



Non-Conduit Policy

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1. Introduction

1.1 *Who we are*

1.1.1 Rotary Australia World Community Service Ltd (RAWCS) is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC). We facilitate a broad range of humanitarian and development projects, both in Australia and in developing countries. RAWCS administers four Tax Deductible Charitable Trusts:

1. **Rotary Australia Overseas Aid Fund (RAOAF):** This fund supports efforts by Rotary Clubs, Rotary Districts and other partners to deliver humanitarian assistance in developing countries. RAOAF focuses on both sustained development and immediate disaster response, working collaboratively with communities to deliver impactful, sustainable projects to meet identified needs.
2. **Rotary Australia Benevolent Society (RABS):** RABS supports Rotary Clubs, Rotary Districts and other partners to respond to specific community challenges within Australia. It offers an avenue for wider community involvement through tax-deductible donations. The Rotary Australia Compassionate Grants Projects within RABS uses matching funds from donations, such as those provided by Dick Smith's Trust, to assist Australians facing hardship.
3. **Rotary Australia Relief Fund (RARF):** This fund is dedicated to responding to national appeals and efficiently disbursing funds to appropriate aid projects. RARF's focus is on mobilising rapid support during national crises, such as natural disasters, providing a structured channel for public generosity to be transformed into effective aid. This fund acts as a hub for contributions from both Rotary and non-Rotary sources, ensuring swift and effective aid delivery to disaster-affected areas.
4. **Rotary Australia Trust for the Environment (RATE):** This trust is dedicated to delivering activities that protect and enhance all aspects of the natural surroundings affecting communities and individuals (such as air and water quality, waste minimisation, soil conservation, and promotion of ecologically sustainable development principles).

1.2 *Purpose*

1.2.1 The purpose of this policy is to ensure that RATE operates in compliance with all applicable laws and regulations and does not act as a mere conduit for a donor by transferring funds or property to other organisations, bodies, or individuals as directed or indicated by the donor. It must not act as a collection agency for donations intended by a donor for another institution or person.

1.3 *Scope and Governance*

1.3.1 This policy applies to all donors and recipients of RATE funds.

1.4 *Policy References*

- RAWCS Constitution
- ACNC External Conduct Standards
- International Environmental Law
- ATO requirements for Environmental Organisations

1.5 *Definitions*

Term	Definition
Conduit	An organisation that passes funds or property to another entity or individual without exercising control over the use of those funds or property
Donation	A gift given to RATE to support its charitable activities
RATE Projects Committee	The group responsible for overseeing the implementation and management of RATE projects

2. Policy Commitments

RATE is committed to maintaining its status as a charitable organization and will not act as a mere conduit for the transfer of funds or property to other entities or individuals. All donations made to RATE projects must be used solely to support the project's objectives under the supervision and control of the Project Committee.

3. Procedures

3.1 Donations Acceptance and Review:

- All donations accompanied by instructions from the donor must be reviewed to ensure they align with RATE's mission and objectives.
- RATE will issue tax-deductible receipts only for donations that support its projects without providing direct benefits to the donor.

3.2 Use of Donations:

- Donations must be applied directly to support the objectives of RATE projects.
- The RATE Projects Committee will oversee the use of donated funds and property to ensure they are used in accordance with the project's goals.

3.3 Monitoring and Reporting:

- The RATE Projects Committee will monitor the use of donations to ensure compliance with this policy.
- Regular reports on the use of donated funds and property will be provided to ensure transparency and accountability.

3.4 Prohibited Activities:

- RATE projects cannot be used as a mere conduit for passing funds or property to other organisations, bodies, or individuals.
- Donations must not be used to provide direct benefits (including tax deductions) to donors or to benefit other entities or individuals indirectly.

4. Roles and Responsibilities

Roles	Responsibilities
National Board of Directors	Approving this policy and holding the RATE Projects Committee accountable for its implementation.
RATE Projects Committee	Implementing this policy, monitoring its performance, and ensuring compliance with relevant legislations.
Employees and Volunteers	Raising issues promptly and participating in the disciplinary processes in good faith.

5. Policy Distribution

5.1.1 This policy will be communicated to all employees and volunteers. All questions or concerns related to matters relating to this policy must be directed to the RATE Projects Committee.

6. Review

6.1.1 This policy will be reviewed at least every three years by the CEO and approved by the National Board of Directors to ensure it is working in practice and updated as required.

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Document Revision History

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