

Interplast Australia & New Zealand

Ethical Fundraising Policy

Policy Status:
APPROVED

Initial CEO Endorsement:	30 May 2023
Board Approval Date:	2 September 2025
Last Review Date:	28 August 2025
Future Review Date:	28 August 2026
Frequency of Review:	Annual
Policy Owner:	Director - Fundraising

Revisions to Policy

Significant Changes	Endorsed by CEO	Approved by Interplast Board
Initial creation	December 2012	December 2012
Revised policy template & separation for procedure documents	1 October 2021	12 October 2021
Inclusion of sections: • Gift refusal • Fundraising materials • Sponsorship & corporate partnerships	30 May 2023	15 June 2023
Updated policy template and added information regarding the management of anonymous donations	29 August 2025	2 September 2025

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Section 1: Purpose

This policy sets out the principles which Interplast Australia & New Zealand abides by in the conduct of its fundraising activities and interactions with donors. It aims to provide:

- Protection for Interplast against major reputational risks and breaches of legislative or regulatory conditions
- Guidance for staff, volunteers and donors
- Protection for donors against unethical fundraising activity that puts them at risk through their interactions with Interplast
- An ethical framework in which to operate fundraising and sponsorship initiatives

Section 2: Scope

This policy applies to all staff, consultants and volunteers, including members of the Interplast Board and Committees engaged by Interplast Australia & New Zealand.

The policy also applies to community fundraisers with authority to fundraise on behalf of Interplast.

Section 3: Legislation & Regulatory Frameworks

- Charitable Collections Act 2003 (ACT)
- Charitable Fundraising Act 1991 (NSW)
- Gaming Control Act 1993 (NT)
- Collections Act 1966 (QLD)
- Collections for Charitable Purposes Act 1939 (SA)
- Collections for Charities Act 2001 (TAS)
- Fundraising Appeals Act 1998 (VIC)
- Charitable Collections Act 1946 (WA)
- Fundraising Institute of Australia Code of Conduct
- ACFID Fundraising Charter

Section 4: Policy

Interplast Australia & New Zealand is committed to ethical, accountable and transparent fundraising practices which build and maintain public trust and confidence, in keeping with the Fundraising Institute of Australia's Code of Conduct, and as members of the Australian Council for International Development. These principles extend to and shall be explicit expectations of all fundraising staff, volunteers and suppliers working for Interplast.

Interplast will only accept donations and other forms of support, such as sponsorship, volunteering or gifts in-kind from individuals, companies and other organisations under the following conditions:

- There are strong grounds for believing it will result in benefit to Interplast and is consistent with agreed strategic objectives, together with the broader Interplast mission
- It is feasible to apply the donation in a way that is consistent with the donor's wishes given the operational constraints and strategic direction of the organisation
- Every effort shall be made to raise unrestricted funds that offer Interplast operational flexibility to meet the needs of beneficiaries unless otherwise directed by Interplast. However, where donors request that donations are restricted, funds shall be used for purposes consistent with the donor's intent. If donations can't be used as requested, Interplast will consult the donor as to the use of the funds.

Gift refusal

Interplast will not accept donations or other forms of support where any of the following criteria may apply as assessed by the CEO with review by the Audit & Risk Committee:

- The support is known or suspected to derive from the proceeds of crime or from fraudulent activities
- The support derives from a source conflicting with Interplast's objectives and/or values
- The supporting source is known or suspected to be closely associated with a regime known or suspected to be in violation of human rights including the rights of the child
- The support can be linked to organisations or individuals listed in terrorist listing published by relevant government authorities and made known to Interplast through existing screening channels
- Acceptance is likely to deter actual or potential supporters from future support
- Acceptance would compromise the organisation's status as an independent registered charity
- Funds raised are suspected to come from vulnerable individuals or groups who may not be fully aware of the impact that making such a donation could have on their own personal circumstances
- Funds directly raised through the manufacture of tobacco, adult content or those products/ services in violation of UN sanctions and resolutions of the UN Security Council.
- A potential donor is engaged in any activity which negatively affects the wellbeing of children or a child's community.

