**External Conduct Standard 2: Annual review of overseas activities and record keeping**

**1. Purpose**

The purpose of this policy is to Ensure **Project Juan’s** operations outside Australia are transparent and that registered charities are accountable to the public.

**2. Objective**

**Project Juan** will keep records of all its operations outside Australia. This includes activities and programs it runs itself – or in collaboration with a third party – as well as funds it sends for use overseas.

**3. Scope**

**Project Juan** will keep records containing the following**:**

* the types of activities it conducted outside Australia on a country-by-country basis
* details of how its activities outside Australia enabled it to pursue and achieve its purpose on a country-by-country basis
* details of all expenditure relating to its activities outside Australia on a country-by-country basis
* details of any procedures and processes it used to monitor its overseas operations
* a list of the third parties it worked with outside Australia
* details of any documented claims of inappropriate behaviour by its employees or [Responsible Persons](https://www.acnc.gov.au/tools/factsheets/responsible-persons-board-or-committee-members) outside Australia, and actions it took in response which may involve documenting information if it breaks Australian or overseas laws, or breaches its own code of conduct.

**4. Compliance to External Conduct Standard 2: Annual review of overseas activities and record keeping**

**Project Juan** will ensure records are complete, accurate and legible, prepared on a timely basis, kept in English or in a form that can be easily translated to English, stored safely, and kept for at least 7 years.

**Project Juan** will keep attempt to keep recording keeping to an electronic form where possible but will also file and hard copied documents have received. All records will be accessible to the board when required and or requested.

Though records for operations outside Australia is not a requirement by the ACNC, **Project Juan** will maintain these records in the event the records are requested as part of an enquiry or investigation.

**Contacts**

For questions about this policy, contact the board or **Jeremiah Guevara** by email on project\_juan@zoho.com