



FUNDRAISING

Institute - Australia Ltd.

*Leading and empowering fundraisers
to best serve their organisations and communities
through integrity and professionalism*

SUBMISSION TO THE QUEENSLAND OFFICE OF GAMING AND RACING

CONSULTATION PAPER

PROPOSED AMENDMENTS GAMING LEGILSATION AMENDMENT BILL (AUTHORITY TO INTRODUCE A BILL STAGE)

Casino Control Act 1982
Charitable and Non-Profit Gaming Act 1999
Gaming Machine Act 1991
Interactive Gambling (Player Protection) Act 1998
Keno Act 1996
Lotteries Act 1997
Wagering Act 1998

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Gaming Amendment Consultation
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Fundraising Institute – Australia Ltd (FIA) thanks you for the opportunity to provide comment on the *Gambling Legislation Amendment Bill (Authority to Introduce a Bill Stage)* concerning the *Casino Control Act 1982, Charitable and Non-Profit Gaming Act 1999, Gaming Machine Act 1991, Interactive Gambling (Player Protection) Act 1998, Keno Act 1996, Lotteries Act 1997* and the *Wagering Act 1998*.

FIA welcomes the consistency in legislation program being undertaken by the QOGR and notes that there is a role for government in the regulation fundraising. As the Industry Commission report into charities noted three key objectives of fundraising legislation are:

- To protect the public against fraud, misappropriation of funds and misleading conduct
- To ensure that donors and the public have access to information
- To ensure that organisations use acceptable fundraising practices (IC 1995:231).

With particular reference to the *Charitable and Non Profit Gaming Act 1999* there is an important role for government in protecting consumers from fraudulent practices, supporting the fundraising and gaming sector and providing an appropriate framework within which fundraising activity can take place. Caution is needed however to not 'over regulate' in this area as there exist a range of other state and federal laws covering and protecting consumers in cases of fraud or misleading conduct (e.g. consumer protection laws, Trade Practices legislation, criminal codes) and others that cover account and record keeping and reporting requirements (associations incorporation acts (states), Corporations Act 2001 (Commonwealth)).

Yours sincerely



Dr Sue-Anne Wallace BPHARM BA HONS MFIA
CHIEF EXECUTIVE OFFICER

Consistency of Legislation Program

Fundraising Institute-Australia Ltd (FIA) (see Appendix 1) commends the initiative of the legislative amendment program being conducted by QOGR to amend and bring consistency to gaming legislation in Queensland. Ideally such consistency will eventually extend nationally.

FIA acknowledges that proposed amendments will facilitate the ease of administration and will be beneficial to both industry and the regulator. FIA further acknowledges that to update the language and drafting style of the concerned pieces of legislation will improve readability, understanding and thus application of the legislation.

FIA notes that consistency of legislation has relevance for all fundraisers. A survey of FIA members indicated that approximately 50 per cent of those surveyed worked predominantly or exclusively in their 'home state' while 50 per cent worked across state borders and are currently required to meet different regulations in each state in which they fundraise. Interestingly, more than two thirds responded that they favoured harmonisation of fundraising regulation as a means to improve their capacity to fundraise. Accordingly, harmonisation is seen as being relevant to industry practice, even for those fundraisers that work in only one state.

FIA believes that as a means of progressing harmonisation of legislation the most appropriate model of fundraising regulation is one based on a framework of self regulation. By self regulation we mean a framework where organisations internalize the responsibility for ensuring their fundraising practices comply with a national Code of Conduct and that the systems for monitoring that compliance are open to relevant external stakeholders. This offers an approach that will achieve needed reforms more quickly (e.g. via mutual recognition procedures), and be inclusive and responsive to relevant stakeholders.

Other Amendments that Affect Several Gaming Acts

APPOINTMENT OF INSPECTORS

FIA supports the proposal to address the necessary qualifications of inspectors.

DEFINITION OF 'PROBLEM GAMBLER'

FIA welcomes the adoption of a national definition as this will facilitate a move towards national legislative consistency.

We confine our comments to the relevant act affecting charities.

