# Amendments to Verifiers in the ACFID Code of Conduct

**A CHECKLIST FOR ACFID MEMBERS**

The table below lists the **new and revised Verifiers** in the Quality Assurance Framework. Members will need to have these Verifiers in place to demonstrate compliance with the revised ACFID Code, both to their Board and to ACFID. Documentation should be proportionate to the scale and nature of your organisation’s work.

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

ACFID will continue to provide guidelines, templates and worked examples through the [online Good Practice Toolkit](https://acfid.asn.au/good-practice-toolkit/overview/).

Amendments to the Verifiers are highlighted in **bold**. Read the full list of Verifiers in the [Quality Assurance Framework](https://acfid.asn.au/wp-content/uploads/2024/04/ACFID_QAF_2024_V4_web_sml.pdf).

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| Topic | Requirements outlined in the Verifiers | Compliance Indicators | Changes from current Code | Notes |
| Governance | * A governing instrument, available from the member’s website, that **includes the member’s purpose (a charitable purpose for the public benefit)** and a rule requiring them to operate as a not-for-profit
* **Periodic reports are provided to the organisation’s governing body on legal and compliance obligations.**
* **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.**
 | 7.1.17.2.17.2.3 | Amendment to existing requirement – existing ACNC requirement.New requirement.New requirement – existing ACNC requirement. |  |
| Racial justice | * **Policy, statement or guidance document which commits members to the pursuit of racial justice.**
* **Governing body, senior leadership, staff and volunteers are aware of and have access to safe training in issues related to diversity and anti-racism.**
 | 1.1.29.2.3 | New requirements. |  |
| Locally-led action | * **Policy, statement or guidance document that commits the member to locally-led action.**
* **Evidence of naming and addressing power imbalances in organisational relationships relevant to the member’s development and humanitarian initiatives.**
* **Evidence of the voices and decision-making of local actors is consistently captured in:**
* **Design or planning framework, tools, templates or approaches.**
* **Monitoring and evaluation framework, tools, templates or approaches**
* **The allocation of resources (time, funds and people) throughout the project cycle**
* **The design and evaluation of feedback and complaints mechanisms**
* Development and humanitarian initiatives consistently show evidence of the influence of primary stakeholders **in planning, decision-making and evaluation.**
 | 2.1.12.1.22.1.3 | New requirements.Amendment to existing requirement. |  |
| Climate action | * Policy, statement or guidance document committing the member to promoting environmental sustainability, **climate action** and improved environmental outcomes in development and humanitarian initiatives.
* Design or planning framework, tools, templates which require or approaches which consistently show evidence of the analysis of environmental risk and management, **including risks associated with climate change**.
* Policy, statement or guidance document committing the member to minimising the environmental impact, **including the carbon footprint**, of their organisation’s internal operations.
* 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, **impacts of climate change** and an analysis of power dynamics including issues of gender equality and equity.
* A risk framework, risk management plan or approach that assesses and addresses risks for all initiatives including from a protection / safeguarding perspective, **and risks associated with climate change** (see 1.4.1, 1.5.1, 3.2.1).
 | 3.2.13.2.24.2.14.2.2 | Amendments to existing requirements. |  |
| Risk management | * **A documented organisation-wide risk management approach.**
* **Regular reporting to the governing body of key risks and controls.**
* **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.**
 | 7.4.51.4.11.5.17.3.17.3.27.3.38.2.1 | New requirementNew requirement – replacing requirement that members must extend certain Code requirements to partners through an MOU or similar. |  |
| Whistleblowing | * A whistleblowing policy, **for disclosures where a whistleblower has reasonable grounds to suspect their information discloses misconduct or wrongdoing,** that has the following components as a minimum:
* **States the purpose and importance of the policy.**
* **Requires staff and volunteers to disclose possible misconduct or wrongdoing, and encourages disclosures from other whistleblowers.**
* **Outlines any Whistleblowing Protections for governing body members, staff, volunteers, their relatives or dependents, and others, including as required by law,** and guaranteeing that staff and volunteers who disclose possible misconduct or wrongdoing will be protected from adverse employment consequences.
* **Clarifies to whom disclosures that qualify for protection can be made.**
* **Outlines processes to protect anonymity where requested, confidentiality, and a fair and impartial investigative process.**
 | 9.2.2 | Amendment to existing policy requirement – alignment with ACNC and ASIC. |  |
| Child Safeguarding | * Policy document applicable to all governing body members, staff, **contractors**, volunteers and visitors to projects, that includes:
	+ - A commitment to effective leadership to enable the safeguarding of children.
		- **Definition of a child as anyone under 18.**
		- **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.**
		- A commitment to communication of the Child Safeguarding policy and procedures to all governing body members, staff, volunteers, visitors to projects and partners.
		- **A commitment to report to any donors that require reporting under any funding agreements.**
		- **A commitment to providing child safeguarding training for personnel at induction and regularly thereafter depending on risk profile.**
		- **A commitment to preventing a person from working with children if they pose an unacceptable risk to children.**
		- Approach to assessing risk and monitoring risk and child safeguarding processes of all activities.
		- A commitment to the use of images and personal information for promotion, fundraising and development education which ensures the privacy and safeguarding of children.
		- The process for regular review of the policy, **at least every 5 years.**
* Policy or procedures applicable to all governing body members, staff, contractors, volunteers and visitors to projects, that cover:
* Recruitment screening processes for all personnel in contact with children which include:
* Criminal record checks before engagement; statutory declarations of local legal equivalent where criminal record checks are unavailable or unreliable. **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.**
* Verbal referee checks.
* The following additional screening measure for all personnel working with children:
* Behavioural-based interview questions.
* **Risk assessments of all activities including identification of risks and an outline of mitigations measures, which are regularly re-assessed.**
* Employment contracts which contain:
* Provisions for the prevention of a person from working with children if they present an unacceptable risk to children.
* Suspension or transfer to other duties for any employee who is **under investigation and provision to dismiss any employee after an investigation.**
* **Child safeguarding training is provided to all personnel, including on reporting procedures.**
* A documented code of conduct that covers the following with regard to child safeguarding:
* Appropriate language, communications **and behaviour.**
* Banning of alcohol and drugs.
* Gifts to children.
* Physical contact with children.
* Banning of sexual relations with children.
* Child labour.
* Photos and images.
* Reporting obligations.

