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POLICIES AND PROCEDURES

2018

AUTHORISATION

Policies and Procedures have been approved by the management committee of
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Contents

This manual consists of 3 parts.

Part 1. Governance- general risk management policies and practices

Part 2. Management Committee- policies specific to FONAI management

Part 3. Financial Policies specific to FONAI - internal operations

Part 1. Governance

Policy	Page
G.1 Governance	7
G2 Code of Conduct	9
G3 Conflict of Interest	14
G.4 Confidentiality	17
G.5 Transparency and Accountability	19
G 6 Privacy	22
G.7 Acceptable Use of Electronic Media	27
G.8 Email/Document Retention	29
G. 9 Budget Planning	31
G.10. Fraud Management	35
G 11. Access and Equity	42
G.12 Risk Management	45
G.13 Natural Disaster	53
G.14 Child Protection	55
G.15 Legislative Compliance	76
G.16 Occupational Health and Safety Procedures – Injury, Accident and Reporting	78
G. 17. Media Relations	81
G. 18. Social Media	84
G.19 Complaints	88
G.20 Environmental and Social	97

Part 2. Management Committee Policies and Procedures

Policy	Page #
MC.1 Management Committee Member Office-Bearer – roles & responsibilities	101
MC 2. Conduct Of Meetings	108
MC 3 Committees	113
MC 4 Volunteer Management	115
MC. 5 Fundraising	119
MC. 6 Ethical Fundraising	121
MC. 7 Sponsorship	123

Part 3. Internal Financial Management

Policy	Page #
FM 1 Investment Planning	126
FM 2 Financial Transactions Cards	129
FM 4 Authority To Sign Cheques	133
FM 5 Reimbursement of Expenses	134
FM 6 Petty Cash	137

G.1 Governance Policy

Policy number	G.1	Version 1
Drafted by	Denise Roscrow	Approved Jan 2018
Responsible person	Denise Roscrow	Scheduled review date 2019

INTRODUCTION

Governance in the community sector is concerned with the systems and processes that ensure the overall direction, effectiveness, supervision and accountability of an organisation. FONAI management committee members take ultimate responsibility for the governance of their organisations. However, governance is not a role for management committee members alone. Governance is also concerned with the way management committees work with volunteers, service users, members and other stakeholders to ensure the organisation is effectively and properly run and meets the needs for which the organisation was set up.

PURPOSE

The Governance Policy is intended to clarify the content of FONAI'S Rules of the Association by making explicit the underlying principles of governance approved by FONAI.

This policy does not cover legal or ethical issues concerning the role of the management committee or its members, which are addressed separately elsewhere.

The following safeguard principles underpin FONAI's work.

Principle 1: Do no harm

Principle 2: Identify, assess & manage environmental & social impacts.

Principle 3 :Engage effectively with stakeholders

Principle 4: Work effectively with partners

Principle 5: Promote improved environmental & social outcomes.

POLICY

The management committee of FONAI is an elective, representative, and collective body.

- It is **elective**, in that the determination of committee members is the prerogative of members through the election process.
- It is **representative**, in that no member can be mandated by their constituency to adopt a particular position if they do not believe it to be in the best interests of the organisation. Whatever the constituency of any member, all members are committed to acting selflessly and making decisions and voting on governance decisions solely in the best interests of the organisation.
- It is **collective**, in that while each member should put the point of view of their constituency, and each member has the right to argue for their own point of view and to vote for that position, once a collective decision has been taken Board members are required to support that decision.

The function of the management committee of FONAI is to collectively ensure the delivery of the organisation's objects, to set its strategic direction, and to uphold its values. The management committee should collectively be responsible and accountable for ensuring and monitoring that the organisation is performing well, is solvent, and is complying with all its legal, financial, and ethical obligations.

The responsibilities of the management committee that cannot be delegated to any other person or body include

- Compliance monitoring – ensuring compliance with the objects, purposes and values of the organisation, and with its constitution
- Organisational governance – setting or approving policies, plans and budgets to achieve those objectives, and monitoring performance against them
- Strategic planning – reviewing and approving strategic direction and initiatives
- Regulatory monitoring – ensuring that the organisation complies with all relevant laws, regulations and regulatory requirements
- Financial monitoring – reviewing the organisation's budget, monitoring management and financial performance to ensure the solvency, financial strength and good performance of the organisation
- Financial reporting – considering and approving annual financial statements and required reports to government;
- Organisational structure – setting and maintaining a framework of delegation and internal control
- Succession and remuneration planning –
- Risk management – reviewing and monitoring the effectiveness of risk management and compliance in the organisation; agreeing or ratifying all policies and decisions on matters which might create significant risk to the organisation, financial or otherwise
- Dispute management – dealing with and managing conflicts that may arise within the organisation, including conflicts arising between committee members, volunteers, or stakeholders.
- Social responsibility – considering the social, ethical and environmental impact of all activities and operations and ensuring that these are acceptable
- management committee performance and composition – evaluating and improving the performance of the management committee

Relationship with management

The management committee should focus on the strategic direction and the core policies of the organisation, and avoid becoming involved in day-to-day operational decisions made by FES management team in Nepal. Where individual committee members do need to become involved in operational matters, they should separate their strategic role (where they operate independently of any direction) from their operational role (where they act at the direction of management).

G.1 Governance Procedures

Procedures number	G1	Version 1
Drafted by	Denise Roscrow	Approved Jan 2018
Responsible person	Denise Roscrow	Scheduled review date 2019

RESPONSIBILITIES

It shall be the responsibility of the management committee to establish and maintain standing orders, policies and procedures, and systems of financial control, internal control, and performance reporting.

It shall be the responsibility of the management committee to clearly demarcate and delegate the functions of sub-committees, office bearers, the FES manager and other agents.

It shall be the responsibility of the Chairperson address key management and operational issues within the direction and the policies laid down by the management committee, including

1. Developing and implementing organisational strategies and making recommendations to the management committee on significant strategic initiatives;
2. Developing the annual budget and managing day-to-day operations within the budget;
3. Maintaining an effective risk management framework;
4. Keeping the management committee and regulators informed about any developments with a material impact on the organisation's performance; and
5. Managing day-to-day operations in accordance with agreed standards for social, ethical and environmental practices.

PROCEDURES

Internal controls

The Management Committee should set and maintain standing orders, policies and procedures, and systems of financial control, internal control, and performance reporting. The Management Committee should ensure that there is a system for the regular review of the effectiveness of its financial control, internal control, performance reporting, and policies and procedures.

Managing risk

The Management Committee should undertake a full risk assessment (either periodically or on a rolling basis) and take appropriate steps to manage the organisation's exposure to significant risks. The Management Committee must regularly review the risks to which the organisation is subject, and take action to mitigate risks identified.

Board review

The Management Committee should ensure that there is a system for the regular review of its own effectiveness in meeting its responsibilities.

RELATED DOCUMENTS

- Code of Conduct Conflict of Interest Policy Access and Equity Policy Committee Grievance Policy Committee Dispute Resolution Policy Transparency and Accountability Policy Environmental & Social Impact policy

G.2 Code of Conduct

Policy number	G2	Version	1
Drafted by	Denise Roscrow	Approved by Board	August 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

Introduction

FONAI's primary work of fundraising, raising public awareness of our programs, guest speakers & special events is conducted in Adelaide, Australia.

Many members however travel regularly to Nepal to meet formally & informally with stakeholders to monitor programs & build capacity in NGO's with which FONAI has partnership agreements. Family members & members of the general public may accompany Board members or authorised representatives of FONAI on these trips. This code of conduct applies to all activities FONAI &/or it's representatives & volunteers, undertake both in Australia & Overseas.

An undertaking indicating knowledge of and willingness to comply with the Code is required of all Board members, volunteers, authorised representatives for FONAI, &/or other any interested parties who assist with FONAI's work both in Australia or overseas.

Principles

FONAI members & representatives & volunteers, must at all times maintain the highest standards of integrity and conduct consistent with our FONAI core values.

FONAI Mission Statement

To support marginalised & vulnerable Nepalese undertake education and/or vocational training to improve their socio/economic position.

Our core values are to:

- Do no harm
- Identify, assess & manage environmental & social impacts.
- Engage effectively with stakeholders
- Work effectively with partners
- Promote improved environmental & social outcomes.

We are committed to:

- The highest level of ethical behaviour & professionalism.
- Respectful collaboration with our key stakeholders.
- Respectful collaboration with our donors & supporters.
- Open & honest communication
- Conducting annual reviews of all programs to ensure the best outcomes
- Prioritise funding allocation so it goes where it is most needed.
- Being aware of the issues affecting all FONAI funding recipients and advocating for their interests.
- Respecting the dignity and protecting the privacy of FONAI funding recipients
- Ensuring the confidentiality of all relevant stakeholder records and/or personal circumstances.

FONAI members & representatives & volunteers, must at all times:

- Behave honestly and with integrity in all of our dealings
- Be a positive representative of FONAI & Australia.
- Act with care and diligence in the conduct of our responsibilities and duties
- Treat everyone with respect and courtesy, and without harassment
- Comply with all applicable Australian laws (federal and state)
- Comply with all applicable Nepalese government rules.
- Comply with any lawful and reasonable direction given by anyone who has authority to give such a direction
- Disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent) in line with FONAI'S Conflict of Interest policy

This includes not making use of:

- a. Confidential information
- b. The member's or office bearer's, status, power or authority, in order to gain, or seek to gain, a benefit or advantage for the member or office bearer or any other person.

Representing FONAI overseas.

These guidelines apply to official representatives of FONAI, (Board Members), people authorised to represent FONAI overseas by the Board, &/or any persons/s accompanying FONAI representatives for duration of overseas visits.

Introduction

1.1 Representatives of FONAI both in Australia & overseas are required to provide an undertaking that they will at all times behave in a way that upholds the good reputation of Australia & FONAI.

1.2 Representatives of FONAI assume a position of trust together with ethical obligations. FONAI representatives overseas are required to comply with the applicable laws of Australia and with all applicable regulations, directions and guidelines relating to their official and personal conduct.

1.3 The Code provides guidelines for FONAI's representatives behaviour overseas, both personal and professional. In conducting themselves overseas, FONAI's representatives are expected to use their good judgment and common sense. If any of FONAI's representatives is in any doubt about aspects of the Code or unsure about how to proceed, they are encouraged to seek guidance from FONAI Board of Management.

1.4 In the Code the term 'FONAI representative' means a person authorised by FONAI Board of Management to represent FONAI overseas.

Upholding Australia's Reputation

2.1 FONAI's representatives working overseas are seen as representatives of Australia in the manner in which they conduct themselves as private individuals. Their visibility and status as foreign visitors means that their actions may have an impact on Australia's reputation. FONAI's representatives abroad may face dilemmas in the area of conduct and ethics which do not arise in Australia, in a range of social, cultural, financial or personal settings.

2.2 FONAI's representatives overseas have a duty to act at all times in a manner which upholds the good reputation of Australia

Respect for the Law

3.1 In accordance with the Vienna Conventions on diplomatic and consular relations, FONAI's representatives overseas must respect the law of the country which he or she is travelling. FONAI's representatives must comply with any lawful and reasonable directions, and take into account any guidance issued by the Department and local authorities, concerning the operation of local laws and regulations. Such directions and guidance will be of special relevance where there is a major difference between the requirements of local law and the law applying in Australia.

3.2 FONAI's representatives overseas must inform the Board of Management as soon as practicable if the representative, or a member of his or her household, comes to the notice of the local law enforcement authorities.

Cultural Sensitivity

4.1 FONAI's representatives working overseas need to be culturally sensitive to the people of the host country and to be understanding of local customs, including those relating to personal behaviour.

4.2 FONAI's representatives overseas must respect laws and customs which are protective of local cultural property. FONAI's representatives must not purchase or export, or make arrangements in respect of the purchase or export of, any item of cultural property other than in accordance with local regulations, and with the knowledge and consent of the host authorities where this is required. The term 'cultural property' includes any antiquity, artefact, document, work of art or other chattel which is of national, historical, scientific, literary or artistic importance, and also includes any property the sale or export of which is, or may be, subject to local regulation.

4.3 FONAI & Australia have a reputation for integrity which must not be undercut by any perception that FONAI's representatives might be influenced by bribes, gifts or other benefits. Money must never be accepted as a gift.

Appropriate Personal Behaviour

5.1 FONAI's representatives must not engage in behaviour at any time which is likely to affect adversely their ability to perform their duties, or the ability of project to achieve its objectives, or which is likely to bring the project or Australia into disrepute. In particular, FONAI's representatives should be aware that sexual behaviour and use of alcohol and other substances are areas of particular sensitivity, where conduct may more easily be seen as offensive or be misinterpreted, and where particular attention to appropriate personal behaviour in the local context is therefore required. Where a FONAI's representative is in any doubt as to the applicability of this principle, he or she should seek advice from Board of management &/or partnering NGO.

5.2 Where a FONAI representative is engaged in any personal relationship which might have any of the adverse effects set out in Para 5.1, he or she must inform Board of Management. The Board must treat any information they receive in relation to such matters in accordance with the *Privacy Act 1988*.

5.3 A FONAI representative must comply with the age of consent requirements specified for sexual activity in the law of the host country or the age of consent under the law of the Australian Capital Territory (16 years), whichever sets the greater age.

5.4 A FONAI representative must not use, or be required to use, stakeholder office facilities, staff or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to the mission.

5.5 A FONAI representative's personal conduct towards members of partnering NGO's board members, domestic staff and locally-engaged staff must not be exploitative or be such as to lead reasonably to a perception of exploitation.

Accompanying Members.

6.1 FONAI representative accompanying trip members are not covered directly by the Code of Conduct. It is nonetheless the case that the actions of accompanying members have an impact on the reputation of Australia or of an Australian /FONAI mission, and on the ability of FONAI representatives to perform their duties.

6.3 A FONAI representative overseas must take all reasonable steps to ensure that any accompanying members, are aware of local laws, culture and customs. In the event of illegal behaviour by a member, the FONAI representative must take all reasonable steps to ensure that the behaviour ceases &/or consult the Board of Management.

Respect for Others and Tolerance of their Opinions

7.1 FONAI representatives overseas have a duty to contribute to effective operations & must treat all stakeholders & the public with respect. This included paying particular attention to their different cultural backgrounds, beliefs and opinions. This principle is central to good relations and is important to effective performance in all overseas environments.

7.2 FONAI representatives overseas must respect the cultural background of all stakeholders, not discriminate against, or harass such persons or any other person because of their sex, marital status, ethnicity, age, sexual orientation, disability or religious beliefs, or upon any similar ground; and respect the privacy of individuals when dealing with personal information.

Implementation

10.1 An undertaking indicating knowledge of and willingness to comply with the Code is a condition of approval for travel overseas, whether on short or long-term assignment, for all FONAI representatives.

10.2 FONAI representatives have an obligation to report apparent or alleged breaches of the Code to the Board of Management.

10.3 Where a FONAI representative becomes aware of serious criminal misconduct, by another Australian who is not a FONAI representative, the FONAI representative should report the matter to the Board of Management, who will, in turn, consider the most appropriate course of action, including reporting the matter to local law enforcement authorities or the Australian Federal Police. FONAI representatives should be aware of potential conflict of interest where the person involved may subsequently become a FONAI stakeholder.

10.4 Any failure to comply with the Code will be handled in accordance with procedures for handling breaches of the FONAI's Code of Conduct.

10.5 The making of an allegation which is found to be without substance and which is knowingly false, vexatious or malicious, may be treated as a breach of FONAI's Code of Conduct.

10.6 In accordance with accepted practice, the Board of management of FONAI will pass to the Australian Federal Police any information which it can reasonably be suspected relates to an offence under applicable Australian law.

I have read, understand and agree to abide by the FONAI Code of Conduct.

Name:	
Position:	
Signature:	Date:

RELATED DOCUMENTS

- [Conflict of Interest Policy](#)
- [Access and Equity Policy](#)
- [Committee Grievance Policy](#)
- [Committee Dispute Resolution Policy](#)
- [Transparency and Accountability Policy](#)
- [Environmental & Social Impact policy](#)
- [Grievance & Complaints Policy](#)

G.3 Conflict of Interest Policy

Policy number	G3	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

The Management Committee of FONAI is committed to high standards of ethical conduct and accordingly places great importance on making clear any existing or potential conflict of interest.

It is to assure all relevant stakeholders, partners, prospective donors and the public generally that

- (i) no organization has an unfair advantage in obtaining FONAI funding because of member affiliation, and
- (ii) no member will benefit unfairly from the FONAI's scholarship funding or other FONAI resources. The absence of any perception of favouritism or unfair benefit is as important as the absence of the condition itself.

It is important to note that while these guidelines refer to the funding process, they apply equally to all investment and business decisions and related matters. This policy also applies to all Board-appointed committees.

The reputation and credibility of FONAI rests on its ability to make fair, objective and impartial decisions in accordance with carefully defined criteria. Consequently, it is essential to avoid situations where a conflict of interest may influence, or appear to influence, that decision making process.

There are two types of conflict of interest situations:

Where a board member or board member's family has or appears to have a financial interest in a decision or will receive (or appear to receive) a benefit from FONAI resources; and

Where a board member or board member's family has or appears to have an affiliation or some relationship with a grant applicant that could influence or appear to influence a board member's decision.

The following guidelines are intended to help the FONAI's board members avoid both types of conflicts.

General

FONAI recognizes that its board members have broad interests and participate in many community, charitable and business activities. The broader the member's experience, the more value is the member to FONAI.

From time to time, however, a member may serve as an advisor/ consultant to an organization under consideration for FONAI support. Situations may also arise where a member's business or personal interests may be affected by a FONAI scholarship grant or other decision.

In all such cases, the potential for conflict of interest should be recognized and disclosed, and appropriate steps taken to prevent influence or favouritism by such member in the FONAI's grant or other decision. Even this is not enough; FONAI F should avoid any situation that might appear to have involved such influence or favouritism.

PURPOSE

This policy has been developed to provide a framework for:

- all Management Committee members in declaring conflicts of interest; and
- the Management Committee, when determining how to deal with situations of conflict.

POLICY

A conflict of interest may occur if an interest or activity influences or appears to influence the ability of Management Committee Member to exercise objectivity. The Management Committee places great importance on making clear any existing or potential conflicts of interest. All such conflicts of interest shall be declared by the member concerned and documented in the Board's Conflicts of Interest Register.

A Management Committee member who believes another Management Committee member has an undeclared conflict of interest should specify in writing the basis of this potential conflict.

Where a Management Committee member has a conflict of interest, as defined by statute, that member shall not initiate or take part in any Management Committee discussion on that topic (either in the meeting or with other Board members before or after the Board meetings), unless expressly invited to do so by unanimous agreement by all other members present.

