

TRANSPARENCY POLICY

1. Scope

Sight For All is committed to disclosing timely, relevant and accurate information in accessible forms. Additionally, Sight For All is committed to high standards of transparency and accountability and acknowledges the importance of transparency in operations and in communications with donors, funders, supporters and the Australian Government.

This Transparency Policy outlines the importance that Sight For All places on transparency and accountability, what information will be shared with the public and how requests for information will be responded to. The policy also outlines exceptions to information that is not disclosed.

For the purposes of this Policy, 'Organisational Leader' refers to the most senior employed officer of the organisation (eg: Chief Executive Officer or General Manager), as appointed by the Board of Directors.

This policy applies to Sight For All Board Directors, staff, Visionaries, volunteers, Fellows and In-Country Visionaries.

2. Purpose

The purpose of this Transparency Policy is to recognise the importance of transparency and accountability in all business undertakings including in the organisation's operations, marketing and project delivery. Through this policy, Sight For All representatives are required to communicate transparently so that all information that is not subject to privacy requirements or relevant permissions, is shared openly and accurately.

3. Principles underlying this Policy

The principles underlying this policy are:

- Ethical and transparent processes for accepting and managing donations and for coordinating fundraising activities
- Ensuring the privacy of donors that is consistent with their wishes and to the extent provided by law and as outlined in Sight For All's Privacy Policy
- Accurate reporting of funds raised
- Ensuring the use of funds for which they were intended and in complying with Sight For All's Vision and Purpose
- Compliance with relevant legislation, ACNC and the ACFID Code of Conduct plus funding and contractual requirements
- Adherence to the ACFID Fundraising Charter
- A commitment to not making statements about other ACFID members with the intention of creating a reputational or other advantage to themselves.

4. Transparency in Practice

The ways in which Sight For All demonstrates transparency include having:

- Published Vision, Purpose, Values and Strategies
- A Constitution that is available on the organisation's website
- Published structure, governance, Board Directors, committees and staff
- Contact information being easily accessible
- ACNC registration, ACFID membership and ANCP accreditation
- Robust financial, governance, compliance and reporting structures
- Published audited financial statements and annual reports that comply with applicable laws and practices, meet ACFID requirements and include statements from a qualified independent auditor
- Information shared on the website, social media platforms and in newsletters
- The Strategic Plan being shared to stakeholders and available on the website

- Head Agreements with Ministries of Health / Ministries of Foreign Affairs in partner countries where active projects are undertaken
- Project Agreements in place for all projects
- Service Agreements in place with suppliers
- Progress of projects shared via communication channels (website, social media, newsletters)
- Development of project management documents including appraisals, proposals and acquittals
- Project progress and completion reports shared with funders
- Policies and procedures available on the website, including for Child & Young Person Protection, Prevention of Sexual Exploitation, Abuse and Harassment, Code of Conduct, Vulnerable Persons Code of Conduct and Complaints Handling
- Translated fact sheets for Child & Young Person Protection, Prevention of Sexual Exploitation, Abuse and Harassment, Code of Conduct, Vulnerable Persons Code of Conduct, Personal Image Consent and Complaints Handling.

5. Information not made public

Sight For All documentation not publicly available includes:

- Personal details of anyone associated with the organisation without their expressed written consent. This includes Board Directors, staff, Visionaries, consultants, contractors, fellows, volunteers, In-Country Visionaries, Vision Giver Members, donors and corporate supporters.
- Any information that would breach Sight For All's Privacy Policy or the Privacy Act 1988.
- Board or committee meeting papers or minutes.
- Internal documents including project documents and specific funder details or requirements.

6. Assessing non-public documents

In the instance where an external party requests access to a document that is not a public facing, the following steps are to be undertaken:

- Request for a document is to be made in writing to the Organisational Leader including why the request is being made
- Depending on the request, the Organisational Leader may send a redacted version of the document to the individual making the request
- For instances where entire documents are requested, the Organisational Leader will refer the request to the Board of Directors. In these situations, the Board will make the decision as to whether the entire document can be distributed.
- The legal Board Director will provide advice and guidance in such matters.

7. Transparency in Fundraising

Sight For All's Fundraising Policy provides direction in the coordination of fundraising activities, and outlines requirements to ensure fundraising activities are conducted ethically and transparently.

