

# Background and rationale: amendments to the ACFID Code of Conduct and Quality Assurance Framework

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## Introduction

This document summarises the amendments to the Code of Conduct and Quality Assurance Framework that have been made following consultation with ACFID members and other key stakeholders from August 2022 – June 2023. It also outlines the rationale for these changes and is provided to members to assist in understanding, communicating and ultimately deciding on the revised Code and the new Quality Assurance Framework.

The document is structured around the key thematic areas for change that emerged throughout the review. It should be read alongside the amended Code of Conduct (Document B) and the Quality Assurance Framework (Document C).

## Review Process

The ACFID Code of Conduct is periodically reviewed to ensure it continues to reflect good practice and the needs of ACFID and its members. It was first developed in 1997 and comprehensively revised and expanded in 2010 and 2016. The purpose of the [2022-23 review](#) was to make sure the Code and associated Quality Assurance Framework remains relevant, coherent, useful and credible to members and external stakeholders. This has been done through an extensive consultative process involving ACFID decision-making bodies, Communities of Practice, ACFID members and external stakeholders including DFAT and the ACNC. This process commenced in July 2022 and will finish in October 2023 when the revised Code is considered by members for ratification at the ACFID Annual General Meeting.

In August 2022, ACFID released a Discussion Paper outlining key questions to guide the first phase of consultations with ACFID members and stakeholders. Responses were invited from ACFID members, staff, board members, volunteers, partners, DFAT and other interested stakeholders, through an online survey tool and online workshops. The outcomes from these consultations informed the development of seven key recommendations which guided the next stage of drafting changes to the ACFID Code and Quality Assurance Framework. These were shared with ACFID members in December 2022.

From January to May 2023 ACFID facilitated an iterative consultation approach to the drafting of proposed amendments, using the feedback gathered at each stage to inform further amendments. Two rounds of online and face-to-face workshops were held in March and May 2023, with over half the ACFID membership represented. The expertise of relevant Communities of Practice and key ACFID Committees was instrumental in drafting and refining the amendments. External consultants were engaged to provide advice on updates to the financial elements in the Code and opportunities to improve alignment with other standards and legislation.

Throughout the review, expert guidance was provided by a Project Reference Group which included representatives from the ACFID Board, CCC, DPC, Pacific Islands Association of NGOs (PIANGO), DFAT, ACNC and an independent academic advisor.

Feedback received during the several rounds of consultations informed the development of a Penultimate Decision Draft which was considered by the CCC and ACFID Board before being finalised as this Decision Draft. The Decision Draft is being circulated to all ACFID members 60 days prior to the consideration of its formal adoption at the ACFID Annual General Meeting to be held in Sydney on 18 October 2023.

## Objectives and Guiding Principles

The purpose of the Review was to ensure the ACFID Code of Conduct and associated Quality Assurance Framework remains relevant, coherent, useful and credible both to Code signatories and external stakeholders.

To achieve this, the Terms of Reference for the Code review set out the objective to review and revise, if required, the Quality Principles and Commitments in the ACFID Code of Conduct and the Compliance Indicators and Verifiers in the Quality Assurance Framework, with the aim of:

- ensuring the Code remains relevant in light of the changing roles and practices of NGOs
- aligning the Code with changes in international self-regulation and domestic policies, legislation, standards, other regulatory norms and community expectations
- removing redundancy and overlap within the Code itself and clarifying requirements where there is ambiguity or lack of specificity
- addressing specific gaps in the Code which have emerged over the last five years
- updating guidance and resources in line with the above
- ensuring compliance is manageable for members and ACFID

The Terms of Reference for the Review set out several guiding principles:

- Changes to the Code of Conduct or Quality Assurance Framework will be undertaken on the grounds of necessity not convenience, keeping in mind the impact of changes on member's compliance requirements;
- The overall architecture and structure of the Code and Quality Assurance Framework shall be maintained; and
- The triennial compliance assessment and reporting cycle shall be maintained.

## 1. Alignment with other standards and regulations

### Rationale

The Code is both informed by and informs other global and national standards and regulations relevant to Australian development and humanitarian organisations. Where relevant and possible, the Code seeks to align with other standards to reduce inconsistencies for members. Since 2017, ACFID has conducted detailed mapping of the Code requirements in relation to the ACNC Governance Standards, ACNC External Conduct Standards and DFAT Accreditation Criteria.

Through all consultation mechanisms, member feedback focused significantly on this area for change. Members currently experience the intersection between legal and regulatory compliance, voluntary self-regulation, due diligence and contractual obligations, and other good practice standards to be complex and administratively burdensome.

The main external standard members wanted to see greater alignment with was DFAT Accreditation. Many noted that the Code and Accreditation are frequently very similar, yet not similar enough (noting the previous work on mapping the alignment). However, members also noted that the ACFID Code and DFAT Accreditation serve distinct purposes. More than half of ACFID members are not DFAT Accredited, and should not need to be bound by additional DFAT-specific requirements where these significantly change what is already required in the Code. For this reason, amendments which seek to bring the Code and DFAT requirements into greater alignment have been made with the following principles in mind:

- Alignment should be considered where the regulation is well-established, and the Code already substantially meets or aligns with the regulation.
- Amendments to the Code should be considered where increased alignment to DFAT requirements may reduce overall compliance burden:
  - i. Where DFAT may increase its recognition of ACFID Code status, seek to align with DFAT Accreditation requirements;
  - ii. In areas such where DFAT is unlikely to increase its recognition of ACFID Code status, only increase alignment of the Code where not creating additional or expanded burden on members.

The next most frequently referenced requirements were the ACNC Governance Standards, External Conduct Standards, and reporting requirements for the ACNC. The opportunity exists to increase the Code's alignment with ACNC Standards, without adding any additional burden on members given that all members are already obliged to meet ACNC requirements. The aim is not to duplicate the ACNC standards in the Code, but to reduce the risk of contradiction with the ACNC, and reduce the need for members to cross-reference between the Code and the Standards in pursuing quality and compliance. While with different purposes and organised around different structures, there is significant alignment of intent between the ACFID Code and both sets of ACNC Standards.

Since the Code was last reviewed, legally mandated requirements for whistleblower policies, and whistleblower protections have been introduced. At a minimum, these apply to charities structured as public companies limited by guarantee with annual consolidated revenue of \$1 million. While the Code had already previously adopted a standard higher than that required by law, legislation now has more specific, legally mandated requirements for many members. The existing whistleblowing

policy requirements have been updated at Compliance Indicator 9.2.2 to provide greater clarity for members and to ensure the Code requirements remain aligned with current legislation.

A range of other legal and regulatory standards that apply to all members were also reviewed, as well as other voluntary codes, standards or guidance. Minor amendments have been made to improve alignment with the Core Humanitarian Standard and Australian Accounting Standards.