Charitable and Non Profit Gaming Act 1999

PENALTY FOR BREACH OF ADVERTISING PROVISIONS

Professional fundraisers who are members of the Fundraising Institute Australia, the peak body of professional fundraisers,¹ agree to abide by a mandatory Code of Ethics and

¹ FIA's key objectives are:

A) To promote, establish and maintain high standards of ethics and practice among persons and organisations engaged in the raising of funds or the conduct of appeals for charitable philanthropic religious educational or other purposes for the public good.

Professional Conduct. FIA's codes are currently under review (see [Appendix 2](#)). FIA's provisions for professional practice are drawn from the recently promulgated International Statement of Ethical Principles in Fundraising (see [Appendix 3](#)).

FIA has a series of provisions for breaches of the Code which, if the offence is warrants, include expulsion from FIA. The Victorian Government has expressed an interest in supporting FIA's codes as a means of enhancing self-regulation of the fundraising profession in order to enhance public trust and confidence in the industry. We believe that it would be beneficial to your regulation of gaming in Queensland to promote adherence to FIA's codes as well as the legislative environment. Experience in the UK has shown the importance of government support for self-regulation in fundraising.

We have no particular issue with the proposed penalty, apart from commenting that for some charities a fine of \$7,500 would be very significant. Is there a scale of penalties depending on the significance of the breach? Fines would naturally impact on the costs of fundraising as it is likely that any monetary fine would be taken from funds raised as there may be no other sources of general revenue from which to draw.

ABILITY TO TAKE PROSECUTION ACTION AGAINST CERTAIN OFFICERS

Apart from the arguments rehearsed above concerning FIA's role in self-regulation of the fundraising industry, it is widely recognised that charities and other nonprofit organisations have limited ability to reward employees sufficiently with regard to their remuneration. In recognising this, the Australian Taxation Office has made provision for special tax arrangements which enable Public Benefit Institutions, at least, to more advantageously package salaries. In addition to monetary limitations, an individual may be required to undertake his or her in a certain manner, which, if breaching the Act, would also certainly breach FIA's codes of ethics and professional practice. FIA has in some circumstances suggested to members that they resign their position if they are asked to work in conflict with the professional standards of fundraising.

In proposing to take prosecution action against certain officers, as well as the organisations for which they work, there may be a perception of undue harshness against an individual even if there is a clear breach by the organisation.

FIA argues strongly that in considering this amendment, the Queensland Government takes into account:

- The importance of government promotion of self-regulation of fundraising, including gaming;
- The capacity of an individual to refuse to implement practices which may breach the Act;
- The ability of an individual employed by the charity or nonprofit to pay a monetary fine;
- Where other legislation, particularly criminal codes, already cover the implied breach

B) To educate and inform organisations, companies, other bodies and the public for the purpose of bringing about a better understanding of the fundraising profession and ethical methods and practices in the raising of funds or the conduct of appeals for charitable philanthropic religious educational or other purposes for the public good.

APPENDIX 1

BACKGROUND INFORMATION: FUNDRAISING INSTITITE AUSTRALIA-LTD

Fundraising Institute Australia Ltd (FIA), established in 1968, is the peak national body for fundraising in Australia. FIA is a company limited by guarantee. As a nonprofit body, FIA is recognised as a charitable fund.

Membership

FIA engages with over three thousand fundraisers, representing more than two thousand nonprofit organisations, who subscribe to FIA's information services or attend FIA's professional development programs. Full membership of FIA at December 2006 comprised over one thousand four hundred fundraisers.

National Agenda

In 2006 FIA has continued its professional advocacy through briefings to state and federal governments on issues relating to fundraising regulation which is hampered by legislative inconsistencies that challenge efforts to fundraise nationally. FIA is pushing for greater clarity and consistency in regulation across Australia and seeking to encourage national harmonization of fundraising regulation. Governments and the sector are acutely aware of the importance of ensuring public confidence in fundraising.

