

OVERSEAS OPERATIONS POLICY

[YOUR CHURCH NAME]

A. Preamble

A [ACC Church Name] (The “Church”, We, Us) is a Christian Church located at [ACC Church Address or Location] that is affiliated with the Australian Christian Churches Movement (ACC Movement) and that is registered as a charity with the Australian Charities and Not For Profit Commission (ACNC).

B The Church engages in Overseas Activities that align with its charities purpose of Advancing Religion and our desire to demonstrate the love of God to others by responding to the spiritual, social, emotional and physical needs of individuals and communities who are experiencing poverty, suffering, distress or disaster.

C The purpose of this policy is to:

- (i) demonstrate a commitment to good practice in regards to any Overseas Activities;
- (ii) meet compliance obligations with the ACNC Governance Standards and ACNC External Conduct Standards, specifically in regards to Overseas Activities.
- (iii) establish clear compliance expectations in regards to any Third Party Programs that involve Overseas Activities.

D This policy applies to all Church Board Members, staff and volunteers.

E This policy has been developed with regards to the ACNC Governance Standards and ACNC External Conduct Standards.

F Responsibilities

- (i) It is the responsibility of the Church Board to oversee the implementation and operation of this policy; and
- (ii) It is the responsibility of the Church staff and volunteers to ensure Third Party Programs and any other Overseas Activities are carried out in compliance with this policy.

G Definitions

In this policy, unless the context suggests otherwise, the terms listed below have the following meanings:

ACC International Missions Ltd (ACCIM), ABN: 66 077 367 223, is the missionary sending and support arm of the ACC Movement, and **ACC International Relief (ACCIR)**, ABN: 26 077 365 434, is the aid and development arm of the ACC Movement, being collectively referred to as **ACCI**.

ACNC Registered Third Party means a charitable entity that is currently registered with the ACNC, required to comply with the ACNC Governance and External Conduct Standards and up to date with their reporting and compliance obligations. Any individual or entity that does not meet this definition is deemed to be a **Non-ACNC Registered Third Party**.

Board members means members of a committee, board or other governing entity.

Child means an individual who is under the age of 18 years;

Conflict of Interest means an actual or perceived conflict between a person’s interests and the interests of the Parties, including interests of a person’s family, friends or other organisation they are involved in;

Equipment means all items provided to You by Us or purchased with **Resources** for the Program with a value over A\$1,000 or listed in the Schedule.

Overseas Activities means any operations or activities that the Church is required to report on or keep records on under the ACNC External Conduct Standard. This includes overseas activities and programs it runs itself, or in collaboration with a third party, as well as any funds or resources it sends for use overseas.

Resources means money, property, materials or other assets provided by Us or acquired with money provided by Us for the Third Party Program.

Third Party Programs means Overseas Activities carried out by Third Party individuals or organisations (referred to as the Program or Programs).

Vulnerable Individual means:

- (i) a Child (under the age of 18); or
- (ii) any individual who is or may be unable to take care of themselves, or is unable to protect themselves against harm or exploitation due to age, illness, trauma, disability or other disadvantage.

B. Overseas Operations Policy

1. Policy

- (a) The Church will only engage in ethical Overseas Activities or engage with Third Party Programs that reflect good standards of practice.
- (b) The Church will take reasonable steps to ensure appropriate standards of behaviour, governance and oversight when engaging in Overseas Activities, including:
 - (i) Following policies and procedures in regards to Overseas Activities and the control of resources;
 - (ii) Conducting an annual review and keeping records on Overseas Activities;
 - (iii) Engaging in practices that seek to minimise the risk of fraud and corruption; and
 - (iv) Seeking to safeguard vulnerable individuals.
- (c) The Church will not engage in the direct implementation of Overseas Activities outside the context of an approved Third Party Program, with the exception of
 - (i) engaging for the purpose of making an assessment of such a program; or
 - (ii) activities that are deemed to be incidental.
- (d) The Church will establish and communicate clear expectations in regards to Overseas Activities and Third Party Program Compliance.
- (e) The Church may facilitate sending individuals or teams overseas as part of an Ethical Missions Trip to a Third Party Program.

2. Risk management approach

- (a) The Church will take a risk management approach in the assessment and allocation of resources to any Third Party Programs, including a risk assessment of the:
 - (i) Implementing Third Party Partner;
 - (ii) Overseas Activities; and

- (iii) Church involvement.
- (b) The Church will use a traffic light approach to assessing risk, where:
 - (i) **GREEN**, indicates a low level of risk
 - (A) Third Party Partner is ACNC registered charity, subject to external compliance that can be independently verified;
 - (B) Overseas Activities are restricted to common faith based areas of work, or which are similar to your Churches Australian activities and with which the Church and people have a high level of alignment. While there may be a specialist component to some of these activities, they are area in which it is not unusual to see faith based organisations engaging.
 - (C) Your Church involvement is limited to that of a normal donor relationship, where funds are disbursed as donations under the Churches ordinary finance and governance policies and procedures.
 - (ii) **ORANGE**, indicates high risk partners, activities or involvement, where that risk can be managed or mitigated, such as through policy, procedures, specialist skills or technical competence; and
 - (A) Any Third Party Partners that is not an ACNC registered charity will automatically be classified as higher risk and will require an organisational due diligence assessment and the relationship appropriately documented (e.g. MOU).
 - (B) Any Overseas Activities which involves vulnerable people, child sponsorship, specialist skills, legal or regulatory compliance, registration requirements will be inherently high risk and will require a review and risk management assessment.