## Summary of amendments

### DFAT

Location of amendment(s)	Amendment(s)	Type of change
Commitment 1.4	<p><b>Child Safeguarding Policy (1.4.1)</b> Language and requirements have been updated to better align with DFAT Child Protection Nine Minimum Standards.</p> <ul style="list-style-type: none"> <li>- Policy must include a definition of a child; reporting procedures; commitment to training at induction and regularly thereafter, the process for regular review of the policy.</li> <li>- Members have greater flexibility in where they document their recruitment screening procedures.</li> <li>- Members must have evidence of risk assessment and child safeguarding training, not just a policy commitment.</li> </ul> <p><b>Code of Conduct (1.4.2)</b> Minor language update to alignment with requirements with DFAT Child Protection Nine Minimum Standards, including:</p> <ul style="list-style-type: none"> <li>- More closely aligning the language to broadly cover the Professional Behaviours that DFAT require to be in the Code of Conduct.</li> <li>- Expand the people who are required to sign the Code of Conduct to align with DFAT’s definition of personnel.</li> </ul> <p><b>Incident reporting and child-friendly complaints procedures (1.4.3)</b> Align requirements with DFAT Child Protection Nine Minimum Standards, specifically Minimum Standard 2.</p> <ul style="list-style-type: none"> <li>- Members now have greater flexibility to document child safeguarding and child-friendly complaints processes in one single policy or procedure, or more than one.</li> <li>- Amendments outline specific elements of what must be covered, which are also informed by the National Principles for Child Safe Organisations</li> </ul>	Update to existing requirement.
Commitment 1.5	<p><b>Safeguarding / PSEAH</b></p> <ul style="list-style-type: none"> <li>- Incorporation of ‘harassment’ alongside sexual abuse and exploitation.</li> </ul>	Update to existing requirement.

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	<ul style="list-style-type: none"> <li>- Greater clarity as to who the policy applies to – ‘governing body members, staff, contractors, volunteers, visitors to projects and partners’, rather than using general terms like ‘representatives’.</li> </ul>	
Commitment 9.3	<p><b>Child Safeguarding and PSEAH</b> Screening of staff as part of child safeguarding and PSEAH is now mentioned explicitly as part of Human Resources policy. This was an existing requirement in Commitment 1.4 and 1.5 but has been included here for clarity.</p>	Existing requirement.
Commitment 9.4	<p><b>Child Safeguarding and PSEAH</b> Increased specificity to require that staff and volunteers acknowledge acceptance of the organisation’s Code of Conduct, e.g. signed, incorporated into employment or volunteer agreement. (9.4.1)</p>	Update to existing requirement.
Commitment 4.3	<p><b>Evaluation</b> The requirements for members have not changed. Evaluation has been separated from monitoring to more closely align with DFAT Accreditation (B4.1 and B4.3) and elevate the place of evaluation. (4.3.3)</p>	Existing requirement.
Commitment 5.1	<p><b>Partnerships</b> Members documented assessment process for organisations with whom they work in formal partnership must include an assessment of their partner’s authority to work in relevant countries. This should be considered by the member as part of the due diligence process but may not necessarily prevent the member from working with that partner.</p> <p>Capacity assessment of safeguarding practices and risk management practices have been split into two separate points for greater alignment with DFAT – no new requirement. (5.1.2)</p>	Update to existing requirement.
Commitment 5.2	<p><b>Partnerships</b> Members must ensure that, for formal partnerships, members and partners have a shared understanding of responsibilities in the partnership agreement. Relates to DFAT requirement C1.4. (5.2.1)</p>	Update to existing requirement.
Commitment 5.3	<p><b>Partnerships</b> Minor language change to align with DFAT requirement (C3.6) on effectiveness of partnerships. (5.3.2)</p>	Update to existing requirement.
General definitions	<p><b>Partnerships</b> New definition for ‘formal partnership’. Includes DFAT’s definition of ‘implementing partner’</p>	New definition.
Commitment 7.4	<p><b>Organisational risk management</b> New indicator related to organisational-wide risk management. Members are required to have a documented organisation-wide risk management approach and regular reporting to the governing body of key risks and controls. Aligns with DFAT requirement at A2.1. (7.4.5)</p>	New requirement.

## ACNC

Location of amendment(s)	Amendment(s)	Type of change
Commitment 1.2	<p><b>Definition of ‘Vulnerable People’</b></p> <p>While the Code does not use the language of ‘vulnerable people, but instead speaks of ‘those in vulnerable positions’, the verifier at 1.2.1 has been updated to reflect the ACNC’s definition of vulnerability in the External Conduct Standards as something that is temporary or ongoing. This has replaced the non-exhaustive list of potential drivers of vulnerability, marginalisation or exclusion.</p>	Existing requirement.
Commitments 4.1, 4.3, 7.1 and 8.2	<p><b>Charitable purpose</b></p> <p>Three indicators (4.1.1, 4.3.1, 7.1.1 and 8.2.5) have been updated to reference the need to ensure initiatives are consistent with the member’s ‘charitable purpose’, and that this information is provided publicly as required in Governance Standard 1 and External Conduct Standard 1.</p>	Update to existing requirement.
Commitment 7.2	<p><b>Record keeping</b></p> <p>Incorporation of elements of ACNC External Conduct Standard 2, not otherwise reflected in the Code. Members are required to have records that include information necessary for the organisation to be able to prepare a summary of its activities and related expenditure outside Australia on a country-by-country basis (7.2.3).</p>	New requirement in Code.
Commitment 7.4	<p><b>Conflict of interest</b></p> <p>Members are already required to have a conflict of interest policy (7.4.3). The scope of the policy has been amended to include third parties, as required by ACNC.</p> <p>Some further updates to the language in relation to the documentation of conflicts, and managing or remedying conflicts, in line with ACNC Government Standard 5, and the laws it derives from, and the ACNC guidance on managing conflicts of interest.</p>	Updates to existing requirements.
Financial Reporting Formats	<p><b>Financial reporting</b></p> <p>Amendment to financial reporting formats to consolidate Donations and Bequests income lines, in alignment with ACNC financial reporting format. Consolidation also made in the Financial Definitions.</p>	Updates to existing requirements.
Financial definitions	<p>Definition of ‘Other Income’ and ‘Revenue from Providing Goods and Services’ definitions to include more examples from ACNC.</p>	Updates to existing requirements.

**Whistleblowing regulation**

Location of amendment(s)	Amendment(s)	Type of change
Commitment 9.2	<p>Policy requirements (9.2.2)</p> <ul style="list-style-type: none"> <li>- replacing the terminology of “in good faith” disclosures with “reasonable grounds”;</li> <li>- differentiating between the requirements for staff and volunteers and other whistleblowers who may still be eligible for protections;</li> <li>- ensuring policies include a process to protect confidentiality and anonymity where requested.</li> </ul> <p>Members whistleblowing policies will be required to be made available on members’ websites, reflecting ACNC guidance.</p>	<p>Update to existing requirement.</p> <p>New requirement.</p>
General definitions	Updated definition of whistleblowing and new definition for Whistleblowing Protection.	