Nationally, FIA worked in collaboration with the Australian Council of Social Service (ACOSS), the lead agency in a project *Giving Australia*² released in October 2005, funded by the Prime Minister's Community Business Partnership on behalf of the Australian Government Department of Family and Community Services. This project has researched philanthropy, fundraising and the development capacity of the nonprofit sector (for the report see www.fia.org.au under Resources).

Through the Chief Executive Officer, FIA is a member of the Code of Conduct Committee of the federally-funded Australian Council for International Development (ACFID), a member of the Experts Panel advising the Victorian Government of the regulatory environment for the nonprofit sector, and the lead agency for a governance/management tool kit for the fundraising sector in Queensland.

FIA regularly makes submissions to governments on issues concerning legislation and regulation, privacy and harmonization of legislation.³

² *Giving Australia, Research on Philanthropy in Australia*, Australian Government Department of Family and Community Services, Canberra, October 2005. This project was led by The Australian Council of Social Services, with QUT's Centre of Philanthropy and Non-profit Studies, University of Technology, Sydney's Centre for Australian Community Organisations and Management, Fundraising Institute Australia Ltd, Roy Morgan Research PL and McNair Ingenuity Research PL.

³ Since Sept 2004 submissions have included:

- Victorian Government's review of the Fundraising Appeals Act 1998
- Victorian Government's review of legislation on raffles
- Federal Privacy Commissioner's review of the private sector provisions of the Privacy Act 1988
- Australian Tax Office review of the draft taxation ruling what is a gift?
- Senate Enquiry into the Privacy Act 1988
- House of Representative Inquiry on Harmonisation of Legal Systems
- Queensland Government Office of Fair Trading Review of the Associations Incorporation Act 1981
- Victorian Government Proposed Gambling (Commercial Raffle Organisers) Regulations 2005
- Australian Taxation Office Draft Taxation Rulings TR2005/D6 and TR2005/D7
- Australian Communications & Media Authority Draft Industry Standard (Integrated Phone Number Database) (August 2005)
- Victorian parliamentarian draft bill on telemarketing regulation (October 2005)
- Ministers for Fair Trading in New South Wales and Victoria, on the option for harmonization of trading laws relating to telemarketing (October 2005)

International Agenda

Internationally, FIA has Memoranda of Understanding with the two principal US fundraising organisations, Association of Fundraising Professionals (AFP) and Association for Healthcare Philanthropy (AHP), and has adopted a code of practice with the Washington-based ePhilanthropy Foundation, with whom FIA is working towards a Memorandum of Understanding. The Chief Executive Officer is an invited member and the international delegate on AFP's Ethics Committee. FIA is working with the Institute of Fundraising (UK) and Resource Alliance (UK) to formalize memoranda of understanding to promote further international cooperation between fundraising organisations. FIA is working with Resource Alliance to develop a capacity building program in the Asia Pacific region coinciding with the regional conference in 2006.

FIA is a member of the international consortium of twenty-four professional associations for fundraisers. The summit is working towards developing an International Code of Ethics for Fundraisers. FIA's work with the summit has been of significant value to the development of the project for FIA's codes of fundraising practice.

AHP Faculty head the teaching personnel in FIA's annual intensive professional development program Madison Down Under.

Professional Development

FIA has developed a comprehensive professional development pathway, from the Diploma of Fundraising Management (DFM) to the internationally-recognised Certified Fundraising Executive (CFRE), based in Washington, US. A new residential program in 2006, the Fundraising leadership Program, in partnership with Melbourne Business School, addresses the specific needs of executive fundraisers and managers in the nonprofit sector. FIA has broad reach in its professional development programs, delivering approximately 10,000 hours to members and other professional fundraisers in 2005.

