from our donor list at any time without providing a reason. SWOP will ensure these requests from donors are handled promptly, and that these donors are not contacted again
- request access to SWOP's most recent Annual Report and associated financial statements as approved by the Executive Committee
- request a copy of our income tax exempt charitable entity and endorsement as a deductible gift recipient which is downloadable from the Australian Charities and Not For Profits Commission (ACNC) [website](#).

SWOP will consider the privacy of donors in the same way that it considers the privacy of service users, as set out in the SWOP Privacy Policy. SWOP will not rent, sell, share or exchange our donor list.

4.3. Financial Accountability

SWOP will keep factual and accurate financial reports that detail all fundraised monies, whether or not they are receipted, separate from government grants and contributions. These records will also show fundraising expenses, including salaries and overhead costs, as well as SWOP's expenditure on other charitable activities (including gifts to other charities).

4.4. Restricted Donations

If restricted donations (e.g. donations nominating specific projects at SWOP) are accepted by SWOP, these monies will only be used to advance the nominated project or activity, not by the wider organisation. Should this not be possible, say through changes to programs or the organisation SWOP will contact the donor (or representatives of the donor if the donor is deceased) to discuss alternative uses and the option of a refund (minus a reasonable account keeping fee to cover administration).. Failing contact, SWOP will use the donation in a manner that is as close as possible to the donor's original intention.

4.5. Planning A Fundraiser

When planning a fundraiser, employees should consider:

- current trends in fundraising
- the impact of the fundraiser on sex workers, the general public and SWOP employees
- where this fundraiser fits in the annual SWOP calendar with respect to any other fundraising initiatives, including fundraising we have done, or intend to do for others. Be careful not to overload donors with too many requests too often
- whether multiple fundraisers can be held at the same time. For example, if you're running an event, consider selling SWOP merchandise at a stall at the event, and make sure the event program has a donation form attached, and contains information about how to become a SWOP member
- the aim of the fundraising initiative. For example, if you ask for donations to support multicultural sex workers, this means the monies raised must be used on these projects. However money raised through selling general SWOP services and assets (e.g. our expertise) is usually untied money. This means SWOP can decide how to use the monies raised
- if the fundraising involves community-business partnerships, whether the association aligns with SWOP's mission and values, as outlined in SWOP's current Strategic Plan. Fundraising opportunities are rarely perfect, so even if language or themes might be flawed, SWOP can (with Executive Committee approval) agree to accept fundraising opportunities where we are afforded an opportunity to shift the conversation

Complaints from donors and people we are soliciting fundraising from should be handled as per the SWOP Complaints Policy. Serious matters, where a breach of fundraising conduct by SWOP may affect SWOP's status as an income tax exempt charitable entity and endorsement as a deductible gift recipient should be referred by the CEO to the Executive Committee.

5. Miscellaneous

Any questions relating to this policy should be addressed to your line manager

6. Review of this Policy & Procedure

This policy will be reviewed at least once every three years by the CEO.

7. Related Documents

- Code of Conduct
- Privacy Policy
- Complaints Policy
- Strategic Plan (current)

5. Policy History

| Date | Reason for Change | Change Description | Author | Issue No: |
|----------|-------------------|---|---|-----------|
| 03/05/16 | Creation | | Jackie McMillan / Michelle Wood / Cameron Cox | 0.1 |
| 05/08/16 | Editing | Incorporated Committee changes to sections on Bequests and Restricted Donations | Michelle Wood | 0.2 |
| 11/08/16 | Approved | | Cameron Cox / SWOP Executive Committee | 1.0 |