

A group of young children, mostly girls, are seated at wooden desks in a classroom. They are looking towards the camera with various expressions. The classroom has wooden walls and large windows in the background showing greenery. The text "SEAPC LIMITED" is overlaid in white on a dark background across the middle of the image.

SEAPC LIMITED

A teal rectangular box containing the text "EXTERNAL CONDUCT POLICY" in white, bold, uppercase letters. The box is positioned in the lower-middle part of the image, overlapping the children's desks.

EXTERNAL CONDUCT POLICY

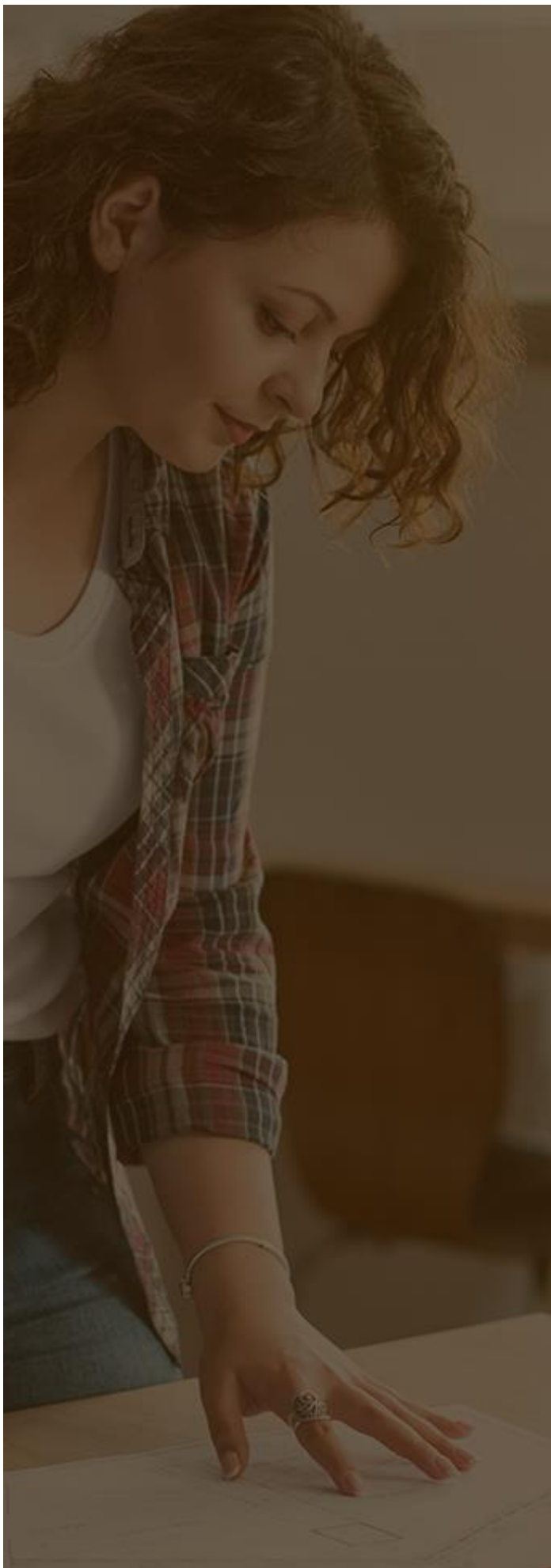


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I. Document Information

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Approved By:	SEAPC Limited Board
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Policy Delegate:	Nil
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2. Introduction

This policy outlines the commitment of SEAPC Limited (**'SEAPC'**), an Australian charity, to comply with the Australian Charities and Not-for-profits Commission (**'ACNC'**) External Conduct Standards. These standards are designed to provide confidence to the public, donors, and government bodies that Australian charities operating overseas do so in a manner that is consistent with Australian values, legal obligations, and with a high degree of accountability and transparency.