Professional development seminars, held monthly by each chapter over breakfast or lunch, are an important way to network with colleagues while learning. Intensive professional development opportunities are provided with FIA's annual International Conference (February) and the four-day residential program Madison Down Under (held just out of Adelaide in August). FIA partners with other organisations where appropriate to bring keynote national

- Department of Communications, Information Technology and the Arts, discussion paper on Introduction of a Do Not Call Register (November 2005)
- Australian Competition and Consumer Commission, Draft Determination lodged by The Australian Direct Marketing Association Ltd in relation to the Direct Marketing Code of Practice (December 2005)
- Gambling Regulation (Commercial Raffle Organisers) Regulations 2006 Victoria (February 2006)
- Fundraising Appeals Act 1998 Proposals for Reform Victoria (February 2006)
- Australian Taxation Office Proposal to pre-populate gift labels on electronic returns for individuals, Non-Profit News Service no. 0134. (March 2006)
- South Australian Government Office of Consumer and Business Affairs, on consumer protection and telemarketing in SA. Options for regulation (April 2006)
- South Australian Department of Treasury and Finance, Collections for Charitable Purposes (Miscellaneous) Amendment Bill 2005 ("the Amendment Bill") (May 2006)
- Federal Senate Reference Committee, Inquiry into the Do-not-Call Register Bills 2006 (June 2006)
- Australian Communications and Media Authority: Industry Standards for the Making of Telephone Calls (September 2006)
- NSW Premier Department, NSW State Plan (September 2006)
- Treasury of Victoria, Reducing the Regulatory Burden (September 2006)
- Queensland Office of Gaming Regulation Proposed Amendments Charitable and Nonprofit Gaming Act 1999 (September 2006)
- Australian Law reform Commission, Review of Privacy Issues Paper 31, (January 2007)
- Queensland Office of Gaming and Racing, Consultation paper on Proposed Amendments - Gaming Legislation Amendment Bill (Authority to Introduce a Bill Stage) (January 2007)

and international speakers to as wide an audience of members and other fundraisers. The Diploma of Fundraising Management is a distance learning program, usually completed over two and a half years, comprising eleven modules undertaken at the students' pace. Skills Training (Skills 1, 2 and 3) offers vocational sessions to fundraisers from entry level to most experienced fundraising and is delivered by chapters in each state.

Principles and Standards of Fundraising Practice⁴

FIA's priority 2006 through 2008 is to develop comprehensive standards of fundraising practice⁵ to:

- provide the Australian community with assurance of accountability for their gifts
- support the rights of donors who make gifts
- establish a code of conduct for fundraisers
- guide fundraisers in ethical and professional practice
- enhance self-regulation of the fundraising industry

The non-profit sector

Australia's nonprofit sector consists of a wide spectrum of organisations addressing societal needs. Nonprofit organisations are the major providers of community services, sport and the representation of collective interests. They are significant providers of education and health services, arts and culture and hospitality services. They are the exclusive providers of religious services. This is a representation much broader than the traditional charitable organisations.

Research undertaken by Professor Mark Lyons (University of Technology, Sydney) has shown there are as many as 700,000 nonprofit organisations, approximately half of which are incorporated as separate legal entities.⁶ About 35,000 organisations employ over 600,000 paid staff and involve over 4 million volunteers. These organisations contribute about 3.3% to GDP (4.7% when the value of volunteer labour is included) and account for 6.8% of total employment).⁷

⁴ This project is assisted by the Helen Macpherson Smith Trust

⁵ ELEMENTS OF THE CODES OF FUNDRAISING PRACTICE

Principles:

- Code of Ethics
- Code of Professional Conduct
- Code of Acceptance and Refusal of Donations
- The Donor's Bill of Rights
- The Enforcement Process

Standards:

- Code of Events
- Code of Personal Solicitation of Public Places (F2F)
- Code of Telephone Fundraising and Telemarketing
- Code of Payroll Giving and Matched Giving Schemes
- Code of Bequests
- Code of Raffles, Lotteries and Games of Chance
- Code of Workplace Giving Partnerships
- Code of Charity Challenge Events
- Code of Fundraising from Grant Making Trusts and Foundations
- Code of Fundraising in Schools
- Code of e-Fundraising
- Code of Reciprocal Mailings
- Code of Direct Mail
- Code of Direct Marketing

⁶ Lyons, M (2001) *Third Sector: The contribution of nonprofit and cooperative enterprises in Australia* (Sydney: Allen and Unwin, 2001).

