



**FIA**

**Fundraising  
Institute  
Australia**

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The Professional Body for Australian Fundraising

# **Code Annual Report 2023**

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# About the FIA Code

**The FIA Code is a voluntary, self-regulatory code of conduct for charitable fundraising in Australia. The Code does not replace or override any law but aims to raise standards of ethical conduct across the charitable fundraising sector by going beyond the requirements of government regulation.**

Its content is informed by the International Statement of Ethical Principles in Fundraising. The Code applies to all FIA members and adherence to it is a requirement of membership.

The Code, in its current form, was launched in 2017 following a year-long, comprehensive review into sector sustainability by an FIA-led taskforce. The review resulted in significant reforms to protect people in vulnerable circumstances, reduce the risk of over-communicating with donors and improve governance and supply chain accountability, among other changes. Training in Code compliance by all fundraisers became mandatory in 2018 for FIA members. Monitoring of compliance is conducted through complaints handling and mystery shopping. An independent Code Authority oversees all aspects of Code administration.

## ABOUT THE CODE AUTHORITY

The Code Authority takes an active role in overseeing the fundraising activities of FIA members. It aims for swift and fair resolution of Code complaints and appeals while also fostering awareness of the Code through training initiatives. Additionally, it provides suggestions to the FIA Board for enhancing self-regulation within the sector.

The Authority is independently chaired by former NSW Liberal leader Peter Debnam; members in 2023 are Ashley Rose FFIA, CEO of Mondial Fundraising Communications, Karen Shields, Director-Individual Giving, Great Barrier Reef Foundation, Nerida Wallace MFIA, Principal of Transformation Management Services, Shanthini Naidoo FFIA CFRE, CEO at St Vincent's Curran Foundation and Allan Godfrey FFIA, Chief Marketing Officer at Royal Life Saving Society WA. Members of the Code Authority are appointed by the FIA Board of Directors for their stature in the fundraising community as well as their ability to adjudicate independently in the interest of upholding the values embodied in the Code.

The Code Authority has a variety of options available in cases where a member has been found in breach, ranging from requiring the member to undertake Code training, make an apology, or conduct other remedial action to ensure the breach does not happen again. In cases of repeated non-compliance, the Authority can recommend to the FIA Board that the member be suspended or expelled from the membership.

The Code Authority members have worked together, in a highly collegiate and reflective manner, to enable FIA to understand the issues within fundraising that need to be addressed. The Code Authority has taken to heart the public's concern about certain aspects of fundraising practice, and collaborated with FIA to develop training, education and resources to assist members and advance its cause for self-regulation to government.

# A MESSAGE FROM THE CHAIR

## PETER DEBNAM

As the Chair of the FIA Code Authority tasked with overseeing the implementation of FIA's self-regulatory code, I strongly believe the activities of the Code Authority have been integral in ensuring trust and confidence in the charitable fundraising sector is sustained. Operating in a collaborative and considered manner, the Code Authority has worked together to manage the prevailing issues arising from the fundraising practices and conduct of FIA members.

I am pleased to state that, in 2023, the majority of fundraising interactions we monitored adhered to the high standards outlined in the FIA Code. Instances of non-compliance were infrequent, and in most such cases, they were predominantly attributed to inadequate administrative capacity of member organisations.

In 2023, we further demonstrated the instrumental role we play in shaping and elevating fundraising standards with our mystery shopping, audit program, and the development of training, guidance and resources for members.

As we look to the years ahead, we remain committed to ensuring that all FIA members adhere to high standards of fundraising practices, aligning with our goal to uphold the integrity of the charitable fundraising sector.

## COMPLAINTS HANDLING

As part of its role in administering the Code, the Code Authority reviews complaints to FIA on fundraising issues related to its members. A complaints form is available at [fia.org.au](http://fia.org.au) for members of the public to lodge a complaint about a fundraising organisation. The FIA Code Authority adjudicates on the complaint and provides advice and guidance on handling the complaint to the satisfaction of the complainant. Complaints provide valuable information to the Code Authority and to FIA with regard to areas or issues for improvement.

A total of 20 complaints against FIA members were recorded and resolved in 2023. This compares to 12 in the previous year. There were also four complaints recorded against non-FIA members in 2023, all of which were resolved.

## CODE COMPLIANCE MONITORING

The Code Authority commissions third-party monitoring of member compliance. Techniques include mystery shopping in which monitors pose as donors. Monitoring focusses on areas of the Code that the Authority believes are most relevant to ensuring the fundraising profession maintains a high standard and a good public reputation.