Where a Management Committee member has a conflict of interest, as defined by statute, that Board member shall not vote on that matter.

The Management Committee may supplement the statutory definition of conflict of interest if it so wishes, in which case the same procedures shall apply.

Management Committee members are not barred from engaging in business dealings with the organisation, provided that these are negotiated at arm's length without the participation of the member concerned.

G.3 Conflict of Interest Procedures

Procedures number	G3.	Version 1
Drafted by	Denise Roscrow	Approved Jan 2018
Responsible person	Denise Roscrow	Scheduled review date 2019

RESPONSIBILITIES

The Chairperson is responsible for bringing this policy to the attention of prospective Board members.

All Management Committee members are responsible for respecting this policy.

PROCEDURES

Before Management Committee Member begins his or her service with the organisation, he or she shall provide the Management Committee a list of his or her principal business activities, as well as involvement with other charitable and business organisations, vendors or business interests, or with any other associations that might produce a conflict of interest. This information should be documented in the Conflict of Interest Checklist.

Further, Members shall declare any conflicts of interest of which they become aware either at the start of the Board meeting concerned or when a relevant issue arises. The nature of this conflict of interest should be entered into the meeting minutes.

Where a conflict of interest or potential conflict of interest, as defined below, is identified and/or registered, the Management Committee member concerned shall leave the room as soon as that item comes up for discussion.

The concerned Management Committee member shall not vote on that issue, nor initiate or take part in any Board discussion on that topic (either in the meeting or with other Management Committee members before or after the Management Committee meetings), unless expressly invited to do so by unanimous agreement by all other members present.

The Management Committee Member's abstinence should be recorded in the meeting minutes.

If a person declares him/herself to have an existing or potential conflict of interest, confidentiality will be respected.

If a person alleges that another person has a conflict of interest, whether existing or potential, and that person does not agree, and if the Management Committee cannot resolve this allegation to the satisfaction of both parties, the Chairperson shall form an Ethics Sub-Committee to consider the matter.

This sub- committee will make a recommendation to the Management Committee as to what action shall be taken.

‘Conflict of interest’ is defined as applying

1. in accordance with the statute, where a Management Committee member stands to gain financially from any business dealings, programs or services of the organisation, other than where
 - a. the Management Committee member falls into the class of people benefited by the organisation and the financial gain is of a nature common to other beneficiaries, or
 - b. the person is an employee of the organisation, and the financial gain is of a nature common to other employees.
2. under the Rules of The Association of the organisation,
 - a. where the immediate family or business connections of a Management Committee member stands to gain financially from any business dealings, programs or services of the organisation,
 - b. where the person is an employee of the organisation,
 - c. where a Management Committee member or the ex-officio member of the Board has a role on the governing body of another organisation, where the activities of that other body may be in direct conflict or competition with the activities of FONAI

Related policies

Code of Conduct

Confidentiality

Fraud

Child Protection

Complaints

G.4 Confidentiality Policy

Policy number	G4	Version	1
Drafted by	Denise Roscrow	Approved by C/mee	
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

Committee confidentiality is important. It encourages open and frank discussion at meetings, helps facilitate the development of vision and the implementation of an effective strategy to achieve that vision, and protects information that is confidential, personal, or relates to employment, commercial or legal matters.

PURPOSE

The purpose of this policy is to facilitate effective governance of FONAI by ensuring Committee confidentiality.

POLICY

Committee members must keep confidential all information pertaining to matters dealt with by the Committee. This includes committee meeting minutes, agendas, reports to the committee and associated documents, and information contained in those documents.

The obligation to maintain confidentiality continues to apply even after a person has left the Committee.

Maintaining confidentiality as a general rule will also help ensure observance by Committee members of the following legal duty:

A person who obtains information because they are, or have been, a member of the Committee must not improperly use the information to:

- *gain an advantage for themselves or someone else; or*
- *cause detriment to the organisation.*

If a request is made for access to one or more committee papers, the Committee may on a case by case basis resolve to provide access to the document/s. In considering this request, the Committee will have regard to:

- the importance of maintaining confidentiality to facilitate effective committee meetings;
- the importance of complying with the law – including privacy law - and recognising that the law sometimes creates duties to disclose or protect information;
- whether the person requesting the document is a member, and the important role of members in holding the Committee accountable; and
- the need to be consistent in the way that documents are treated, and the consequence of establishing any precedents or expectations.

Nothing in this policy is intended to prevent the Committee from seeking confidential legal, accounting, financial or other expert advice from independent professionals to assist the Committee in carrying out its functions. Any person who is not a member of the Committee but is present at a Committee meeting (or part of a meeting) must maintain in confidence all information obtained as a result of their participation in the meeting.

Committee papers means all written communications to committee member/s including without limitation monthly/quarterly board papers, submissions, minutes, letters, memoranda, committee and sub-committee papers and copies of other documents referred to in any of the abovementioned documents made available to the Committee member as a Committee member during his or her time in office.

G. 4 Committee Confidentiality Procedures

Procedures number	G4	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

The Chairperson is responsible for bringing this policy to the attention of prospective Committee members.

The Secretary must ensure that it is included in the induction kit (if such a kit exists) for new Committee members.

Requests for access to Committee Papers should be made to the Secretary who should include consideration of the request as an item on the Committee agenda.

PROCEDURES

The Secretary shall ensure that Committee Papers are created, maintained and distributed in a manner which is consistent with their confidential status. They shall be kept separately from other (non-confidential) documents and stored in a manner which limits access to them by unauthorised persons (including employees).

In circumstances where a request for access to Committee Papers has been made, and there is reason to believe that there are laws governing the disclosure or non-disclosure of the document, the Chairperson will obtain legal advice on the matter to assist the Committee in its consideration of the request.

RELATED DOCUMENTS

- [Transparency and Accountability Policy](#)
- [Privacy Policy](#)
- [Code of Conduct](#) [Complaints](#) [Fraud](#) [Child Protection](#)

G.5 Transparency and Accountability Policy

Policy number	G5	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

Friends of Nepal-Adelaide Inc (FONAI) values its relationship with its clients, its members, its donors, its volunteers and other stakeholders who partner with it to enable it to achieve its purpose.

It recognises that transparency and accountability build trust and help those relationships to flourish.

PURPOSE

The purpose of this document is to recognise the importance of transparency and accountability and facilitate the development and implementation of measures by FONAI management committee to provide appropriate transparency and accountability.

POLICY

1. Committee of Management Reporting

1. The Committee must ensure that it complies with its legal and contractual reporting obligations. They include:
 - a. Reporting annually to the Members, in accordance with the requirements of the Rules of the Association, on the organisation's activities in the preceding year, and providing an opportunity for questions
 - b. Preparing financial reports as required by law
 - c. Preparing an annual report in accordance with Australian Charities & Non Profits commission (ACNC)
 - d. Reporting to government agencies in accordance with the terms of grants and funding contracts
 - e. Reporting to the Australian Taxation Office, and/or other relevant Commonwealth Government departments, in accordance with the requirements of its deductible gift recipient status
 - f. Reporting to donors in accordance with the terms of any philanthropic grants issued
 - g. Reporting to the Australian Charities and Not-for-profits Commission.
2. In addition to its specific legal and contractual obligations, the Committee will consider each year whether there are any other stakeholder relationships which could benefit from receiving a report from the Board on the organisation's activities and performance.

3. In preparing its reports, the Committee will consider the extent to which it can report on each of the following matters:
- a. The purpose of FONAI
 - i. A report on the purpose of FONAI involves explaining the environment in which the organisation operates. It includes reporting on FONAI's mission, vision and values, and explaining FONAI'S relevance in the current environment.
 - b. FONAI stakeholder reporting and engagement
 - i. This includes reporting on how stakeholder relationships are managed, how volunteers are recruited, trained, rewarded, retained and recognised, and how the organisation is funded.
 - c. Fundraising and investments
 - i. This includes reporting on the source of funds, fundraising and funding targets.
 - ii. It includes reporting on accountability mechanisms governing the use of the funds.
 - iii. It includes an assessment of FONAI's ability to maintain the current levels of funding in the future, and how its fundraising approach is being evolved or adapted to changes in circumstances.
 - iv. It includes reporting on investments, and the management oversight and skills in FONAI to manage investment risks and performance.
 - v. It includes reporting on movements in the level of funding, particularly where it has fallen in any year.
 - d. Business strategy and mission
 - i. This includes explaining the strategy and structures that enable FONAI to operate and to grow.
 - ii. It includes identifying the priorities and associated budgets and allocation of resources.
 - iii. It also includes honest self-assessment and disclosure of performance and plans to address underperformance and/or ongoing challenges, recognising that this helps to build trust.
 - e. Governance structure and processes
 - i. This includes reporting on governance structures, systems, processes and how risk management frameworks are aligned with those structures, systems and processes.
 - ii. It includes providing clear diagrams of the organisational structure with reporting lines and key roles identified.
 - iii. It includes disclosure of qualifications, experience and length of service of the members of the Committee, CEO and senior management.
 - iv. It includes reporting on how FONAI identifies and manages risks, and what risks are specific to FONAI in addition to general risks.

- f. Activity and performance
 - i. This includes reporting on outputs, outcomes and impacts.
 - ii. It also includes reporting on KPIs.
 - g. Financial performance and position
 - i. This includes reporting on sources of revenue, revenue recognition policies and a discussion and analysis of the factors affecting the organisation's financial performance.
- 4. In undertaking its function of reporting to stakeholders, the Committee must be mindful of the organisation's privacy policy, underpinned by its privacy law obligations, and it must take care to act in the interests of FONAI.
- 5. Deliberations of the Committee and its sub-committees shall be dealt with in accordance with the Committee confidentiality policy/procedure.

2. Stakeholder Records

FONAI will deal with stakeholder records in accordance with its privacy law obligations.

3. Member Records

FONAI will deal with member records in accordance with the *Fair Work Act 2009* (Cth), and its privacy policy and privacy law obligations.

4. Member and Donor records

FONAI will deal with client records in accordance with its privacy policy and privacy law obligations.

5. Access to Minutes of General Meetings and the Members Register

Access to minutes of general meetings and the Members Register will be provided in accordance with the terms of the Rules of the Association.

G.5 Transparency and Accountability Procedures

Procedures number	G 5	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

In order for the FONAI committee of management to facilitate accountability and transparency with stakeholders, there needs to be good internal documentation and reporting.

The Chairperson is responsible for ensuring that there are systems and processes in place to capture, record and analyse the information necessary to enable the Committee to perform its reporting functions. This includes reporting regularly to the Committee on the operations of FONAI.

The Chairperson will also ensure that privacy and other policies are in place to govern the access and use of documents including client records, staff records, member and donor records, and minutes of general meetings, in accordance with the Board's transparency and accountability policy.

Committee members are responsible for implementing and adhering to the policies and procedures developed by the CEO.

RELATED DOCUMENTS

- Privacy Policy
 - Confidentiality Policy

G.6 Privacy Policy

Policy number	G6	Version	1
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

The Management Committee of Friends of Nepal-Adelaide Inc is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

PURPOSE

The purpose of this document is to provide a framework for FONAI in dealing with privacy considerations.

POLICY

FONAI collects and administers a range of personal information for the purposes of it's Education Scholarship Program. FONAI is committed to protecting the privacy of personal information it collects, holds and administers. Personal information will not be sent overseas without written permission of individuals.

FONAI recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the *Privacy Act 1988 (Cth)*.

FONAI is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

FONAI will:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

G.6 Privacy Procedures

Procedures number	G6	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

FONAI's Committee of Management is responsible for developing, adopting and reviewing this policy.

FONAI'S chairperson is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

PROCESSES

Collection

FONAI will:

- Only collect information that is necessary for the performance and primary function of FONAI.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

Use and Disclosure

FONAI will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, FONAI will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:

- a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or the person has consented; or certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and FONAI has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- State in FONAI's privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as FONAI is required to be.
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that the personal information is not accurate, then FONAI must take steps to correct it. FONAI may allow a person to attach a statement to their information if FONAI disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

Storage FONAI

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- Before FONAI discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. FONAI will have systems which provide sufficient security.
- Ensure that FONAI'S data is up to date, accurate and complete.

Destruction and de-identification FONAI

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information FONAI holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

Data Quality

FONAI will:

- Take reasonable steps to ensure the information FONAI collects is accurate, complete, up to date, and relevant to the functions we perform.

Data Security and Retention

FONAI will:

- Only destroy records in accordance with the organisation's Records Management Policy.

Openness

FONAI will:

- Ensure stakeholders are aware of FONAI Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

Access and Correction

FONAI will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.
- Anonymity
- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

Making information available to other organisations

FONAI can:

- Release information to third parties where it is requested by the person concerned.

G.7 Acceptable Use of Electronic Media Policy

Policy number	G7	Version	1
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

FONAI recognises that members need access to email systems and the internet to assist in the efficient and professional delivery of services. FONAI supports the right of members to have access to reasonable personal use of the internet and email communications in the workplace.

PURPOSE

This policy sets out guidelines for acceptable use of the computer network, including internet and email, by members and volunteers of FONAI. Access to internet and email is provided to FONAI office bearers, chairperson, secretary and treasurer for the primary purpose of assisting them in carrying out their duties.

POLICY

Office bearers may use the internet and email access provided by FONAI for:

- Any work and work-related purposes;
- Limited personal use (for details see Procedures, below);
- More extended personal use under specific circumstances (for details see Procedures, below).

Where members use computer equipment or computer software at the premises of FONAI or use computer equipment or software belonging to FONAI, properly authorised members of FONAI may access any data on that equipment to ensure that the organisation's policies are being adhered to. Such data should not be regarded as under all circumstances private in nature.

G. 7 Acceptable Use of Electronic Media Procedures

Procedure number	G7	Version	1
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

DEFINITION

Electronic media includes all electronic devices and software provided or supported by FONAI, including, but not limited to, computers, electronic tablets, peripheral equipment such as printers, modems, fax machines, and copiers, computer software applications (including software that grants access to the internet or email) and telephones, including mobile phones, smartphones and voicemail systems.

Responsibilities

It is the responsibility of the Chairperson to ensure that:

All members are aware of this policy;

Any breaches of this policy coming to the attention of management are dealt with appropriately.

It is the responsibility of all members and volunteers to ensure that their use of electronic media conforms to this policy.

Processes

Limited personal use

Limited personal use of computer, internet and email facilities provided by the organisation is permitted where it:

- Is infrequent and brief;
- Does not interfere with the duties of the members
- Does not interfere with the operation of FONAI
- Does not compromise the security of FONAI or of its systems;
- Does not compromise the reputation or public image of FONAI
- Does not impact on the electronic storage capacity of FONAI
- Does not decrease network performance (e.g. large email attachments can decrease system performance and potentially cause system outages);
- Corresponds to the procedures outlined in the Email Maintenance and Archiving Procedures document;
- Incurs no additional expense for FONAI
- Violates no laws;
- Does not compromise any of the confidentiality requirements of FONAI

Access to electronic data

FONAI may need to access any and all information, including computer files, email messages, text messages and voicemail messages. FONAI may, in its sole discretion, authorise its members to inspect any files or messages recorded on its electronic media at any time for any reason. Where use of FONAI's equipment or software requires the use of a password, this should not be taken to imply any right of privacy in the user. FONAI may also recover information that a user has attempted to delete, and staff should not assume that such data will be treated as confidential.

Unacceptable use

Members may not use internet or email access (including internal email access) provided by FONAI to:

- Create or exchange messages that are offensive, harassing, obscene or threatening;
- Visit websites containing objectionable (including pornographic) or criminal material;
- Exchange any confidential or sensitive information held by FONAI (unless in the authorised course of their duties);
- Create, store or exchange information in violation of copyright laws (including the uploading or downloading of commercial software, games, music or movies);
- Undertake internet-enabled activities such as gambling, gaming, conducting a business or conducting illegal activities;
- Create or exchange advertisements, solicitations, chain letters or other unsolicited or bulk email.

RELATED DOCUMENTS

- [Email Retention and Archiving Policy](#)

G.8 Email/Document Retention Policy

Policy number	G8	Version	1
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

The rise to predominance of electronic communication mandates electronic message management systems comparable to existing hard copy filing systems. Members or volunteers of FONAI acquire no rights in any material, electronic or otherwise, created by in the course of their employment, or accessed on FONAI equipment.

PURPOSE

Electronic document retention management needs to meet multiple objectives:

1. That email retention does not materially degrade IT system performance;
2. That important emails remain accessible for operational purposes;
3. That legal document retention requirements are met; and
4. That *Privacy Act* obligations to delete certain personal information is complied with.

To help committee members determine what information sent or received by email should be retained and for how long, this policy identifies the broad categories of electronic messages processed by FONAI system and sets out the factors to be considered in setting practice guidelines to be adopted in each case.

CORE POLICY

Material that should be preserved should be clearly distinguished from material that should be purged from the system.

G.8 Email/Document Retention Procedures

Procedures number	G8	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

It is the responsibility of the Chairperson to ensure that:

- Committee Members Are Aware Of This Policy;
- Any breaches of this policy coming to the attention of management are dealt with appropriately.

It is the responsibility of the all committee members to ensure that their usage of email conforms to this policy.

PROCESSES

The first step is to consider whether there is a particular legal obligation to retain the email for a minimum period of time. The email can then be classified for FONAI'S internal purposes as one of:

1. Material of permanent significance (perpetual)
2. Administrative correspondence (4 years)
3. Fiscal correspondence (4 years)
4. General correspondence (1 year)
5. Ephemeral correspondence (retain until read and acted upon, then destroy)

The email should then be retained for the longer of the minimum legal period and the period set down in FONAI'S internal classification.

Classification of Correspondence

1. Material of permanent significance

Material that requires permanent retention includes:

- any material required to be retained in accordance with legal obligations (see further explanation below under the heading, 'Legal Requirements');
- items of historical significance to the organisation;
- emails creating or recording permanent legal relationships; and
- items recording significant policies or precedents.

2. Administrative Correspondence

FONAI'S Administrative Correspondence includes, though is not limited to, confidential management information, FES program student information, and project-related correspondence.

3. Fiscal Correspondence

FONAI'S Fiscal Correspondence includes all information related to revenue and expense for the organisation.

4. General Correspondence

FONAI'S General Correspondence covers information that relates to stakeholder interaction and the operational decisions of the organisation. The secretary is responsible for email retention of General Correspondence where this is likely to be of continuing usefulness. General correspondence may include such things as Instant Messenger Correspondence, which may be saved with the logging function of Instant Messenger, or copied into a file and saved. Instant Messenger conversations that are Administrative or Fiscal in nature should be copied into an email message and stored appropriately.