3. Purpose

The purpose of this policy is to ensure that SEAPC conducts its operations and activities overseas in compliance with the ACNC External Conduct Standards, thereby upholding the integrity and objectives of the charity. The policy will guide the Board, staff, volunteers, partners, and collaborators of SEAPC in fulfilling their roles and responsibilities with respect to international operations.

4. Scope

This policy applies to all aspects of SEAPC's operations and activities conducted outside Australia, including but not limited to program delivery, fundraising, financial management, and collaboration with third parties.

5. Policy Principles

SEAPC is committed to:

- i. ensuring that its overseas activities are carried out in a manner that is consistent with its objectives and values;
- ii. promoting transparency and accountability in all its dealings;
- iii. ensuring that funds and resources are used effectively for their intended purposes;
- iv. protecting vulnerable individuals and communities with whom it works; and
- v. complying with all relevant Australian and international laws.

6. External Conduct Standards

Standard 1: Activities and Control of Resources (including funds)

SEAPC will:

- i. maintain a robust system of control and accountability over the use of resources overseas;
- ii. ensure that activities conducted overseas are consistent with its objectives and are carried out in a manner that is compliant with both Australian and local laws; and
- iii. implement procedures to ensure that funds transferred overseas are received by the intended recipient and used for the intended purpose.

Standard 2: Annual Review of Overseas Activities and Record-Keeping

SEAPC will:

- i. conduct an annual review of its overseas activities to ensure compliance with the External Conduct Standards; and
- ii. maintain accurate and detailed records of all overseas activities, including financial transactions and program outcomes.

Standard 3: Anti-fraud and Anti-corruption

SEAPC will:

- i. develop and implement policies and procedures to detect and prevent fraud, corruption, and other financial impropriety;
- ii. provide training to staff and partners on anti-fraud and anti-corruption measures; and
- iii. take prompt and appropriate action if any cases of fraud or corruption are detected.

Standard 4: Protection of Vulnerable Individuals

SEAPC will:

- i. implement policies and procedures to protect vulnerable individuals from harm, exploitation, abuse, and discrimination;
- ii. ensure that staff and partners are aware of and adhere to these policies and procedures; and
- iii. regularly review and update protection policies to maintain their effectiveness.

7. Operational Details

7.1 Income and Sources of Income

SEAPC anticipates its income to be derived from the following sources:

- i. public donations and bequests;
- ii. grants from government and non-government organisations;
- iii. fundraising events and activities; and
- iv. collaborations with other organisations including charitable and for-profit organisations.

SEAPC will ensure that all income is received and managed in accordance with the ACNC Governance Standards and the External Conduct Standards.

7.2 Expenditure

SEAPC will allocate its expenditure in line with its objectives, focusing on:

- i. direct aid and support to individuals and communities in developing countries;
- ii. operational costs associated with delivering programs overseas; and

- iii. costs of ensuring compliance with the ACNC External Conduct Standards.

7.3 Financial Management

SEAPC will:

- i. implement financial management systems that ensure accurate tracking and reporting of income and expenditure;
- ii. prepare financial reports annually, which will be audited by an independent auditor; and
- iii. ensure that financial reports are made available to the public, donors, and the ACNC as required.

Risk Management

SEAPC will:

- i. conduct regular risk assessments of its overseas activities;
- ii. develop and implement risk management strategies to mitigate identified risks; and
- iii. monitor and review the effectiveness of risk management strategies on an ongoing basis.

7.4 Monitoring and Evaluation

SEAPC will:

- i. establish a framework for monitoring and evaluating its programs and activities;
- ii. use the findings from monitoring and evaluation to inform program design and implementation; and
- iii. report on program outcomes to stakeholders, including donors, partners, and the ACNC.

7.5 Partnerships and Collaboration

SEAPC will:

- i. enter into partnerships and collaborations only with organisations that share its values and objectives and that can demonstrate compliance with the ACNC External Conduct Standards;
- ii. conduct due diligence on all potential partners to ensure their suitability and compliance; and
- iii. monitor and evaluate the performance of partners on a regular basis.