⁷ Woodward, S and Marshall, S (2004) *A better framework – reforming not-for-profit regulation*, University of Melbourne: Centre for Corporate Law and Securities Regulation.

Fundraising is a key activity of the nonprofit sector. Australian giving as measured through the *Giving Australia* project is estimated at \$11 billion dollars per annum. The giving of money, goods and services to nonprofit organisations by individuals and business estimated by this research comprises \$7.7 billion by individuals donated by 13.4 million people, 87% of adult Australians and \$3.3 billion from 525,900 businesses, 67% of all businesses.

Taken together, the financial and voluntary labour contributions of Australians to the sector – Lyons estimates that approximately 65 per cent of Australians belong to at least one nonprofit organisation and about 40 per cent describe themselves as active members – provide clear indications that the nonprofit sector impacts on Australians in every walk of life.

APPENDIX 2

OVERVIEW OF THE FIA CODES PROJECT: PRINCIPLES AND STANDARDS OF FUNDRAISING PRACTICE

INTRODUCTION

Ethical practice has been a topic for public discussion and corporate interest with regard to fundraising and in particular during the recent unprecedented efforts with the tsunami appeals. Fundraising Institute Australia Ltd (FIA) has embarked on an advocacy program to government and the corporate sector to promote the importance of community confidence in fundraising through self-regulation of industry practice through codes of practice.

FIA's priority is to ensure professional conduct and competence in fundraising and to promote ethical fundraising through the development of standards of practice that are mandatory for members of FIA. FIA is benefiting from its work in the international context with the 24-member summit developing an international code of ethics and from its membership of the Codes Committee of the Australian Council for International Development (ACFID).

In January 2005 FIA commenced a further avenue of professional advocacy through briefings to state and federal governments on issues relating to fundraising regulation which is hampered by legislative inconsistencies that challenge efforts to fundraise nationally. FIA is pushing for greater clarity and consistency in regulation across Australia and seeking to encourage national harmonization of fundraising regulation. Political awareness of fundraising and the importance of public confidence in the sector has been heightened by the phenomenal responses to the recent tsunami appeals.

FIA has a code of professional practice and ethics to which individual and organisational members agree to adhere. However, FIA's standards in fundraising are no longer adequate for the contemporary environment in which fundraisers work, providing neither clear guidelines for fundraisers nor adequate protection for donors. FIA regards the development of standards as the most important task for the fundraising profession over the next two years.

PROJECT DESCRIPTION

This project is to develop comprehensive standards of fundraising practice to

- provide the Australian community with assurance of accountability for their gifts
- support the rights of donors who make gifts
- establish a code of conduct for fundraisers
- guide fundraisers in ethical and professional practice
- enhance self-regulation of the fundraising industry

CODES OF FUNDRAISING PRACTICE TASK FORCE

Development of the Codes of Fundraising Practice will lie with FIA's Codes of Fundraising Practice Task Force. FIA's Board of Directors appoint members of the Task Force to reflect the broad interests of the fundraising profession.

For more information on the Task Force please see [The Terms of Reference of Fundraising Institute – Australia's Codes of Fundraising Practice Task Force](#).

ELEMENTS OF THE CODES OF FUNDRAISING PRACTICE

Principles:

- Code of Ethics
- Code of Professional Conduct
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- The Enforcement Process

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- Code of Workplace Giving Partnerships
- Code of Charity Challenge Events
- Code of Fundraising from Grant Making Trusts and Foundations
- Code of Fundraising in Schools
- Code of e-Fundraising
- Code of Reciprocal Mailings
- Code of Direct Mail
- Code of Direct Marketing

If you wish to provide feedback on an existing Code or would like to suggest a new Code please see "[Fundraising Institute - Australia's Codes of Fundraising Practice: Feedback and Suggestions](#)"

The Codes of Practice Task Force will provide direct advice on development of Codes 'Principles'. Specific Working Parties appointed by the Task Force will provide advice various Codes 'Standards'.