**Core Humanitarian Standard**

Location of amendment(s)	Amendment(s)	Type of change
Commitment 1.3	<p>Minor updates have been made to align with the wording used by the Core Humanitarian Standard, i.e. that organisations are “working towards application”. ACFID members who support or undertake humanitarian assistance are still required to work towards application of the CHS, with verification under the CHS a new Good Practice Indicator.</p> <p>Indicators 1.3.3 and 1.3.4 reflected some of the commitments outlined in the CHS, but not all. These have been removed for simplicity, noting that members who are working towards application of the CHS will aim to fulfill all nine commitments.</p>	<p>Existing requirement.</p> <p>Removal of requirements.</p>

**Australian Accounting Standards**

Location of amendment(s)	Amendment(s)	Type of change
Balance Sheet template and Financial Definitions	New ‘Right of Use Asset’ and ‘Lease liability’ lines added to the Balance Sheet template, and update to definitions to reflect this change. Relates to <i>ASB16 Leases</i> .	Update to existing requirements.

## 2. Climate Change

### Rationale

Climate change is a global priority issue, which is already impacting, and will continue to impact the work of ACFID’s members and the communities and organisations they work with. Through the initial consultation phase, members identified climate change as a critical issue, recognising that while not all members work in the area of environment and climate change programming, the impacts of climate change will be widespread.

While climate change can be considered part of the broader category of environmental sustainability already covered in Quality Principle 3, there was strong feedback to elevate climate change within the Code to signify its priority and importance. Feedback from members identified the main areas of focus should be on ensuring climate is addressed within NGO operations, not only programming; consideration of climate change as a factor when conducting a contextual analysis; and incorporating climate into risk assessment processes.

The amendments build on [ACFID Council Resolution 2-2021](#) on climate action, along with the work ACFID and its members have already done in developing a [Climate Action Framework](#). They recognise that not all ACFID members engage in specific climate change programming, and there is no requirement to do so within the amendments. Instead, the amendments seek to ensure ACFID members are aware of and respond to the potential impacts of climate change in both their internal operations and their development and humanitarian initiatives.

Consistent with the Code’s role in supporting members to improve practice over time, Good Practice Indicators have been used as a way of introducing practices or approaches that may not be relevant or applicable for all members currently. These include adopting a climate justice approach, establishing organisational targets to measure environmental impact, and considering the potential and realised impacts on the environment in all programming.

### Summary of amendments

Location of amendment(s)	Amendment(s)	Type of change
Quality Principle 3	Wording and description of Quality Principle 3 amended to include explicit reference to climate action. The term ‘climate action’ has been chosen to reflect terminology used in ACFID’s Climate Action Framework.	Updated description.
Commitment 3.2	Members are required to have an organisational commitment to climate action, which is evidenced by a policy, statement or guidance document; and to include risks associated with climate change in their analysis and management of environmental risks in their development and humanitarian initiatives. (3.2.1)  Members are required to demonstrate a commitment to climate action in their organisation’s internal operations, which is evidenced by a policy, statement or guidance	Update to existing requirements

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	<p>document which commits them to minimising the carbon footprint of their organisation. (3.2.2)</p> <p>New Good Practice Indicators which address climate justice; organisational targets; and assessment of potential or realised impacts on the environment.</p>	
Commitment 4.2	<p>Members are required to consider the impacts of climate change when undertaking a contextual analysis as part of the planning and design process. (4.2.1)</p> <p>Members are required to include the assessment and management of risks associated with climate change as part of their risk management processes. (4.2.2)</p>	Update to existing requirements
Good Practice Indicator at 8.3	Members are encouraged to report on actions to reduce organisational carbon footprint in their annual reports.	Update to existing Good Practice Indicator
General Definitions	New definitions for climate action, climate change, climate justice, carbon footprint, environmental sustainability and environmental stewardship, to support a shared understanding of key concepts that have been introduced through the amendments, or where terms were previously undefined.	New definitions

### 3. Locally-led development and humanitarian action

#### Rationale

Across the development and humanitarian sectors much discussion has arisen about the need for locally-led development and humanitarian action. At the global level, frameworks such as the Grand Bargain commit the humanitarian system to prioritising the leadership and capacity of local responders and the participation of communities. The OECD DAC recommendation on enabling civil society in development cooperation and humanitarian action calls on its adherents to ensure the involvement of local civil society actors and address power relations. Closer to home, many ACFID members are investing in local leadership, and deliberately stepping back to allow local partners and stakeholders to take the reins in the design and delivery of programs in their communities.

Initial consultations suggested that while the ACFID Code was seen to incentivise or support locally-led action it was simultaneously found to be somewhat preventing and hindering it. One of the main amendments has been to reshape the way in which certain ‘high-risk’ elements in the Code are cascaded to partners. Feedback highlighted the value in taking a more flexible approach, which can adapt to diverse partnerships, that does not only require members to extend the Code requirements through MOUs or similar. Instead, members must now have appropriate mechanisms to assess, manage and mitigate the risks relevant to the compliance indicators and verifiers when working with partners, allowing a more tailored approach to be taken with different partners.

Another key amendment has been to reshape Commitment 2.1 to directly address a commitment to locally-led action, and to bring to the forefront the necessity of ensuring the voice and decision-making of local actors at all stages of the program cycle, in the design and evaluation of complaints mechanisms, and in the allocation of resources. How this should be done has not specified to allow for differences in organisational approaches and operating environments.

The language of ‘power’ was prominent in conversations throughout the Review, along with the need to both recognise the power of members and the need to shift power. However, it was also acknowledged there was a diversity of understanding of the meaning of ‘power’, and the scope in which members can influence power dynamics, for example at a community level, was at times limited. For this reason, members are being asked to take steps to name and address power imbalances, with a focus on organisational relationships relevant to their development and humanitarian initiatives. This is an area where members have identified they would like further guidance and support.

A shift in language used in Commitment 5.3 also reflects a desire to ensure that the priorities of local partners are at the centre of organisational strengthening activities, with ACFID members playing a supporting role as required. ACFID members, INGOs and donors also have a role to play in minimising the compliance burden felt by local partners. A Good Practice Indicator which encourages ACFID members to proactively collaborate with others to reduce the resources required by local partners to manage compliance obligations has been introduced.

The amendments also recognise the importance of ensuring research and public materials are shared with and reflect the perspectives of those directly affected or involved in our development and humanitarian initiatives, acknowledging that there is power in who tells the stories.

Throughout the consultation there was strong support for the overall intent and aspiration of the amendments, with many members already seeing themselves as operating in a way which

contributes to locally-led action. However, there remain some differences in how to define locally-led action, particularly the role of in-country offices and national Governments as ‘local’ actors. The amendments to the Code include a definition for locally-led action which draws on work done by the Development Practice Committee and a localisation working group of ACFID members. The definition recognises that locally-led action will look different in each context, and outlines general approaches which will lead to effective locally-led action, without being overly prescriptive.