7.6 Training and Capacity Building

SEAPC will:

- i. provide training to its Board, staff, volunteers, and partners to ensure they understand and can effectively implement this policy; and
- ii. build capacity within partner organisations to ensure they can meet the requirements of the ACNC External Conduct Standards.

7.7 Compliance and Reporting

SEAPC will:

- i. ensure that all required reports and statements are submitted to the ACNC in a timely manner; and
- ii. respond promptly to any concerns or inquiries from the ACNC regarding its overseas activities.

8. Review and Update of Policy

SEAPC will:

- i. review this policy at least every two years or as required by changes in legislation or circumstances; and
- ii. update the policy to reflect best practices and ensure ongoing compliance with the ACNC External Conduct Standards.

9. Conclusion

SEAPC is dedicated to upholding the highest standards of conduct in all its overseas activities. Through the implementation of this policy, SEAPC will ensure that it operates in a manner that is transparent, accountable, and consistent with its mission to provide benevolent relief to those in need in developing countries.

Appendix A: SEAPC self-evaluation: Meeting obligations as a charity operating overseas

This self-evaluation helps SEAPC assess whether the charity is meeting its obligations as a charity with operations overseas. It helps you identify issues that may prevent it from doing so.

The ACNC's External Conduct Standards

The External Conduct Standards are a set of standards that govern a registered charity's operations outside Australia.

The External Conduct Standards apply in addition to the ACNC's Governance Standards. And they work in a similar way to the Governance Standards – both impose reasonable levels of oversight and standards of governance rather than specific steps for charities to take.

All registered charities (including Basic Religious Charities) that operate outside Australia must comply with the External Conduct Standards. Operating outside Australia includes:

- undertaking activities overseas (for example - providing medical assistance, missionary work, building housing, education programs)
- sending money or supplies overseas
- sending people overseas (for example - on a cultural exchange, for research, or as volunteers helping on projects)
- buying goods or services from overseas
- working with, or funding, other parties that are operating outside of Australia.

Importantly, a charity is generally considered to be operating outside of Australia even if its activities:

- only involve sending a small amount of money overseas
- are only a minor part of the charity's overall activities
- are undertaken by another organisation on the charity's behalf

The reasonable steps that a charity must take to comply with the Standards depend on its circumstances and the risks associated with its work.

See [more detailed information about the External Conduct Standards](#) and how they apply.

What the self-evaluation covers

The self-evaluation for charities that operate overseas comprises 5 short parts that cover each of the ACNC's 4 External Conduct Standards.

External Conduct Standards:

- [External Conduct Standard 1](#): Activities and control of resources (including funds)
- [External Conduct Standard 2](#): Annual review of overseas activities and record-keeping
- [External Conduct Standard 3](#): Anti-fraud and anti-corruption
- [External Conduct Standard 4](#): Protection of vulnerable individuals

Completing the self-evaluation

Go through each section in the self-evaluation and respond to the questions and statements about your charity in the columns.

Describe what SEAPC does or has done to ensure it is meeting its obligations.

Make a note of the action it needs to take to improve in specific areas. Create an action plan based on these notes.

The self-evaluation is a way of checking SEAPC's compliance with its obligations. Once it is complete, share it the Responsible People – and keep it as part of record keeping purposes. Revisit it annually as part of reviews of SEAPC compliance.

Part 1: External Conduct Standard 1 – Activities and control of resources (including funds)

External Conduct Standard 1 requires a charity to:

- take reasonable steps to ensure its activities outside Australia are consistent with its purposes and character as a not-for-profit entity, and
- have reasonable internal controls in place to ensure resources used outside Australia – including resources given to third parties – are used in a way consistent with the charity’s purposes and character as a not-for-profit entity.

