**POLICY ON TRANSPARENCY**

**Policy Context**

Vine Communities 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 Vine Communities 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 Vine Communities* *Policy on Complaints)*

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 Vine Communities.

**Definitions**

Vine Communities 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**

Vine Communities 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 Vine Communities website.

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

Key Vine Communities policies are available on the Vine Communities website.

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

**Membership and Member Information**

Individual membership of Vine Communities is open to any person subject to the provisions outlined in the Vine Communities Constitution. As required by company law, Vine Communities will maintain a register of members but will only maintain such information as is necessary to fulfil legal requirements.

Where a member is a Director on the Board of Vine Communities, additional information to enable a biographical statement to be published on the Vine Communities 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**

Vine Communities 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**

Vine Communities 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.

Vine Communities 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, Bright Futures reports to its Board annually against the ACFID fundraising charter.

Vine Communities 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).*

Vine Communities 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 Vine Communities fundraising events are in ethical alignment with Vine Communities vision and mission.

**Donor Information**

Vine Communities is committed to ensuring that donor requests, allocation to purpose or anonymity, are observed *(Refer also Policy on Privacy).* Vine Communities 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 Vine Communities 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 Vine Communities
* As a matter of practice and policy, Vine Communities 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**

* Vine Communities 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 Vine Communities 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 Vine Communities, 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**

Vine Communities will only retain such information in staff records as is necessary to:

* Fulfil 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 fulfil their work responsibilities, and to the Board or its representative, when the Board considers the action necessary.

**Requests for Information**

Contact:

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