Ultimately the amendments outlined below seek to strengthen the Code’s approach to locally-led action and reflect the understanding that the interests and wellbeing of the stakeholders and communities ACFID members seek to serve are best realised when work is locally-led.

## Summary of amendments

Location of amendment(s)	Amendment(s)	Type of change
Quality Principle 2	Wording and description of Quality Principle 2 amended to shift language away from ‘participation’ and ‘empowerment’ and explicitly reference locally-led action and inclusive approaches.	Update to existing text.
Commitment 2.1	The previous Commitments 2.1 and 2.2 have been consolidated. Wording of Commitment 2.1 has been updated to explicitly reference power imbalances and an investment in locally-led action.	Update to existing text and removal of requirements.
	Members are required to have an organisational commitment to locally-led action, which is evidenced by a policy, statement or guidance document; and have evidence of naming and addressing power imbalances in organisational relationships relevant to the member’s development and humanitarian initiatives. (2.1.2)	New requirement.
	Members are required to contribute to locally-led action, which is evidenced by the voice and decision-making of local actors in all stages of a program, the allocation of resources and the design and evaluation of feedback and complaints mechanisms. (2.2.2)	New requirement.
	Removal of some Good Practice Indicators which have been superseded by new requirements.	Removal of requirement.
Commitment 5.3	Members are required to listen to and respond to the priorities of their local partners around organisational strengthening. (5.3.1)	Update to existing requirements
	An existing GPI has been shifted into the Verifier for 5.3.1 and requires members to have regular partnership meetings where open feedback and dialogue is facilitated.	New requirement.
Good Practice Indicator at 5.2	Members are encouraged to take active steps to collaborate with other INGOs and donors to reduce the resources	New GPI.

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	required by local partners to manage compliance obligations.	
Commitment 6.1	Members are required to ensure their public materials reflect the perspectives of primary stakeholders. (6.1.1)	Update to existing requirement.
Commitment 4.2	An existing GPI has been shifted into the Verifier for 4.2.3 and requires members to share research plans and results with those who are involved in or impacted by the findings. This is only a requirement for members which undertake research.	New requirement.
Commitment 1.2	Language amended for consistency with requirements in Quality Principle 2, around prioritising the voice, rights and input of those who are in vulnerable positions and those who are experiencing marginalisation and exclusion. (1.2.1 – 1.2.3)	Update to existing requirement.
General Definitions	New definition for locally-led action and updated for local actors.	New definitions
Various commitments	The language which describes how certain compliance indicators and verifiers are extended to partners has been amended to: “Members are required to ensure they have appropriate mechanisms to assess, manage and mitigate the risks relevant to these compliance indicators and verifiers when working with partners.”	Update to existing requirement

## 4. Anti-racism, racial justice and diversity

### Rationale

In recent years there has been discussion across the sector about how to work alongside growing movements – including Black Lives Matter and Stop Black Deaths in Custody – to dismantle structures of unjust privilege and enable inclusive and equitable workplaces.

Ending poverty and social injustice requires that we confront the reality that much of Australia’s international development sector - and indeed Australian society - has its legacy in colonialism. In 2020, ACFID members affirmed their commitment to building greater representation, participation and access to decision making with peoples of varied cultural and racial origins and intersections in the sector, as outlined in [ACFID Council Resolution 1-2020](#). This was followed by a subsequent related [ACFID Council Resolution 1-2022](#) on Decolonisation, Anti-Racism and Locally-Led Action in 2022.

While the existing requirements in the Code imply a commitment to avoidance of discrimination and racism, there was strong support for establishing a commitment to racial justice, separate from other general human rights commitments and supported by the strengthening of other elements in the Code.

Feedback throughout the consultation period emphasised the need to explicitly address NGOs’ own power structures, and the diversity of workforces, leadership, and governance bodies. Representation and reporting were both identified as ways of highlighting diversity in governance and personnel. However, members noted that mandatory requirements may be burdensome or infeasible for small agencies at this time, and as such many of the amendments have been introduced as Good Practice Indicators.

The amendments will require members to ensure their governing body, staff and volunteers are aware of and have access to safe training in issues related to diversity and anti-racism. Training at all levels of an organisation was identified as a key way to support behaviour and attitudinal change. Likewise, ensuring a commitment to anti-racism was echoed throughout relevant policies and documentation will help support holistic change. Human resource policies and organisational codes of conduct were identified as key areas, and will now need to reflect an overarching commitment to racial justice and anti-racism.

Finally, it is worth noting that these amendments are closely related to those associated with locally-led action, but focus more on the systems and structures within ACFID member organisations, rather than development or humanitarian initiatives. Together, these amendments should advance both locally-led action and racial justice through a holistic approach that addresses organisational systems and development approaches.

## Summary of amendments

Location of amendment(s)	Amendment(s)	Type of change
Commitment 1.1	<p>Description of Commitment 1.1 updated to draw an explicit link between existing commitment to human rights and acknowledgement of inequities, systemic barriers and racism that impact our organisations and the work we do.</p> <p>Members are required to demonstrate an organisational commitment to the pursuit of racial justice, as evidenced by a policy, statement or guidance document. (1.1.2)</p>	New requirement
Good Practice Indicators at 7.4	New Good Practice Indicators which encourage members to seek out diversity and representation in their leadership and governing body; and, report publicly on the diversity and representation of their leadership and governing body.	New GPI
Commitment 9.2	<p>Members are required to provide access to safe training in issues related to diversity and anti-racism for governing body, senior leadership, staff and volunteers.</p> <p>New Good Practice Indicators which encourages members to periodically assess the cultural safety of their organisation.</p>	New requirement.  New GPI
Commitment 9.3	<p>Members are required to ensure their human resource policies cover equity, diversity and anti-racism.</p> <p>New Good Practice Indicators which encourage members to seek out diversity and representation in their staff and volunteers; and report publicly on the diversity and representation of their staff and volunteer.</p>	Update to existing requirements. New GPIs
Commitment 9.4	<p>Members are required to include reference to anti-racism in their organisational codes of conduct.</p> <p>New Good Practice Indicator which encourages members to nominate a member of the senior leadership or governing body to have oversight and responsibility for the organisation’s progress on diversity and anti-racism.</p>	Update to existing requirement. New GPI
General Definitions	New definitions for anti-racism, racial justice and cultural safety, to support a shared understanding of key concepts that have been introduced through the amendments.	New definitions.

## 5. Misconduct Disclosure Scheme

### Rationale

In 2018, ACFID and its members commissioned an [independent review into sexual misconduct](#) in our sector. This review was conducted by the Victorian Institute of Forensic Medicine and made 31 recommendations, all of which were accepted by the ACFID Board.

The review found that the re-employment of perpetrators of sexual misconduct was a prominent issue, and featured strongly in interviews, stakeholder consultation, focus groups and accompanying data analysed covering 2015-2017. The majority of reported sexual misconduct incidents were perpetrated by aid workers (75%) against individuals from affected populations or against other aid workers.