 * The code of conduct must be signed by relevant **governing body members**, staff, **contractors**, volunteers and project visitors.
* **Documented and accessible policies and/or procedures** for:
* Child safeguarding incident reporting
* Child-friendly complaints handling
* **These policies and/or procedures must be known by all personnel and:**
* **Cover:**
* **How to report and respond to child exploitation and abuse suspicions and/or allegations.**
* **The relevant roles and responsibilities of governing body, staff and volunteers.**
* **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.**
* **How reporting obligations will be fulfilled.**
* **Contact information to enable an external person to report.**
* **Appointment of a child protection incident reporting focal person.**
* Reflect the following principles:
* **The safety and wellbeing of children and young people are prioritised.**
* Consistency with relevant legislation, including compliance with mandatory reporting responsibilities, privacy, and employment law.
* Protection of all parties involved in the complaint of concern.
* Confidentiality (as distinct from secrecy).
* Expedient reporting.
* Truthfulness.
* Fairness.
* Professionalism.
 | 1.4.11.4.21.4.3 | Amendment to existing requirements. |  |
| Safeguarding / PSEAH | * Policy document that:
* describes the standards of behaviour for **governing body members**, staff, **contractors,** volunteers, **visitors to projects** and partners.
* specifically prohibits sexual exploitation, abuse **and harassment**.
* outlines how the policy is implemented throughout the organisation.
* specifies the agency’s reporting responsibilities where an incident is identified, including processes for reporting to local enforcement authorities, subject to the wishes and welfare of the complainant/survivor.
 | 1.5.1 | Amendment to existing requirements. |  |
| Partnership management | * A documented assessment process that includes:
* Alignment with members’ values and objectives.
* Governance, legal registration **and authority to work in relevant countries.**
* Financial **management capacity** and systems.
* Reference checks of partners against prohibited entities listings.
* Capacity assessment to implement safeguarding practices including child protection and prevention of sexual exploitation, abuse and harassment.
* Capacity assessment to implement risk management practices, including financial wrongdoing.
* **For formal partnerships, members and partners ensure shared understanding of responsibilities under partnership agreements (e.g. through inception workshops or periodic partnership reviews).**
* Development and humanitarian initiatives consistently show evidence of **listening to and responding to local partners’ priorities for organisational strengthening.**
* **Regular partnership meetings take place where open feedback and dialogue is facilitated.**
* Documented evidence of the periodic and joint review of **the effectiveness of** key collaborations and partnerships.
 | 5.1.25.2.15.3.15.3.2 | Amendments to existing requirements. |  |
| Conflict of interest | * A conflict of interest policy that includes:
* A definition of ‘conflict of interest’.
* A requirement for responsible people, staff, volunteers **and third parties** to disclose perceived, potential and actual conflicts of interest.
* A requirement to **document and review** disclosed perceived, potential or actual conflicts of interest.
* **Procedures for the prevention, management and remedy of conflicts of interest, and their potential impact**, including open and fair procurement of goods and services (or reference made to a relevant policy, see 8.1.3).
 | 7.4.3 | Amendment to existing policy requirement |  |
| Human Resources | * Human resource policies and procedures which address:
* Recruitment and selection, including
* **Screening of staff as part of child safeguarding and prevention of sexual exploitation, abuse and harassment (see 1.4.1 and 1.5.1)**
* Reference checking and vetting for previous misconduct of all staff and volunteers.
* Remuneration and benefits.
* Equity, diversity **and anti-racism**.
* Staff learning and development.
* Performance management.
* Family and carer leave provisions.
* Conduct in the workplace.
* Integrity (including confidentiality and conflict of interest)
* Grievance and disciplinary procedures.
* Workplace health and safety (see 9.2.3)
* A documented code of conduct that specifies the values and expectations of professional conduct of all staff and volunteers. This must include reference to child safeguarding behaviours, prevention of sexual exploitation, abuse **and harassmen**t, transactional sex, **anti-racism**, and anti-bullying; and an obligation on staff and volunteers to report wrongdoing.
* **Acknowledgement by staff and volunteers of their acceptance of the code of conduct (e.g. signed, incorporated into employment or volunteer agreement).**
 | 9.3.19.4.1 | Amendment to existing policy requirement.Amendment to existing requirement.New requirement. |  |
| Research (*only for members who undertake research)* | * **Research plans and results are shared with those who are involved in or impacted by the findings.**
 | 4.2.3 | New requirement. |  |
| Humanitarian Initiatives *(only relevant for members who support or undertake humanitarian initiatives)* | * Policy, statement or guidance document that commits the member to working towards application of the Core Humanitarian Standard:

• **aiming to fulfil all nine Core Humanitarian Standard Commitments****• working to continuously improve systems, structures and practices to improve the quality and accountability of humanitarian initiatives, acknowledging where difficulties are encountered in fulfilling the Core Humanitarian Standard Commitments*** **Evidence of participation in the Misconduct Disclosure Scheme.**

***This indicator and verifier are relevant to members who are engaged in the deployment of personnel for humanitarian initiatives.*** | 1.3.21.3.3 | Amendment to existing requirement.New requirement |  |
| Design and planning | * Design or planning frameworks, tools, templates which require or approaches that consistently show the consideration of the potential for unintended harm and strategies to mitigate the risk of harm, **including for those who are in vulnerable positions or experiencing marginalisation and exclusion.**
 | 1.2.4 | Amendment to existing requirement. |  |
| Vision, mission, values | * Documented **and publicly available** 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 **evaluation of the effectiveness of their development and humanitarian initiatives**.
* 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, **including whether initiatives are consistent with the member’s charitable purpose and not-for-profit status.**
 | 4.3.1 | Amendment to existing requirement. |  |
| Communications / Fundraising | * Public materials:
* **Reflect the perspectives of primary stakeholders.**
 | 6.1.1 | Amendment to existing requirement. |  |
| Websites | * Members will provide the following information on their website:
* Key policies relevant to the public including but not limited to, privacy, complaints, **whistleblowing**, transparency non-development activity, child protection, prevention of sexual exploitation, abuse, and harassment, and conflict of interest.
 | 7.3.4 | Amendment to existing requirement - Whistleblowing policy now required to be on website. |  |
| Financial management | * Policy, procedure or guidance documents that address:
* Financial wrong-doing, especially fraud, corruption, **bribery**, terrorism financing and money-laundering and violation of sanctions imposed by the Australian Government.
 | 8.2.1 | Amendment to existing requirement. |  |
| Annual financial reporting | * All members must publish ACFID-Code-compliant financial statements in their Annual Reports which include:
* 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).
* Comparative figures for the previous reporting period.
* 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.
* **Reporting in Australian dollars.**
* Members whose consolidated entity international development and humanitarian revenue is above $250,000 must publish Financial Statements in Australian dollars and include the following:
* An Income Statement in Option 2 format.
* A Balance Sheet that complies with the requirements of Australian Accounting Standard AASB 101 Presentation of Financial Statements.
* A Statement of Changes in Equity that **complies with Corporations Law requirements** (for members that are companies or trustee companies only).
 | 8.3.2 | Amendment to existing requirement. |  |