Lower Risk	Higher Risk
Supporting a missionary through a sending organisation	Beneficiaries with disabilities
Bible training	Child sponsorship programs
Capacity building of church based personnel	Counselling services
Church planting	Dangerous locations
Community development programs	Disaster response
Community strengthening programs	Education (setting up new schools outside of government and community partnerships)
Developing Bible training or church based resources	Human rights, advocacy and prevention work (which can put local staff in danger for speaking up about failures of government)
Disaster preparedness	Medical programs
Discipleship and mentoring	Rehabilitation (including addition or trauma related)
Education (partnering with government or community primary or secondary schools)	Shelters, boarding homes and transitional homes
Engaging in outreach based activities	Trafficking and prostitution intervention

Family strengthening initiatives	Transitioning a children's residential care facility or orphanage
Heath and sanitation projects	Volunteering in children's residential care facilities
Income generation activities	Working with unaccompanied minors
Leadership training	Any activity that involves:
Vocational and skills training	<ul style="list-style-type: none"> - A high risk of harm to workers or beneficiaries - Any vulnerable individuals - An expectation they would be undertaken only by highly trained and experienced professionals

- (C) Any Church involvement that moves beyond the parameters of a normal donor relationship, this includes, but is not limited to:
- (I) Short-term teams or volunteers;
 - (II) Medium to long-term volunteers or staff;
 - (III) Large financial contribution;
 - (IV) Vision, leadership or operational control; or
 - (V) Equipment, supplies, resources or transportation logistics.

(iii) **RED**, indicate high risk activity that cannot be mitigated, inappropriate involvement, illegal or unethical practices which should be avoided. This includes but is not limited to:

- (A) Establishing a new residential care facility or orphanage (refer to <https://rethinkorphanages.org> or <https://kinconnected.org.au>);
- (B) Existing residential care facility or orphanage unless part of a transition process or a legitimate temporary, emergency care solution (e.g. ACCI Kinconnected Program);
- (C) Participating in short term missions activities that fail to uphold local laws and regulations (e.g. medical programs with volunteers who are not licensed to practice in the receiving country); and
- (D) Political activities.

(c) The Church will **NOT** allocate resources to any Third Party Program or Overseas Activity that have been assessed as:

- (i) **ORANGE**, unless it has been determined that appropriate policy and compliance mechanisms are in place, and risks that have been identified can be appropriately mitigated; or
- (ii) **RED**, under any circumstances.

3. Third Party Programs approach

(a) ACNC Registered Third Party

- (i) By working through an ACNC Registered Third Party, the Third Party will be the entity that is responsible for compliance with the External Conduct Standards in respect of their own Overseas Activities.
- (ii) This will reduce risk to the Church and increase confidence that the organisation should have a minimum level of controls in place.
- (iii) Where **ORANGE** risk indicators have been identified, it will still be important to make an assessment of how they are or how they intend to manage and mitigate those risk indicators.
- (iv) This will allow the Church to focus on Church engagement, fundraising, advocacy and Ethical Missions Trips and the role of the Church will largely be characterised as that of a donor.

(b) Membership of Peak Bodies

- (i) In addition to being an ACNC Registered Third Party, if the Third Party is also a member of one of the the following peak bodies, this has the potential to further reduce risk to the Church and increase confidence that the organisation is engaging in groups that hold its membership accountable to higher standards of practice. These groups include, but are not limited to:
 - (A) The Australian Council for International Development (ACFID), which holds its members to comply with the ACFID Code of Conduct, which defines minimum standards of governance, management and accountability for non-governmental development organisations;
 - (B) Missions Interlink, which requires members to comply with Missions Interlink Statements and Accreditation Standards that have application to overseas missions organisations;
 - (C) CMA Standards Council, which assesses members against the Nine Principles of Ministry Accountability; and
 - (D) ACC Ministry Department, as each ministry department of the ACC is subject to annual governance review and quarterly compliance reporting.

(c) Non-ACNC Registered Third Party

- (i) The Church will carry the full burden of compliance with the External Conduct Standards in regards to any Non-ACNC Registered Third Parties and their Overseas Activities. Therefore a rigorous due diligence and risk management assessment will be necessary.
- (ii) Where **ORANGE** risk indicators have been identified, it will be even more important for the Church Board to make an assessment of the risk to the organisation.
- (iii) The Church will not be able to characterise it's role as being merely a donor, as risks which are unable to be managed or mitigated have the potential to directly impact the Church, it's Board Members, it's ACNC Registration and potentially it's legal liability.
- (iv) The Church will now be directly responsible under the ACNC External Conduct Standards for implementing these Overseas Activities, and will have additional Implementation Risk considerations.