The review further found that the screening processes in place in our organisations do not go far enough in screening candidates, and emphasised the need for those in the sector be able to provide references to each other in a way that was also mindful of the legal implications of doing so. One of the outstanding recommendations of the review was for “ACFID to monitor and engage in the development of multi-lateral international humanitarian passporting and registration schemes and other forms of regulation tech”.

The Misconduct Disclosure Scheme was launched in January 2019 to address the specific problem of known sexual abusers moving between organisations within the development and humanitarian sector undetected. The Scheme complements other vetting processes, such as police checks, as it picks up perpetrators who have had disciplinary processes completed against them, or who are subject to ongoing investigation, but who may not have committed crimes or been investigated by the police.

The [Misconduct Disclosure Scheme](#) is currently implemented by over 190 organisations worldwide. To date, more than 86,000 checks have been conducted, resulting in over 230 applications being rejected at the final stage of recruitment. Several ACFID members, both large and small, have already implemented the scheme within their organisations, as have a number of Australia-based international development managing contractors. While other referencing and digital passporting schemes have been trialled, the Misconduct Disclosure Scheme has received the greatest traction to date.

Choosing to implement the Scheme as a collective sends a powerful public message that our sector remains committed to addressing this issue. It also enables ACFID to dedicate resources to assist with the implementation of the Scheme, and coordinating efforts with other stakeholders, such as DFAT and the managing contractor community. Having ACFID members utilise the same Scheme will also improve its overall effectiveness, and allow it to operate at scale.

Throughout the Code Review, ACFID consulted with members on the relevance and practical implications of the Scheme. The most common features of organisations that have chosen to implement the Scheme are those that readily engaged in humanitarian response and rapid deployment settings, regularly employed personnel from other INGOs, and/or were seeking a way to disclose information of this nature between the arms of international partners/federated entities or equivalents. For this reason, the ACFID members that would gain the most immediate benefit from becoming implementing organisations of the Scheme were identified as those that are currently part

of global humanitarian response. Following further consultations, this has been refined further to organisations that deploy personnel for humanitarian initiatives.

The amendments to the Code will require a sub-set of ACFID members who deploy personnel for humanitarian initiatives to participate in the Scheme, and encourage all ACFID members to participate, as a Good Practice Indicator.

While there has been broad support for the intent of the Misconduct Disclosure Scheme and its incorporation into the Code, there have also been some concerns about the legal, administrative and practical implications for members. ACFID has commissioned general legal guidance to support members' understanding of the possible implications in the Australian context, and is considering other ways in which practical support can be provided to members implementing the Scheme, e.g. centralised investigation capacity, development of shared tools/templates.

### Summary of amendments

Location of amendment(s)	Amendment(s)	Type of change
Good Practice Indicator at Commitment 1.5	All members are encouraged to participate in the Misconduct Disclosure Scheme.	New GPI
Commitment 1.3	Members that deploy personnel for humanitarian initiatives are required to participate in the Misconduct Disclosure Scheme.	New requirement.

## 6. Incorporation of the Statement of interpretation

### Rationale

In 2021 the Code of Conduct Committee and the ACFID Board approved a Statement of Interpretation which aimed to address a perceived ambiguity in the architecture of the Code related to how members demonstrate their compliance. 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 Code of Conduct Committee drafted a short statement of interpretation.

One of the recommendations arising from the first round of consultation was to explicitly integrate the contents of the [Statement of Interpretation](#) into the Quality Assurance Framework, to help consolidate the Code related documents and to provide clarity for members.

### Summary of amendments

Location of amendment(s)	Amendment(s)	Type of change
Compliance Indicators, Verifiers and Good Practice Indicators	The text in the Quality Assurance Framework has been updated to align with the wording used in the Code of Conduct. Specifically, both the Code of Conduct and the Quality Assurance Framework now state (amendment in italics): “To demonstrate compliance, members will have all of the Verifiers in place, commensurate with their size and the nature of their work. <i>Members will also ensure that their policies, processes and guidelines are implemented and subject to regular review.</i> ”	Update to existing text.
General Definitions	Definitions for ‘implemented’ and ‘regular review’ have been included, as outlined in the Statement of Interpretation.	New definitions
Explanatory text for each Commitment.	The text which previously used to introduce the Verifiers at each Commitment has been updated to state (amendment in italics): “To demonstrate compliance, members will have all of the Verifiers in place, commensurate with their size and the nature of their work. <i>Members will also ensure that their policies, processes and guidelines are implemented and subject to regular review.</i> ” For consistency this has been included at each Commitment in the Quality Assurance Framework.	Update to existing text.

## 7. Clarification and Simplification

### Rationale

As a self-regulatory sector code of good practice it is important that the language and requirements in the Code are clear, accessible and meet the needs of all ACFID members. Generally, members thought the Code was manageable and the resources and guidance were suitable. However, opportunities were identified to make the Code more coherent and useable. These primarily relate to ensuring consistent language and terminology is used throughout, updating the definitions to reflect key terms and current approaches, removing duplication where relevant, updating language to provide greater clarity. Most of the changes outlined below do not have any material impact on the content or intent of the Code or members' reporting obligations.

ACFID also received feedback on other ways to improve the useability of the Code, including the incorporation of cross-referencing with other standards, providing downloadable and accessible versions of all Code documents and developing indexes which identify requirements related to particular topics. ACFID will use this feedback in developing resources to support the implementation of a revised Code and Quality Assurance Framework.

### Summary of amendments

Location of amendment(s)	Amendment(s)
Throughout	Consistent language and terminology: <ul style="list-style-type: none"> <li>- Use of 'development and humanitarian initiatives', rather than 'action', 'response', 'assistance', 'programs' etc.</li> <li>- Use of 'sexual abuse, exploitation <i>and harassment</i>'</li> <li>- Use of 'processes and responsibilities' rather than 'protocols'.</li> <li>- Use of 'publicly available' rather than 'accessible'</li> <li>- Use of 'Responsible People' rather than 'responsible persons'</li> <li>- Use of 'development and humanitarian initiatives' rather than 'aid and development'</li> </ul>
Quality Principle 1	Consistency - updated title to ' <i>Rights, Justice and Safeguarding</i> ' to better reflect subsequent Commitments.
Commitment 1.2	Consistency - update in terminology for consistency with the revisions made to Commitment 1.2.
Commitment 1.3	Clarity – humanitarian principles are now only listed in the verifier
Commitment 2.4	Clarity – language which describes who this Commitment relates to updated to: "The indicators and verifiers under this commitment are relevant to members with initiatives <i>involving or directly affecting children.</i> " This language is now reflected in the indicators.
Quality Principle 3	Consistency - updated title to ' <i>Systemic Change and Climate Action</i> ' to better reflect subsequent Commitments.
Commitment 4.2	Simplification – verifier which required an appraisal/selection process is now integrated into the first verifier.
Commitment 4.4	Clarity – commitment to 'learn from results and lessons' is now captured in Commitment 4.4, not 4.3.