In 2023, compliance with the FIA Code was robust, with most fundraising interactions achieving compliance with the Code. Out of 4,856 interactions monitored, only 29 issues were identified, resulting in an impressively low non-compliance rate of 0.5%. Instances of non-compliance were primarily attributed to administrative challenges, particularly in effectively implementing opt-out requests. This issue extended across the range of FIA members from organisational members with large programs to those with smaller programs. This trend underscores a sector-wide challenge related to administrative capacity and the level of sophistication needed to properly manage donor opt-out requests. It is also important to consider this in the broader context of charities facing pressure to delete data as a preventive measure against data security threats. However, there is a delicate balance required in navigating data deletion, as it introduces the risk of unintentionally

erasing data related to opt-out requests. The sector faces challenges in meeting these dual requirements and aligning with the expectations of regulators and the public.

Importantly however, the FIA Code Authority's feedback to member organisations on their mystery shopping performance significantly advanced best practice and higher standards of conduct in charitable fundraising. Across all mystery shopping areas, the FIA Code Authority provided feedback to member organisations that were included in every mystery shopping round. This feedback took various forms including:

- i) Seeking clarification from member organisations on fundraising practices inconsistent with the FIA code.
- ii) Requesting member organisations to explain reasons for fundraising conduct inconsistent with the FIA code.
- iii) Requesting member organisations to outline actions they are implementing to rectify non-compliant fundraising conduct.
- iv) Specifying actions for member organisations to implement for robust FIA Code compliance.
- v) Cautioning members of their inclusion in further mystery shopping to observe those improvements.
- vi) Commending and approving conduct that is FIA code compliant.

In every instance, member organisations responded by articulating the measures they are undertaking to rectify the conduct or practice. These measures usually encompass further staff training, enhancements to systems, improved management of relationships with third-party suppliers, reiterating their need for greater awareness of responsibilities under the FIA Code, and other actions aligned with achieving effective Code compliance and ethical fundraising.

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**Total number of members included in mystery shopping this year, and since 2019**

<b>110</b>	<b>798</b>	<b>398</b>
<b>New members added to monitoring in 2023</b>	<b>All members included since 2019</b>	<b>Members currently actively monitored</b>

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**Number of interactions this year, and since 2019**

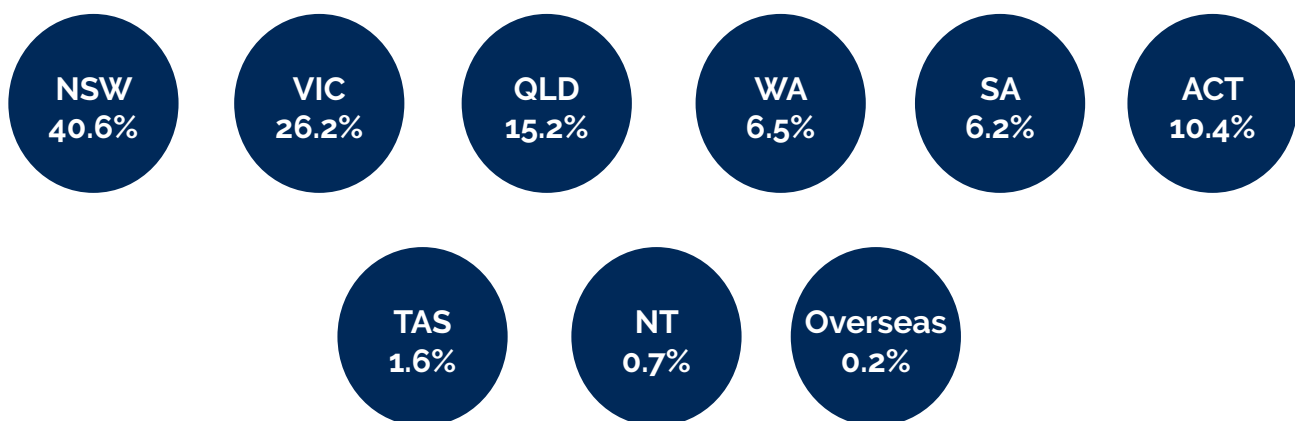
<b>5,901</b>	<b>17,517</b>
<b>2023 interactions</b>	<b>Interactions since 2019</b>

# MONITORING

## Contact type: 2019 - 2023



## Member organisations monitored by State: 2019 - 2023



Code Clause	Total	2019	2020	2021	2022	2023
2.1	2	1	1	0	0	0
3.3	1	0	1	0	0	0
4.1a	7	1	0	0	2	4
4.1b	31	4	5	6	1	15
4.3c	4	2	2	0	0	0
4.7a	65	15	8	22	16	4
4.11a	3	2	0	0	1	0
4.11b	3	0	0	0	3	0
SMS 3.1, 3.2	5	0	0	0	1	4
Phone 4.1a	1	0	0	0	0	1
Phone 3.1f	1	0	1	0	0	0
Phone 4.1j	1	0	0	0	0	1
Total Code breaches found	124	25	18	28	24	29

