ROSEWOOD

welcome home

Donations and Fundraising Policy

ROSEWOOD CARE GROUP

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Purpose

This policy sets out how Rosewood Care Group Inc. ("Rosewood") seeks, accepts, receipts, records, uses and reports donations, bequests, sponsorships and fundraising income.

It ensures that fundraising is ethical, lawful and transparent, that donors' wishes are respected, and that residents and clients are never pressured to give or treated differently because they have, or have not, given.

Scope

- This policy applies to everyone listed under Audience, in any Rosewood service or setting.
- It covers donations of money, property, shares and goods; bequests to Rosewood; in-memoriam and tribute gifts; grants; corporate sponsorship; fundraising events, appeals, raffles and auctions; and fundraising by third parties on Rosewood's behalf.
- It covers resident amenity or comfort funds raised through Rosewood fundraising activities.
- Gifts and benefits offered to individual workers are managed under the Governance - Gifts and Benefits Policy, not this policy.
- Government funding, resident fees and accommodation payments are outside the scope of this policy.

Policy Statement

Rosewood welcomes donations and fundraising support that help it improve the lives of the people it cares for. All fundraising will be honest, respectful and lawful, and every donation will be used for the purpose for which it was given.

A donation will never be a condition of, or affect, a person's access to care, accommodation, services, waiting list position or the way they are treated. Rosewood will not ask residents, clients or their families for donations in the course of providing care, and will not seek donations from anyone who lacks capacity to make that decision.

Rosewood may decline any donation, sponsorship or fundraising offer that conflicts with its values, creates a conflict of interest, carries reputational or legal risk, or comes with conditions it cannot meet.

Definitions

Term	Definition
Donation	A voluntary gift of money, property, shares or goods to Rosewood for which the donor receives no material benefit in return.
Bequest	A gift to Rosewood made through a person's will, or a nomination of Rosewood as beneficiary of a superannuation fund, insurance policy or trust.
Restricted donation	A donation that the donor has asked to be used for a specific purpose, service or site.
Unrestricted donation	A donation that Rosewood may use where the need is greatest.
In-kind donation	A donation of goods, services or property other than money, such as equipment, furniture or professional services.
Sponsorship	A commercial arrangement where an organisation provides money or goods in return for recognition or another benefit.
Fundraising activity	Any appeal, event, raffle, auction, sale, online campaign or other activity that seeks money or goods for Rosewood.
Third-party fundraiser	An individual, business, school or community group that raises money for Rosewood through its own activity.
Donations Register	The register maintained by Finance recording every donation, bequest and sponsorship, including any restrictions and how the funds were used.

Ethical Fundraising

All fundraising by or for Rosewood must:

- be truthful and not misleading about how funds will be used, consistent with the Australian Consumer Law;
- respect donors' privacy and their right to decline, without pressure or repeated requests;
- never use images, stories or personal information about a resident or client without their informed consent (or their authorised representative's consent) and the approval of the CEO;

- comply with the Charitable Collections Act 1946 (WA) and any licence or notification requirements, and with the National Fundraising Principles once in force;
- keep fundraising costs reasonable and report them honestly; and
- never offer or promise any benefit, priority or preferential treatment in exchange for a donation.

Residents, Clients and Families

Residents, clients and families sometimes wish to give to Rosewood. Rosewood will accept these gifts only when they are genuinely voluntary.

- Workers must not ask a resident, client or family member for a donation, or suggest that one would be welcome.
- Where a resident, client or family raises a donation, the worker must refer them to the General Manager Finance, who will handle it outside the care relationship.
- Rosewood will not accept a donation from a resident or client who lacks capacity to make that decision, or where there is any sign of pressure or undue influence. Donations from a representative under a power of attorney will only be accepted where the representative confirms in writing that they are authorised to make it.
- Donations will not be accepted from a resident, client or family during an admission, assessment or complaint process, or where a dispute about fees is unresolved.
- Rosewood will not ask prospective residents, clients or families about donations before or during admission.
- Gifts given to thank a team (for example, a donation to a site's amenity fund) are accepted as donations to Rosewood and recorded on the Donations Register.

Bequests and Gifts in Wills

Rosewood welcomes bequests, but workers must never be involved in a resident's or client's will.

- Workers must not encourage, suggest or assist a resident or client to make or change a will, or to leave a gift to Rosewood.
- Rosewood may provide general information about leaving a gift in a will through its published materials, but will not target current residents or clients with bequest marketing.
- Anyone considering a bequest to Rosewood will be encouraged to obtain independent legal advice.

- Where Rosewood is notified of a bequest, the General Manager Finance will manage it, including liaison with the executor and legal advice where required. Bequests over $20,000 are reported to the Board.
- Where a bequest is made by a person who was a resident or client at the time the will was made or changed, the CEO will review the circumstances before acceptance to ensure there was no undue influence.

