# Statement of interpretation of the ACFID Code of Conduct

The Code of Conduct Committee (CCC) has identified a perceived ambiguity in the architecture of the Code which relates to how members demonstrate their compliance with the Code. Specifically, whether it is sufficient for members to simply have all the verifiers outlined in the Quality Assurance Framework to be deemed compliant with the Code, or whether there is an expectation that the verifiers are implemented and subject to regular review.

It has been the view of the Committee and the practice of members to see implementation as a necessary part of compliance, beyond mere documentation. However, although the expectation of implementation is stated in the Code itself, it is not stated in the Quality Assurance Framework.

To address this ambiguity, and in keeping with their role to interpret the Code, the Committee has drafted the following short statement of interpretation. This was approved by the Code of Conduct Committee and the ACFID Board on 15 September 2021 for inclusion in the Quality Assurance Framework.

**STATEMENT OF INTERPRETATION – 15 SEPTEMBER 2021**

1. The ACFID Code of Conduct states that 'To be compliant with the Code, ACFID's members will have the required policies, processes, guidelines and documentation in place appropriate to the size and nature of the organisation and its work.

2. The Quality Assurance Framework states that 'To demonstrate compliance, members should have all of the Verifiers in place, commensurate with their size and the nature of their work'.

3. Members should note that the ACFID Code of Conduct goes on to state that members 'will also ensure that their policies, processes and guidelines are implemented and subject to regular review'.

4. The ACFID Code of Conduct Committee, in accordance with its obligation to contribute to strategies for enhancing member compliance with the Code of Conduct and good practice:

    a. draws members' attention to their obligation to ensure that their policies, processes and guidelines are implemented and subject to regular review

    b. advises members that

        i. 'implementation' includes processes of communicating the policy and providing training to governing body members, staff, and volunteers as is appropriate, and applying the policy to the members' systems, procedures and programs accordingly.

        ii. 'regular review' includes monitoring, reviewing, evaluating, and amending as is necessary

    c. advises members that, to demonstrate their compliance with the Code under the Quality Assurance Framework, verification of policies, processes and guidelines includes verification that those policies, processes and guidelines are implemented and subject to regular review