5. Ephemeral Correspondence

FONAI'S Ephemeral Correspondence is by far the largest category and includes personal emails, emails dealing with the work of the day, and emails containing information outdated by events. FONAI may destroy this after reading and acting on the material.

6. Personal Information

Legal requirements

1. Australian Charities and Not for Profit Commission Act 2012 (Cth)

Section 55-5 requires a registered entity to keep for 7 years written records that correctly records its operations, so as to enable any recognised assessment activity to be carried out. Under section 55-10 a recognised assessment activity includes an activity carried out to assess compliance with the *Australian Charities and Not for Profit Commission Act* and Regulations under that Act.

Citing just two examples of obligations under the *Australian Charities and Not for Profit Commission Regulations 2013*:

- A registered entity must take reasonable steps to ensure its committee members disclose any perceived or actual material conflicts of interest of any members. If a committee member was to send an email to the rest of the committee disclosing a conflict of interest then this would need to be retained;
- A registered entity must take reasonable steps to ensure its committee members do not allow the entity to operate while insolvent. Any email discussion between committee members regarding the solvency of the entity (ie its ability to pay its debts as and when they fall due) would need to be retained.

2. Destruction of evidence

Various state and territory laws criminalise the destruction or concealment of a document that is likely to be required in evidence in a legal proceeding.

In South Australia under the *Criminal Law Consolidation Act 1935* (SA) s 243, it is an offence to conceal or destroy anything that may be required in evidence at judicial proceedings with the intention of influencing a decision by a person whether or not to institute judicial proceedings or to influence the outcome of judicial proceedings (whether proceedings that are in progress or proceedings that are to be instituted at a later time).

3. Correspondence involving intellectual property

Any correspondence that involves the creation of any significant intellectual property rights shall be retained at the discretion of the CEO. To ensure Administrative Correspondence is retained in an accessible format, a mailbox in FONAI's name is to be created. Users should copy (cc) to this address when receiving or sending such email. Retention of such material will be administered by the IT officer.

4. Correspondence relating to litigation (or anticipated legal proceedings)

When legal proceedings are in process (or reasonably to be anticipated), particular considerations apply to document retention. This would include correspondence relating to any threatened or likely legal action against FONAI, relating to any alleged or likely misconduct by FONAI, its members, partners or volunteers. It is the responsibility of the Chairperson to inform members should these considerations be applicable and to circulate any relevant changes in policy and procedures.

5. Privacy Act 1988 (Cth)

Under the Australian Privacy Principles implemented in accordance with the *Privacy Act 1988* (Cth), an APP entity (ie an entity that is obliged to comply with the Australian Privacy Principles) must take such steps as are reasonable in the circumstances to destroy personal information, or to ensure that the information is de-identified, if the entity no longer needs the information for any purpose for which the information may be used or disclosed by the entity. The *Privacy Act* only applies to information about an individual (ie a human) it does not apply to information about entities. Furthermore, in determining whether the entity has any continuing need for the information is based upon uses that are permitted under the

Privacy Act, not all possible uses to which the entity may want to put the information. However, this obligation is expressly subject to any obligation at law to retain the information so that an obligation to retain overrides this obligation to destroy.

Storage

It shall be the responsibility of the Chairperson or their nominee to maintain backup discs or cloud back-up, and archiving from FONAI email server. The email server should be backed up at least daily.

Where physical back-up media is used (rather than cloud storage) then at least once a quarter a set of discs shall be taken out of the rotation and be moved offsite. Email shall not be removed from the offsite backup discs.

G.9 Budget Planning Policy

Policy number	G9	Version	1
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

The Management Committee of FONAI is responsible for overseeing the budget of the organisation and for ensuring that the organisation operates within a responsible, sustainable financial framework.

In line with this responsibility, the Management Committee of FONAI conducts a budget planning process each year as part of its annual business planning.

PURPOSE

This policy is designed to set out the process for compiling, monitoring and reviewing FONAI's annual budget.

POLICY

The Management Committee of FONAI conducts a budget planning process each year as part of its annual business planning.

The organisation operates under a budget that must be flexible in responding to unforeseen events, including possible reductions in cash flow, and therefore be regularly monitored and reviewed.

G 9. Budget Planning Procedures

Procedures number	G9	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

The Management Committee of FONAI has ultimate responsibility for overseeing the budget of the organisation and for ensuring that the organisation operates within a responsible, sustainable financial framework.

It is the responsibility of the Treasurer to prepare all budgets and review budgets in consultation with the Committee.

PROCEDURES

Preparation of the Budget

In January each year, the Treasurer starts preparing the budget estimates as part of the Business Plan for the financial year. The process includes:

- Considering operational costs
- Estimating income.

The initial budget estimates are based on the current expenditure projections to end of year and a 10% increase on operating expenses such as power, telephones, etc. The Management Committee of FONAI shall be provided with information about how cost increases will be absorbed or will lead to increases in charges.

The Treasurer will present the draft budget for discussion at a Management Committee meeting. The Committee may accept the estimates as presented or may request variations, within the context of the Business Plan. A detailed report denoting reasons for decisions should be attached to the draft budget for discussion.

The Treasurer will then revise the draft and present the amended draft budget at the next available committee meeting, usually in April but no later than end of May. Once adopted by the Management Committee, this becomes the official operating budget for FONAI for the following financial year, and all members must work within the financial limits stated or implied by this document.

Monitoring and Reviewing the Budget

The Treasurer is responsible for monitoring the organisation's expenditure, reviewing the actual and budgeted expenditures, and reporting on the progress of such expenditure.

Financial reports will be prepared each month showing the year-to-date expenditure and its variation from the budget estimates, and indicating any increases or decreases in funding. A detailed commentary should be attached to Management Committee reports detailing reasons for variations and recommendations for corrective action should that be required.

The Treasurer will indicate what effect any variations will have on the budget projections and provide this information to the Management Committee.

The Treasurer will also report on any other financial matters that may be related to the Business Plan.

Once adopted by the Management Committee, the Amended Budget will become the new operating budget for the remainder of that financial year.

RELATED DOCUMENTS

Code of Conduct

Fraud

Financial

G.10 Fraud Policy

Policy number	G10	Version	2
Drafted by	Denise Roscrow	Approved	Aug 2018
Responsible person	Denise Roscrow	Scheduled review date	Jan 2019

INTRODUCTION

FONAI is committed to the highest standards of corporate governance, fiduciary duty, responsibility and ethical behavior. Fraud, bribery, and corruption go against our core values and diminish our impact, undermine the viability of our organization, and breach the trust placed in us by our stakeholders.

FONAI has a zero tolerance policy with respect to fraud, bribery, corruption, and other forms of corporate dishonesty in its programs and operations

A zero tolerance approach to fraud and corruption does not mean that all fraud and corruption can be avoided or prevented.

Instead a zero tolerance approach represents a set of principles and actions that are applied by FONAI to prevent, detect, investigate and respond to fraud and corruption in order to effectively manage risks.

It is FONAI 's responsibility to have robust systems and procedures in place to protect public money and property from fraud and corruption.

DEFINITIONS

FRAUD

The Commonwealth Fraud Control Framework 2014 defines fraud as 'dishonestly obtaining a benefit or causing a loss by deception or other means'.

This includes:

- Theft of FONAI program funds or assets.
- Obtaining property, a financial advantage or any other benefit by deception;
- Causing a loss, or avoiding or creating a liability by deception;
- Providing false or misleading information to FONAI, or failing to provide information where there is an obligation to do so;
- Making, using or possessing forged or falsified documents;
- Bribery, corruption or abuse of position;
- Unlawful use of FONAI computers, elephones and other property or services
- Hacking into, or interfering with a Commonwealth computer system; and
- Any offences of a like nature to those listed above.
- Misappropriation of funds
- Altering documents and Falsifying signatures
- Misuse of FONAI assets
- Unauthorised disclosure of confidential information

CORRUPTION

DFAT defines corruption as the abuse of entrusted power for private gain.

- Corruption can be large or small scale, political in nature and is usually perpetrated for financial gain.
- Large scale corruption can consist of acts that distort policies or the general functioning of the State.
- Small scale corruption refers to the abuse of power by lower to mid-level government officials.
- Political corruption refers to the abuse of power to manipulate policies of institutions for political gain.

FACILITATION PAYMENTS

Facilitation payments are defined under section 70.4 of the Australia Criminal Code Act 1995. The code defines these as payments to foreign public officials for the 'sole or dominant purpose of expediting or securing the performance of a routine government action of a minor nature.' Facilitation payments are indistinct from bribes in many jurisdictions and pose a serious reputational risk to the Australian Government, DFAT, and any organisation or individual who make such payments.

ZERO TOLERANCE

All FONAI delivery partners and contractors are required to report within five (5) days all cases of suspected or detected fraud or corruption in accordance with DFAT policy and contractual funding agreement requirements.

In practice, 'zero tolerance' means FONAI will:

- investigate all alleged instances or reports of fraud and corruption to determine the nature and extent of the fraud;
- apply appropriate administrative or contractual sanctions, including termination of engagement; › seek prosecution of offenders and the application of appropriate penalties, including through referral to local law enforcement authorities overseas and/or the Australian Federal Police; and ›
- seek the recovery of misappropriated funds or assets.

RESPONSIBILITY

The **Board** of FONAI has ultimate responsibility for the prevention and detection of fraud and is responsible for ensuring that appropriate and effective internal control systems are in place.

In addition to personally refraining from the types of conduct prohibited above, all FONAI Board of management members are responsible for taking appropriate steps to prevent, deter, and detect fraud, bribery, and corruption within their areas of responsibility.

The **Chairperson** is responsible for dealing with and investigating allegations of or instances of fraud reported to them.

FONAI board of management must consider fraud, bribery, and corruption risks at the outset of new programs, operations, or other significant activities and take reasonable steps to mitigate those risks.

The Board of management must routinely monitor program activities and operations for any irregularities that could suggest the presence of fraud, bribery, corruption, or corporate dishonesty and report any concerns in compliance with the procedures set forth below.

RELATED DOCUMENTS

Mechanisms pertaining to fraud prevention shall be incorporated into the organisation's accounting and human resources policies and procedures including (but not limited to):

- Authority to Sign Cheques Policy
- Reimbursement of Expenses Policy
- Credit Card/Financial Transaction Cards Policy
- Acceptable Use of Electronic Media Policy
- Disbursement of Funds Policy
- Code of Conduct

FONAI is committed to the highest standards of corporate governance, fiduciary duty, responsibility and ethical behavior. Fraud, bribery, and corruption go against our core values of diminish our impact, undermine the viability of our organization, and breach the trust placed in us by our donors.

FONAI has a zero tolerance policy with respect to fraud, bribery, corruption, and other forms of corporate dishonesty in its programs and operations

A zero tolerance approach to fraud and corruption does not mean that all fraud and corruption can be avoided or prevented.

Instead a zero tolerance approach represents a set of principles and actions that are applied by FONAI to prevent, detect, investigate and respond to fraud and corruption in order to effectively manage risks.

It is FONAI's responsibility to have robust systems and procedures in place to protect public money and property from fraud and corruption.

All management committee members must ensure that they:

- Assess the risk of fraud within their area of control;
- Educate staff/volunteers/contractors about fraud prevention and detection; and
- Facilitate the reporting of suspected fraudulent activities.

Management should be familiar with the types of improprieties that might occur within their area of responsibility and be alert to any indications of such conduct. All **staff/volunteers/contractors** share in the responsibility for the prevention and detection of fraud.

FONAI board of management must consider fraud, bribery, and corruption risks at the outset of new programs, operations, or other significant activities and take reasonable steps to mitigate those risks.

The Board of management must routinely monitor program activities and operations for any irregularities that could suggest the presence of fraud, bribery, corruption, or corporate dishonesty and report any concerns in compliance with the procedures set forth below.

G.10 Fraud Management Procedures

Procedure number	G10	Version	2
Drafted by	Denise Roscrow	Approved	Aug 2018
Responsible person	Denise Roscrow	Scheduled review date	Jan 2019

Mitigation of Risk

FONAI will implement following strategies to mitigate risk of fraudulent activity within it's internal & external operations.

- Partnership agreements which clearly outline reporting requirements
- Monthly financial reports – FONAI & partner NGO
- Quarterly narrative & financial reports - partner NGO
- Annual Audits
- Risk management polices
- Financial management polices
- Provision of Fraud awareness training where appropriate
- Prompt Investigation of allegations and suspected fraud cases.
- Initiation of recovery of funds or replace assets lost to fraud or corruption by the organisation or an employee of the organisation; an implementing partner or subcontractor of the organisation or employees of implementing partners or subcontractors of the organisation.
- Reporting all cases of suspected, alleged or committed fraud or corruption within 5 (five) business days of becoming aware of the fraud or corruption. All cases of fraud and corruption are handled in a confidential, prompt and professional manner.
- File copy & share with members/relevant stakeholders DFAT 'Suspected or Detected fraud – What to Report Form' to assist members and implementing partners to report instances of alleged wrongdoing in the Australian aid program in accordance with DFAT's zero tolerance policy.
- Ensure any partners who are primarily engaged in detecting or investigating fraud or corruption are appropriately skilled and experienced.
- FONAI's physical and financial resources are kept secure and accounted for

- FONAI's financial systems are designed to prevent and detect the occurrence of fraud
- FONAI meets the requirements and standards of generally accepted accounting practices

Internal financial controls

FONAI will follow accepted accounting practices & have policies & practices for daily financial operations which include:

- Cash receipts
- Bank reconciliation
- Accounts receivable
- Documentation of credit and collection policies
- Segregation of duties
- Customer receipts
- Cross checking of transactions, such as non-cash credits and write-offs of bad debts, cross-checked
- Reconciliation & trial balance of individual accounts receivable prepared regularly
- Monthly treasurer reports
- Annual independent audit

FONAI will ensure:

- physical and financial resources are kept secure and accounted for
- financial systems are designed to prevent and detect the occurrence of fraud
- the requirements and standards of generally accepted accounting practices are met
- staff with delegated responsibility for ensuring the safety of physical and financial resources are competent to carry out and are held accountable for the proper execution of these responsibilities.
- all FONAI members, stakeholders, volunteers & partners are aware of their responsibility to immediately inform the Chairperson should they suspect or become aware of any improper or fraudulent actions by any stakeholders associated FONAI.

REPORTING PROCEDURES

- Any allegations concerning the Chairperson should be made to the Board
- Any Members, stakeholders, volunteers or partners who suspect any type of behavior that is inconsistent with this Policy is occurring, may have occurred, or may occur must report it to the Chairperson or board of management.
- Reports of misconduct or concern may be made without fear of harassment, demotion, dismissal, disciplinary action, remedial action, suspension, threats or any method of retaliation by any party.
- FONAI will not tolerate any retaliation against a stakeholder employee for making an allegation of fraud, bribery, or corruption in good faith.
- FONAI Management is committed to taking all appropriate disciplinary, legal, and other corrective action in light of any findings of fraud, bribery, or corruption and to taking steps following any incidents of fraud, bribery, or corruption to review controls and protocols to identify and address any gaps or weaknesses in our procedures or, where relevant, our Partners' procedures.

Practice

Responding to suspected fraud

1. Upon notification an allegation pertaining to fraud, the Chair of the Board) will promptly arrange to carry out an initial review into the allegation.
2. After an initial review and a determination that the suspected fraud warrants additional investigation, the CEO (or Chair of the Board) shall coordinate the investigation with the appropriate law enforcement officials or external investigator as deemed appropriate. Internal or external legal representatives will be involved in the process, as deemed appropriate.
3. Once a suspected fraud is reported, immediate action will be taken to prevent the theft, alteration or destruction of relevant records. Such actions include, but are not necessarily limited to, removing relevant records / information and placing them in a secure location, limiting access to the location where the records / information currently exists, and preventing the individual suspected of committing the fraud from having access to the records / information.
4. If an allegation of fraud is substantiated by the investigation, disciplinary action, up to and including dismissal (or termination of an individual's right to work as a contractor or volunteer), shall be taken by the appropriate level of management.
5. The organisation will also pursue every reasonable effort, including court ordered restitution, to obtain recovery of any losses from the offender.

Where a prima facie case of fraud has been established, the matter shall be referred to the relevant authorities. If an allegation is made in good faith, but it is not substantiated by the investigation, no action will be taken against the complainant. The organization will make every effort to keep the investigation confidential; however members of the management team may need to be consulted to assist with a review / investigation.

RELATED DOCUMENTS

Mechanisms pertaining to fraud prevention shall be incorporated into the organisation's accounting and human resources policies and procedures including (but not limited to):

- Authority to Sign Cheques Policy
- Reimbursement of Expenses Policy
- Credit Card/Financial Transaction Cards Policy
- Acceptable Use of Electronic Media Policy
- Disbursement of Funds Policy
- Code of Conduct
- Complaints

G 11. Access and Equity Policy

Policy number	G11	Version 1	
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

The Access and Equity Policy set out in this document is drawn up on the model of the Australian Government's Charter of Public Service in a Culturally Diverse Society. The Charter is the key document guiding the Australian Government's Access and Equity strategy. It helps to ensure that government programs (and those programs funded by the government but delivered by contractors, including not-for-profits) meet the needs of our culturally and linguistically diverse society.

PURPOSE

FONAI acknowledges that its legal and moral responsibilities cover the areas of:

- access in the provision of services offered by FONAI
- access in employment by FONAI
- access in the provision of information offered by FONAI
- access to any training and development offered by FONAI
- access to events hosted by FONAI

The Charter integrates a set of service delivery principles concerning cultural diversity into the strategic planning, policy development, budget, and reporting processes of service delivery, irrespective of whether these services are provided by government agencies, community organisations, or commercial enterprises.

POLICY

Access

FONAI will make services available to everyone who is entitled to them, free of any form of discrimination on the basis of a person's country of birth, language, culture, race or religion.

Equity

FONAI will develop and deliver services on the basis of fair treatment of all those recipients who are eligible to receive them.

Communication

FONAI will use all necessary strategies to inform eligible stakeholders of the services available, their entitlements, and how they can obtain them. FONAI shall also consult with their stakeholders regularly about the adequacy, design and standard of services.

Responsiveness

FONAI will be sensitive to the needs and requirements of stakeholders from diverse cultural and linguistic backgrounds, and be responsive as far as practicable to the particular circumstances of individuals.

Effectiveness

FONAI will be focused on meeting the needs of stakeholders from all backgrounds.

Efficiency

FONAI will optimise the use of available public resources through a user-responsive approach to program delivery that meets the needs of stakeholders.

Accountability

FONAI will have a reporting mechanism in place which ensures it is accountable for implementing access and equity objectives for its stakeholders.

G.11 Access and Equity Procedures

Procedures number	G11	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

It shall be the responsibility of the Chairperson & membership committee to implement this policy and to report annually on its progress.