Charities must also maintain reasonable controls for its activities outside Australia to ensure it complies with Australian laws regulating:

- money laundering
- financing of terrorism
- sexual offences against children
- slavery and slavery-like conditions
- trafficking in individuals and debt bondage
- people smuggling
- international sanctions
- taxation
- bribery

Questions for your charity and examples of reasonable steps it can take.	Response: <ul style="list-style-type: none"> • Yes • No 	Describe the steps your charity taken and demonstrate evidence.	Is action required? (If yes, update
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	<ul style="list-style-type: none"> N/A 		your charity's Action Plan.)
<p>1. Does your charity have a process for sound decision-making?</p> <p>For example:</p> <ul style="list-style-type: none"> <i>All overseas activities and resources align with the charity's purpose and are consistent with what is in the charity's governing document.</i> <i>The charity has clear decision-making and approval policies and processes are in place; decisions are recorded.</i> <i>The charity assesses and formally approves all overseas projects prior to commencing.</i> <i>The charity identifies risks when deciding the activities to undertake and how to use resources; it considers mitigation and management strategies to address risks.</i> 			
<p>2. Does your charity take steps to engage suitable staff and volunteers?</p> <p>For example:</p>			

<ul style="list-style-type: none"> • <i>The charity has thorough recruitment processes for staff and volunteers, including appropriate background and vetting checks.</i> • <i>The charity provides new staff with training and support to help them understand their responsibilities and how they can raise concerns.</i> 			
<p>3. Does your charity take steps to ensure it is helping its intended beneficiaries?</p> <p>For example:</p> <ul style="list-style-type: none"> • <i>The charity's beneficiaries are clearly defined and documented.</i> • <i>The charity regularly assesses its activities and projects to ensure they are meeting the needs of the intended beneficiaries.</i> • <i>The charity has procedures in place to ensure aid reaches the intended beneficiaries.</i> 			
<p>4. Does your charity monitor its activities and projects outside Australia?</p> <p>For example:</p>			

<ul style="list-style-type: none"> • <i>The charity regularly monitors its overseas projects to ensure they are:</i> <ul style="list-style-type: none"> ○ <i>consistent with the charity's purpose and character as a not-for-profit entity;</i> ○ <i>achieving the desired outcomes; and</i> ○ <i>identifying risks or issues.</i> • <i>The charity's Responsible People regularly review project and financial reports.</i> 			
<p>5. Does your charity monitor its resources used outside of Australia?</p> <p>For example:</p> <ul style="list-style-type: none"> • <i>The charity has an asset register for all its equipment, and this is reviewed regularly.</i> • <i>The charity makes sure its equipment is stored securely.</i> 			
<p>6. Does your charity have a process for identifying things going wrong?</p> <p>For example:</p> <ul style="list-style-type: none"> • <i>The charity develops and implements procedures to detect financial wrongdoing.</i> 			

<ul style="list-style-type: none"> • <i>The charity retains records of transactions and reviews them for accuracy and consistency; the charity acts on discrepancies.</i> • <i>The charity has processes in place allowing staff, volunteers, third parties and beneficiaries to report suspected wrongdoing without fear, recrimination or disadvantage.</i> 			
<p>7. Does your charity take steps to ensure it is engaging with appropriate third parties?</p> <p>For example:</p> <ul style="list-style-type: none"> • <i>The charity prioritises ethical conduct and sound financial management as key criteria when selecting third parties.</i> • <i>The charity has processes in place to check the reputation and experience of third parties to determine suitability and legitimacy.</i> 			
<p>8. Does your charity oversee how third parties use charity funds or resources outside Australia?</p> <p>For example:</p>			