Interplast may accept anonymous donations provided they comply with applicable laws and internal due diligence procedures. Interplast will ensure that such donations do not compromise its integrity, mission, or legal obligations. Significant anonymous donations (to the value of \$15,000 or more) will be subject to a risk assessment by the Chief Executive Officer and independent review by the Audit & Risk Committee.

Fundraising Materials

Interplast is committed to ensuring our promotional materials:

- Are truthful and accurately represent the context, situation, proposed solutions and intended meaning of information
- Avoid material omissions, exaggerations, misleading visual portrayals and overstating the need or what the supporter's response may achieve
- Include Interplast's name, address and ABN
- Clearly state if there is a specific purpose of each donation
- Do not contain depictions that are demeaning, discriminatory, pornographic or unduly violent towards a person or group or feature images of dead bodies or dying people
- Only portray people in images or stories if free, prior and informed consent is obtained, and in the case of children, from their parents or guardians
- Do not disparage or endanger the people they are portraying, or infringe on child protection policies, or show children in a naked and/or sexualised manner
- Are not knowingly sent to a child without the consent of the child's parent or guardian
- Do not disparage others or infringe on the intellectual property rights of others, and
- Do not claim or imply that professional fundraising activities are carried out at no cost,

Sponsorship & Corporate Partnerships

The above fundraising principles also apply to sponsorships. Interplast endeavours to establish clear expectations with sponsors and partners through memorandums of understanding, regular engagement and impact reporting. Unlike a gift, sponsorship yields a direct benefit of goods or services for the sponsor.

Interplast is committed to a positive reputation and upholding its values and may therefore decline sponsorships where there may be a conflict of interest or that may lead to adverse publicity. In addition, any proposed sponsors should have an appropriate public image and product and not carry an unreasonable cost associated with the sponsorship.

Section 5: Procedure

Instructions on how to comply with this policy will be found in the correspond procedure document titled Ethical Fundraising Practice Procedures and Interplast's Fundraising Manual

Section 6: Monitoring and Review of this Policy

This policy will be monitored and reviewed at intervals as indicated in this policy and following the process outlined in Interplast's Policy Framework.

The Chief Executive Officer is ultimately accountable to the Board for managing and maintaining this policy and is responsible for the implementation of this policy. The Board is responsible for

adopting this policy. The Director of Fundraising is accountable to the Chief Executive Officer for ensuring the currency of this policy and all supporting procedures and relevant manuals and has responsibility for operationalising the policy.

Where compliance issues are identified, they will be addressed promptly. The Chief Executive Officer is responsible for taking any recommended amendments to this policy to the Interplast Board for its approval.

Section 7: Definitions

Word / Phrase	Definition
Personnel	Personnel includes all employees, consultants, volunteers, Board Directors, Committee members, Working Group members and Ambassadors that are engaged by Interplast to perform the work of Interplast. Volunteers include both professional (e.g. administrative roles) and medical volunteers (e.g. surgeons, anaesthetists, nurses or allied therapists), students, interns, or any other person who has entered into a volunteer arrangement or agreement with Interplast.
Observer	Observers are individuals accompanying an Interplast program, delivered by volunteers in a partner country (e.g. representing a donor organisation or students on an observational placement). Observers do not have a clinical role but may assist the clinical team by completing tasks related to program delivery.
Partner	Partner includes organisations that work with Interplast to implement a joint project with mutually agreed outcomes, and/or with whom Interplast has a signed partnership agreement and/or memorandum of understanding. Partner organisations may or may not be recipients of funds through Interplast.
Beneficiary	Beneficiary 1) a patient receiving treatment through an Interplast activity (this may include a consult only, surgery, allied health treatment or other clinical care, and could be provided by an Interplast volunteer, or a local partner clinician during an Interplast activity), or 2) local partner personnel participating in training delivered by Interplast.
Stakeholder	Stakeholders include all personnel, observers, partners, beneficiaries and supporters, community members in the country where we work, funders, international development peers and organisations, or any other individuals or organisations that connect with Interplast.