Accepting Donations

Approval levels

Type	Value	Approved by	Reported to	Notes
Cash or unrestricted donation	Up to $10,000	Finance (no prior approval)	Quarterly finance report	Receipt and record
Cash or unrestricted donation	Over $10,000	CEO	Board	Check source and any conditions
Restricted donation	Any value	CEO	Board if over $10,000	Confirm the purpose can be met
In-kind goods or equipment	Any value	Facility manager, with Finance	Quarterly finance report	Must meet safety, infection control and maintenance requirements
Property, shares or other assets	Any value	CEO, with Board approval over $20,000	Board	Independent valuation; usually sold
Bequest	Any value	General Manager Finance	Board if over $20,000	CEO reviews if made by a resident
Corporate sponsorship	Any value	CEO	Board if over $10,000	Written agreement required

Donations that will be declined

Rosewood will decline, or return, a donation where:

- the donor lacks capacity, or there is any sign of pressure, coercion or undue influence;

- it is offered in exchange for a benefit, priority or preferential treatment for a resident, client or supplier;
- it comes from a supplier or prospective supplier during a procurement process;
- its source is unknown or suspicious, or may be the proceeds of crime;
- it is linked to an organisation or activity inconsistent with Rosewood's values;
- it comes with conditions that are illegal, unethical, or that Rosewood cannot meet; or
- accepting it would create an unmanageable conflict of interest or reputational risk.

Where a donation is declined, the donor will be thanked and told why in a respectful way, and the decision recorded on the Donations Register.

Anonymous donations

Donors may ask to remain anonymous to the public. Rosewood must still record the donor's identity internally, except for small cash donations such as collection tins.

Restricted Donations

- Restricted donations will only be used for the purpose agreed with the donor, and are tracked separately in the Donations Register.
- Before accepting a restricted donation, Finance will confirm the purpose is achievable and that any ongoing costs (for example, maintenance of donated equipment) can be met.
- If the purpose can no longer be met, Rosewood will contact the donor (or, for a bequest, the executor) to agree a new purpose, or return the donation.
- Funds raised for a resident amenity or comfort fund will be spent for the benefit of residents at that site, with input from the residents' committee where one exists.

Fundraising Activities

Rosewood-led activities

- All fundraising activities must be approved in advance by the General Manager Finance, and by the CEO for activities with expected costs over $2,000 or that involve the public.
- Each activity must have a named lead, a budget, a risk assessment (including work health and safety, infection control and food safety where relevant) and an evaluation after it ends.

- Raffles, lotteries, auctions and games of chance must comply with WA gaming laws, with a permit obtained where required.
- Fundraising must not disrupt care, and residents and clients must never feel obliged to take part or buy anything.

Third-party fundraising

- Individuals and groups who wish to fundraise for Rosewood must seek approval first. If approved, they will receive a letter of authority setting out how Rosewood's name and logo may be used and how funds must be passed on.
- Third-party fundraisers must make clear that they are raising money for Rosewood, not acting as Rosewood, and must pass on all funds raised within 30 days with a record of costs.
- Rosewood may withdraw approval at any time if the activity breaches this policy or puts its reputation at risk.

Workplace fundraising for other causes

Fundraising at Rosewood sites for other charities or causes (for example, a staff morning tea for a national appeal) must be approved by the facility manager. Residents, clients and families must not be asked to contribute.

Corporate Sponsorship

- Every sponsorship must be covered by a written agreement approved by the CEO, setting out what Rosewood receives, what recognition the sponsor receives, and how long it lasts.
- Sponsorship gives the sponsor no influence over Rosewood's care, clinical, procurement or employment decisions, and no access to resident, client or donor information.
- A current or prospective supplier may only sponsor Rosewood where the arrangement is declared and managed under the Governance - Conflict of Interest Policy, and never during a procurement process involving that supplier.
- Rosewood will not endorse a sponsor's products or services to residents, clients or families.

Receipting, Cash Handling and Recording

Receipts

Rosewood will issue a receipt for every donation of $2 or more on request. Receipts for tax-deductible gifts must show Rosewood's name, its ABN and that the receipt is for a gift, and must meet Australian Taxation Office requirements for fundraising event contributions and auction purchases. Where a donor receives something in return (for example, a dinner ticket or an auction item), the receipt must show the market value of what they received, as the ATO requires.

Cash handling

- Cash from collections and events must be counted by two people, recorded on a cash count sheet signed by both, and stored securely.
- Cash must be banked within 3 working days and never used to pay expenses or held personally.
- Online donations must be processed only through Rosewood-approved payment platforms.