4. Overseas Activities and Third Party Program Compliance

- (a) The Church will firstly demonstrate compliance by ensuring our involvement in Overseas Activities has an Ethical Basis and meets our basic Compliance Expectations.
- (b) The Church will require all ACNC Registered Third Parties to:
 - (i) align with our Ethical Basis;
 - (ii) declare compliance or commit to complying with the ACNC External Conduct Standards, including our Compliance Expectations;
 - (iii) declare how they are or how they intend to manage or mitigate any **ORANGE** high risk Overseas Activities that have been identified;
 - (iv) provide assurance and clear guidelines to manage or mitigate any **ORANGE** high risk Church involvement that moves beyond the parameters of a normal donor relationship; and
 - (v) commit to NOT engage in any **RED** high risk activities.
- (c) The Church will require all Non-ACNC Registered Third Parties to:
 - (i) align with our Ethical Basis;
 - (ii) undertake a due diligence and risk assessment to assess their Overseas Activities and their organisational capacity to complying with the ACNC External Conduct Standards expectations of a Third Party, including all the compliance areas in the section below;
 - (iii) demonstrate how they are or how they intend to manage or mitigate any **ORANGE** high risk activities that have been identified;
 - (iv) provide assurance and clear guidelines to manage or mitigate any **ORANGE** high risk Church involvement that moves beyond the parameters of a normal donor relationship; and
 - (v) commit to NOT engage in any **RED** high risk activities; and
 - (vi) sign a Memorandum of Understanding (MOU) agreement as part of this commitment.

C. Ethical Basis

1. Ethical Foundations

- (a) We understand that we are called to participate in God's redemptive plan and Christ's mission of reconciliation. In obedience to the command of Christ to love our neighbours, our Church has a deep commitment to support those living overseas who are oppressed by injustice and poverty.
- (b) As an ACC Church, we align with our ACC Movements biblical position in forming our ethical foundations, which includes these core documents:
 - (i) ACC Statement of Faith;
 - (ii) ACCI Biblical Basis for Missions and Development;
 - (iii) ACCI Justice for the Poor Position Paper; and

- (iv) ACCI Holistic Understanding of Poverty Position Paper.
- (c) This commitment can be expressed in many different forms, from prayer and encouragement to financial or in-kind assistance. Regardless of the particular form, our support of a disadvantaged community always occurs within a Third Party relationship. We recognise that it is essential that we do our due diligence before supporting a particular Third Party or Program.

2. Ethical Approach to Overseas Activities

(a) Problems are Complex

- (i) We need to recognise that inequality is the basis of human poverty, which is far more complex than merely a resource deficit, with a simple cause and effect solution.
- (ii) Human poverty is much more than living below an arbitrary economic line. It is experienced as multidimensional deprivation that spans across physical, economic, psychological and social domains. Poverty deprives people of their basic needs and rights such as food security, clean water, adequate shelter, education, basic health care and security. More significantly the voices of the poor tell us that poverty deprives people of their dignity, self-worth and voice. It deprives people of their positive freedoms, meaningful choices and control over their own lives. It is defined as a state of being powerless.
- (iii) Inequality is basically a false and unbiblical hierarchy of human worth most commonly based on social classifications such as race, caste, gender, socio economic status, education and ability/ disability. When this inequality informs our societies and world's systems and structures, they become sites of partiality and injustice that favour the powerful over the powerless, and the result is poverty.

(b) Change or Transformation Goal

- (i) The underlying purpose in missions is change or transformation. We feel compelled to act because we recognise a problem that requires a solution, a situation that needs to be changed for the better or simply room for improvement. Without a change driver, it would be merely maintenance.
- (ii) Any change within a community is a complex matter and any activity carried out for the purpose of community transformation is carried out within a complex context. There is no such thing as an isolated activity.
- (iii) Biblical principles form the basis of our understanding of ethics which can be summarised as outworking the two great commandments, to 'Love the Lord your God', and 'Love your neighbour as yourself'.