PROCEDURES

All FONAI staff shall, if applicable and feasible, have adequate support and training to provide services and information accessible to all people.

FONAI will ensure its programs are designed and constructed to provide equal access for all stakeholders.

FONAI shall, wherever feasible, assess proposals for any new (or substantially revised) policies or programs for their direct impact on the lives of people from a range of cultural and linguistic backgrounds prior to any decision to pursue such proposals.

Any new (or substantially revised) policies or programs that impact in different ways on the lives of people from different cultural and linguistic backgrounds shall, wherever feasible, be developed by FONAI in consultation with people from those backgrounds.

FONAI shall, wherever feasible, for any new (or substantially revised) policies or program initiatives have a communication strategy developed and sufficiently resourced to inform people from relevant cultural and linguistic backgrounds of these changes.

FONAI shall provide resources so that publicly available and accessible information on its policies and programs is where necessary communicated appropriately to people from a range of cultural and linguistic backgrounds, and especially to those identified as having a high level of non-compliance.

FONAI shall institute complaints mechanisms that enable people (regardless of cultural and linguistic backgrounds) to address issues and raise concerns about its performance.

FONAI shall require that any agents, contractors, or partners of FONAI deliver outcomes consistent with this policy, and shall, in bidding for tenders or contracts, budget, where appropriate, for special provision for linguistic and cultural diversity. FONAI shall, where necessary and feasible, provide for the special needs of stakeholders from diverse cultural and linguistic backgrounds by providing language assistance through the use of interpreters or facilitators.

FONAI shall, where necessary and feasible, provide for the special needs of stakeholders in remote areas through developing outreach and community liaison arrangements.

FONAI shall consider cultural diversity issues in the design and delivery of any training programs it provides.

FONAI Management Committee members shall, where necessary, receive ongoing cultural diversity training so that they develop knowledge and skills to work effectively from a cultural framework.

FONAI shall, where necessary and feasible, provide information in languages other than English, and through print, electronic media, and disability-appropriate methods of communication.

FONAI shall, where appropriate, consult with other providers and government agencies to ensure co-ordination of services appropriate to stakeholders' needs.

FONAI shall promote diversity in the membership of its boards, committees and working groups.

FONAI shall keep in its stakeholders data collection record, if and where appropriate, such data as birthplace; whether a person's first language spoken was English; Aboriginal or Torres Strait Islander background; Australian South Sea Islander background; date of birth; year of arrival in Australia; birthplace of parents; sex; and religion (the collection of data will not always include all these items, as the relevance of these data items will vary depending on the service delivery context).

FONAI shall protect the privacy of individual stakeholders when collecting this data.

Consideration will be given to:

- collecting only data essential to the particular service delivery or evaluation purpose;
- guaranteeing anonymity; and
- ensuring that all data collection proposals are non-intrusive.

G.12 Risk Management Policy

Policy number	G12	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

FONAI will endeavor to minimise the risk any particular operation poses to our organisation, our staff, our volunteers, our clients, or the general public.

FONAI has a duty to provide a safe workplace for its staff and volunteers, a safe environment for its clients, and a reliable development path for the organisation. FONAI will put procedures in place that will as far as possible ensure that risks are minimised and their consequences averted.

PURPOSE

The purpose of this document is to identify applicable risks and to enable risk management procedures to be satisfactorily identified, organised and maintained.

DEFINITIONS

“Risk” is defined as ‘the effect of uncertainty on objectives.’

It includes, but is not limited to,

- Physical hazards
- Financial hazards
- Reputational hazards
- Legal hazards

PRINCIPLES OF RISK MANAGEMENT

1. Creates & protects value - Good risk management contributes to the achievements of FONAI’s objectives through continuous review of it’s processes & systems.
2. Is an integral part of FONAI’s procedures at operational & strategic level.
3. Informs FONAI’s decision making enabling FONAI to identify priorities & select the most appropriate action.
4. Explicitly addresses uncertainty enabling FONAI to implement controls & treatments to maximise chance of gain & minimise chance of loss.
5. Is systematic, structured & timely

6. Is based on best available information relevant to FONAI's activities & be aware that there may be limitations on the information FONAI receives
7. Is tailored to FONAI's unique internal & external operating environment.
8. Recognises & takes into account contribution that people & culture have on achieving FONAI's objectives
9. Is transparent & inclusive – FONAI engages its' stakeholders & partners, internal & external, by regular & consistent communication, consultation & reporting to identify, analyse & monitor risk.
10. FONAI recognises that risk management must be flexible, dynamic, itinerant & responsive to change. Our operational environment is challenging & we must be responsive to not only managing risk, but identifying new risks & allowing for risks that no longer exist.
11. FONAI facilitates the continual improvement of all aspects of it's operations.

RESPONSIBILITIES

- FONAI accepts accountability for the risks & is committed to developing comprehensive controls & treatment strategies.
- FONAI is committed to continuous improvement in monitoring & reviewing its policies & procedures, operating systems, performance goals & reviewing & modifying as required.
- Identifies & supports individuals with appropriate resources within it's board & in partner organisations responsible for risk management.
- All decisions made within FONAI must include consideration of risks & the application of risk management procedures as appropriate.
- FONAI is committed to on-going frequent & visible reporting to all stakeholders of our risk management performance.

SCOPE

FONAI Board of Management is responsible for provision of FONAI strategic direction.

The Board of Management must collaborate with all partners & stakeholders in achieving it's objectives, identifying, assessing & managing & monitoring risk associated with any of it's programs.

G.12 Risk Management Procedures

Procedures number	G12	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

It is the responsibility of the Board to carry out risk management analyses of the organisation, and to take appropriate measures.

It is the responsibility of the event organiser to ensure that:

- A Risk Management Officer for the organisation/event is nominated;
- Effective risk management procedures are in place, applicable to all relevant areas;
- Risk management procedures are reviewed regularly;
- Recommendations arising out of the risk management process are evaluated and, if necessary, implemented; and
- Employees and volunteers are aware of all applicable risks and familiar with the organisation's risk management procedures.

It is the responsibility of the Risk Management Officer to ensure that:

- Risk management analyses are carried out for all relevant sectors of the organisation;
- Risk management checklists are prepared for each relevant section;
- Risk management checklists are reviewed regularly by relevant staff with the assistance of the risk management officer to ensure that no risks have been overlooked or have ceased to be relevant;
- Each risk management checklist is reviewed by every section to which it is applicable at least once a year to ensure that procedures are in place to avert the risk or, if that is not possible, to mitigate its impact; and
- Copies of up-to-date risk management checklists are kept in a central Risk Management Register.

It is the responsibility of all employees and volunteers to ensure that:

- They are familiar with the organisation's risk management procedures applicable to their section;
- They observe those risk management procedures; and
- They inform their supervisor if they become aware of any risk not covered by existing procedures.

PROCEDURES

Managing Risk

The Risk Management Officer shall nominate appropriate officers in each section of the organisation to carry out risk assessment exercises. This should involve:

- identifying the risks attached to every element of their operation and the likelihood of that risk eventuating (see Our Community's Risk Management Helpsheets);
- identifying practices to avert those risks;
- identifying practices to mitigate the effects of those risks; and
- recording those risks, those precautions and those remedies in the form of deliverable checklists.

Appendix 1, 2 & 3 attached.

The Risk Management Officer shall participate in each section's risk management exercise to ensure consistency of approach.

Risk Management Checklists

The Risk Management Officer will ensure that

- each section of the organisation has available to it all relevant risk management checklists;
- each risk management checklist is reviewed by the organisation at least once a year to ensure that no risks have been overlooked;
- each risk management checklist is reviewed by every section to which it is applicable at least once a year to ensure that procedures are in place to avert the risk or, if that is not possible, to mitigate its impact; and
- a current copy of each risk management checklist is held centrally in the organisation's Risk Management Register.

RELATED DOCUMENTS

- Our Community's Risk Management help sheets & checklists

Appendix 1. Risk register return on investment

Risk: Project/Activity Description	
Risk Rating: Probable, major, high	
Risk area/risk identified	lack of return/diversity of investment portfolio
Likelihood of occurrence (score)	
Severity of impact (score)	
Overall or 'gross' risk	
Control procedure	<ul style="list-style-type: none"> • investment policy set by Board • quarterly reviews • annual report
Retained or 'net' risk	me
Monitoring process	performance reports reviewed quarterly by Board
Responsibility	Board
Further action required	quarterly agenda item for Board meetings
Date of review	quarterly

Appendix 2. Risk area/risk identified		Fundraising deficit
Likelihood of occurrence (score)		
Severity of impact (score)		
Overall or 'gross' risk		
Control procedure	<ul style="list-style-type: none"> • financial appraisal of new projects • benchmarking of returns achieved • budget reporting by fundraising activity 	
Retained or 'net' risk		
Monitoring process	<ul style="list-style-type: none"> • financial reporting by fundraising activity • quarterly reporting by fundraising manager to trustees/CEO 	
Responsibility	fundraising chairperson	
Further action required	<ul style="list-style-type: none"> • new initiatives to be approved by Board unless included in current business plan • review of regulatory compliance of current methods 	
Date of review	<ul style="list-style-type: none"> • when appropriate • next Board meeting 	

Appendix 3. Annual Strategic Review

Governance risks

Potential risk	Potential impact	Steps to mitigate risk
FONAI direction, strategy and forward planning		
Management committee lacks relevant skills or commitment		
Management Committee dominated by one or two individuals, or by connected individuals		
Board/member/partner NGO is benefiting from charity (eg remuneration)		
Conflicts of interest		
Ineffective organisational structure		
Activities potentially outside objectives of FONAI s		
Loss of key Board members		
Reporting FONAI (accuracy, timeliness and relevance) Reporting partner NGO		

(accuracy, timeliness
and relevance)

G.13 Natural Disaster Risk Reduction Policy – FONAI Overseas Programs

Policy number	G13	Version	1
Drafted by	Denise Roscrow	Approved by Board on	August 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

There is now global recognition that disasters can undermine, and even reverse, hard won development progress. Investing in disaster risk reduction policies and procedures not only saves lives and livelihoods—it helps reduce the costs involved in responding to disasters, can offer a measure of protection to developing economies, and helps safeguard critical infrastructure built in FONAI's programs.

Minimising disaster risk is also vital for ensuring achievement of sustainable development targets for our programs.

This policy provides a framework for FONAI's commitment to reduce the risk of natural disasters within its aid programs.

This policy will apply to all FONAI overseas development assistance delivered by our partners. It will be implemented in coordination with other relevant policies, other key Australian Government policy initiatives, particularly those outlined below.²

DEFINITIONS

DISASTER RISK

Disaster risk arises when hazards interact with vulnerabilities. The potential for a hazard to become a disaster is determined by a complex relationship between a hazard and the vulnerability and resilience of a population, as represented below.

DISASTER RISK REDUCTION

is 'the concept and practice of reducing disaster risks through systematic efforts to analyse and manage the causal factors of disasters, including through reduced exposure to hazards, lessened vulnerability of people and property, wise management of land and the environment, and improved preparedness for adverse events'.

HAZARD

A hazard is a natural event that may cause loss of life, injury or other adverse impacts.

VULNERABILITY

Vulnerability refers to physical, social, economic, environmental and individual factors that increase the likelihood of loss from a hazard.

Traits that increase vulnerability include:

- > Poverty
- > Disability
- > Disease
- > Gender inequality
- > Age (elderly and young)

RESILIENCE

Resilience is the ability to resist, absorb, accommodate and recover or 'spring back' from the effects of a hazard.

Mechanisms that increase resilience include:

- > Livelihood diversification
- > Warning systems
- > Access to health and education
- > Improved buildings
- > Effective legislation and governance

It is important to recognise that people can be both vulnerable and resilient at the same time. For example, an individual may be **vulnerable** due to poverty, old age or disability but may also be **resilient** due to a range of livelihood options, safe housing, insurance and access to health systems.

PRINCIPLES

The policy is underpinned by the Hyogo Framework for Action

The Hyogo Framework's overarching goal is a substantial reduction in disaster losses—in lives and in the social, economic and environmental assets of countries and communities.

The Framework outlines **five priorities for action**:

1. Ensure that disaster risk reduction is a national and a local priority with a strong institutional basis for implementation.
2. Identify, assess and monitor disaster risks and enhance early warning.
3. Use knowledge, innovation and education to build a culture of safety and resilience at all levels.
4. Reduce the underlying risk factors.
5. Strengthen disaster preparedness for effective response at all levels.

GOALS

The goal of this policy is reduced vulnerability and enhanced resilience of FONAI stakeholders in its programs.

Outcomes

- 1 Disaster risk reduction is integrated into FONAI's aid programs
- 2 The capacity of FONAI's partner NGO's to reduce disaster risks is strengthened in line with the Hyogo Framework for Action
- 3 Leadership and advocacy on disaster risk reduction are supported and enhanced
- 4 Policies and programming for disaster risk reduction and climate change adaptation are coherent and coordinated

While specific implementation plans will be determined by partner country priorities and program size and capacity, efforts will be focused on achieving these outcomes.

G.13 Natural Disaster Risk Reduction Procedures – FONAI Overseas Programs

Procedure number	G13	Version	1
Drafted by	Denise Roscrow	Approved by Board on	August 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

Integration into development assistance

Risks from natural hazards need to be factored into FONAI development policy, planning and program implementation.

Integrating risk reduction will enable appropriate measures to be taken to reduce disaster risk in all development sectors. It will also help to ensure that development assets are protected against potentially negative impacts from hazards and that FONAI development programs do not create new forms of vulnerability or erode traditional methods of resilience.

FONAI aid and development programs will be informed by risk assessments and risk analysis, which will include consideration of natural hazards and local vulnerabilities.

IMPLEMENTATION

FONAI will:

- Collaborate with partnering NGO's to review ongoing programs to identify opportunities for integrating disaster risk reduction and risk sensitivity
- Build partner government capacity, where appropriate, to support integration into policies, planning and programs
- Develop measurable and achievable indicators for integration.
- Customise disaster risk reduction to FONAI programs.
- Ensure humanitarian assistance does not inadvertently create future risks for communities
- Learn from and share lessons with other humanitarian agencies on good practice on integrating disaster risk reduction into humanitarian assistance
- Earmark or program funds for disaster risk reduction as part of our programs where feasible

G.14 Child Protection Policy

Policy number	G14	Version	2
Drafted by	Denise Roscrow	Approved by board on	August 2018
Responsible person	Denise Roscrow	Scheduled review date	January 2019

INTRODUCTION

FONAI has a zero tolerance approach to child exploitation or abuse. FONAI recognises that it is the shared responsibility of all adults to prevent child exploitation and abuse. T

FONAI's Child Protection Policies re principles based, articulate FONAI's zero tolerance of child exploitation and abuse, and include expectations of FONAI board members & funded partners in the management of child protection risks. They enable FONAI to meet community expectations and uphold the United Nations Convention on the Rights of the Child to which Australia is a signatory.

It is FONAI policy to partner with local & overseas NGO's who have existing child protection policies in place & to assist in capacity building of such policies where relevant. FONAI requests & secures copies of these policies with relevant partnership agreements.

CHILD PROTECTION FRAMEWORK.

FONAI strives to be a child safe organisation and to reduce the risk of child abuse in all aspects of FONAI's operations. This risk will be minimised by employing a number of safeguards, including:

- Defining child abuse in its various forms
- Upholding FONAI's Code of Conduct
- Ensuring appropriate recruitment, selection and screening of all FONAI's stakeholders
- Increasing awareness of child protection issues amongst FONAI's stakeholders, including staff, volunteers and overseas partners
- Assigning a FONAI staff member as Child Protection Officer
- Establishing clear procedures for dealing with child abuse allegations and policy breaches
- Reviewing child protection policy standards on a regular basis

In addition, FONAI will encourage, respond to and support initiatives that:

- Affirm that all children in all circumstances have the right to feel and be safe and to live free from harm, exploitation and abuse.
- Keep the health and safety of children paramount at all times.
- Ensure that personal dignity and respect for children and young people is maintained through all projects, programs and departments.
- Work to strengthen a local community's culture and customary traditions. However, it is acknowledged that if cultural practices are contradictory to a child's rights, FONAI will work with partners & community (where possible) to change such practices.
- Work with partners to reduce the risks children face, both from outside and within the family. These activities will be assessed throughout the monitoring and evaluation of projects.

FONAI will refer overseas reports of child abuse to childwelfare@dfat.gov.au which is managed by DFAT's Conduct and Ethics Unit. All information provided will be treated in accordance with relevant Commonwealth legislation, including the *Privacy Act 1988*.

SCOPE

In support of FONAI's zero tolerance of child exploitation and abuse, all FONAI Board members &/or authorized representatives and FONAI funded partners must report immediately any suspected or alleged case of child exploitation, abuse or policy non-compliance by anyone within scope of this policy in connection with official duties or business.

FONAI Board Members & Partner NGO Board Members & staff who manage FONAI funded programs, must familiarise themselves with this policy and the principles it contains.

FONAI Board Members &/or representatives must ensure child protection risk is considered, and is managed in accordance with DFAT's risk management practices.

POLICY PRINCIPLES

Principle 1: Zero tolerance of child exploitation and abuse

FONAI has a zero tolerance approach to child exploitation and abuse. Child exploitation and abuse will attract criminal, civil and disciplinary sanctions.

FONAI will not knowingly engage—directly or indirectly—anyone who poses a risk to children.

FONAI works to minimise the risks of child exploitation and abuse associated with its functions and programs, and trains its members and partners on their obligations under this policy.

Principle 2: Assess and manage child protection risk and impact

While it is not possible to entirely eliminate risks of child exploitation and abuse, careful management can identify, mitigate, manage or reduce the risks to children that may be associated with FONAI functions and programs.

Principle 3: Sharing responsibility for child protection

To effectively manage risks to children, FONAI requires the commitment, support and cooperation of partner organisations and individuals who help to deliver programs administered by FONAI

Principle 4: Procedural fairness

FONAI will apply procedural fairness when making decisions that affect a person's rights or interests. FONAI's partners are expected to adhere to this principle when responding to concerns or allegations of child exploitation and abuse.

Principle 5: Recognition of the best interests of the child

Australia is a signatory to the United Nations Convention on the Rights of the Child. FONAI is committed to upholding the rights of the child and Australia's obligations under this convention. In all actions concerning children, the best interests of the child shall be a primary consideration.

Risk based approach

The policy provides a risk-based approach to the management of child protection in FONAI activities.

FONAI has these minimum child protection standards to ensure that all funded partners (as defined under this policy) understand and act on their obligations to manage risks to children.

Guidance on establishing the risk context is provided to assist FONAI partners. Regular monitoring for any change in risk and reporting on the effectiveness of the management of child protection risk must also occur.