Donations Register and donor information

- Finance records every donation, bequest and sponsorship on the Donations Register, including any restriction and how the funds were used.
- Donor information is handled in accordance with the Privacy Act 1988 (Cth) and Rosewood's Privacy Policy. It is used only for receipting, thanking and fundraising communication the donor has agreed to, and is never sold or shared.
- Donors can ask to stop receiving fundraising communication at any time, and their request will be actioned within 5 working days. Electronic messages must comply with the Spam Act 2003 (Cth).

Donor Recognition

- Donors will be thanked promptly and appropriately for every donation.
- Public recognition (for example, a plaque or a name in the annual report) will only be given with the donor's written consent, and must be approved by the CEO.
- Naming of buildings, rooms or programs requires Board approval.
- Recognition will not be given in a way that suggests the donor has any influence over Rosewood's care or operations.

Refunds

Donations are not normally refundable. A donation may be refunded where it was made in error, was a duplicate, was obtained in breach of this policy, or should have been declined. Refunds require approval from the General Manager Finance, and any receipt issued must be cancelled.

Reporting

- Finance reports donations, bequests, sponsorships and fundraising income and costs to the Executive Group quarterly and to the Board annually, including restricted funds held and how they were used.
- Fundraising income is reported in Rosewood's annual financial statements and, where applicable, its Annual Information Statement to the Australian Charities and Not-for-profits Commission.

Complaints and Concerns

Complaints about fundraising will be managed under the Feedback and Complaints Policy. Any concern that a worker has pressured a resident or client to give, or has misused donated funds, must be reported immediately to the manager on duty and will be managed under the Incident Management Policy, including reporting under the Serious Incident Response Scheme (SIRS) where required. Concerns can also be raised under the Whistleblower Policy.

Breach of Policy

Failure to comply with this policy may constitute misconduct or serious misconduct. For employees, it will be managed in accordance with Rosewood's disciplinary procedures and the applicable Enterprise Agreement, including procedural fairness. Depending on the circumstances, an employee may be suspended while an investigation is undertaken. For board members and sub-committee members, it will be managed in accordance with the Constitution and Board Charter. Outcomes may include:

- formal warnings;
- repayment of misused funds;
- suspension;
- termination of employment, engagement or appointment; and

- notification to the Aged Care Quality and Safety Commission, the police or other authorities.

Support and Guidance

If you are unsure whether a donation or fundraising activity is appropriate, speak with your manager or the General Manager Finance before you accept or proceed.

Roles & Responsibilities

Everyone covered by this policy

- Never ask residents, clients or families for donations, and refer any offer to the General Manager Finance
- Pass all donations, including cash, to Finance promptly and never hold them personally.
- Report any concern about pressure, undue influence or misuse of funds immediately.

Managers and Facility Managers

- Ensure their team knows this policy.
- Approve in-kind donations and workplace fundraising for other causes at their site.
- Ensure cash handling procedures are followed at their site.

General Manager Finance

- Approves and coordinates fundraising activities and third-party fundraisers.
- Manages donor relationships, thanks and recognition.

Finance

- Receipts, records and banks donations, and maintains the Donations Register.
- Tracks restricted funds and manages bequests and refunds.
- Reports fundraising income, costs and restricted funds to the Executive Group and the Board.
- Ensures Rosewood holds any licence or notification required to fundraise in WA.

CEO

- Approves donations, sponsorships and activities above the thresholds in this policy.
- Reviews bequests made by current or former residents or clients.
- Approves any use of resident or client stories or images in fundraising.

Governing Board

- Approves this policy and its thresholds, large or unusual gifts, and naming rights.
- Receives the annual fundraising report.

Related Policies, Procedures and Forms

- Rosewood Care Group (Inc) – Governance - Gifts and Benefits Policy
- Rosewood Care Group (Inc) – Governance - Conflict of Interest Policy
- Rosewood Care Group (Inc) – Donations Register
- Rosewood Care Group (Inc) – Fundraising Activity Approval Form
- Rosewood Care Group (Inc) – Third-Party Fundraising Letter of Authority
- Rosewood Care Group (Inc) – Delegations of Authority
- Rosewood Care Group (Inc) – Procurement Policy
- Rosewood Care Group (Inc) – Privacy Policy
- Rosewood Care Group (Inc) – Feedback and Complaints Policy
- Rosewood Care Group (Inc) – Incident Management Policy
- Rosewood Care Group (Inc) – Whistleblower Policy
- Charitable Collections Act 1946 (WA), as amended
- National Fundraising Principles (once in force)
- Australian Consumer Law (Competition and Consumer Act 2010 (Cth), Schedule 2)
- Privacy Act 1988 (Cth) and Spam Act 2003 (Cth)
- Australian Taxation Office – Gifts and fundraising guidance for deductible gift recipients
- ACNC Governance Standards
- Aged Care Act 2024 (Cth), Aged Care Rules 2025 and the Statement of Rights
- Code of Conduct for Aged Care