# 2.21 POLICY ON TRANSPARENCY

# Policy Context

Bright Futures is committed to being open and transparent with its stakeholders at all levels in its operations and its use and stewardship of funds and resources. We acknowledge the importance of being accountable to funders, donors, supporters, regulating authorities (eg ACNC, ASIC), partners and the general public.

This Policy commits Bright Futures to the disclosure of relevant information in a timely, accurate and accessible manner and expresses both our openness and desire to receive and respond to requests for information from all stakeholders. (Refer also Bright Futures Policy on Complaints)

This policy outlines our approach to:

- Management and stewardship of funds and resources and our commitment to clear and understandable financial reports
- Management and stewardship of information.

## **Application**

The policy applies to Board members, staff, contractors and volunteers of Bright Futures.

#### **Definitions**

Bright Futures defines 'transparency' as organisational behaviours and practices that make accessible and visible the activities, operations, policies and finances of the organisation, coupled with clear and accessible reports and readily available means for feedback, complaints and reporting of concerns.

### Governance and Regulatory Responsibilities

Bright Futures is governed by a voluntary Board of suitably qualified Directors with management responsibility for operations delegated to the Executive Officer. The identity and qualifications of Directors are published on the Bright Futures website.

As a charity registered with the Australian Charity and Not-for-profit Commission (ACNC), Bright Futures meets its reporting obligations through the provision of Annual Reports, Annual Information Statements and Audited Financial Reports which are published on the ACNC portal.

As a member of the Australian Council for International Development (ACFID) Bright Futures engages in an annual Code of Conduct self-assessment process. Key Bright Futures policies are available on the Bright Futures website.

At each meeting of the Board, the Executive Officer will provide a Governance Report identifying any issue requiring disclosure in order to enable the Board to effectively fulfil is governance and strategic planning responsibilities (Refer Attachment A – Governance Report Template.)

## Membership and Member Information

Individual membership of Bright Futures is open to any person subject to the provisions outlined in the Bright Futures Constitution. As required by company law, Bright Futures will maintain a register of members but will only maintain such information as is necessary to fulfil legal requirements.

Where a member is a Director on the Board of Bright Futures, additional information to enable a biographical statement to be published on the Bright Futures website or to be used in reports, proposals or applications will be held, subject to the Director approving content related to them.

#### Sources of Income

Bright Futures receives funds from the following sources:

- Donations from the individuals, community groups and charitable foundations are the main source of income (90%+);
- Income from sales and events;
- Special circumstance Government grants (eg Covid-19).

# Transparency in Fundraising

Bright Futures demonstrates transparency with donors and supporters through clear processes and clear communication in the acceptance and managing of donations. Donors are provided with opportunities to identify the project areas to which they desire to have their gifts assigned.

Bright Futures promotes transparency and accuracy in the reporting donations and commits to compliance with all relevant legislation including the ACNC and the ACFID Code of Conduct and Fundraising Charter. Additionally, Bright Futures reports to its Board annually against the ACFID fundraising charter.

Bright Futures has established a framework for considering whether or not a donation, over which there is a concern, will be accepted where there are ethical or reputational concerns (*Policy on Acceptance and Refusal of Donations*).

Bright Futures does not engage with third parties in generating donation income (eg contract fundraisers). The Executive Officer is responsible for ensuring that Bright Futures fundraising events are in ethical alignment with Bright Futures vision and mission.

### Donor Information

Bright Futures is committed to ensuring that donor requests, allocation to purpose or anonymity, are observed (*Refer also Policy on Privacy*). Bright Futures will:

- Maintain a data base of supporters and donors and where requested will not send supporters or donors promotional or fundraising material
- Ensure donor records are not made available to any other person or organisation except where there is a legal requirement to do so
- Ensure that within Bright Futures donor information is only be made available to persons
  whose duties relate to donor management, recording or engagement or to the Board where
  there is a specific need to do so
- Donors may request at any time information about them held by Bright Futures
- As a matter of practice and policy, Bright Futures will not maintain any information on donors that is not directly related to the recording of their contact details, donation record and contact preferences.

# Participant Information

- Bright Futures will only maintain information on participants delivered by our program
  partners excepted where the information is related to communications and fundraising and
  the information has been provided with the informed consent of the individual or a person
  with authority to provide consent
- Individual participant/recipient records will not be held by Bright Futures but by the partner group except where the records form part of an evaluation and the personal details are held with consent
- No individual participant/recipient records will be made available to any person outside the organisation
- Within Bright Futures, individual participant/recipient records will only be made available to management or staff with a relevant program responsibility or the Board, or its representative, when the Board considers the action necessary.

Staff Records - Paid & Voluntary Staff

Bright Futures will only retain such information in staff records as is necessary to:

- Fulfil legal employment requirements (eg employment contracts)
- Ensure a proper record of service, hours work, pay and leave taken
- Record matters related to performance, review and training.

Access to staff records will only be available to management and staff whose duties require access to the information held in order to fulfil their work responsibilities, and to the Board or its representative, when the Board considers the action necessary.

# Requests for Information

Requests for information can be made through any of the following avenues:

- Through the Bright Futures office P: 08 7225 7175 E: office@brightfutures.com.au
- Bright Futures Executive Officer Paul Madden P: 0411 740 549
   E: paul.madden@brightfutures.com.au
- Bright Futures Chairperson Sarah Spiker M: 0423 027 912

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