

# **Transparency Policy**

Responsible Officer	National Director		
Contact Officer	Head of Governance and Operations		
Superseded Documents	A4U Transparency Policy V1.0		
Review	Three years		
Associated Documents	A4U Business Operational Policy Handbook, A4U Complaints Policy		
Policy Status	This policy may be amended or revoked by A4U at any time and at its discretion		
Version	Authorisation	Approval Date	Effective Date
1.0	Board	27/02/2020	March 2020

### Introduction

Australia for UNHCR is committed to being transparent in our work, accountable to our stakeholders and places a high value on feedback and continuous improvement. We will share information with partner organisations and the general public.

The information we publish and make available is a key part of our accountability. We will proactively publish information, and on request will disclose information, or will provide reasons where information cannot be disclosed.

This Policy is subject to National Privacy Policy, Intellectual Property, Copyright Information and information that is exempt under other laws, policies and regulations.

## **Availability of Information**

Australia for UNHCR aligns itself to the transparency and complaints handling expectations of the Australian Charities and Not-for-Profits Commission (ACNC), of the Australian Council for International Development (ACFID) and the Fundraising Institute of Australia (FIA).

On the Australia for UNHCR website we openly share:

- Our mission, values and strategy
- An Annual Report;
- With You magazine;
- Audited Annual Financial Statements, which meet and seek to exceed the requirements of ACFID, the ACNC and all applicable accounting standards;
- the Constitution and Board composition;
- key governance policies (privacy, complaints, child protection, transparency, conflict of interest, non-development);
- Historic annual and financial reporting is available on the website covering at least the prior 10 years.

Other information is also shared via email, social media, direct mail and presentations.

Information can also be requested by contacting Australia for UNHCR. Most requests can be dealt with by directing enquirers to existing publically available information. Some information is subject to disclosure restrictions. The reason will be given if we cannot disclose information.

Australia for UNHCR will only consider bona fide requests for information; being requests which are not frivolous, excessive or abusive. If a request requires significant resource allocation in order to respond, Australia for UNHCR will consider its stewardship stance; including the interests of primary stakeholders, partner organisations, donors and supporters.

Reasons for not disclosing information include:

**Privacy**: Information private to individuals concerned, as outlined in the A4U Privacy policy and National Privacy legislation.

**Confidential Information**: Information because of a legal, commercial or contractual reason, or issues under negotiation.

Intellectual Property and Copyright Information: In some cases we do not have the right to disclose

information because it is someone else's copyright or provided to us under obligation of confidentiality.

**Security**: We will not disclose information where we consider it could jeopardize our ability to operate or the safety of our staff and that of our partners.

**Harm to Operations**: We will not disclose information that could compromise or harm our work.

**Other**: Information concerned entirely with internal administration or operating systems. Internal working papers that address future plans or drafts of work

## **Approval Procedures**

All material that is communicated externally is approved by at least one of the National Director, Deputy National Director, Strategic Development Director or Head of Communications & Public Affairs. This includes all fundraising and communications materials including TV, online (including social media), all face to face materials, printed materials, press releases, event content, scripts, recruitment advertising etc.

Clear internal guidelines exist with regards to the development of materials which need to be adhered to, including a briefing and approval process. Australia for UNHCR will ensure that all communications are accurate, respectful and also protect privacy, confidentiality, copyright, staff security and organisational integrity.

#### **Feedback Valued**

Australia for UNHCR places a high value on receiving feedback and commits to listening, responding to and reviewing any comments or complaints from any stakeholder or other member of the public.

On the Australia for UNHCR website, clear and easily understandable information is given about how people can give feedback or make complaint. Confidentiality is maintained throughout all contact regarding the feedback or complaint, except as required in order to respond quickly and fairly. When Australia for UNHCR reviews and analyses complaint information generally within the organisation, in order to maximise learning and improvement, identifying personal information is removed to the fullest extent possible.

Australia for UNHCR consistently makes clear the option, and mechanism, to refer a complaint to the Australian Council for International Development (ACFID), including for concerns relating to Australia for UNHCR's compliance with the ACFID Code of Conduct.

These mechanisms, and the standard that supports this Policy, apply to feedback or complaints generated external to the organisation. Internal concerns and processes are covered by other policies within Australia for UNHCR.

#### **Policy Monitoring**

Any breach of strategic significance or any material risk associated with this policy will be reported to the Board in a timely manner.

This policy has been drafted using guidance provided by ACFID and will be reviewed every three years.