The Fundraising Policy details responsibilities for the acceptance of and non-acceptance of donations, including:

In soliciting donations

- Ensuring donations are made to Sight For All generally or for specified projects
- Ensuring all materials and other communications used for fundraising purposes clearly identify Sight For All and are accurate and truthful
- Appropriately acknowledging and recognising donations in consultation with the donor.

In not accepting donations

- If the donor's activities are not compatible with Sight For All's Vision, Purpose or Values
- If the cost of accepting donations is more than the value of the donation itself
- If through receiving the donation there will be a detrimental impact on Sight For All's reputation.

8. Financial Transparency

Sight For All's finances are externally audited and available on the organisation's website. Reports state funds spent on administration and fundraising activities and are supported by graphs and a written report by the Treasurer.

Written and verbal financial reports are provided at Sight For All Board meetings and Sight For All's Finance, Risk, Remuneration, Audit and Compliance Committee meetings that occur approximately six times per year.

8. Privacy

Sight For All is committed to protecting the privacy of individuals. Sight For All is bound by the Privacy Act 1998, the 13 Privacy Principles, the ACFID Code of Conduct and Payment Card Data Security Standards. Sight For All's Privacy Policy outlines the way in which Sight For All manages an individual's personal information to protect their privacy. The Privacy Policy is available on the Sight For All website.

8. Published Materials

Sight For All has an Ethical Communications Policy in place to ensure that information contained in published materials is accurate and is portrayed in an appropriate manner. The policy outlines the process of approving material, including when content may be sensitive or disturbing.

9. Ethical Decision Making

Sight For All's Ethical Decision Making Policy outlines requirements to ensure that information including images, videos, stories and case studies are collected and shared ethically and inline with the organisation's Ethical Decision Making Framework, Informed Consent Procedure, Code of Conduct Policy, Child and Young Person Protection Policy and Privacy Policy. The Informed Consent Procedure is shared with staff, Visionaries, Fellows, project participants and volunteers via training in the Good Development Practice Workshop and details contained in the Visionary, In-Country Visionary and Fellows Handbooks.

10. Informed Consent

Sight For All has an Informed Consent Procedure, which outlines the steps to be taken prior to individuals being photographed, when taking images and after images have been taken. As outlined in this procedure, written consent is required prior to the image being taken. This consent is stored by Sight For All. Individuals are also advised that they may decline the opportunity to be photographed.

The Sight For All team do not use images without confirmation that consent has been provided. When taking images, Sight For All representatives will ensure that adults and children are presented in a dignified and respectful manner and that the image is an honest representation of context and fact.

Sight For All staff, Fellows, In-Country Visionaries and Visionaries are aware of the Ethical Communications Policy and the need for consent to be provided, prior to images being taken in-country. Fellows and in-country staff provide assistance in obtaining consent. The Personal Image Consent Form is available in Burmese, English, Khmer, Laotian and Mongolian.

11. Complaints

Sight For All recognises the rights of individuals and organisations that it does business with to lodge a complaint and have it resolved fairly and as quickly as possible.

As an observer of the ACFID Code of Conduct, Sight For All recognises that individuals who believe there has been a breach of the Code by Sight For All, are able to make a complaint with the ACFID Code of Conduct Committee directly.

ACFID can be contacted via telephone +61 2 6285 1816 or email code@acfid.asn.au

Further details of submitting a complaint to the Code of Conduct Committee can be found via this link <https://acfid.asn.au/content/complaints>

The Complaints Handling Policy contains a full outline of Sight For All's processes and timeframes in dealing with complaints. The Complaints Handling Policy is available on the Sight For All website.

12. Related Documents

- Sight For All Complaints Handling Policy
- Sight For All Fundraising Policy
- Sight For All Non-Development Activity Policy
- Sight For All Informed Consent Procedure
- Sight For All Personal Image Consent Form
- Sight For All Privacy Policy
- Sight For All Ethical Communications Policy

13. Review

The Sight For All Transparency Policy is reviewed on a biennial basis.

Sight For All Transparency Policy
Approved by the Board of Directors
Version 4.0

Document Revision History		
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Transparency Policy	1	8 January 2018
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