DEFINITIONS

CHILD

Definition of Terms In keeping with the UN Convention on the Rights of the Child, FONAI defines a child as a person under the age of 18 years.

ABUSE

There are several forms of child abuse, all of which have the potential to have a significant impact on a child's development and well-being. They include:

- **Physical Abuse** Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person. This abuse may include slapping, punching, shaking, kicking, burning, shoving or grabbing. Physical injury may take the form of bruises, cuts, burns or fractures. It is not always the case that the physical injuries will be visible.
- **Emotional Abuse** Emotional abuse occurs when persistent ill treatment on a child affects their self-esteem. This may include name calling, rejection, threatening, intimidating or any other acts which can affect the child's physical and emotional growth, and self-esteem.
- **Neglect** Neglect occurs when a child's basic needs have consistently not been met to the extent that it has a detrimental effect on the child's health and personal development. These basic needs include food, clothing, shelter and supervision.
- **Sexual Abuse** Sexual abuse occurs when there has been any (or likely) sexual exploitation of a child by an adult. Sexual abuse includes any actual, attempted or threatened sexual activity involving children, including intercourse, fondling, oral sex, exhibitionism and exposing the child to pornography.
- **Commercial Sexual Exploitation (CSEC)** CSEC occurs when a child is sexually abused or exploited in return for cash or any other goods or services. Examples of CSEC include children in prostitution, children involved as subjects in child pornography and child sex tourism.

REASONABLE GROUNDS FOR BELIEF

Is a belief based on reasonable grounds for the belief that child abuse has occurred when all known considerations or facts relevant to the formation of a belief are taken into account and these are objectively assessed. Circumstances or considerations may include the source of the allegation and how it was communicated, the nature of and details of the allegation, and whether there are any other related matters known regarding the alleged perpetrator.

A reasonable belief is formed if a reasonable person believes that:

The child is in need of protection,

The child has suffered or is likely to suffer "significant harm as a result of physical injury",

The parents are unable or unwilling to protect the child.

A 'reasonable belief' or a 'belief on reasonable grounds' is not the same as having proof, but is more than mere rumour or speculation.

A 'reasonable belief' is formed if a reasonable person in the same position would have formed the belief on the same grounds. For example, a 'reasonable belief' might be formed if:

A child states that they have been physically or sexually abused;

- A child states that they know someone who has been physically or sexually abused (sometimes the child may be talking about themselves);
- Someone who knows a child states that the child has been physically or sexually abused;
- Professional observations of the child's behaviour or development leads a professional to form a belief that the child has been physically or sexually abused or is likely to be abused; and/or
- Signs of abuse lead to a belief that the child has been physically or sexually abused.

VOLUNTEER

The term 'volunteer' includes; Local volunteers who assist at FONAI events/programs. Volunteers under the years of 18, also adhere to the Code of Conduct.

STAKEHOLDER

The term 'stakeholder' include: Committee Members, interns, volunteers, partners and agents.

COMPLAINT

The term "complaint" includes any expression or communication that suggests that there may have been a breach of this policy, including a breach of FONAI's Code of Conduct.

SCOPE

FONAI requires all FONAI stakeholders, including its management committee, volunteers, partners and agents to understand and act in accordance with the child protection policy at all times.

FONAI will ensure the rights of the child are held paramount at all times. If an allegation of child abuse or breach of FONAI's Child Protection Policy has been made, FONAI will take steps to fully investigate the matter.

POLICY IN PRACTICE

1. Confidentiality

- FONAI recognises the importance of confidentiality in regards to reporting and investigating child protection allegations, and that a breach in confidentiality can have negative effects on the child, their family, the complainant and the alleged offender.
- In order to protect the interests of the child, their confidentiality will be respected at all times.
- Only those specifically involved in the allegation and subsequent investigation will be aware of personal information of those involved. Information will therefore be shared on a strictly 'need to know' basis.
- FONAI will not reveal the name or personal details of those alleged to anyone in or outside the organisation other than to those in charge of the investigation.

2. Code of Conduct

- FONAI's Child Protection Code of Conduct is designed to minimise the risk of child abuse allegations, policy breaches and serves as a guide for all FONAI stakeholders to conduct themselves in a manner which in turn reduces their own risk of any allegations made against them.
- On commencement of their association with FONAI, all stakeholders are required to read and commit to FONAI's Child Protection Code of Conduct (Appendix 1). All FONAI stakeholders are expected to be aware of the Code of Conduct and adhere to this at all times during their involvement with FONAI.

3. Recruitment

To uphold the principles of Child Protection, the following steps are taken in any FONAI's volunteer recruitment process.

Relevant State Screening Background Checks are undertaken for all FONAI or FONAI representatives who are in direct contact with children or children's information.

- FONAI reserves the right to not engage with volunteers with a prior conviction directly or indirectly related to child abuse.

4. Child Protection Awareness and Training

- FONAI recognizes the importance of ensuring all stakeholders are aware of child protection issues and their responsibility to uphold the rights of the child at all times.
- As part of the induction process for all new board members &/or partner organisations,, they receive a copy of FONAI's Child Protection Policy and are briefed on FONAI's Child Protection Policy and procedures.
- Any policy change updates & required training is provided by the Child Protection Officer to ensure that:
 - Members stakeholders understand what Child Protection is, understand FONAI Child Protection Policy and Code of Conduct, why they are both important and how it impacts their work.

- Members/stakeholders understand the reporting procedure and consequences if there is an issue where the Child Protection Policy or Code of Conduct is breached.
- Members/stakeholders have an opportunity to raise any questions, challenges and apprehensions they may have in implementing the Child Protection policy and procedures.
- Members/stakeholders are aware of any changes to the FONAI Child Protection Policy or Code of Conduct.
- FONAI Board members are briefed on FONAI's Child Protection Policy and procedures as part of the Board induction process with the Chairperson.

5. Australian Child Protection Laws & Regulations Each state in Australia follows certain processes when investigating or responding to allegations or suspicions of child abuse. Any allegations or suspicions resulting from FONAI activities in Australia will refer to the relevant state authority by the Chairperson. (CARL in South Australia)

6. International and Local (in field country) Child Protection Laws

All FONAI representatives and stakeholders have a legal obligation to adhere to International and Local (in field country) Child Protection Laws whilst representing FONAI. This obligation is part of the Child Protection Code of Conduct.

7. Child Protection Officer

The Chairperson appoints a Child Protection Officer (CPO) (and an acting CPO in their absence) who is responsible for:

- Ensuring Child Protection Policy and procedures are up to date and relevant
- Monitoring organisation-wide compliance with the Child Protection Policy and procedures
- Coordinating staff induction and trainings/briefings on FONAI Child Protection Policy and Procedures.
- Together with the Chairperson, jointly responding to any allegations of child abuse, neglect or any other action which directly contradicts FONAI's Child Protection Policy.

8. Risk Mitigation To ensure that FONAI remains committed to implementing the Child Protection Policy, risk management strategies are applied across the organisation. These include:

- Planned activities and programs consider the rights of children and their safety.
- Wherever children are involved in an activity, at least two adult members are present at all times.
- All FONAI stakeholders are informed about FONAI's Child Protection policy and procedures.
- The Child Protection Policy and Code of Conduct are enforced at all times.
- Child Protection risks are considered during overseas project design.
- Child Protection risks are included in the Organisation's Risk Register.
- Where possible, open plan spaces are used for activities involving children.

9. Child Protection and our Overseas Partners

FONAI works with partners to address child protection in our joint development programming and projects.

It supports its Partners to understand and comply with Child Protection Policies through:

- Assistance with their own Child Protection Policy development
- Capacity building support for policy implementation as needed.
- Encouraging each Partner to put in place a Local Reporting Procedure to include local contacts and referral list of networks.
- Reporting to DFAT any notifications of child abuse and exploitation, code of conduct breaches and policy non-compliance in DFAT funded activities or projects. This includes any incidents from secondary partners.
- FONAI expects Partner Organisations to alert FONAI of any such incidents or reports, so that these reports can be referred to DFAT.

10. Marketing and Communications

FONAI takes steps to ensure the appropriate use of children's images (including photographs, videos, flyers etc.) in all its marketing activities and communications. All FONAI stakeholders are briefed and receive consent forms to use when collecting content on project visits.

Further information on the appropriate use of narratives /images are in FONAI's 'Use of Narratives and Images Policy' (Attachment 2)

Steps we have taken to ensure the appropriate use of children's images include the following:

- Any image of a child shall not be printed, scanned or distributed unless consent from the partnering organization &/or child family if possible is given.
- All children should be appropriately dressed in images and concern for their dignity and respect will remain paramount at all times.
- An image should not be taken which depict children in a submissive or sexually suggestive manner.

- An image should not disclose details which could enable the child to be identified.
- An image of a child should portray a truthful account of their situation.
- No information will be published which will identify the exact location of a child e.g. surname, first name and village name may be changed to protect children's identify.

11. Child Protection and Member/stakeholder visits to FONAI funded overseas programs

- All members of any FONAI hosted or authorized trips to visit FONAI funded overseas programs must read and commit to FONAI's Child Protection Policy, which includes FONAI's Code of Conduct, the behavioral guidelines for all FONAI representatives, as well as FONAI's Use of Narratives and Images Policy.
- During the Trip all members are required to comply with FONAI's policies, including Child Protection Policy. If at any time a team member does not comply with the FONAI policies, Board members or FONAI authorized personnel are required to inform both the local host partner and FONAI management committee immediately.
- Any volunteers are only allowed in FONAI project communities with FONAI members & Partner NGO staff at designated times. They are not left alone with children or families and volunteer activities are not directly with children. The nature of the program also mitigates the risk of participants grooming a child and their family as well as possible power dynamics between participants and children and their family. Where possible, FONAI partners & FONAI board members monitor what photos are shared through social media platforms.

12. Child Protection Policy and Code of Conduct Breaches

A breach occurs when a stakeholder's behaviour contradicts the principles outlined in the Child Protection policy or the Code of Conduct, but does not constitute child abuse, as described in the definitions (see definitions in Section 1 Introduction). A complaint of a breach of the Child Protection Policy and the Code of Conduct by any FONAI stakeholder, must be reported to the FONAI Chairperson as soon as possible.

13. Child Abuse Complaint

There is an ethical, moral and legal obligation that all incidents of physical, sexual or emotional abuse are reported (see definitions in Section 1 Introduction). Any complaint of any form of child abuse must be reported to the FONAI Chairperson within a 24-hour period.

14. Investigation of Complaints

- 1) Any complaint is to be reported to the Chairperson. Wherever possible this should be done using the Reporting Form for Suspected Child Abuse or Child Protection Policy Breach
 - For all complaints of breaches, the Chairperson will make an initial assessment of the severity of the breach and the urgency of action. The Board of management will be notified that an investigation has started, depending on the severity of the breach.
 - In the event that the alleged perpetrator is the Chairperson, the Board will notify the each member directly.

- Any relevant donors or third parties (such as DFAT) will be informed as required by agreement with them, where a breach involves an activity is supported by such a donor or third party.

2) The Chairperson will appoint a team to conduct a formal investigation into the complaint. The investigation team will include members of the FONAI Board of Management. The investigation team will treat all complaints seriously. The investigation will be handled professionally, in confidence and in a timely manner. Procedural fairness will be applied and all decisions made will be in the best interests of the child. FONAI will ensure that the person who raises the complaint is not required to express their suspicion to the person implicated. Individuals who report a suspected breach are not responsible for investigating their concern.

3) If the complaint is assessed as being a potential criminal offence, the Chairperson is required to refer the case onto relevant state, federal, &/or, in-country law enforcement authorities.

4) FONAI's investigation should not interfere with any steps being taken by appropriate authorities. Ordinarily this will mean that the FONAI investigation will not proceed until the investigation by authorities is concluded.

5) If the alleged perpetrator is associated with FONAI in a volunteer capacity, they must cease FONAI activities until the investigation has been completed. If the allegations are from previous involvement with FONAI, the alleged perpetrator is not able to reengage with FONAI until the investigation has been completed.

6) If the breach concerns A FONAI stakeholder overseas or one of our overseas partners; FONAI will work with the relevant overseas partner to investigate the matter and to manage the allegation. If it involves a FONAI stakeholder on a project team, FONAI would work with the Host Coordinator, Team Leader and other team members (when required) to investigate the issue.

7) The team that conducts the investigation will provide a written report to the Chairperson setting out what the investigation has discovered and recommendations of action to address the matters raised by the investigation.

8) Once an outcome has been determined by the Chairperson, the people involved will be informed including (where appropriate) the child, family, and alleged perpetrator. Anyone else actively involved will be informed on a need to know basis consistent with confidentiality requirements.

9) All necessary steps will be taken after the investigation has been completed to address the outcome.

FONAI will keep a record of all complaints and the investigation and outcomes of those complaints. This record should be appropriately kept so as to protect confidentiality.

APPENDIX I: FRIENDS OF NEPAL -ADELAIDE INC CHILD PROTECTION CODE OF CONDUCT

As a FONAI board member, representative, stakeholder, I WILL:

- Treat all children and young people with respect at all times, regardless of culture, creed, gender, colour, language, political or other opinion, nationality or ethnicity, disability or any other difference.
- Ensure that I am fully aware of HFHA's child protection policy, principles and procedures. ☐ Promote a safe environment where children (and young people, parents and families) feel safe, empowered and able to communicate openly.
- Act professionally and maintain appropriate boundaries at all times.
- Avoid circumstances where my behaviour may be misinterpreted as hostile, suggestive, inappropriate or neglectful.
- Always ensure that a minimum of two adults are present when with a child. If it is not possible to have another adult present, ensure that I am at least visible to others.
- Act swiftly and ensure that any perceived risk to a child is immediately reported via the procedures listed.
- Immediately report concerns or allegations of policy and code of conduct noncompliance, child exploitation or abuse; to FONAI senior management, Child Protection Officer or team leader, regardless of whether this has resulted in the harm of a child.
- Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with FONAI.
- Keep all reported cases and allegations (proven or otherwise) confidential at all times.
- Adhere to international or local (in field country) child protection laws
- Comply with all relevant Australian and local legislation, including labour laws in relation to child labour.

As a FONAI board member, representative, stakeholder, I WILL:

- Engage in any behaviour (including use of language or physical) with a child which is, or could be interpreted as inappropriate, offensive, discriminatory or suggestive.
- Engage in any unwarranted or inappropriate touching of a child.
- Engage in any form of sexual intercourse or sexual activity with a child or any persons under the age of 18 years.
- Spend time alone with a child or children in their home or community.
- Invite unaccompanied child or children – including inviting a child to visit my home, hotel accommodation or office alone, or take children alone in my car (except in emergency situations, or if they are at immediate risk of injury or in physical danger).
- Undertake or participate in any activities with children present which are illegal.
- Hire children as domestic or any other form of labour.

- Engage in special treatment of a child e.g. spending inappropriate special time with the child, inappropriately giving gifts, showing special favours to them but not other children, allowing the child to overstep rules.
- Use physical punishment on children
- Engage in testing of boundaries with a child e.g. undressing in front of the child, talking about sex, 'accidental' touching, for example, of the genitals.
- Misuse photographs for the purpose of exploiting children
- Exchange personal contact details with children and have ongoing communication with them after my visit to the community FONAI &/or it's partners.
- Visit or return to FONAI program communities/families I have previously visited, without the facilitation of FONAI.
- Give gifts or special favours to a particular child or family member. This can appear to be grooming and shifting the power dynamic between you and the child and their family.

APPENDIX 2. NARRATIVE AND IMAGES CODE OF CONDUCT.

As a FONAI board member, representative, stakeholder, volunteer, I WILL:

I will ensure the appropriate use of children's images in my emails, donor updates and communications. As such:

- Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this I must explain how the photograph or film will be used.
- All children should be appropriately dressed in images and concern for their dignity and respect will remain paramount at all times.
- An image should not be taken which could depict the child in a sexually suggestive manner.
- An image should not in any way include information which will identify the child.
- An image of a child should portray a truthful account of their situation.
- I will protect the identity and location of a child by not reporting their full names and exact location. FONAI requires you to not publish surnames and village names when you communicate stories or display photos of children or adults.
- Assess and endeavor to comply with local traditions or restrictions for reproducing personal images before acquire consent to photograph or film a child or adult.
- I will have GPS tracking turned off when taking pictures/video of children, so that when they are uploaded to social media the photo will not contain data that can be used to identify the location of the child.
- I will not add location mapping to any photos shared through Instagram, Facebook, Snapchat, Twitter and any other social media platforms.
- Use any computers, mobile phones, video cameras, cameras or social media appropriately and never to exploit or harass children or access child exploitation material through any medium.
- Ensure file labels, Meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

I have reviewed the FONAI Child Protection Code of Conduct and I agree to adhere to these standards throughout my association with FONAI . I understand that the onus is on me as a person associated with FONAI, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.

Name: _____

Date: _____

Signature: _____

Name of Witness: _____

Date: _____

Signature of Witness: _____

APPENDIX 3
Child Incident Notification (CIN)

This document is to be provided to the Conduct and Ethics Section (CEU) within the Department of Foreign Affairs and Trade (DFAT) at childwelfare@dfat.gov.au as soon as possible.

CEU will assess the notification and direct it to the proper area of inquiry and investigation within the Department.

Privacy Notification

The Department collects and uses your personal information to assist DFAT in maintaining safe environments for children during the delivery of its business. DFAT may contact you about the information you have provided. DFAT may disclose the information you have provided to the Australian Federal Police and/or overseas authorities so that any threats to a child's safety, welfare and wellbeing can be investigated by the appropriate authority. If we are unable to collect your personal information, authorities may be unable to fully investigate the circumstances being reported.

The Department's Privacy Policy is available at: <http://dfat.gov.au/about-us/about-thiswebsite/pages/privacy.aspx>.

It describes how DFAT protects and manages personal information, including sensitive information, consistent with DFAT's obligations under the Privacy Act. It explains how:

- you can access and seek to correct your personal information
- to make a complaint about our privacy practices and how your complaint will be handled.

1. Names(s) of person reporting and contact details	
Name: Position:	Telephone: Email:
2. Reporting Post or Organisation	
Post or Organisation:	Country:
3. Type of Allegation	

Please circle most appropriate description of alleged incident: Sexual Abuse\Sexual Misconduct Physical Abuse Psychological Abuse Neglect Other	Further details if known (Date\location\when report was received): Other relevant details: (For example implements used, vulnerability, or disability factors):
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4. Details of Person(s) against whom the allegation has been made					
Family Name:					
Given Name:					
Sex:					
Date of birth:					
Nationality:					
Contact details:					
Employer\Program:					
(Please circle most appropriate descriptor. You can circle more than one)	DFAT Employee including LES	Australian Citizen or Permanent Resident	NGO Employee	Contractor including subcontractor	Volunteer
Position: (If applicable)					
5. Details of Victim(s)					
Family Name:					
Given Name:					
Sex:					
Date of birth:					
Nationality:					
Contact details:					
Age of child at time of alleged incident:					

Have any injuries been observed or reported? *(If more space is needed, please utilise Section 8)*

6. Further Details

Is the victim still in danger of abuse or neglect?	
Are local police or other local authority aware of the incident\allegation?	
What other authorities have been informed?	
Has the AFP at post (where relevant) been advised or consulted? If so, what is their response or proposed action?	