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Commitment 5.3	Consistency - language of the Commitment updated to “We invest in the <i>sustainability and</i> effectiveness of our collaborations and partnerships” to reflect the subsequent indicators.
Commitment 6.2	Consistency - requirements for an ethical decision making framework have been brought out of the ACFIFD Fundraising Charter at Commitment 8.1 to ensure consistency of requirements, and reduce duplication.
Commitment 7.2	Clarity - update in language of verifiers regarding ACNC reporting and compliance registers.
Commitment 7.3	Consistency - update in policies required on the member’s website, to reflect existing requirements elsewhere in the Code, and so the website requirements can be found in one place.
Commitment 8.2	Clarity - update to the name of the list of prohibited entities to ensure it is up-to-date and for greater clarity.
Commitment 8.3	<p>Clarity - requirement that ACFID-compliant financial statements are reported in Australian dollars is made explicit, to improve clarity and respond to member feedback.</p> <p>Remove duplication – requirement to have annual report on website already listed in Commitment 7.3.</p> <p>Good Practice Indicators: Add reference to including bribery, gifts, entertainment and facilitation payments in financial wrongdoing policy. Response to member feedback.</p>
Commitment 9.2	<p>Clarity – update to language to clarify that requirements are for safety and security of personnel while travelling.</p> <p>Consistency – inclusion of workplace insurances, alongside travel insurances.</p>
Financial Definitions	<p>Clarity:</p> <ul style="list-style-type: none"> <li>- Costs of dedicated project management software added to Program Support Costs.</li> <li>- Expand on Funds to International Programs definition to make it clearer that it includes program support costs expended overseas</li> <li>- Include foreign exchange losses in Other Expenditure definition</li> </ul>
General Definitions	Various updates to definitions to ensure they remain up-to-date and reflect sector good practice. See Quality Assurance Framework for full list of Definitions.

## Transition to the Revised Code

If ratified at the October 2023 Annual General Meeting, the revised Code will replace the current Code on 30 June 2024.

During the first half of 2024, ACFID will update all Code-related documents, policies and tools to reflect the revised Code. This will include updating the resources and guidance provided in the Good Practice Toolkit. ACFID will place a particular focus on providing guidance, tools and templates in relation to areas of the Code where new compliance requirements have been introduced. ACFID will also host in-person and online workshops to socialise and provide learning opportunities related to the revised Code.

Members will continue to report against the Code, following the current three-year reporting cycle. All members will be advised well in advance about their reporting timetable and reporting requirements. Members that have a 30 June 2024 FYE will be required to report to ACFID against the revised Code by 30 November 2024. As per the current policies, members will have up to 12 months to remedy any areas of non-compliance that emerge through the reporting process, or sooner if the area of non-compliance is considered high risk.

Given that Members are expected to be compliant with the current Code and that there are relatively limited changes to the compliance requirements in the revised Code, the transition should be straight forward for most Members. ACFID will work with members to provide support, advice, tools and templates to assist with any required remedial action.

Should a complaint against a member arise, it will be assessed against the version of the Code in place at the time of the events that triggered the complaint. If the complaint is triggered by an event that relates to the revised Code and this occurs early in the transition period, the CCC will take this into account in determining its findings.

## Annex 1: Changes in evidence required for compliance

The table below lists the new and revised Verifiers in the Quality Assurance Framework, which members will need to meet to demonstrate compliance with the Compliance Indicators in the ACFID Code both to their Board and to ACFID. Any documentation should be proportionate to the scale and nature of a member’s work.

To be considered compliant with the Code, the member’s Board and Management must not only ensure that the documentation meets the requirements of the Code but that the stated requirements are effectively implemented and that the document is subject to regular review.

As in current practice, ACFID will provide guidelines, templates and worked examples for each type of documentation required by the revised Code with these made available via the Good Practice Toolkit. In doing so, ACFID will give priority to developing templates and tools for those areas of the Code where there are new requirements. Members will be given up to 12 months to put any new or changed documentation in place.

Amendments to the Verifiers are highlighted in **bold**.

Area	Requirements outlined in the Verifiers	Compliance Indicators	Changes from current Code
Governance	<p>A governing instrument, available from the member’s website, that <b>includes the member’s purpose (a charitable purpose for the public benefit)</b> and a rule requiring them to operate as a not-for-profit</p> <p><b>Periodic reports are provided to the organisation’s governing body on legal and compliance obligations.</b></p> <p><b>Records that include information necessary for the organisation to be able to prepare a summary of its activities and related expenditure outside Australia on a country-by-country basis.</b></p>	7.1.1 7.2.1 7.2.3	<p>Amendment to existing requirement.</p> <p>New requirement.</p> <p>New Code requirement – ACNC requirement.</p>
Racial justice	<p><b>Policy, statement or guidance document which commits members to the pursuit of racial justice.</b></p> <p><b>Governing body, senior leadership, staff and volunteers are aware of and have access to safe training in issues related to diversity and anti-racism.</b></p>	1.1.2 9.2.3	New requirements.
Locally-led action	<p><b>Policy, statement or guidance document that commits the member to locally-led action.</b></p> <p><b>Evidence of naming and addressing power imbalances in organisational relationships relevant to the member’s development and humanitarian initiatives.</b></p> <p><b>Evidence of the voices and decision-making of local actors is consistently captured in:</b></p> <ul style="list-style-type: none"> <li><b>Design or planning framework, tools, templates or approaches.</b></li> </ul>	2.1.1 2.1.2	New requirements.

	<ul style="list-style-type: none"> <li>• <b>Monitoring and evaluation framework, tools, templates or approaches</b></li> <li>• <b>The allocation of resources (time, funds and people) throughout the project cycle</b></li> <li>• <b>The design and evaluation of feedback and complaints mechanisms</b></li> </ul> <p>Development and humanitarian initiatives consistently show evidence of the influence of primary stakeholders <b>in planning, decision-making and evaluation.</b></p>		Amendment to existing requirement.
Climate action	<p>Policy, statement or guidance document committing the member to promoting environmental sustainability, <b>climate action</b> and improved environmental outcomes in development and humanitarian initiatives.</p> <p>Design or planning framework, tools, templates which require or approaches which consistently show evidence of the analysis of environmental risk and management, <b>including risks associated with climate change.</b></p> <p>Policy, statement or guidance document committing the member to minimising the environmental impact, <b>including the carbon footprint</b>, of their organisation’s internal operations.</p> <p>Design, planning or appraisal framework, process, tools, templates which require or approaches which consistently show context and stakeholder analysis. Contextual analysis should consider the perspectives and knowledge of primary stakeholders, <b>impacts of climate change</b> and an analysis of power dynamics including issues of gender equality and equity.</p> <p>A risk framework, risk management plan or approach that assesses and addresses risks for all initiatives including from a protection / safeguarding perspective, <b>and risks associated with climate change</b> (see 1.4.1, 1.5.1, 3.2.1).</p>	3.2.1 3.2.2 4.2.1 4.2.2	Amendment to existing requirements.
Risk management	<p><b>A documented organisation-wide risk management approach.</b></p> <p><b>Regular reporting to the governing body of key risks and controls.</b></p> <p><b>Members are required to ensure they have appropriate mechanisms to assess, manage and mitigate the risks relevant to this compliance indicator and verifier when working with partners.</b></p>	7.2.3  1.4.1 1.5.1 7.3.1 7.3.2 7.3.3 8.2.1	New requirement  New requirement – replacing requirement that members must extend certain Code requirements to partners