PROCESSES AND PROCEDURES

Each draft document will be subject to a full consultation process at the stage of its final draft. Consultation will include FIA's organisational members, representing fundraising charities and other non-profit organisations, state-based Chapter Executive Committees, chairs of special interest groups, government departments with responsibilities for fundraising legislation and regulation, appropriate peak bodies including the Not-for-profit Roundtable and other bodies with an interest in the field covered by a new Code of Fundraising Practice. Others may include public observers.

The Codes will be kept under review and periodically updated to keep pace with the changing fundraising environment. Both draft and endorsed Codes will be available on FIA's website.

The project is planned to commence early in 2006 and is expected to conclude in 2007.

To read more about processes and procedures see "[Procedures for developing Fundraising Institute – Australia's Codes of Fundraising Practice](#)" and "[Creating a Code of Fundraising Practice: Guidelines for a Working Party](#)".

For those interested in joining a Working Party please see the "[Membership of the Codes of Fundraising Practice Working Parties: Registering an Interest](#)".

COMPLIANCE

Compliance with the Codes will be mandatory for members of FIA. Failure of members of FIA to comply to the spirit or letter of a Code will leave themselves open to both concerns and complaints from regulators and members of the public as well reprimand or even expulsion from the Fundraising Institute – Australia. All complaints directed to FIA will be investigated in accordance with our disciplinary procedures through the Ethics Committee. Members of this committee will include FIA's organisational members, regulators and consumers (donors). Fundraising organisations will be encouraged to establish internal committees to address complaints in the first instance.

RESOURCES

This project was assisted in 2006 by the Helen Macpherson Smith Trust.

APPENDIX 3

International Statement of Ethical Principles in Fundraising

PREFACE

Fundraisers work in many varied fields, countries and circumstances, but they share several fundamental values and practices: they work to make the difference, help others and save what is valuable, in fact to make the world a better place. It is for these reasons that fundraisers strive to identify and employ best practices.

Over thirty countries⁸ have taken part in the development of this statement. The current draft encapsulates their common principles. It has no legal authority but its moral authority will be as strong as the number of organizations that support it.

It is the purpose of this Statement of Ethical Principles to foster the growth of a worldwide fundraising community dedicated to accountability, transparency and effectiveness. In this Statement we want to set forth what unites us in the way we practise our profession. Recognising that in many countries there already exist codes of conduct and standards of practice, the intent of this statement is to unify the global fundraising community behind a single universal declaration of fundamental principles. Organizations and individuals who endorse this Statement are not necessarily abandoning existing codes or standards, but are announcing their interest in a global understanding of these fundamental principles.

Applied in different cultural settings, this Statement can provide guidance for initiating best practices in newly developing markets. It also provides a clear alternative to local customs which may not represent best practices. Adherence to this Statement should also advance the common purpose of assuring public trust in the non-profit sector while discouraging personal gain at the expense of donors and stakeholders.

A form of words has been incorporated within the statement in paragraph 5 where use of the words "**will**" and "**must**" indicate what is a mandatory requirement and "**should**" what is regarded as best practice by all organizations endorsing the statement. The statement recognises that fundraisers operate subject to many different jurisdictions and that they must observe the law of the jurisdiction in which they work. However, it is expected that fundraisers adhering to the principles of the statement should adhere to the most rigorous interpretation of the law (and of the Code of Ethics of their own Membership Association) applicable to an activity, whichever jurisdiction that activity derives from.

FIVE UNIVERSAL PRINCIPLES

Five important principles for acting as a fundraiser:

- | | |
|-----------------|--|
| Honesty: | Fundraisers shall at all times act honestly and truthfully so that the public trust is protected and donors and beneficiaries are not misled. |
| Respect: | Fundraisers shall at all times act with respect for the dignity of their profession and their organisation and with respect for the dignity of donors and beneficiaries. |

⁸ Argentina, Australia, Belgium, Canada, Finland, France, Germany, Hungary, Hong Kong, Indonesia, Italy, Kenya, Republic of Korea, Netherlands, New Zealand, Poland, Singapore, South Africa, Spain, Sweden, Switzerland, Ukraine, United Kingdom, United States

Integrity:	Fundraisers will act openly and with regard to their responsibility for public trust. They shall disclose all actual or potential conflicts of interest and avoid any appearance of personal or professional misconduct.
Empathy:	Fundraisers will work in a way that promotes their purpose and encourage others to use the same professional standards and engagement. They shall value individual privacy, freedom of choice, and diversity in all forms.
Transparency:	Fundraisers stimulate clear reports about the work they do, the way donations are managed and disbursed, and costs and expenses, in an accurate and comprehensible manner.