(c) Ethical Approach

- (i) When we acknowledge that a situation is complex, we are more inclined to slow down and expect that we may not have all the answers. Unpacking the complex problems involves consulting widely, asking lots of questions, active listening, making and challenging our assumptions.
- (ii) It also involves alternating between zooming out to map the big picture and zooming in to explore details, including:
 - (i) Drill down to the root cause of issues affecting the community
 - (ii) Identify the various stakeholders and the complex web of relationships they create

- (iii) Locate community assets and strengths (not just needs and weaknesses)
- (iv) Explore the cross cultural issues and the different worldviews and beliefs involved

3. Ethical Approach to Missions Trips

- (a) The Church recognises that the Third Party will be the implementing party for the Overseas Activities, so any short-term missions trips will not be characterised by implementation of Third Party Program activities.
- (b) The Church is committed to running ethical missions trips, that must lead to good outcomes for the Church, Third Party, the volunteer teams and the Program beneficiaries, and unintended consequences for none.
- (c) Ethical Missions Trips will fall into 2 categories:
 - (i) Action oriented trips facilitate teams or volunteers to achieve a tangible goal which is related to a Program during the course of the trip, including:
 - (i) Skills based volunteering and exchange, when someone uses their specific expertise and qualifications to assist a local organisation or community in a niche area.
 - (ii) Asset based trips, in which we first recognise that every community has assets and the capacity to envisage and initiate positive change for themselves. This could be by way of contributing to the resource pool communities require to fulfil their self-identified goals, or coming alongside communities to work together and lighten the load. Either way, it's a 'do it together approach'.
 - (ii) Learning orient trips, designed to impart knowledge to teams about local and global issues, include:
 - (i) Exposure trips, are about exposing people to other countries, cultures and contexts.
 - (ii) Advocacy trips are designed to equip teams and volunteers with knowledge and awareness for the purposes of advocacy efforts that are most likely to take place once they return home.
- (d) Ethical missions trips will prioritise the safeguarding of vulnerable individuals, specifically:
 - (i) Safeguarding children and upholding their rights must also be central to any short-term missions trip that engages with children; and
 - (ii) Safeguarding Vulnerable Individuals and other Program beneficiaries with whom we hold an unequal power dynamic.

D. Third Party Compliance Expectations

1. Use of Resources

- (a) All Resources must be used to:
 - (i) further the objectives and activities of the Third Party Program;
 - (ii) benefit the participants in the Third Party Program.
- (b) Resources may not:

- (i) be used in a way that is inconsistent with the objectives of the Third Party Program;
or
 - (ii) be distributed to members or staff of your organisation, except where those payments specifically relate to the delivery or administration of the Third Party Program.
- (c) Any Resources must only be disbursed in accordance with relevant Australian and overseas laws including taxation, counter terrorism financing and anti-money laundering legislation, specifically the Criminal Code Act 1995 (Cwth) and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.
- (d) Any surplus Resources should be reallocated to another program with similar objectives and activities.

2. Controls and risk management

- (a) The Third Party must implement reasonable controls and risk management processes to ensure that Resources (particularly funds) are not:
- (i) stolen;
 - (ii) used for any purpose other than the objectives of the Third Party Program; or
 - (iii) inadvertently used to finance criminal activities including terrorism.

Appropriate controls and risk management processes may include reviewing transactions, obtaining records of expenditure such as receipts, budgeting and ensuring that more than one individual has oversight of accounts.

- (b) We may ask the Third Party to provide evidence of controls and risk management processes as part of the risk assessment, monitoring or reporting process.
- (c) Where possible, the Third Party must effect and keep current a public liability insurance policy in respect of their activities.

3. Use and storage of Equipment

The Third Party must ensure any Equipment is:

- (a) only used to further the objectives of the Third Party Program;
- (b) stored in a secure and safe location.
- (c) recorded in a Register of Equipment.

4. Whistleblowing and complaints handling

The Third Party will ensure:

- (a) there is a clear, documented and published process:
 - (i) for employees, volunteers, others involved in delivery of the Third Party Program and participants in the Program to raise concerns regarding misconduct or behaviour that is illegal, unethical or corrupt;
 - (i) for participants in the Third Party Program to raise a complaint regarding the Program;
- (b) that concerns and complaints raised are acknowledged and responded to in an appropriate and timely manner; and

- (c) that individuals who express concerns or make complaints under this clause are not adversely affected because a concern or complaint was raised by them or on their behalf.

5. Conflicts of interest

- (a) The Third Party must ensure that Your Board members, employees, volunteers or other third parties:
 - (i) understand when and how a perceived or actual Conflict of Interest may arise; and
 - (ii) are required to disclose any perceived or actual Conflict of Interest to You.
- (b) The Third Party must take reasonable steps to manage Conflicts of Interest so that decisions relating to the Third Party Program are not affected by the Conflict of Interest.

6. Protection of vulnerable individuals

Vulnerable Individuals must be protected in the delivery of the Third Party Program. Vulnerable Individuals may include both participants in the Program and individuals assisting in the delivery of the Program. The Third Party must ensure that:

- (a) the Program is delivered in a way that minimises the risk of harm to Vulnerable Individuals;
- (b) concerns and complaints about suspected abuse of Vulnerable Individuals are received and responded to;
- (c) the privacy of Vulnerable Individuals is respected and protected; and
- (d) staff and volunteers working with Vulnerable Individuals have appropriate training and qualifications.