<ul style="list-style-type: none"> • <i>The charity has written agreements setting out everyone’s responsibilities.</i> • <i>The charity regularly monitors the projects of third parties overseas; details are regularly reported to the charity’s Responsible People.</i> • <i>The charity’s third-party partners have appropriate management policies and procedures in place.</i> • <i>The charity records risks in a risk register which is regularly reviewed by the charity’s Responsible People.</i> 			
<p>9. Does your charity take steps to ensure it complies with Australian laws?</p> <p>For example:</p> <ul style="list-style-type: none"> • <i>The charity has a way to identify the laws it must comply with.</i> • <i>The charity’s considers all its legal in planning projects and activities.</i> • <i>The charity monitors changes to the laws and assess the effect on its operations</i> • <i>The charity’s Responsible People ensure the charity’s licences, compliance obligations and reporting obligations are up to date and maintained.</i> 			

Part 2: External Conduct Standard 2 – Annual review of overseas activities and record-keeping

External Conduct Standard 2 requires a charity to obtain and keep records necessary to prepare a summary (if requested) of its activities and expenditure outside Australia on a country-by-country basis for each financial year in which it:

- operates outside of Australia, or
- gives resources (including funds) to third parties for use outside Australia.

These records need to be:

- complete, accurate and legible
- prepared on a timely basis
- kept in English or in a form that can be easily translated to English, and
- stored safely for at least seven years.

A charity can keep records in any format, including in electronic form, as long as specific information in the records is easy to find and can be produced if it is requested.

Read [more information on all record keeping obligations](#) for charities.

Questions for your charity and examples of reasonable steps it can take.	Response: <ul style="list-style-type: none"> • Yes • No • N/A 	Describe the steps your charity taken and demonstrate evidence.	Is action required? (If yes, update your charity's Action Plan.)
<p>1. Does your charity keep records on its activities that allow a breakdown on a country-by-country basis?</p> <p>For example:</p> <ul style="list-style-type: none"> • <i>The charity has records of how each of its activities outside its Australia enabled it to achieve its purposes.</i> • <i>The charity has recorded details of all expenditure relating to its activities outside Australia, including activities by third parties it works with.</i> • <i>The charity has details of the procedures and processes it has in place for each of the countries in which it has activities.</i> • <i>The charity keeps a record of all third parties it works with outside Australia, including copies of written agreements, details of changes in personnel and any issues that arise.</i> 			

<ul style="list-style-type: none"> <i>The charity keeps records of decisions that are made regarding its operations outside of Australia; specifically, issues raised about inappropriate conduct or behavior towards staff, third parties, volunteers or beneficiaries.</i> 			
<p>2. Does your charity have a system in place to ensure it meets its record-keeping obligations?</p> <p>For example:</p> <ul style="list-style-type: none"> <i>The charity has completed the ACNC's record-keeping checklist.</i> <i>The charity has policies and procedures for record-keeping that cover:</i> <ul style="list-style-type: none"> <i>which records that are kept, how they are secured and who is responsible for them</i> <i>how sensitive records are secured and who has authorised access</i> <i>the requirement for records to be kept for seven years.</i> <i>The charity regularly backs up electronic records and stores them securely.</i> <i>The charity securely stores its paper records.</i> 			

Part 3: External Conduct Standard 3 – Anti-fraud and anti-corruption

External Conduct Standard 3 requires charities to take reasonable steps to:

- minimise risks of corruption, fraud, bribery or other financial impropriety by its Responsible People, employees, volunteers and third parties outside Australia, and
- identify and document any perceived or actual conflicts of interest for their employees, volunteers, third parties and Responsible People outside Australia.

Questions for your charity and examples of reasonable steps it can take.	Response: <ul style="list-style-type: none"> • Yes • No • N/A 	Describe the steps your charity taken and demonstrate evidence.	Is action required? (If yes, update your charity's Action Plan.)
1. Does your charity take proactive steps to prevent financial misconduct? For example:			