STANDARDS OF PRACTICE

These standards are presented with the recognition that fundraisers operate subject to many different jurisdictions and that they must observe the law of the jurisdiction in which they work. However, it is expected that fundraisers adhering to these standards of practice will, first and foremost, adhere to the most rigorous interpretation of the law, and of the Code of Ethics of their own membership association, applicable to an activity, whichever jurisdiction that activity derives from.

1. Fundraisers responsibility regarding **donations**.

- Donations should be accepted if voluntary, in line with the goals of the organisation and will bring not more than reasonable costs related to the value of the donation.
- Funds will be disbursed in accordance with the donor's wishes, if expressed.
- Funds will not be raised for the personal financial gain of the fundraiser or the fundraising organisation the fundraiser works for.
- Funds will be collected carefully and with respect of donor's free choice, without the use of pressure, harassment, intimidation or coercion.

2. Relationship with **stakeholders**.

- Fundraisers are strictly answerable to all stakeholders including donors, beneficiaries, and employers.
- Fundraisers will respect donor rights by providing timely information about how contributions are used, respecting donor privacy, and honouring donor wishes.
- Fundraisers will respect beneficiary rights and preserve their dignity and self-respect. They will not use fundraising materials or techniques that undermine this dignity.
- Fundraisers work with suppliers or intermediary agents at the same standards as within their own organisation. They make reasonable efforts to assure that suppliers do not gain unreasonable profit while working with their own organisation.

3. Responsibility for **communications**, marketing and public information.

- Fundraisers will only use public information that is accurate, truthful and not misleading, and information that respects the dignity and self-respect of beneficiaries.
- Fundraisers will not express or suggest in public information that fundraising lacks administration and fundraising costs, thus giving the incorrect impression that fundraising activity is without costs. Fundraisers will object to their organization expressing or suggesting that fundraising activity is without costs.
- Fundraisers will provide truthful information about use of funds, without exaggeration or underestimation.
- They respect data protection rules and laws at all times.

- Fundraisers accept that all donor and prospect information developed by or on behalf of an organisation shall not be transferred or utilised except on behalf of that organisation.
- Donor wishes to be removed from request lists will be followed promptly and without obstacles for the donor.

4. Management **reporting**, finance and fundraising costs.

- Fundraisers assure that all fundraising transactions, accounting and reporting for which they are responsible are transparent and unambiguous. They are able to account anytime for their professional work.
- They will encourage their organisation to report within the national and international standards of accounting methods.
- They will submit accurate annual reports to all stakeholders within a reasonable time or encourage their organisation to do so.
- Fundraisers will be open and clear to all stakeholders about fundraising costs, fees and expenses and the way these are allocated.
- They will make any compensation arrangement transparent to an employer, donor, and beneficiary upon request.

5. **Payments** and compensation.

- Fundraisers provide their services either as a volunteer, or on a salaried basis or for pre-determined fees. Fundraisers should not accept commissions or compensation based upon a percentage of the funds raised.
- Fundraisers will not accept any gratuity when making decisions on behalf of the organisation.
- Fundraisers will not seek or accept any personal payments, in cash or in kind, from a supplier of goods or services in recompense for business placed with that supplier.
- Criteria that will qualify a fundraiser for performance-based remuneration must be agreed upon beforehand and should not be based on a percentage of the funds raised.

6. Compliance with **national** laws.

- Fundraisers will object if the organisation they work for does not comply with applicable local, state, provincial and national or international civil and criminal laws.
- Fundraisers will not engage in activities that conflict with national and international legal obligations to their organisation or to others. Moreover, they will avoid even the appearance of any criminal offence or professional misconduct.