7. Child Safeguarding

- (a) The Third Party must be committed to child safeguarding and promoting the care, protection and wellbeing of children and agree to work to ensure their organisation is child safe.
- (b) The Third Party must have an approved and regularly reviewed Child Safeguarding/Protection Policy that is appropriate to their organisation's level of risk and which addresses the following:
 - (i) development project planning and implementation;
 - (ii) use of images and personal information of children for fundraising and promotion purposes;
 - (iii) personnel recruitment and screening including staff, volunteers, consultants and suppliers (in both Australia and overseas where necessary);
 - (iv) all applicable legal obligations including mandatory police checks where available and appropriate for all stakeholders who have regular contact with children;
 - (v) behaviour codes of conduct;
 - (vi) education and training of staff and volunteers and communication of the policy to all stakeholders; and
 - (vii) reporting procedures for any incidents, belief or suspicion of child abuse or concerns regarding the safety and wellbeing of a child.

- (c) The Third Party agrees to always take child protection reports seriously and immediately report any incidents, belief or suspicion of child abuse (past or present) in accordance with their policies, procedures and legal reporting requirements.

8. Screening and background checks

The Third Party must ensure that:

- (i) all staff and volunteers involved in the delivery of the Program are appropriately screened and recruited to minimise the risk of:
 - (A) harm to Vulnerable Individuals;
 - (B) financial impropriety; and
 - (C) perceived or actual Conflicts of Interest.
- (ii) all required checks to work with Vulnerable Individuals are completed before staff and volunteers work with Vulnerable Individuals. Screening and background checks may include criminal record checks and child safety checks (if they are available in Your country or region) as well as reference checks. Screening helps ensure that delivery of the Program is in good hands.

9. Extraterritorial legislation

- (a) The Third Party acknowledges that the Program and the Use of Resources may be subject to Australian laws, particularly in relation to:
 - (i) Money laundering
 - (ii) Terrorism financing
 - (iii) Modern Slavery
 - (iv) Trafficking
 - (v) Child sexual abuse
 - (vi) Bribery
 - (vii) People Smuggling
 - (viii) Dealing with internationally sanctioned countries, entities or persons.
- (b) The Third Party confirms that these laws are being complied with.
- (c) Specifically, the Third Party,
 - (i) agrees to regularly check that the beneficiaries and third parties that they deal with are not terrorist individuals or organisations that are listed on the Department of Foreign Affairs list of 'prescribed organisations' (www.nationalsecurity.gov.au) and the 'consolidated list' issued by the Department of Foreign Affairs and Trade (www.dfat.gov.au); and
 - (ii) agrees to immediately notify the Church if they discover any link whatsoever, whether direct or indirect, with any organization or individual that is included on either of these lists, and any suspected link whatsoever to any organisation or individual listed by the Australian Government will be immediately brought to the attention of all relevant intervention bodies (including the Australian Federal Police on the national security hotline).

10. Promotions

- (a) The Third Party is committed to conveying dignity and respect on the people and communities where they work.
- (b) When promoting their Program, they agree to ensure the following:
 - (i) that images and messages of women and men, boys and girls will present them in a dignified, respectful manner, portraying them as equal partners in the development process;
 - (ii) that images and messages will honestly portray the diversity of local people and convey the context and complexity of the situations in which local people live;
 - (iii) that key figures in images will be informed of what the image is being used for and if possible, their permission obtained;
 - (iv) that care will be taken to ensure that the identification of or use of images of local people will not endanger the people they portray; and
 - (v) that origins of any images used will be known and any necessary permissions, including copyright releases, be held.
- (c) The Third Party is responsible for ensuring that their staff and volunteers comply with the above guidelines.

11. Record keeping and reporting

The Third Party agrees to:

- (a) Keep records for seven years of:
 - (i) income and expenses in relation to the Program;
 - (ii) complaints or concerns raised by Board members, employees, volunteers and beneficiaries about the Program, as well as information about how those complaints or concerns are resolved;
 - (iii) Conflicts of Interest identified relating to the Program;
 - (iv) screening and background checks completed for the Program; and
 - (v) policies and procedures that relate to the Program.
- (b) Provide the Church with any agreed records and information relating to the Program:
- (c) Provide the Church with immediate notification of:
 - (i) any breach of these compliance expectations and corrective action taken;
 - (ii) any act or omission that could cause damage to their reputation or to the Churches reputation; and
 - (iii) any harm to Vulnerable Individuals, and with specific reference to children.

- (d) On request, information and documentation reasonably necessary to enable the Church to confirm compliance with the ECS.

12. Dispute resolution

If a dispute arises that the Church and Third Party cannot resolve by negotiation, they may attempt to resolve the dispute with the assistance of a mediator acceptable to both.






