

## Gift Acceptance Policy

### Purpose of Policy:

Alpine Valley Community Leadership (AVCL) 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 will ensure that gifts accepted by AVCL do not compromise or interfere with broader 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.

### Scope:

This policy applies to AVCL Fund Ltd and AVCL Ltd

This policy applies to the following people:

- AVCL staff members, particularly those engaged in resource mobilisation and fundraising;
- AVCL donors and prospective donors;
- Existing or prospective suppliers,
- AVCL Board of Directors; and
- Partner organisations.

## Definitions:

In accordance with Australian Tax Office (ATO) guidelines, AVCL 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, AVCL will also consider a gift-in-kind of services or pro-bono support to be a gift.

## 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 AVCL should more information be learned about its source post-receipt.

## Principles:

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

- AVCL will not accept a gift from any organisation or individual identified by the Department of Foreign Affairs and Trade (DFAT) as being subject to sanctions, including on the basis of their country of operation;
- AVCL will not accept a gift if it is made with the proceeds of crime
- AVCL will not accept a gift from organisations operating in a specific industry or manner in conflict with AVCL values.
- AVCL 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
- AVCL will not accept a gift when to do so would compromise the interests or objectives of AVCL; and
- AVCL will not accept a gift where the activities of the donor are incompatible with the objectives of AVCL; and
- AVCL will not accept a gift where the role of AVCL would be limited to serve solely as a donor driven funding conduit to non- AVCL project partners and/or where the objectives of the non- AVCL partners do not align with AVCL strategic and project objectives; and
- AVCL will not accept a gift where the cost of accepting the gift would be greater than the value of the gift itself; and
- AVCL will not accept a gift where there is reason to believe that accepting the gift will damage the reputation and brand of AVCL; and
- AVCL will not accept a gift where there is reason to believe that accepting the gift may result in litigation; and

- AVCL 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 AVCL 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 AVCL as this is a gift from the business itself.

## Gifts from Existing or Prospective Suppliers

AVCL recognise the value to the community through receiving gifts from a diversity of sources. To this end, existing or prospective suppliers of goods and/or services to AVCL are not excluded from providing a gift to AVCL, or entering into a sponsorship arrangement with AVCL, with additional provisions set out below.

- AVCL strongly values transparency, accountability, integrity and will work to ensure there is no real or perceived unfair advantage gained by a supplier offering, or entering into, a sponsorship arrangement or providing a gift.
- To this end, where a gift or sponsorship request involves a prospective or existing AVCL supplier, the nature of the relationship will be recorded in the central register, and the request will be assessed in line with the process set out in the relevant policies (sponsorship policy and gift policy) to determine if it meets the defined criterion. Any decision about the acceptance of the gift or sponsorship shall be free of bias, and without any intent to obtain or provide unfair advantage through other procurement processes.
- Decision making responsibilities and thresholds are set out in AVCL's delegations procedure and policy, including the award of goods and services. Decision making for contracts for new services are delegated to the Board; the Board will ensure appropriate measures are taken in considering the award of any contracts, with any sponsorship or gift arrangement precluded from influencing the decision-making process.

## Gift Acceptance Procedures:

If AVCL 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 AVCL, it will be returned to the donor promptly. AVCL will bear the cost of returning the donation.

A donor has the right to know why their gift is being refused and AVCL 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 AVCL's Complaints Management Policy.

AVCL will keep a register of gifts, accepted and declined. The register will include the date, gift amount, name of donor and if declined, the reason for this.

### Monitoring and Review of Policy and Procedure:

The Executive Officer is accountable to the AVCL Board for managing and maintaining this policy. The Executive Officer is accountable for ensuring all AVCL staff understand and adhere to this policy in their day-to-day work. Where compliance issues surface, the Executive Officer will work with staff to address these issues promptly. Any updates/revisions to the policy must be endorsed by the Board.

### Changes to This Policy:

Nature of Changes	Date of Board Approval
Updated to include existing or prospective suppliers section	28 May 2024