## AREAS OF MONITORING IN 2023

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### Ongoing monitoring

Social Media  
fundraising

Email  
fundraising

SMS  
fundraising

Direct mail  
fundraising

Telephone  
fundraising

Lottery  
fundraising

Newsletters

Donor surveys

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### Specific monitoring to date

Opt out  
requests

Vulnerable donor  
communications

Natural disaster  
appeal fundraising

Matched giving  
appeals

Virtual gift  
appeals

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## KEY AREAS OF IMPROVEMENT IN 2023

- SMS fundraising compliance – adding “STOP” element to messages has improved
- Reduction in claims of “100% goes to the cause” in fundraising appeals
- Reduction in issues with failing to disclose sources of data from swaps and co-ops
- Reduction in number of telephone fundraising issues relating to over-persistent callers / too many asks in calls
- Inclusion of privacy statements in nearly all fundraising communications (although note below regarding surveys)

## KEY AREAS FOR CONTINUED MONITORING IN 2024

- Better implementation of opt-out and donation cancellation requests, not due to intentional disregard, but requests largely due to database hygiene and administrative issues in recording and managing requests
- Improved recognition and handling of donors in vulnerable circumstances
- Greater transparency in matched donations promotions
- Donor surveys - including privacy statements around the capture and use of personal information in donor surveys

## CODE TRAINING

By the end of 2023 9,000 people had registered for and/or taken the FIA Code Training. The FIA Code Course provides fundraisers with an understanding and awareness of each section of the Code assisting them to meet their FIA membership obligations. The course provides a solid understanding of how to conduct fundraising within an ethical framework and promote a culture of responsible fundraising practice. Any member who has the term ‘fundraiser’ in their job description or who is

involved in fundraising on behalf of a charity or non-profit organisation is obligated to undertake the training. This applies to individuals at all levels of an organisation, and suppliers who engage in fundraising activities on behalf of FIA members. Undertaking the FIA Code Course is mandatory for all FIA members, the Code Authority continually urges all FIA members to complete the course to minimise the risk of breaching the Code.

## CODE AUTHORITY MEETINGS IN 2023

Throughout 2023, the Code Authority convened on seven occasions, which included three extraordinary meetings. Quarterly meetings featured a report from the Code Monitor and updates from the FIA CEO, Policy Advisor and Code Administrator. The regular meeting agenda also included discussions on FIA Code training, communications, and initiatives to enhance awareness of the FIA Code.

Following each meeting, a 'Code Update' was routinely sent to FIA members, summarising compliance outcomes and other pertinent matters. The Code Authority also handled a diverse range of complaints lodged by both the public and individuals, irrespective of their FIA membership status (further details on the following page). In response to the monitoring reports, the Code Authority offered guidance to FIA regarding connecting with members based on their mystery shopping findings.

As part of its oversight of the FIA Code, the Code Authority also presided over the introduction of two new practice notes and redeveloped guidance on percentage-based remuneration for FIA Members.

As part of the purpose to establish and promote high standards of fundraising ethics and practices, the Code Authority presided over the introduction of a new matched giving practice note. The Matched Giving Practice Note was developed to provide guidance for FIA Members in applying best practice and maintaining transparency when conducting matched giving fundraising campaigns. The Practice Note was endorsed by the Code Authority in December 2023.

## CODE AUTHORITY MEMBERS, APPOINTMENTS AND TERMS

Members of the Code Authority are appointed for a two-year term, with a maximum of two terms or four years. At the end of 2023, Ashley Rose FFIA had completed his term with thanks from the Code Authority and FIA for his service. Two Code Authority members were reappointed for a second term, Shanthini Naidoo FFIA CFRE and Nerida Wallace MFIA.

Position	Name	Appointed	Status	Term Number	Term Completes on
Chair	Peter Debnam	1 Feb 21	Current	2	Feb 25
Board appointed Member	Ashley Rose FFIA	30 Nov 19	Current	2	Nov 23
Board appointed Member	Karen Shields	17 June 20	Current	2	June 24
Board appointed Member	Nerida Wallace MFIA	1 Jan 22	Current	2	Feb 26
Board Representative	Shanthini Naidoo FFIA CFRE	1 July 21	Current	2	July 25
Board Representative	Allan Godfrey FFIA	25 May 23	Current	1	July 25



The logo for the Fundraising Institute Australia (FIA) consists of the letters 'FIA' in a white, serif font, set against a dark blue rectangular background with a thin orange vertical stripe on the right side.

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The Professional Body for Australian Fundraising

FIA would like to thank and acknowledge  
the support of our national partners:



**Prepared by Fundraising Institute Australia**

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