13. Additional policies







- (a) The intention of this policy is that these Compliance Expectations will be sufficient to manage the Churches risk, by partnering with Third Parties that have appropriate policies and procedures in place to manage and mitigate their risks, and who have and demonstrate the capacity to meet these Compliance Expectations and the ACNC External Conduct Standards.
- (b) It is expected that Third Party partners will be able to reference their own applicable policies or reference an external policy framework which they comply with.
- (c) Where these Compliance Standards require further specific policy guidelines for managing and mitigating risk, the Church will view the current ACCI suite of policies as a measure of demonstrating good practice and managing risk appropriately.

E. Third Party Assessment Process and Guidelines








1. ACNC Registered Third Party

- A. ACC International Missions and ACC International Relief are the overseas missions and overseas aid and development arms of the ACC Movement, and they have been established as ACNC registered charities and to maintain compliant Overseas Activities on behalf of our ACC Churches. Refer to Schedule 1 for the ACCI Missions & Relief Assessment to satisfy compliance with this policy.
- B. An ACNC Registered Third Party ECS Assessment Process is detailed in Schedule 2 for assessing compliance with this policy. This process reflects that the ACNC Registered Third Party will be primarily responsible for compliance with the ECS, and the Church involvement will largely resemble that of a donor.
- c. Some general Overseas Activity risk assessment guidelines have been included here for quick reference.

Overseas Activity Risk Assessment Guidelines	
	Based on the ACNC's classification of children as vulnerable individuals, any activity involving children, including education, should be flagged and carefully assessed for risk.
	Child Sponsorship - Based on the ACNC's classification of children as vulnerable individuals, any activity involving children, including education, should be flagged and carefully assessed for risk.
	Vulnerable Individuals - External Conduct Standard 4 requires a charity to take reasonable steps to ensure the safety of vulnerable individuals overseas. The ACNC define 'Vulnerable individuals' as people under the age of 18, or those who may be either unable to take care of themselves (including age, illness, trauma, disability) or unable to protect themselves against harm or exploitation.
	Specialist Skills - The nature of the activity demands a minimum standard or tertiary qualifications, professional certification, specialist skills and experience.
	Legal/Regulatory Requirements - There is an expectation or a requirement for organisations or individuals to be registered, certified, accountable to a government department or regulatory board. There is a regulatory framework around these sorts of activities.

	Inherently High Risk - Certain locations and activities will always be considered high risk, due to the inherent volatility and uncertainty involved, as well as external factors beyond your control. Any location with a smartraveller.gov.au warning level 3 or 4 reflects this level of inherent risk. (Level 3: Reconsider your need to travel, Level 4: Do not travel).
	Where any of these high risk Overseas Activities cannot be appropriately managed or mitigated, they remain high risk, and the Church will not engage in these activities.
	Inappropriate Responses Certain activities will always be inappropriate and the level of risk cannot be managed or mitigated down. ACCI will not be involved in these inappropriate responses.
	Political Activities - Promoting or opposing a political party or candidate for political office disqualifies an organisation from being an ACNC registered charity. Charities can promote or oppose a change to any matter of law, policy or practice, as long as this advocacy furthers or aids another charitable purpose.
	New Residential Care or New Orphanages - Institutionalisation of children should only ever be temporary and last resort. There is a continuum of alternative family based care options that can be explored and developed.
	Unskilled Volunteering in Orphanages or Voluntourism - It is important that engage in ethical practices related to our short-term missions and overseas volunteering, and this includes putting an end to the practice of orphanage volunteering. The best way STM teams and volunteers can help orphaned and vulnerable children is by helping local churches and organisations that support their families and relatives to care for them.

- d. Some Church Involvement risk assessment guidelines have been included here for quick reference.

	Your Church Involvement Risk Assessment Guidelines
	Small to Medium Donation – Exercise a normal level of due diligence when giving to any Australian charity, including an appropriate donation receipt and donor reporting the funded activities.
	Medium to Large Donation – In addition to the normal due diligence, you might need to review budgets up front, and require more detailed donor reporting and a financial acquittal.
	Missions Sending Agency - Sending long-term workers overseas through an ACNC registered, specialist missions sending agency, significantly reduces the Churches risk exposure.
	Short-Term Teams and Volunteers - It is important that the Church engages in ethical practices related to short-term missions and overseas volunteering.
	Medium and Long-term Workers and Staff - Consider the special needs, training requirements and support services necessary for cross-cultural workers. This will require policies and procedures that are specific to the overseas activities and workers.
	Equipment, Supplies and Resources - Introduces another layer of complexity, with the need for policies, procedures and systems around these items, in addition to your normal financial controls. Additional safety concerns or appropriateness of resource considerations as well as the potential logistical issues.
	Vision, Leadership or Operational Control – Your Church level of involvement will require you to manage these activities with the highest level of scrutiny as you would be taking on a heavy potential risk exposure.