			through an MOU or similar.
Whistleblowing	<p>A whistleblowing policy, <b>for disclosures where a whistleblower has reasonable grounds to suspect their information discloses misconduct or wrongdoing</b>, that has the following components as a minimum:</p> <ul style="list-style-type: none"> <li>○ <b>States the purpose and importance of the policy.</b></li> <li>○ <b>Requires staff and volunteers to disclose possible misconduct or wrongdoing, and encourages disclosures from other whistleblowers.</b></li> <li>○ <b>Outlines any Whistleblowing Protections for governing body members, staff, volunteers, their relatives or dependents, and others, including as required by law</b>, and guaranteeing that staff and volunteers who disclose possible misconduct or wrongdoing will be protected from adverse employment consequences.</li> <li>○ <b>Clarifies to whom disclosures that qualify for protection can be made.</b></li> <li>○ <b>Outlines processes to protect anonymity where requested, confidentiality, and a fair and impartial investigative process.</b></li> </ul>	9.2.2	Amendment to existing policy requirement – alignment with ACNC and ASIC.
Child Safeguarding	<p>Policy document applicable to all governing body members, staff, <b>contractors</b>, volunteers and visitors to projects, that includes:</p> <ul style="list-style-type: none"> <li>• A commitment to effective leadership to enable the safeguarding of children.</li> <li>• <b>Definition of a child as anyone under 18.</b></li> <li>• <b>The reporting procedure for child exploitation and abuse suspicions or allegations, code of conduct or policy non-compliance, and sanctions that would be applied in the event of breaches.</b></li> <li>• A commitment to communication of the Child Safeguarding policy and procedures to all governing body members, staff, volunteers, visitors to projects and partners.</li> <li>• <b>A commitment to report to any donors that require reporting under any funding agreements.</b></li> <li>• <b>A commitment to providing child safeguarding training for personnel at induction and regularly thereafter depending on risk profile.</b></li> <li>• <b>A commitment to preventing a person from working with children if they pose an unacceptable risk to children.</b></li> <li>• Approach to assessing risk and monitoring risk and child safeguarding processes of all activities.</li> </ul>	1.4.1 1.4.2 1.4.3	Amendment to existing requirements.

	<ul style="list-style-type: none"> <li>• A commitment to the use of images and personal information for promotion, fundraising and development education which ensures the privacy and safeguarding of children.</li> <li>• The process for regular review of the policy, <b>at least every 5 years.</b></li> </ul> <p>Policy or procedures applicable to all governing body members, staff, contractors, volunteers and visitors to projects, that cover:</p> <ul style="list-style-type: none"> <li>• Recruitment screening processes for all personnel in contact with children which include:             <ul style="list-style-type: none"> <li>○ Criminal record checks before engagement; statutory declarations of local legal equivalent where criminal record checks are unavailable or unreliable. <b>Checks must be conducted for each country in which the individual has lived for 12 months or longer over the last 5 years, and for the individual’s countries of citizenship.</b></li> <li>○ Verbal referee checks.</li> </ul> </li> <li>• The following additional screening measure for all personnel working with children:             <ul style="list-style-type: none"> <li>○ Behavioural-based interview questions.</li> </ul> </li> </ul> <p><b>Risk assessments of all activities including identification of risks and an outline of mitigations measures, which are regularly re-assessed.</b></p> <p>Employment contracts which contain:</p> <ul style="list-style-type: none"> <li>• Provisions for the prevention of a person from working with children if they present an unacceptable risk to children.</li> <li>• Suspension or transfer to other duties for any employee who is <b>under investigation and provision to dismiss any employee after an investigation.</b></li> </ul> <p><b>Child safeguarding training is provided to all personnel, including on reporting procedures.</b></p> <p>A documented code of conduct that covers the following with regard to child safeguarding:</p> <ul style="list-style-type: none"> <li>○ Appropriate language, <b>communications and behaviour.</b></li> <li>○ Banning of alcohol and drugs.</li> <li>○ Gifts to children.</li> <li>○ Physical contact with children.</li> <li>○ Banning of sexual relations with children.</li> <li>○ Child labour.</li> <li>○ Photos and images.</li> <li>○ Reporting obligations.</li> </ul>		
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	<p>The code of conduct must be signed by relevant <b>governing body members</b>, staff, <b>contractors</b>, volunteers and project visitors.</p> <p><b>Documented and accessible policies and/or procedures</b> for:</p> <ul style="list-style-type: none"> <li>• Child safeguarding incident reporting</li> <li>• Child-friendly complaints handling</li> </ul> <p><b>These policies and/or procedures must be known by all personnel and:</b></p> <ul style="list-style-type: none"> <li>• <b>Cover:</b> <ul style="list-style-type: none"> <li>○ <b>How to report and respond to child exploitation and abuse suspicions and/or allegations.</b></li> <li>○ <b>The relevant roles and responsibilities of governing body, staff and volunteers.</b></li> <li>○ <b>How concerns or allegations of child exploitation, abuse, or non-compliance with the code of conduct or policy will be managed, including Sanctions that would be applied in the event of breaches.</b></li> <li>○ <b>How reporting obligations will be fulfilled.</b></li> <li>○ <b>Contact information to enable an external person to report.</b></li> <li>○ <b>Appointment of a child protection incident reporting focal person.</b></li> </ul> </li> <li>• Reflect the following principles: <ul style="list-style-type: none"> <li>○ <b>The safety and wellbeing of children and young people are prioritised.</b></li> <li>○ Consistency with relevant legislation, including compliance with mandatory reporting responsibilities, privacy, and employment law.</li> <li>○ Protection of all parties involved in the complaint of concern.</li> <li>○ Confidentiality (as distinct from secrecy).</li> <li>○ Expedient reporting.</li> <li>○ Truthfulness.</li> <li>○ Fairness.</li> <li>○ Professionalism.</li> </ul> </li> </ul>		
Safeguarding / PSEAH	<p>Policy document that:</p> <ul style="list-style-type: none"> <li>• describes the standards of behaviour for <b>governing body members</b>, staff, <b>contractors</b>, volunteers, <b>visitors to projects</b> and partners.</li> <li>• specifically prohibits sexual exploitation, abuse <b>and harassment</b>.</li> <li>• outlines how the policy is implemented throughout the organisation.</li> <li>• specifies the agency’s reporting responsibilities where an incident is identified, including processes for reporting</li> </ul>	1.5.1	Amendment to existing requirements.