7. Any other pertinent information for initial assessment

--

CEU use only		
Case Number (Year\ CIN No.)		
Recorded on CIN\CEU database:	Date:	
Received via (Post\Agency\original source)		
Responsible Section (Circle):	Conduct & Ethics Child Protection Compliance Section Consular Operations	Responsible Section Case No.
Referral to responsible section	Date:	
CEU advised of case outcome\closure	Date	

CEU database updated and cross referenced with Section case No.	
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G.15 Legislative Compliance Policy

Policy number	G15	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

The operations of FONAI are subject to a wide range of legal requirements, embodied in legislation, regulations, licences, codes, guidelines and similar binding instruments. These include (but are not limited to):

- Occupational Health & Safety legislation
- Anti-discrimination legislation, including that relating to equal opportunity, racial vilification and disability discrimination
- Taxation legislation
- Privacy legislation
- Australian National Charities Commission

PURPOSE

This document sets out FONAI's policy for compliance with the law and the governance structures, responsibilities and processes that have been established to give effect to that policy.

POLICY

FONAI is committed to the highest standards of integrity, fairness and ethical conduct, including full compliance with all relevant legal requirements, and requires that all its Board members and stakeholders acting on its behalf meet those same standards of integrity, fairness and ethical behaviour, including compliance with any legal requirement.

There is no circumstance under which it is acceptable for FONAI or any of its employees or contractors to knowingly and deliberately not comply with the law or to act unethically in the course of performing or advancing FONAI's business.

G.15 Legislative Compliance Procedures

Policy number	G15	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

1. The Management Committee will:

- Review and monitor the leadership and commitment given to legislative compliance through active promotion of the organisation's Legislative Compliance Policy.
- Review compliance management objectives and plans for legislative compliance.
- Monitor compliance performance by way of periodic management reports and assurances.
- Monitor performance against legislative compliance objectives and plans, and report to the Board on progress toward accomplishment of objectives.
- Where appropriate, delegate responsibility for compliance to officers with responsibility for particular sections.
- Oversee the performance of subordinate officers in these matters, including:
 - conforming to and applying relevant requirements of the Law within the workplace;
 - ensuring that systems and procedures established to make the policy effective are operational;
 - ensuring that staff are trained and have the necessary knowledge and understanding to perform their duties in compliance with the policy and all relevant requirements of the law;
 - ensuring that significant compliance responsibilities and accountabilities are included in position descriptions and performance reviews;
 - reporting and investigating any incident or occurrence thought or known to constitute a breach of any legal requirement; and
 - designing and implementing system enhancements to correct weaknesses that could result in a breach of such a requirement.
- Review and report annually on the effectiveness of the management systems established to deliver legislative compliance.
- Analyse material breaches and identified compliance system weaknesses for systematic trends and ensure that any adverse trends are addressed.
- Promote a culture of effective legislative compliance across the organisation.
- Provide formal assurance to the Board as to the state of compliance of the organisation.

2. All members, volunteers and contractors, at all levels, will

- Ensure that they are aware of any legal requirements that apply to their work activities and that they comply with them.
- Report all incidents of breaches of legal requirements.
- Where appropriate, suggest ways in which practices, systems and procedures could be improved so as to reduce the likelihood of a breach occurring.

PROCESSES

The Board will, at least once a year, feature as an agenda item the monitoring of compliance performance.

Legislative compliance objectives and plans will be prepared by the CEO, approved by the Board, and held on file.

Delegation by the Chairperson of responsibility for compliance in any area will be decided by the management committee.

G. 16 Occupational Health and Safety Policy – Injury, Accident and Reporting

Policy number	G16	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

FONAI recognises that the health and safety of its members and all stakeholders is a priority and that if accidents or incidents do occur, they should be reported. Incidents should be investigated to ensure that the possibility of recurrence or further risk is minimised.

FONAI understands the importance of incident reporting and investigation and has developed hazard inspection, hazard reporting and maintenance programs to minimise the workplace accidents or dangerous occurrences.

This policy applies to all stakeholders under the control of FONAI.

PURPOSE

This policy has been developed to ensure that all members (including volunteers) understand the processes to be taken in the event of a dangerous occurrence or accident.

DEFINITION

Incident refers to any event which causes or could have caused injury, illness, damage to plant, equipment, vehicles, property, material, or the environment or public alarm.

It also includes losses of containment, fire, explosion, non-compliance with environmental regulatory requirements, vehicle incidents and off-site incidents.

POLICY

FONAI commits to preventing workplace accidents and minimising dangerous occurrences and will endeavour to achieve a zero accident rate.

FONAI will:

- Provide a mechanism for reporting accidents, incidents, work-related illness and dangerous occurrences;
- Investigate accidents to determine the root cause with the objective of preventing a recurrence;
- Obtain statistical information about the accident or incidents;
- Meet legislative requirements for reporting accidents and incidents.

All accidents or incidents that result in an injury or work-related illness during the course of work must immediately be reported to the Chairperson &/or management committee and retained & filed by secretary.

Any dangerous occurrence which has the potential to result in injury or damage to property must be reported in the same manner as an accident.

In the event of a dangerous occurrence or accident FONAI must ensure the relevant state authority is notified and that a full investigation is undertaken to determine the root cause. The most appropriate corrective action will be taken to ensure the incident does not recur.

G.16 Occupational Health and Safety Procedures – Injury, Accident and Reporting

Procedure number	G16	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

It is the responsibility of the **Management Committee** to ensure that:

- Stakeholders notify the Occupational Health and Safety Representative of all dangerous occurrences;
- Stakeholders are aware and understand the principles of incident and accident reporting and investigation;
- All incidents and accidents that result in or have the potential to result in injury or damage are investigated and, where necessary, corrective or preventative action is taken;
- All matters relating to employee/volunteer welfare are dealt with in the most appropriate and timely manner.

It is the responsibility of **all stakeholders** to ensure that:

- Accidents and hazards are reported to management at the earliest opportunity;
- All requirements and obligations under the relevant legislation are complied with.

It is the responsibility of the **Occupational Health and Safety Representative** to:

- Help identify the causes of dangerous occurrences and accidents and develop corrective action;
- Ensure State Authorities are appropriately notified of all reportable occurrences or events.

PROCEDURES

All accidents or incidents that result in an injury or illness at work must be reported to the Occupational Health and Safety Representative within 24 hours of the incident occurring.

Any workplace accident or incident (*dangerous occurrence*) which has the potential to result in injury or damage to property must be reported in the same manner as an incident or accident that results in injury or damage.

Immediate actions

All injuries and illnesses must be assessed by a qualified First Aid Officer to determine whether medical treatment is required. The relevant Supervisor must advise the Event Manager of all injuries or illnesses.

If medical treatment is required, the injured person's Manager must ensure that suitable arrangements are made for transport to a doctor or hospital. It must be noted that:

- All eye injuries (including foreign objects between the eye and eye lid which is not dirt or dust particles) must be referred to a doctor or hospital.
- When injury or illness involves a chemical, a Material Safety Data Sheet and other information which may have been prepared for such incidents must accompany the injured person to the doctor or hospital.

The Chairperson/Occupational Health and Safety Representative must be notified immediately in the event of any incident which occurs.

All injuries resulting in lost work time must be reported to the Occupational Health and Safety Representative within 24 hours.

The following documents must be completed for all incidents and injuries involving employees, volunteers, agency staff, contractors, visitors or the general public:

- The FONAI Accident/Incident Report Form (see Appendix B of First Aid Policy);
- The FONAI Injury Register (see Appendix D of First Aid Policy);
- Incident notification as appropriate to the relevant WorkCover authority.

A copy of the completed incident report form must be retained and filed by the Secretary. Members are required to liaise with Occupational Health and Safety Representatives to implement corrective or preventative actions arising from any investigation.

In the event of a death:

Advise Emergency Services on 000.

If an incident results in a death, the site of the incident must not be disturbed until:

- an inspector arrives at the site of the incident; or
- an inspector directs otherwise at the time of notification.

The above does not apply if the disturbance to the site is for the purpose of:

- protecting the health and safety of any person; or
- aiding an injured person involved in an incident; or
- taking essential action to make the scene safe or to prevent a further occurrence of an incident.

Advise the Chairperson/Management Committee immediately.

G. 17 Media Relations Policy

Policy number	G17	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

Local, state, national and international media are vital partners in achieving the goals of FONAI. In order to maximise the advantages of media presentation and minimise the risks of media misrepresentation it is necessary to establish guidelines for how media contacts will be conducted. It is not the intention of this policy to curb freedom of speech or to enforce strict rules and regulations. Rather, the intention is to establish a framework for achieving an effective working relationship with the media. The organisation welcomes the opportunity to talk to the media and, through them, to debate issues in the public arena.

In dealing with the media, staff, Board members and other volunteers should be conscious that they may be seen as representatives of the organisation and should therefore avoid making comments or participating in photo opportunities that may damage the long-term reputation of FONAI.

PURPOSE

FONAI works with the media in order to:

- Advocate for the goals of the organisation
- Promote the work of the organisation
- Inform the public of the details of the organisation
- Assist in fundraising for the organisation

In order to ensure that these purposes can be fulfilled, this policy regulates the choice of people entitled to speak for FONAI.

The media themselves have a vital role to play on behalf of the community in holding FONAI to account for its policies and actions. It is important that they have access to officers and members and to background information to assist them in this role.

To balance this, FONAI must have the capacity to defend itself from any unfounded criticism, and will ensure that the public are properly informed of all the relevant facts (if necessary using other channels of communication).

It is the responsibility of all staff, board members and volunteers to ensure that effective media relations are maintained in order to achieve the aims of FONAI. Naturally, in doing this, certain legal constraints might apply (e.g. not making comment on current court cases, especially those before a jury).

This policy deals with the day-to-day relationship between FONAI and the media and does not address how the organisation will work with the media in a crisis, for which separate guidelines are available as an Our Community Helpsheets on [What to do in a Media Crisis](#).

Core Policy

FONAI operates on the values of:

- **Honesty:** The organisation will never knowingly mislead the public, media or staff on an issue or news story.

- **Transparency:** The organisation will promote openness and accessibility in our dealings with the media, whilst complying with the law and maintaining confidentiality when appropriate.
- **Clarity:** All communications with the media will be written in plain English
- **Balance:** Information provided to the media by FONAI will as far as humanly possible be objective, balanced, accurate, informative and timely.

FONAI should seek to establish and maintain a good and open relationship with the media. It is important that the organisation works with the media to communicate important public information messages about its work and its goals.

However, contact concerning any significant matter in the name of or on behalf of FONAI should only be made by staff, Board members and other volunteers where:

- They have consulted the Communications Officer nominated by the Board.
- They have the required expertise to speak on the issue under discussion.
- They have some experience in media relations.

Where any of these criteria do not apply, staff, Board members and volunteers are recommended to exercise extreme caution and to seek guidance from the most senior staff or Board member available.

G.17 Media Relations Procedures

Procedure number	G17	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

The Board shall nominate a Communications Officer as required to coordinate FONAI's relationships with the media.

The Communications Officer, Chairperson & Office Bearers are all authorised to speak on behalf of FONAI.

Other members are advised to ensure they are properly briefed and guided by the Communications Officer, CEO or Board Chair before talking to the media on any issue related to FONAI.

Where information or public comment is requested or required, the Communications Officer shall determine the most appropriate person to respond.

All stakeholders are encouraged to deliver public presentations that discuss FONAI's work and its goals, provided that they make it clear where such presentations are or are not authorised by the organisation.

All stakeholders must observe FONAI's Privacy Policy in relation to client records.

PROCESSES

Significant statements on behalf of FONAI shall be made as authorised by the Communications Officer and/or Management as detailed above.

It should always be made absolutely clear whether the views put forward regarding any issue relating to FONAI are those of the organisation or of an individual. At all times consideration should be given as to how the correspondence may affect the reputation of FONAI.

The Management Committee is responsible for:

- Producing and updating a list of key contacts for distribution to local press and radio and TV stations. The Chairperson/office Bearer can also be contacted for preliminary discussions on any story or if a journalist or researcher is unsure who to approach for a comment.
- Producing the organisation's annual public relations plan, which shall be consistent with the organisation's business plan and marketing plan.
- Coordinating all media conferences for FONAI. All such conferences shall be videotaped by the organisation.
- Authorising all media releases from FONAI and for mounting them on the organisation's website. All media releases must also be checked and approved by staff in charge of the relevant area before distribution.
- Being involved in any approaches to the media to feature FONAI's work.
- Receiving and coordinating a response to all approaches from all national press, radio or TV stations or specialist press.

All Management Committee members are responsible for:

- Providing advice (preferably before the issue becomes public knowledge) to the Chairperson on any issues that are likely to be complex or contentious or to be sustained for any length of time. In such a situation the Communications Officer will work with the relevant staff and Board members to produce a communications plan which will ensure that balanced, timely information is provided to keep all parties informed.
- Ensuring that no photos of clients, patients, employees, or students shall be released to the public via advertising, news media, or internet, or by any other means, without the approval of the Communications Officer, who shall satisfy themselves that the organisation's Privacy Policy has been observed.
- Notifying the Communications Officer of any contact made in the name of FONAI to the media and providing the name of the reporter or writer and the media outlet they represent.

Any significant media contacts with FONAI's stakeholders on any issue likely to prove contentious shall, where possible, be videotaped.

Any filming or taping on FONAI's property or of the organisation's proceedings by the media is subject to prior permission of the Management Committee.

Every effort should be made to assist the media in their inquiries. Where media queries involve requests for information that will require substantial staff work to produce, such work must be authorised by the Chairperson. It will usually be necessary to provide information in addition to that which is requested in order to set the facts and figures in context. Requests for detailed information of this nature, whether from the local or national media, should be referred to the Management Committee.

FONAI reserves the right to withhold certain sensitive information concerning, say, commercial transactions or governmental negotiations. Any such information will be clearly labelled and clearly notified to relevant staff.

If any unauthorised releases of confidential information do occur, an investigation will take place to establish who was responsible and appropriate action will be taken.

G.18 Social Media Policy

Policy number	G18	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

Introduction

Social media such as Twitter, Facebook, Google+, YouTube and blogging represent a growing form of communication for not-for-profit organisations, allowing them to engage their members and the wider public more easily than ever before.

However, it is also an area in which rules and boundaries are constantly being tested. This policy acts in conjunction with FONAI's Media Relations Policy in order to maximise our social media reach while protecting our public reputation.

Purpose

FONAI may choose to engage in social media such as:

Twitter

Facebook

Google+

WordPress/Blogger

YouTube/Vimeo

iTunes/Podcasting

FONAI seeks to encourage information and link-sharing amongst its membership, staff and volunteers, and seeks to utilise the expertise of its employees and volunteers in generating appropriate social media content.

At the same time, social media posts should be in keeping with the image that FONAI wishes to present to the public, and posts made through its social media channels should not damage the organisation's reputation in any way.

Due to the fast-moving nature of social media and the constant development of new social media programs, it is important that this policy and its procedures be reviewed at regular intervals.

Core Policy

FONAI's social media use shall be consistent with the following core values:

Integrity: FONAI will not knowingly post incorrect, defamatory or misleading information about its own work, the work of other organisations, or individuals. In addition, it will post in accordance with the organisation's Copyright and Privacy policies.

Professionalism: FONAI's social media represents the organisation as a whole and should seek to maintain a professional and uniform tone. Staff and volunteers may, from time to time and as appropriate, post on behalf of FONAI using its online profiles, but the impression should remain one of a singular organisation rather than a group of individuals.

Information Sharing: FONAI encourages the sharing and reposting of online information that is relevant, appropriate to its aims, and of interest to its members.

FONAI should seek to grow its social media base and use this to engage with existing and potential members, donors and stakeholders. At the same time, a professional balance must be struck which avoids placing the organisation's reputation at risk.

G.18 Social Media Procedures

Procedure number	G18	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

Responsibilities

The Board shall as required, nominate a Communications Officer to co-ordinate FONAI's social media management.

The Communications Officer will oversee expansion of social media and help to develop the Social Media Strategy in line with the organisation's Media Relations Policy.

Staff and volunteers may, from time to time and where appropriate, post on behalf of FONAI using the organisation's online social media profiles. This is to be done only with the express knowledge and authorisation of the Communications Officer.

The Communications Officer has ultimate responsibility for:

1. Ensuring that all posts are in keeping with FONAI'S core Social Media Policy.
2. Ensuring appropriate and timely action is taken to correct or remove inappropriate posts (including defamatory and/or illegal content) and in minimising the risk of a repeat incident.
3. Ensuring that appropriate and timely action is taken in repairing relations with any persons or organisations offended by an inappropriate post.
4. Moderating and monitoring public response to social media, such as blog comments and Facebook replies, to ensure that trolling and spamming does not occur, to remove offensive or inappropriate replies, or caution offensive posters, and to reply to any further requests for information generated by the post topic.

It is important to maintain the balance between encouraging discussion and information sharing, and maintaining a professional and appropriate online presence.

Delegation

Social media is often a 24/7 occupation & as such, the responsibilities outlined above may be delegated by the Chairperson to another appropriate committee member/volunteer.

Processes

Posting to social media.

Before social media posts are made, volunteers and staff should ask themselves the following questions:

1. Is the information I am posting, or reposting, likely to be of interest to FONAI's members and stakeholders?
2. Is the information in keeping with the interests of the organisation and its constituted aims?

3. Could the post be construed as an attack on another individual, organisation or project?
4. Would FONAI's donors be happy to read the post?
5. If there is a link attached to the post, does the link work, and have I read the information it links to and judged it to be an appropriate source?
6. If reposting information, is the original poster an individual or organisation that FONAI would be happy to associate itself with?
7. Are the tone and the content of the post in keeping with other posts made by FONAI? Does it maintain the organisation's overall tone?
8. If you are at all uncertain about whether the post is suitable, do not post it until you have discussed it with the Chairperson. A few moments spent checking can save the organisation big problems in the future.

Damage limitation

- In the event of a damaging or misleading post being made, the Communications Officer should be notified as soon as possible, and the following actions should occur:
- The offending post should be removed.
- Where necessary an apology should be issued, either publicly or to the individual or organisation involved.
- The origin of the offending post should be explored and steps taken to prevent a similar incident occurring in the future.