2. Non-ACNC Registered Third Party

- a. As a Third Party that is not an ACNC registered charity is implementing the Overseas Activity, the Church must comply with the External Conduct Standards for:
- i. The Overseas Activities and will need to ensure that the Third Party organisation and individuals also comply with the ACNC External Conduct Standards. This also includes any other organisations and individuals that they work with;

- ii. The management of the resources sent overseas.
- b. Due to the increased scope of ACNC External Conduct Standards compliance exposure, the Church will need to undertake a significantly more detailed Risk Assessment Process.
- c. As the Church will now be directly responsible under the ACNC External Conduct Standards for implementing these activities, they will also have an additional Implementation Risk.

d. Implementing Third Party Partner Risk Assessment

- i. The Church will need to undertake a full due diligence review of the Third Party organisation, and any partners they work with in order to assess the Implementing Partner Risk.
- ii. The Church will need to evaluate whether the existing Financial Controls, Systems and Processes are appropriate to manage the risks identified.
- iii. The Church will need to evaluate whether their existing Policies and Procedures (including HR, child safeguarding, conflicts of interest, counter terrorism, complaints handling and whistleblowers) are appropriate to manage the risks identified.

e. Overseas Activity Risk Assessment

- i. The Church will need to document in detail the agreed Overseas Activities, and conduct a full Overseas Activity Risk assessment.
- ii. Where a single very High Risk activity, or multiple High Risk Activity Flags are identified, the Church will review:
 - 1. Lower risk options for achieving the desired change goal;
 - 2. Whether the methods and activities to achieve those goals are appropriate;
 - 3. The motives of all parties;
 - 4. Whether there are appropriately detailed policies and procedures in places;
 - 5. What good practices standards or codes of conduct are being adhered to;
 - 6. The extent to which sound technical skills, training or experience is present on the team;
 - 7. Appropriate legal structures and registrations; and
 - 8. Functioning oversight bodies, external accountability and reporting.

f. Your Church Involvement Risk Assessment

- i. The Church will need to document and review clear budgets, including the extent of funding and resources committed.
- ii. The Church will need to document an Overseas Activity Risk Management Plan, that addresses the overseas activity risks, implementing organisation risks and your involvement risks.
- iii. The Church will need to review and document written agreements with the implementing organisations or individuals, and clearly set out roles and responsibilities.

- iv. The Church Governing Board will need to review and approve the risk assessment and agreements.

g. Implementation Risk

- i. The Church will need to develop and provide clear Progress Reporting templates and guidelines to any Third Party organisations and individuals.
- ii. The Church will need to develop a clear Monitoring and Evaluation plan and conduct an annual review of overseas activities and partnership plan.
- iii. The Church will need to keep appropriate records (paying special attention to the ACNC External Conduct Standard 2 requirements).

Disclaimer: Please note that this is a template policy for guidance only. While all care has been taken in the preparation of this material, no responsibility is accepted by the author(s) or ACCL, its staff, volunteers or partners, for any errors, omissions or inaccuracies. The material provided in this resource has been prepared to provide general information only. It is not intended to be relied upon or be a substitute for legal or other professional advice. No responsibility can be accepted by the author(s) or ACCL or its partners for any known or unknown consequences that may result from reliance on any information provided in this publication.

Schedule 1 - ACCI Missions & Relief Assessment







1. IMPLEMENTING PARTNER RISK ASSESSMENT

- (a) ACC International Missions Ltd (ACCIM), ABN: 66 077 367 223, is the missionary sending and support arm of the Australian Christian Churches Movement.
- (i) Located at 5/2 Sarton Road, Clayton VIC 3168; (03) 8516 9600; info@acci.org.au
 - (ii) ACNC reporting up-to-date, including annual audited general purpose financial statements;
 - (iii) Membership with Missions Interlink;
 - (iv) As an ACC Ministry Department, holding a high level of alignment with the Ethical Standards; and
 - (v) Supply an annual ECS Compliance Declaration.
- (b) ACC International Relief Inc (ACCIR), ABN: 26 077 365 434, is the aid and development arm of the Australian Christian Churches Movement.
- (vi) Located at 5/2 Sarton Road, Clayton VIC 3168; (03) 8516 9600; info@accir.org.au
 - (vii) ACNC reporting up-to-date, including annual audited general purpose financial statements;
 - (viii) Membership with Missions Interlink;
 - (ix) Membership with Australian Council for International Development (ACFID);
 - (x) As an ACC Ministry Department, holding a high level of alignment with the Ethical Standards; and
 - (xi) Supply an annual ECS Compliance Declaration.
- (c) Where ACCIM or ACCIR (ACCI) is the implementing agency for any Overseas Activity:
- (i) The Church must comply with the External Conduct Standards for the management of the money it sends overseas;
 - (ii) The Church does not need to comply with the External Conduct Standards for ACCI Overseas Activities; and
 - (iii) ACCI must comply with the External Conduct Standards for its Overseas Activities and its Third Party Partners.