<ul style="list-style-type: none"> • <i>The charity has established clear policies and adequate controls for proper and ethical financial management.</i> • <i>The charity's policies and procedures for financial management are communicated throughout the charity and to relevant stakeholders.</i> • <i>The staff involved in fundraising, managing money or reporting are supervised.</i> • <i>The charity's clearly articulates and records its financial delegations.</i> 			
<p>2. Does your charity have a process to detect fraud or other financial misconduct?</p> <p>For example:</p> <ul style="list-style-type: none"> • <i>The charity's financial statements are regularly checked for inconsistencies or inaccuracies.</i> • <i>The charity's staff are trained to identify warning signs that may indicate financial wrongdoing.</i> • <i>The charity has processes allowing staff, volunteers and beneficiaries to report suspected wrongdoing without fear, recrimination or disadvantage.</i> 			

Part 4: External Conduct Standard 4 – Protection of vulnerable individuals

External Conduct Standard 4 requires a charity to take reasonable steps to ensure the safety of vulnerable people overseas to the extent that they are:

- being provided with services, or accessing benefits under programs provided by the charity (whether directly or through collaboration with a third party) or
- engaged by the charity, or a third party in collaboration with the charity, to provide services or benefits on behalf of the charity or third party.

Vulnerable people are defined as a people aged under 18 or other individuals who may be unable to take care of themselves or are unable to protect themselves against harm or exploitation.

An individual may be unable to take care of themselves because of their age, an illness, trauma, disability, or some other disadvantage. Vulnerability may be either temporary or ongoing.

Questions for your charity and examples of reasonable steps it can take.	Response: <ul style="list-style-type: none"> • Yes • No 	Describe the steps your charity taken and demonstrate evidence.	Is action required? (If yes, update
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	<ul style="list-style-type: none"> N/A 		your charity's Action Plan.)
<p>1. Does your charity communicate its commitment to protecting vulnerable people?</p> <p>For example:</p> <ul style="list-style-type: none"> <i>The charity has a policy committing its staff, volunteers, third parties and visitors to protecting vulnerable people.</i> <i>The charity has a code of conduct setting out appropriate and inappropriate behaviors.</i> <i>All staff, volunteers, third parties and visitors are aware of their responsibility to report any suspected abuse within the charity.</i> <i>The charity has controls in place to ensure vulnerable people's privacy is protected, particularly when using images and personal information.</i> <i>The charity's staff, volunteers, beneficiaries and third parties know how to recognise when someone may become vulnerable.</i> 			

<p>2. Does your charity take steps to ensure the suitability of staff, volunteers and contractors working with vulnerable people?</p> <p>For example:</p> <ul style="list-style-type: none"> • <i>The charity has thorough recruitment procedures, including appropriate background checks.</i> • <i>Staff, volunteers and contractors are suitably qualified to work with vulnerable people and are properly supervised when doing so.</i> • <i>The charity gives staff, volunteers and contractors training to help them understand their responsibilities identifying and protecting vulnerable people.</i> 			
<p>3. Does your charity have a process for identifying and managing complaints, concerns or issues promptly and appropriately?</p> <p>For example:</p> <ul style="list-style-type: none"> • <i>The charity has confidential complaints procedures all vulnerable persons, as well as staff, volunteers and third parties can access.</i> 			

<ul style="list-style-type: none"> <i>The charity deals with complaints or concerns appropriately, sensitively and promptly.</i> 			
<p>4. Does your charity ensure it complies with laws and reporting requirements related to safeguarding?</p> <p>For example:</p> <ul style="list-style-type: none"> <i>The charity meets safeguarding requirements or relevant minimum standards in Australia and each host country.</i> 			

Part 5: Action plan

Action Item	Issue	Action required	Timeframe	Assigned to
1	<i>Our annual review of activities outside Australia has not been completed.</i>	<i>Complete the review, discuss any issues at board/committee level.</i>	<i>1 July 20XX</i>	<i>CEO</i>



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Signing off

Self-evaluation completed by:

Full name: _____

Position: _____

Signature: _____

Date: _____

Charity's Responsible People:

Full name: _____

Full name: _____

Full name: _____

Signature: _____

Signature: _____

Signature: _____

Date: _____

Date: _____

Date: _____



Full name: _____

Full name: _____

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