If the mistake seems set to grow, or to cause significant damage to the organisation's reputation, revert to the Media Relations Policy and the Our Community helpsheet:

[What to do in a Media Crisis.](#)

Moderating social media

The reputation of FONAI is first and foremost, and this involves maintaining a safe and friendly environment for its members.

From time to time social media forums may be hijacked by trolls or spammers, or attract people who attack other posters or the organisation aggressively. In order to maintain a pleasant environment for everybody, these posts need to be moderated.

Freedom of speech is to be encouraged, but if posts contain one or more of the following, it is time to act:

- Excessive or inappropriate use of swearing
- Defamatory, slanderous or aggressive attacks on FONAI, other individuals, organisations, projects or public figures
- Breach of copyrighted material not within reasonable use, in the public domain, or available under Creative Commons license
- Breach of data protection or privacy laws
- Repetitive advertisements

Topics which fall outside the realms of interest to members and stakeholders, and which do not appear to be within the context of a legitimate discussion or enquiry.

If a post appears only once:

- Remove the post as soon as possible
- If possible/appropriate, contact the poster privately to explain why you have removed the post and highlighting FONAI's posting guidelines.

If a poster continues to post inappropriate content, or if the post is spam:

- Remove the post as soon as possible
- Ban or block the poster to prevent them from posting again.

Banning and blocking should be used as a last resort only, and only when it is clear that the poster intends to continue to contribute inappropriate content. However, if that is the case, action must be taken swiftly to maintain the welfare of other social media users. The decision to block, ban and remove posts ultimately lies with the Chairperson, but may, at their discretion, be delegated to responsible members and volunteers.

G.19 Complaints Policy

Policy number	G19	Version	2
Drafted by	Denise Roscrow	Approved by Board	August 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

1.INTRODUCTION

1.1 Purpose

This policy is intended to ensure that FONAI handles complaints fairly, efficiently and effectively.

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

1.2 Scope

This policy applies to all FONAI stakeholders, partners and our governing body, receiving or managing complaints from the public and clients made to or about us, regarding our products, services and representatives, or our complaint handling process.

1.3 FONAI commitment

FONAI expects its management committee members & representatives all levels to be committed to fair, effective and efficient complaint handling.

Our commitment to you

We have five core service principles that underpin our commitment to you:

- We are responsive when you contact us
- We are always professional in our dealings with you
- We value your feedback and we listen and are engaged
- We respect your privacy
- We are accessible to you through many different contact channels

The following table outlines the nature of the commitment expected from FONAI and the way that commitment is implemented. FONAI aims to provide high quality services which meet your needs. We believe we achieve this most of the time: if we are not getting it right please let us know.

RESPONSIBILITIES

Who	Commitment	How
Chairperson	Promote a culture that values complaints and their effective resolution	Report to the governing body on our complaint handling. Provide adequate support and direction to key members responsible for handling complaints. Regularly review reports about complaint trends and issues arising from complaints. Encourage all members to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. Encourage members to make recommendations for system improvements. Support recommendations for service, member and complaint handling improvements arising from the analysis of complaint data.
Office bearers whose duties include complaint handling	Demonstrate exemplary complaint handling practices	Treat all people with respect, including people who make complaints. Assist people to make a complaint, if needed. Comply with our policy and associated procedures. Provide regular feedback to management and/or the governing body on issues arising from complaints. Provide suggestions to management on ways to improve our complaints management system. Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.
Management committee	Understand and comply with our complaint handling practices.	Treat all people with respect, including people who make complaints. Be aware of our complaint handling policies and procedures. Assist people who wish to make complaints access our complaints process. Be alert to complaints and assist members handling complaints resolve matters promptly.

2.TERMS AND DEFINITIONS

Complaint

An expression of dissatisfaction made to or about us, our services, members or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required. (AS/NZ 10002:2014)

As well as complaints being made directly to FONAI, remember that some complaints (or at least negative comments) made be made on social media.

Complaint handling/management system

All policies, procedures, practices, members, hardware and software used by us in the management of complaints.

Dispute

An unresolved complaint escalated either within or outside of our organisation.

Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our services or complaint handling system where a response is not explicitly or implicitly expected or legally required.

Grievance

A clear, formal written statement by an individual member about another member or a work-related problem.

Policy

A statement of instruction that sets out how we should fulfil our vision, mission and goals.

Procedure

A statement or instruction that sets out how our policies will be implemented and by whom.

3.GUIDING PRINCIPLES

An effective complaint handling system must be modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture.

3.1 Facilitate complaints

People focus

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame (as in AS/NZ 10002).

People making complaints will be:

- provided with information about our complaint handling process and how to access it
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redress or review.
- No detriment to people making complaints
- We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints -We accept anonymous complaints if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where there is enough information provided.

Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised on our website.

We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, we will communicate with them through their representative if this is their wish.

Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

Three Step Process

1. Facilitate complaints
2. Acknowledge & respond to complaints
3. Manage and resolve the complaint

How to make a complaint

Call You can call us on 0414 358 106 in business hours.

Outside of these hours, you can always leave us a message and a contact number and your call will be returned within one working day.

Email You can email us at friendsofnepal@ozemail.com.au

Write You can write to us at:

Friends of Nepal-Adelaide Inc
23 Centre Way,
Belair 5052

Please include your name, address and a contact telephone number in your email or letter so that we can get back in touch with you easily.

No charge

Complaining to us is free.

3.2 Respond to complaints

Early resolution

Where possible, complaints will be resolved at first contact with us.

FONAI will record complaints resolved at first point of contact, the frontline to add to the pool of data we regularly analyse to identify system issues and track more accurately the complaint handling activities of staff.

When appropriate we may offer an explanation or apology to the person making the complaint.

Responsiveness

We will promptly acknowledge receipt of complaints. We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

Objectivity and fairness

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a complaint is different from any member whose conduct or service is being complained about.

Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Responding flexibly

Our members are empowered to resolve complaints promptly and with as little formality as possible.

We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

Confidentiality

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by us as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

3.3 Manage the parties to a complaint

Complaints involving multiple agencies

Where a complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our members but also the actions of our service providers.

Empowerment of committee members

All members managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Members are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of our members
- our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our members to do the same in accordance with this policy.

Alternative avenues for dealing with complaints

We will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight regulatory bodies).

The three levels of complaint handling

Level 1

We aim to resolve complaints at the first level, the frontline. Wherever possible members will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Level 2

Where this is not possible, we may decide to escalate the complaint to a an office bearer within our organisation. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made,
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Level 3

Where a person making a complaint is dissatisfied with the outcome of our review of their complaint, they may seek an external review of our decision. Australian Charities & Not for Profit Commission <https://www.acnc.gov.au/>

4 Accountability and learning

4.1 Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management committee.

We will run regular reports on:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline ☐ issues arising from complaints
- systemic issues identified, and
- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements. Both reports and their analysis will be provided to management committee, at least annually.

4. MONITORING and CONTINUOUS IMPROVEMENT

4.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints
- identify and correct deficiencies in the operation of the system,
- monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

4.3 Continuous improvement

We are committed to improving the way our organisation operates, including our management of the effectiveness and efficiency of our complaint management system.

To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaint management system and complaint data
- implement appropriate system changes arising out of our analysis of complaints data
- maintain a complaints register

G.19 Complaints Procedures

Procedures number	G19	Version	2
Drafted by	Denise Roscrow	Approved	August 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

When responding to complaints, FONAI members act in accordance with complaint handling policy as well as any other internal documents providing guidance on the management of complaints. Members consider any relevant legislation and/or regulations when responding to complaints and feedback.

IMPLEMENTATION

The five key stages in FONAI's complaint management system.

1 Receive

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information. We will also assign a unique identifier/number to the complaint file.

The record of the complaint will document:

- Contact information of the person making a complaint and the date received
- Issues raised by the person making a complaint and the outcome/s they want
- Any other relevant information,.
- Any additional support the person making a complaint requires.

2 Acknowledge

We will acknowledge receipt of each complaint promptly, and preferably within 5 working days. When appropriate we may offer an explanation or apology.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

3 Assess and investigate

3.1 Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is
- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed
- Whether a resolution requires the involvement of other organisations.

3.2 Investigating the complaint

After assessing the complaint, we will consider how to manage it.

We may:

- Give the person making a complaint information or an explanation
- Gather information about the issue, person or area that the complaint is about, or
- Investigate the claims made in the complaint.

We will keep the person making the complaint up-to-date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

4 Determine outcome and provide reasons for decision

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- The outcome of the complaint and any action we took
- The reason/s for our decision
- The remedy or resolution/s that we have proposed or put in place,
- Any options for review that may be available to the complainant, such as an internal review, external review or appeal.

5 Close the complaint: document and analyse data

5.1 Document

We will keep records about:

- How we managed the complaint
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations), and
- Any outstanding actions to be followed up, including analysing any underlying or root causes.

5.2 Analyse data

We will ensure that outcomes are properly implemented, monitored and reported to the complaint management committee.

RELATED DOCUMENTS

- Conflict Of Interest Access And Equity
- Committee Grievance Committee Dispute Resolution
- Transparency And Accountability
- Environmental & Social Impact
- Code Of Conduct Child Protection
- Fraud Management Risk Management

G.20 Environmental & Social Safeguard Policy

Policy number	G20	Version	1
Drafted by	Denise Roscrow	Approved by Board on	July 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

Principles

The following safeguard principles guide FONAI's management of environmental and social impacts in its programs. The safeguard principles underpin the successful application of the five environmental and social safeguards. Most importantly, applying the principles helps ensure our funding/aid programs achieve positive development outcomes without harming the environment, people or communities.

All investments must be designed and implemented in accordance with the safeguard principles. The principles must be considered at each stage of FONAI's aid management cycle: policy and planning; design and procurement; implementation and performance management; and review and evaluation.

FONAI's aid programs will be in partnership with NGO's where these governance principles are in place. The principles have been adapted from DFAT Environmental and Social Safeguard Policy for the Aid Program (policy)

Safeguard Principles

Principle 1: Do no harm

Seek to protect the rights, health, safety, and livelihoods of people including, children, women, indigenous peoples, and other vulnerable or disadvantaged groups. Maintain the health, diversity and productivity of the environment.

Principle 2: Identify, assess and manage environmental and social impacts

Identify potential environmental and social risks and impacts early in the investment design process, and ensure they are adequately assessed and managed in investment concepts, designs and implementation.

Avoid, or where avoidance is not possible, minimise, mitigate or as a last resort, offset or compensate for negative impacts.

Assess and manage direct and indirect environmental and social impacts of the investment in a way that is proportional to potential impacts.

Manage risks and impacts of the investment through management plans, and monitor and report on their delivery.

Consider the different impacts on the environment and people, including children, people of different genders, indigenous peoples and other vulnerable or disadvantaged groups. The assessment and management of potential impacts must take into account these different needs.

Principle 3: Engage effectively with stakeholders

Provide affected people with access to information about the investment, its risks, and potential social and environmental impacts in a way that is timely, accessible, and culturally and socially suitable for the affected group.

Engage with affected parties and other stakeholders early in identifying and managing environmental and social risks and impacts, and continue this throughout the investment.

Ensure consultations include directly and indirectly affected parties, are inclusive, free of external manipulation, interference, coercion, or intimidation, and enable meaningful participation.

Provide accessible and culturally appropriate grievance redress mechanisms and ensure that grievances are handled promptly, transparently, and without retribution or cost to the party that raised the concern.

Disclose information about the social and environmental performance of aid investments in accordance with FONAI's aid transparency commitments.

Principle 4: Work effectively with partners

Comply with partner country safeguard laws and policies and where possible build partners' capacity to develop and implement environmental and social governance systems.

Work with multilateral, bilateral, NGO and private sector development partners to ensure environmental and social impacts are managed in a way that is consistent with this policy.

Work with partners to manage safeguard risks in a way that maximises the use of country systems and avoids imposing duplicate or unnecessary safeguard assessment and management planning requirements.

Principle 5: Promote improved environmental and social outcomes

Where possible, promote improved environmental and social outcomes by integrating ecologically sustainable development into aid investments. Improve the implementation and outcomes of aid investments by effectively identifying and managing environmental and social risks.

G.20 Environmental and Social Safeguard Procedures

Procedure number	G20	Version	1
Drafted by	Denise Roscrow	Approved by Board on	August 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

It is the responsibility of the management committee to follow these mandatory safeguard steps to address safeguards when implementing an aid investment in any programs.

Any or all of these steps may be carried out by FONAI's implementing partners, with agreement from FONAI or as part of the partner's own safeguard processes. However, FONAI must make sure the safeguards applied by partners are consistent with the requirements of this policy and monitored to ensure they are implemented effectively.

- Enter, only, where possible, into partnerships with NGO's who have these environmental and social safeguard principles in place or are working towards implementing them.
- Assist in capacity building where NGO's are developing environmental and social safeguard policies and practices.
- **Screen all investments** for potential environmental and social impacts
- **Rate the risk** of potential environmental and social impacts
- Ensure a proportional **environmental and social impact assessment and management plan** is developed for identified risks and impacts
- Put in place systems to **monitor and report** on implementation

RELATED DOCUMENTS

Code of Conduct

Fraud

Complaints

Reference <http://dfat.gov.au/about-us/publications/Pages/environmental-social-safeguard-policy-for-the-aid-program.aspx>

Part 2. Management Committee Policies and Procedures

Policy	Page #
MC.1 Management Committee Member Office-Bearer – roles & responsibilities	101
MC 2. Conduct Of Meetings	108
MC 3 Committees	113
MC 4 Volunteer Management	115
MC. 5 Fundraising	119
MC. 6 Ethical Fundraising	121
MC. 7 Sponsorship	123

MC.1 Management Committee Member Office-Bearer Policy

Policy number	MC1	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

A Management Committee operates more effectively if the members and office-bearers of the Management Committee know their respective duties and obligations.

PURPOSE

This policy seeks to ensure that members and office-bearers of the Management Committee know their respective duties and obligations.

POLICY

Members and Office-bearers of the Management Committee shall have the duties and obligations set out in Appendix #1, below.

MC 1 Management Committee Member Office-Bearer Procedures

Procedures number	MC1	Version	1
Drafted by	Denise Roscrow	Approved on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

The Chairperson shall be responsible for including this policy in the induction package provided to new Management Committee members.

The Secretary of the Management Committee shall be responsible for ensuring that a copy of this policy is available for reference in Board meetings.

The Management Committee Chair shall be responsible for making a ruling on any point in dispute in this policy.

PROCEDURES

This policy shall be included in the induction package provided to new Management Committee members. A copy of this policy shall be available for reference in Management Committee meetings. Any point in dispute in this policy shall be resolved by the Chair.

RELATED DOCUMENTS

- Board Attendance Policy Conflict of Interest Policy

APPENDIX A

POSITION STATEMENT: MANAGEMENT COMMITTEE CHAIR

DUTIES	FONAI
Governance	Provide leadership to the organisation
	Ensure [in partnership with the Management Committee] that the organisation's objectives, goals and mission are being followed
	Ensure [in partnership with the Management Committee] that the organisation develops in the appropriate direction
	Ensure [in partnership with the Management Committee] that the organisation operates in an ethically, environmentally, and socially responsible fashion
Planning	<i>Produce [in partnership with the Management Committee] a Strategic Plan for the organisation</i>
	Ensure [in partnership with the Management Committee] the regular review and development of the Strategic Plan
Meetings	Ensure that appropriate standing orders are in place
	With the Secretary, prepare the agenda in advance of the meeting
	Chair Management Committee meetings according to Standing Orders
	Rule on issues of meetings procedure not covered in the Standing Orders
	Report to the Annual General Meeting on the situation of the organisation
	Chair General Meetings according to Standing Orders
Administrative & Management	Assign [in partnership with the Board] administrative duties to Board members and volunteers
	Personally carry out administrative duties as assigned
	Manage the business of the Management Committee
	Manage the recruitment, induction, and training of Board members [in partnership with the Management Committee]
	Manage [in partnership with the Management Committee] the assessment, review and renewal of the Management Committee
	Manage the organisation's grievance procedures
	Ensure the harmony of Management Committee deliberations
	Manage [in partnership with the Management Committee] the succession of the position of Chair
Media	Under the organisation's Media Policy, serve as spokesperson for the organisation as appropriate

Promotion	Promote the organisation in the community as opportunities arise
Negotiation	Serve [as nominated by the Management Committee] in negotiation with other organisations
Legal	Ensure that <ul style="list-style-type: none"> the modes of performance of all legal requirements are featured in the Rules of The Association the performance of all legal requirements is reported to the Management Committee the performance of all legal requirements is fully documented.
	Ensure that all legal requirements are met
Finance	With the Treasurer, ensure the organisation's financial control procedures are adequate and that risk management strategies are in place
Other duties	As for Management Committee members (below)

APPENDIX B

POSITION STATEMENT: MANAGEMENT COMMITTEE TREASURER

DUTIES	FONAI
Governance	Ensure that the Management Committee maintains the degree of financial literacy necessary to conduct the business of the organisation
	Advise the Management Committee on matters of finance
	Advise the Management Committee on fundraising
	<i>Ensure that appropriate financial policies and procedures are in place and fully documented</i>
Planning	<i>Produce [in partnership with the Management Committee] a Business Plan for the organisation</i>
	Ensure [in partnership with the Management Committee] the regular review and development of the Business Plan
Meetings	Report to the Management Committee at each meeting on the financial situation of the organisation
	Report to the Management Committee at each meeting on variances from the approved budget
	With the Secretary, place any necessary financial items on the Management Committee agenda in advance of the meeting
	Report to the Annual General Meeting on the financial situation of the organisation
Administrative & Management	

	Personally carry out financial duties as assigned
	Keep the books of the organisation
	Ensure the organisation's financial records are adequate, protected, backed up, and accessible.
	Manage the organisation's banking
	Maintain the organisation's asset register
Finance	Ensure the organisation's financial control procedures are adequate and that appropriate safeguards against fraud are in place
	Ensure that risk management strategies (including appropriate insurances) are in place
	Collect and receive all money due to the organisation and make all payments authorised by the organisation
	Oversee the organisation's investment strategy and report to the Board
	Prepare the Budget for the coming year
	Review income and expenditure against the budget on a continuous basis
Legal	Ensure the organisation's compliance with all applicable tax arrangements
Other duties	As for Board members (below)

APPENDIX C

POSITION STATEMENT: MANAGEMENT COMMITTEE SECRETARY

DUTIES	TASKS
Administrative & Management	
	Serve on Management Committee committees as required
	Maintain a register of members
	Handle the procedures for the admission of new members
	Handle the procedures for the resignation of members
	Handle the procedures for the discipline, suspension and expulsion of members
	Organise General Meetings and notify members in advance
	Receive nominations for positions on the Management Committee
	Keep in their custody all books, documents and securities, and make them available to members as requested