	ACCI Implementing Partner Compliance Declaration ACCI has taken the necessary steps to ensure their ongoing compliance with the External Conduct Standards, in particular:
	ACCI has in place the necessary organisational and technical capacity for their overseas activities;
	ACCI has in place the necessary financial controls and systems ;
	ACCI conducts due diligence reviews on our Field Workers and Third Party Partners , appropriate to the level of risk involved in their Overseas Activities ;
	ACCI has in place appropriate policies and procedures , especially in regards to the safeguarding of children and other vulnerable persons ; and
	ACCI has a strong commitment to monitoring and evaluation .




2. OVERSEAS ACTIVITY RISK ASSESSMENT

- (a) ACCI is involved in a range of Overseas Activities including sending and supporting missionaries, church planting and leadership training, associated ministry activities, community development activities, child safeguarding and alternative care and disaster responses.
- (b) ACCI is involved in both low risk **GREEN** and high risk **ORANGE** indicator activities. ACCI will be responsible for the ECS compliance of any of these Overseas Activities.
- (c) Where ACCI have partners engaged in high risk **ORANGE** indicator activities, they conduct a risk assessment to ensure those risks can be adequately and appropriately managed.

	<p>ACCI Overseas Activity Risk Management Approach</p> <p>ACCI Missionaries are required to report quarterly on their activities, and Project Partners 6-monthly. Some of our Missionaries and Project Partners are involved in overseas activities that involve High Risk Activity Flags. Where these flags have been triggered, more detailed risk assessments have been undertaken and options for mitigating those risks reviewed. ACCI's risk management approach include a mix of:</p>
	Appropriately detailed policies and procedures ;
	Maintaining and building capacity towards good practices standards and upholding codes of conduct;
	Requiring partners to actively recruit and train to ensure their team has the necessary technical skills and experience ;
	Requiring our partners to put in place appropriate legal structures and registrations ; and
	ACCI is accountable to several oversight bodies that includes external accountability and reporting .
	ACCI does not engage in directly or through Third Parties any Overseas Activities involving political activities, new residential care or unethical volunteering practices.

3. YOUR CHURCH INVOLVEMENT AND EXPECTATIONS RISK ASSESSMENT

- (a) The Church involvement will be limited to that of a normal donor relationship, where funds are disbursed as donations under the Churches ordinary finance and governance policies and procedures. The Church will exercise the normal level of due diligence when giving to any Australian charity.
- (b) Any short-term missions trips will be conducted in compliance with the Ethical Standards.
- (c) Any additional donor reporting expectations can be communicated in advance, and will be targeted towards Church missions engagement and advocacy, so the Church and ACCI do not consider there to be a need to sign a specific Memorandum of Understanding (MOU).

	<p>ACCI Donations Risk Assessment</p> <p>ACCI has in place the appropriate processes and systems for handling your financial support of our missionaries and project partners.</p>
	We produce annual general purpose audited financial statements and our activities are reviewed quarterly by an external review committee.
	In addition to this, ACCI Relief, as a member of ACFID and signatory to the ACFID Code of Conduct , is subject to an external compliance review and held to standards of practice that exceed the requirements of the ACNC External Conduct Standards.
	Whatever the level of financial commitment that you have to an ACCI missionary or project, ACCI is positioned to meet any requirements that you have under either the ACNC Governance or External Conduct Standards in regards to the management of funds sent overseas.

Schedule 2 – ACNC Registered Third Party ECS Assessment

1	IMPLEMENTING PARTNER RISK ASSESSMENT	
	Charity name	
	Charity ABN	
	Contact person	
	Contact details	
	ACNC reporting up-to-date	
	ACNC concerns or non-compliance	
	Conflict of interest disclosures, other disclosures or concerns?	
	List any peak body memberships	<input type="checkbox"/> ACFID <input type="checkbox"/> Mission Interlink <input type="checkbox"/> CMA Standards Council <input type="checkbox"/> ACC Ministry Department
	Ethical Standards alignment	
	Compliance and ECS minimum standards	
	Implementing partner risk assessment conclusion	
2	OVERSEAS ACTIVITIES RISK ASSESSMENT	
	Describe the overseas activities	
	Are they only involved in GREEN?	
	Are they involved in ORANGE?	
	No involvement in RED activities	
	Any other disclosures or concerns?	
	Are they able to adequately manage and mitigate any overseas activity risk? (Through policy, procedures, external oversight, peak body membership)	
	Overseas activities risk assessment conclusion	
3	YOUR CHURCH INVOLVEMENT RISK ASSESSMENT	
	Is your involvement limited to small or medium size financial donation and your role merely that of a donor?	
	Are your existing church governance procedures and compliance adequate?	
	Are any short-term missions trips covered by an Ethical Short-Term Missions policy and procedures?	
	Any conflicts of interest, risks or other disclosures?	
	Are you involved in any ORANGE?	
	Are you able to adequately manage and mitigate any involvement risk? (Through policy, procedures, external parties etc)	
	Your involvement risk assessment conclusion	
4	YOUR DONOR EXPECTATIONS	
	Normal donor reporting for church congregation	
	Any additional reporting expectations or specific timeframes?	