Transparency Policy

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

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

This policy outlines our approach to:

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

Application
The policy applies to Board members, staff, contractors and volunteers of Projects of Promise.

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

Governance and Regulatory Responsibilities
Projects of Promise is governed by a voluntary Board of suitably qualified Directors with management responsibility for operations delegated to the Executive Officer or Country Directors. The identity and qualifications of Directors are published on the Projects of Promise website.

As a charity, Projects of Promise meets its reporting obligations through the provision of Annual Reports, Annual Information Statements and Audited Financial Reports.

Key Projects of Promise policies are available on the Projects of Promise website.

At each meeting of the Board, the Executive Officer or Chairperson will provide a Governance Report *(see Attachment A)* identifying any issue requiring disclosure in order to enable the Board to effectively fulfill its governance and strategic planning responsibilities.

Membership and Member Information
Individual membership of Projects of Promise is open to any person subject to the provisions outlined in the Projects of Promise Constitution. As required by company law, Projects of Promise will maintain a register of members but will only maintain such information as is necessary to fulfill legal requirements.

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

Sources of Income
Projects of Promise receives funds from the following sources:

- Donations from the individuals, community groups and charitable foundations are the main source of income
- Income from sales and events
- Special circumstance Government grants

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

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

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

Projects of Promise does not engage with third parties in generating donation income *(eg contract fundraisers)*. The Executive Officer or in the absence of an Executive Officer the Chairperson is responsible for ensuring that Projects of Promise fundraising events are in ethical alignment with Projects of Promise vision and mission.

Donor Information
Projects of Promise is committed to ensuring that donor requests, allocation to purpose or anonymity, are observed *(Refer also Privacy Policy)*. Projects of Promise will:

- Maintain a data base of supporters and donors and where requested will not send supporters or donors promotional or fundraising material
- Ensure donor records are not made available to any other person or organisation except where there is a legal requirement to do so
- Ensure that within Projects of Promise donor information is only be made available to persons whose duties relate to donor management, recording or engagement or to the Board where there is a specific need to do so

- Donors may request at any time information about them held by Projects of Promise
- As a matter of practice and policy, Projects of Promise will not maintain any information on donors that is not directly related to the recording of their contact details, donation record and contact preferences

Participant Information

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

Staff Records – Paid & Voluntary Staff

Projects of Promise will only retain such information in staff records as is necessary to:

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

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

Requests for Information

Contact:

Projects of Promise Chairperson, Carlyle Ginger
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E: carl.ginger@projectsofpromise.org

Policy Review

November 2025, on change of legislation, or at the discretion of the Board of Projects of Promise.

Policy Version

1.0

Transparency Policy: ATTACHMENT A
BOARD GOVERNANCE & RISK REPORT

This report encompasses known information re Projects of Promise and its partner groups	**Response: Yes/No/Details**
External investigations / enquiries into the organisation (or its partners) including any alleged breach of legislation.	
Any litigation (threatened or pending) by or against the organisation.	
Any matter for which legal/professional advice has been sought and a brief summary of that advice.	
Any critical incidents which may have occurred including: ● Any issue with high profile political and/or public relations impact; ● Death or serious injury/disability of an employee/agent of organisation or member of the public, arising from the organisation operations or occurring on organisation property; ● Any major failure in system or technology affecting operations ● Any significant failure/alleged failure of a standard of care ● Any breach of security (theft, trespass, breach of confidentiality, corruption)	
Social Instability/Unrest - eg instability or social unrest in partner country where the nature of extent of the instability is likely to impact continuity, scale or scope of development activity or impact project visits and monitoring.	
Significant issues in workplace relations; ● Workplace issues – alleged breaches re equal opportunity / sexual harassment etc ● Proposed workplace agreements, enterprise bargaining, award issues / changes ● Any representation from union or industry bodies including potential industrial action ● Staff & OHS issues, vacancies, staff turnover, workplace accidents, incidents, claims.	
Any major contractual issues: ● Contract/leases/licences nearing expiry or renewal ● Breach of current contracts with suppliers, customers, etc ● Any event or reason which may affect the organisation of contracts	
Changes to legislation or regulatory schemes affecting the organisation in terms of compliance, budget, operations, or liability of Board Members.	
Complaints in relation to operations including details of serious individual complaints, any allegation that any officer of the organisation has misused his/her office or exceeded his/her powers, or acted unfairly.	
Media comment by management, any employee or agent.	

Insurance: ● All notifications of possible claims or actual claims ● Any changes or proposed changes to insurance arrangements including any change in operations or new business operation relevant to the risk insured and insurance cover. ● Any event arising which appears not to be covered by insurance or not adequately covered	
Significant purchases or replacement of assets or major repairs/maintenance to assets.	
Disposal of assets not otherwise reported or authorized.	
Marketplace status of customers and/or competitors: ● Any significant change in leadership or structure of strategic partners ● Significant developments by others which may affect operations ● Any other matter that significantly affects our position in the market.	
Has the DFAT Consolidated list been checked to see if the partner organisations or key personnel are on the list? *(Six monthly check – 3 July & 3 January each year)*	
Any other matter	
Signed: Executive Officer	**Date:**