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	to local enforcement authorities, subject to the wishes and welfare of the complainant/survivor.		
Partnership	<p>A documented assessment process that includes:</p> <ul style="list-style-type: none"> <li>• Alignment with members’ values and objectives.</li> <li>• Governance, legal registration <b>and authority to work in relevant countries.</b></li> <li>• Financial <b>management capacity</b> and systems.</li> <li>• Reference checks of partners against prohibited entities listings.</li> <li>• Capacity assessment to implement safeguarding practices including child protection and prevention of sexual exploitation, abuse and harassment.</li> <li>• Capacity assessment to implement risk management practices, including financial wrongdoing.</li> </ul> <p><b>For formal partnerships, members and partners ensure shared understanding of responsibilities under partnership agreements (e.g. through inception workshops or periodic partnership reviews).</b></p> <p>Development and humanitarian initiatives consistently show evidence of <b>listening to and responding to local partners’ priorities for organisational strengthening.</b></p> <p><b>Regular partnership meetings take place where open feedback and dialogue is facilitated.</b></p> <p>Documented evidence of the periodic and joint review of <b>the effectiveness of</b> key collaborations and partnerships.</p>	5.1.2 5.2.1 5.3.1 5.3.2	Amendment to existing requirements.
Conflict of interest	<p>A conflict of interest policy that includes:</p> <ul style="list-style-type: none"> <li>• A definition of ‘conflict of interest’.</li> <li>• A requirement for responsible people, staff, volunteers <b>and third parties</b> to disclose perceived, potential and actual conflicts of interest.</li> <li>• A requirement to <b>document and review</b> disclosed perceived, potential or actual conflicts of interest.</li> <li>• <b>Procedures for the prevention, management and remedy of conflicts of interest, and their potential impact,</b> including open and fair procurement of goods and services (or reference made to a relevant policy, see 8.1.3).</li> </ul>	7.4.3	Amendment to existing policy requirement
Human Resources	<p>Human resource policies and procedures which address:</p> <ul style="list-style-type: none"> <li>• Recruitment and selection, including</li> </ul>	9.3.1 9.4.1	



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	<b>including for those who are in vulnerable positions or experiencing marginalisation and exclusion.</b>		
Vision, mission, values	Documented <b>and publicly available</b> organisational vision, mission, and values.	4.1.1	Amendment to existing requirements – information to be made available on website.
Evaluation	Policy, statement or guidance document committing the member to <b>evaluation of the effectiveness of their development and humanitarian initiatives.</b>  Evaluation framework, tools, templates or approaches that consistently show evidence of evaluation in practice.	4.3.3	Existing requirement – but now separated from monitoring.
Strategy / design/planning	Strategies, designs and plans are critically assessed against a set of criteria or equivalent, <b>including whether initiatives are consistent with the member’s charitable purpose and not-for-profit status.</b>	4.3.1	Amendment to existing requirement.
Communications / Fundraising	Public materials: <ul style="list-style-type: none"> <li>• Are obtained and used according to ethical principles.</li> <li>• Are consistent with their stated purpose and values.</li> <li>• Accurately describe the nature and scope of their work.</li> <li>• Acknowledge the role of partners.</li> <li>• Are consistent with ACFID’s Fundraising Charter (8.1.2) where the public materials relate to fundraising.</li> <li>• <b>Reflect the perspectives of primary stakeholders.</b></li> </ul>	6.1.1	Amendment to existing requirement.
Websites	Members will provide the following information on their website: <ul style="list-style-type: none"> <li>• Information on its governance: structure, responsible persons and organisational contact information.</li> <li>• ABN.</li> <li>• Information on their work, including key projects or programs.</li> <li>• Information on partners and their roles.</li> <li>• A statement of commitment to adherence to the Code.</li> <li>• The scope for and mechanism/process for lodging a complaint against the organisation, and a point of contact.</li> <li>• Identification of the ability to lodge a complaint alleging a breach of the Code with the ACFID Code of Conduct Committee, and a point of contact.</li> <li>• An Annual Report including the ACFID-Code-compliant financial statement in line with ACFID requirements (as outlined in 8.3.1 and 8.3.2).</li> </ul>	7.3.4	Amendment to existing requirement - Whistleblowing policy now required to be on website.

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	<ul style="list-style-type: none"> <li>• Governing instrument (as outlined in 7.1.1)</li> <li>• The Member’s code of conduct</li> <li>• Key policies relevant to the public including but not limited to, privacy, complaints, <b>whistleblowing</b>, transparency non-development activity, child protection, prevention of sexual exploitation, abuse, and harassment, and conflict of interest.</li> </ul>		
Financial management	<p>Policy, procedure or guidance documents that address:</p> <ul style="list-style-type: none"> <li>• Risk management and control mechanisms.</li> <li>• Financial wrong-doing, especially fraud, corruption, <b>bribery</b>, terrorism financing and money-laundering and violation of sanctions imposed by the Australian Government.</li> <li>• Checks of individuals and organisations receiving funds against the Australian National Security Listed Terrorist Organisations and the DFAT ASO Consolidated List of all persons and entities listed under Australian sanctions laws.</li> <li>• Appropriate and effective internal controls.</li> </ul>	8.2.1	Amendment to existing requirement.
Annual reporting	<p>All members must publish ACFID-Code-compliant financial statements in their Annual Reports which include:</p> <ul style="list-style-type: none"> <li>• An auditor’s report that refers to the Code-compliant Financial Statements included in the Annual Report (i.e. not the auditor’s report that refers to the full financial statements).</li> <li>• Comparative figures for the previous reporting period.</li> <li>• A note stating that the ACFID Code-compliant financial statements comply with the presentation and disclosure requirements of the ACFID Code of Conduct and refers readers to the ACFID Code of Conduct website for further information.</li> <li>• <b>Reporting in Australian dollars.</b></li> </ul> <p>Members whose consolidated entity international development and humanitarian revenue is above \$250,000 must publish Financial Statements in Australian dollars and include the following:</p> <ul style="list-style-type: none"> <li>• An Income Statement in Option 2 format.</li> <li>• A Balance Sheet that complies with the requirements of Australian Accounting Standard AASB 101 Presentation of Financial Statements.</li> <li>• A Statement of Changes in Equity that <b>complies with Corporations Law requirements</b> (for members that are companies or trustee companies only).</li> </ul>	8.3.2	Amendment to existing requirement.

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Inclusion and representation	Policy, statement or guidance document that commits the member to the inclusion and representation of those who are in vulnerable positions or experiencing marginalisation or exclusion – <b>temporarily or ongoing.</b>	1.2.1	Amendment to existing requirement.
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