	Liaise with relevant regulators (Consumer Affairs S.A./Australian Charities and Not-for-Profits Commission)
	Personally carry out administrative duties as assigned by the Chair
Media	<i>Ensure preparation and adoption of a Media policy</i>
Promotion	Promote the organisation in the community as opportunities arise
Negotiation	Serve [as nominated by the Management Committee] in negotiation with other organisations
Legal	Keep the Common Seal of the organisation
Other duties	As for Board members (below)

POSITION STATEMENT: MANAGEMENT COMMITTEE

FUNDRAISING CHAIRPERSON

DUTIES	TASKS
Governance	Provide leadership regarding fundraising events to the organisation
	Ensure [in partnership with the Management Committee] that the organisation's objectives, goals and mission are being followed
	Ensure [in partnership with the Management Committee] that the organisation develops in the appropriate direction
	Ensure [in partnership with the Management Committee] that the organisation operates in an ethically, environmentally, and socially responsible fashion
Planning	<i>Produce [in partnership with the Management Committee] a Strategic Plan/Calendar of Events for the fundraising events for the organisation</i>
	Ensure [in partnership with the Management Committee] the regular review and development of the Strategic Plan
Meetings	
	Inform the Secretary of items to be included on agenda in advance of the meeting
	Prepare report to present to meeting as required
	Report to the Annual General Meeting on the fundraising situation of the organisation
Administrative & Management	Assign [in partnership with the Board] fundraising duties to Board members and volunteers
	Personally carry out administrative duties as assigned
	Manage the business of the Fundraising Committee
	Prepare a budget for each fundraising event [in partnership with the Management Committee]
	Manage [in partnership with the Management Committee] the assessment, review and reporting process of each event

Media	Under the organisation's Media Policy, serve as spokesperson for the organisation as appropriate
Promotion	Promote the organisation in the community as opportunities arise
Negotiation	Serve [as nominated by the Management Committee] in negotiation with other organisations
Legal	<p>Ensure that</p> <ul style="list-style-type: none"> • the modes of performance of all legal requirements are featured in the Rules of The Association • the performance of all legal requirements is reported to the Management Committee • the performance of all legal requirements is fully documented.
	Ensure that all legal requirements are met
Finance	With the Treasurer, ensure the Fundraising event's financial control procedures are adequate and that risk management strategies are in place
Other duties	As directed by Management Committee members

MC. 2 Conduct Of Meetings Policy

Policy number	MC2	Version	1
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

It is important to ensure that meetings are conducted well so that:

- in making decisions, proper regard can be had to the views of the majority, of the minority, of individual members, of absentee members, and of all of these groups taken together; and
- decisions can be made efficiently and expeditiously, with due respect for the time and commitment of members of [Name of Organisation] and members of the Board.

Primary responsibility for this rests with the Chair. To achieve that, broad discretion and authority is given to the Chair to make rulings on questions of meeting procedure (subject to the limitations set out in this policy).

PURPOSE

This policy is designed to provide guidance on the appointment of the Chair and set out the parameters by which the Chair is to conduct meetings, to ensure that meetings are conducted well.

APPOINTMENT OF CHAIR

The Chair of FONAI'S Board shall be elected as laid down in the FONAI'S constitution/rules. Subject to anything in the Constitution/Rules:

- In the Chair's absence, the Treasurer shall preside as Chair at each General Meeting of the Organisation.
- If the Chair and the Treasurer are absent from a General Meeting or a Board meeting, or are unable to preside, or decline to preside, the Members present must elect one of their number to preside as Chair.
- Meetings of any Board sub-committees shall be chaired in the manner laid down by the Board in their terms of reference.
- A person should not preside as Chair over the part of a meeting concerning the election of the Chair, nor should the Chair give instructions as to the procedure to be followed, in respect of an election for the position of Chair. A temporary Chair should be appointed for that purpose to ensure a fair, unbiased election.

RESPONSIBILITIES

The Chair shall conduct meetings according to the Standing Orders (see Appendix A), and any other resolution of the Board.

Where the Standing Orders are ambiguous or contestable or silent, and there are no other Board directions given on the subject, the Chair has discretion to rule as to the practices to be followed.

Where there is continuing disagreement on any ruling by the Chair, any member may move a motion of dissent to the Chair's ruling. If this motion is seconded a vote shall be taken. If the motion of dissent is carried, the Chair's decision is reversed.

APPENDIX A

Standing Orders

ELECTION OF MEMBERS TO THE BOARD

- Members of the Board shall be elected or appointed by the method specified in FONAI's Constitution/Rules.

QUORUM

The quorum for any General Meeting shall be as laid down in the Constitution. The quorum for any Board meeting shall be as laid down in the Constitution. The quorum for the meeting of any sub-committee shall be as laid down in the committee's Terms of Reference, or if not there specified shall be as adopted by the committee.

At any point after the opening of a meeting, any member of the Board may call attention to the lack of a quorum. The meeting shall then terminate.

AMENDMENTS TO MOTIONS

A resolution put to a general meeting that has not yet been passed will be referred to as a "motion".

In circumstances where one or more members wishes to amend a motion prior to it being passed at a general meeting, the following process should be adopted:

1. The motion (in its original form) should be put to the meeting by the Chair.
2. A member may propose an amendment to the motion ("the amendment").
3. Another member can then second the amendment [subject to the comment below about seconding].
4. The Chair should allow a reasonable opportunity to discussion of the amendment.
5. The Chair should then call a vote on the amendment. If the vote passes, the motion will be amended.

6. If a member wishes to make another amendment to the motion, then steps 2 - 5 should be followed again.
7. Once all the amendments have been made, the Chair should put the motion to meeting for a vote on whether to pass the motion or not.

Notwithstanding the above, the Chair should not allow any amendment to a motion to be put where:

- The proposed amendment introduces substantially new subject material.
 - Remember that members will have decided whether to attend the meeting on the basis of the notice of meeting. If the meeting considers subject matters not included in the notice, it could be unfair to members that are not present.
- The proposed amendment has the effect of negating the motion in its original form.
- There have already been two amendments, unless the Chair in his or her discretion believes there is good reason to allow more. That is, only two amendments should be moved to any motion, after which the meeting should debate and vote on the motion as amended, unless there is good reason to allow further amendments.

VOTING

The Chair should put to the meeting any motion, except:

- The Chair should not allow any motion to be put to a general meeting that is vague or ambiguous.
- The Chair should not allow any motion to be put initiates a subject for discussion unless notice has been given to members that the subject would be covered at the meeting.

[Subject to the FONAI's Constitution]:

- Members, including members of the Board may vote for any motion or may abstain.
- A motion shall be declared carried if a plurality of members present (that is, a majority of members present and voting) vote in its favor.
- In the event of an equality of votes for and against a motion, the Chair shall have no casting vote and the motion will automatically lapse.

MEMBERS' INTERESTS

The Chair should ensure that Board members are familiar with the Conflict of Interest Policy, and that the procedures required by that policy are observed by members of the Board.

SPEAKING

Members may speak to any motion when granted the right to speak by the Chair. The mover of any motion has the right to speak first on that motion for the time period allocated by the Chair.

The Chair shall grant priority to members who express an intention to move dissent with a decision of the Chair.

In speaking to any motion or amendment, members are to confine their remarks strictly to such motion or amendment, and shall not introduce irrelevant matters or indulge in needless repetition. In this matter, the Chair's ruling is final and not open to challenge.

The Chair of a general meeting should provide a reasonable opportunity for members to ask questions of the Board, and any of the Board members. In all cases, the Chair should have regard to the following in determining what is reasonable:

- the purpose of the meeting;
- the time available at the meeting, and the need to ensure that there is sufficient time allocated to conduct the business included in the notice of meeting;
- the desirability of the meeting closing on-time;
- the relevance of the questions being asked to the business included in the notice of the meeting;
- the relevance of the questions being asked to the meeting as a whole and whether the matters being raised could be more appropriately addressed in another forum;
- the most appropriate person/s or entities to whom the questions should be addressed;
- the desirability of ensuring that members have an adequate opportunity to raise concerns about the governance of FONAI and
- any other matter considered relevant by the Chair.

MINUTES

Minutes of any meeting of the Board shall be circulated to all members as soon as possible after that meeting, and before the scheduled date of the next meeting. The minutes shall record:

- the date, time and venue of the meeting;
- the names of those members and officers present;
- the name of the meeting Chair;
- any apologies tendered;
- any failure of a quorum;
- a list of items considered;
- any resolutions pertaining to those items; and
- details of any declarations of pecuniary interest.

Any other matters may be recorded at the discretion of the Chair.

AMENDMENTS TO STANDING ORDERS

The Board may amend these Standing Orders at any time, either permanently or for a specified period.

OTHER MATTERS

In exercising his or her discretion, the Chair is to take account of, but is not bound by, Robert's Rules of Order (<http://www.rulesonline.com/>).

MC.3 Committees Policy

Policy number	MC3	Version 1	
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

Introduction

The Committee of Management of FONAI recognises that there are times when a sub-committee can act more effectively than can the full Committee.

The Committee of Management of FONAI may put in place standing sub-committees and ad hoc committees to engage in business that can be more efficiently transacted by such means.

Purpose

To give direction on the policy and procedures relating to the formation of the Committee of Management of FONAI standing sub-committees and ad hoc committees.

Policy

The Committee of Management has the authority to establish standing sub-committees and ad hoc committees to assist it in its work. The number of committees will be kept to a minimum.

The Committee of Management shall clearly define the terms of reference of each committee, including their membership, roles, procedures and functions, and the boundaries of their authority.

Committees may from time to time co-opt non- Committee of Management members to serve on a committee in order to bring additional skills, experience or networks, provided that it is not inconsistent with any directions given to the committee by the Committee of Management.

Unless explicitly empowered by the full Committee of Management, committees cannot make binding Committee of Management decisions. For the most part, the function of committees is to solve problems for and/or make recommendations to the Committee of Management on which the latter, and only the latter, has the power to make decisions or policy. Even where power is delegated, the Committee of Management still bears responsibility.

Unless the Committee of Management determines otherwise, the Chairperson shall sit ex-officio on all FONAI committees, but may delegate their attendance to any other person. Committees should always have regard to the achievement of the purpose of FONAI in accordance with the vision and strategy determined by the Committee of Management when exercising its functions.

MC.3 Committees Procedures

Procedures number	MC 3	Version	1
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

The Committee of Management is responsible for appointing, disbanding, and setting the terms of reference for committees.

The Secretary is responsible for keeping records of terms of reference of committees and for ensuring that committee minutes and papers are submitted to the Committee of Management for consideration.

The Chairperson shall sit ex-officio on all Committee of Management committees (unless the Committee of Management determines otherwise), but may delegate their attendance to any other person.

PROCEDURES

Committees, whether ad hoc or standing sub-committees, cannot exercise authority over members, nor shall they delegate tasks to any other body unless the Chairperson has specifically agreed to such delegations.

All committees of the Committee of Management shall submit their minutes to the Committee of Management.

All committees of the Management Committee shall review their terms of reference annually, including their membership and the results of their work and so report to the Management Committee.

All ad hoc committees shall be dissolved by Management Committee resolution once they have completed their work and, if requested, have provided a written report to the Management Committee.

RELATED DOCUMENTS

- [Governance Policy](#)
- [Rules](#) of the Association

MC. 4 Volunteer Management Policy

Policy number	MC 4	Version	1
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

FONAI relies heavily on the unpaid work of volunteers and values their contribution highly.

PURPOSE

This policy is intended to ensure that volunteers working at FONAI have work that is safe, significant, fulfilling, and appreciated.

POLICY

All volunteers shall be treated with respect and gratitude for their contribution. Volunteers shall carry out duties assigned by the management of FONAI.

MC. 4 Volunteer Management Procedures

Procedures number	MC4	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

It is the responsibility of the Chairperson of FONAI to appoint a Volunteer Chairperson. The Volunteer Chairperson shall be responsible for organising the recruitment, training, and supervision of volunteers. The Volunteer Chairperson shall report to the Committee. The Volunteer Chairperson shall assign supervisors to volunteers and shall monitor the work of the supervisor. The appointed supervisor shall ensure that each volunteer is trained and capable of fulfilling their functions adequately. The Volunteer Chairperson shall report to the board regularly on the FONAI volunteer program.

Procedures

Induction

All volunteers shall be offered appropriate information and training to discharge their functions, and successful completion of this training shall be a condition of carrying out these functions.

Supervision

All volunteers shall receive appropriate supervision in the exercise of their functions.

Reimbursement

All volunteers shall be reimbursed for all pre-approved expenditure incurred in the exercise of their functions, as set out in FONAI'S Reimbursement of Expenses Policy.

APPENDIX A

Volunteer Satisfaction Survey

Surveying your volunteers is a practical and common-sense way of gaining feedback from those who have taken part in a volunteer-based partnership activity.

Feedback from surveys like these can be used not only to gauge reaction to certain aspects of the activity undertaken, but also to cater better for volunteers' needs and wants the next time an activity is planned.

The following is a sample survey. It can, of course, be varied to suit more specific volunteering tasks, but it provides a general guide to the sort of questions and comments you should ask of volunteers.

Remember to:

- Encourage the prompt return of the surveys.
- Stress to volunteers their responses to the survey will remain confidential and that they don't have to put a name to the survey if they do not wish.
- Encourage volunteers to answer as many questions as they want, but say they don't have to answer them all.

• SAMPLE SURVEY

Following the recent volunteer activity you helped with, we would like you to take a few minutes to fill in as many questions contained in this survey as you can.

Your responses will remain confidential. We will study your responses, as well as those of other volunteers, to see if there are any ways in which we can improve the next volunteer activity we organise as part of our partnership.

Thank you for your time.

- Name (optional): _____
- How many times have you volunteered? _____
- Are you planning to volunteer again in the future? _____
- Why did you volunteer? _____

• Training

- Was there any training needed for your volunteer role?

- If so, what sort of training was needed, and how many hours of training did you receive?

- Was this on-the-job training or a special training session?

- Was the training you received (Please circle one):
Excellent/Good/Fair/Poor/Received none
- Did your training prepare you for your volunteer role? (Please circle one):
Very well/Somewhat/Didn't relate/Received none
- If you have comments you'd like to share, please include them below.

Supervision

- Were you provided with a clear outline of what was expect from you?
YES/NO
Did your direct supervisor provide adequate support?
YES/NO
- Did he/she make you feel like a valuable member of the team?
YES/NO
Did you feel that FONAI as a whole, supports volunteers?
YES/NO
- Did you feel that FONAI] got as much from your service as it could have?
YES/NO
- If you have comments you'd like to share, please include them below.

Recognition

- Did you feel that your efforts were being/have been recognized and appreciated?
YES/NO
Did you receive recognition for your service? If so, what was it?

Was the recognition you received sufficient?
YES/NO

Were the efforts of volunteers recognised publicly, or in the media? If so, how?

Feedback

- Were your views on FONAI program sought out?
YES/NO
- Were your views listened to?
YES/NO
Overall Satisfaction
- How would you rate your overall volunteer experience? (Please circle one):
Excellent/Good/Fair/Poor
- Were you treated properly and with respect? YES/NO
- Did you enjoy working with other volunteers on the day?
YES/NO
- What was the highlight of your volunteering stint?

- Please use the space below to make any further comments about your experience that could help us improve the volunteer experience for yourself and others?

Thank you for taking the time to complete and return this survey. Your answers are important to us and will be kept confidential. If you would like further information about this survey, please provide your contact information below.

MC.5 Committee of Management Fundraising Policy

Policy number	MC5	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

The Committee of Management members have the responsibility of ensuring the survival and continuation of the FONAI. This includes responsibility for ensuring funding is available to support the activities of FONAI.

While Management Committee may delegate many of the operations of fundraising to other parts of FONAI, it retains the responsibility for inspiring other fundraisers, demonstrating the perceived importance of fundraising to FONAI, and leadership in this area. To achieve this, each member of the Management Committee must individually accept their key role in the fundraising process.

The Management Committee members should show leadership in fundraising by personally giving to FONAI in proportion to their ability, in recognition of the fact that Management Committee members who do not give themselves will have difficulty asking others to give.

PURPOSE

This policy makes explicit the understanding that members of the Management Committee will be asked to contribute to the fundraising activities of FONAI.

POLICY

Management Committee members will be requested to

- Donate to FONAI in proportion to their ability;
- Contribute to the short-term and long-term financial planning of FONAI, including its fundraising plan;
- Support the fundraising efforts of other parts of FONAI;
- Support special events run by FONAI to raise money or generate contacts;
- Where possible, supply FONAI with names of prospective individual and corporate donors;
- Where requested, approach individual or corporate prospects to ask for donations on behalf of FONAI, or sign letters to these prospects.

MC.5 Committee of Management Fundraising Procedures

Procedures number	MC5	Version	1
Drafted by	Denise Roscrow	Approved	Nov 17 2017
Responsible person	Denise Roscrow	Scheduled review date	Nov 2018

RESPONSIBILITIES

The Chairperson is responsible for bringing this policy to the attention of prospective Board members.

All Management Committee members are responsible for respecting this policy.

PROCEDURES

In the planning of its short-term and long-term fundraising strategies, the Management Committee will make appropriate arrangements to draw on the contributions of Management Committee members.

RELATED DOCUMENTS

- [Ethical Fundraising Policy](#)

MC.6 Ethical Fundraising Policies

Policy number	MC6	Version	1
Drafted by	Denise Roscrow	Approved by C/mee	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

The Management Committee of FONAI is committed to ensuring that fundraising activities are carried out in an ethical manner.

This policy applies to the Management Committee and volunteers.

PURPOSE

The purpose of this document is to identify FONAI's position on fundraising practice and to document the standards expected in raising funds from the community.

POLICY

FONAI's guiding fundraising principle is a simple one – we will only use techniques that we would be happy to be used on ourselves. In doing so, the organisation will adhere to the following standards:

- Fundraising activities carried out by FONAI will comply with all relevant laws.
- Any communications to the public made in the course of carrying out a fundraising activity shall be truthful and non-deceptive.
- All monies raised via fundraising activities will be for the stated purpose of the appeal and will comply with the organisation's stated mission and purpose.
- All personal information collected by FONAI is confidential and is not for sale or to be given away or disclosed to any third party without consent.
- Nobody directly or indirectly employed by or volunteering for FONAI shall accept commissions, bonuses or payments for fundraising activities on behalf of the organisation.
- No general solicitations shall be undertaken by telephone or door-to-door.
- Fundraising activities should not be undertaken if they may be detrimental to the good name or community standing of FONAI.
- Financial contributions will only be accepted from companies, organisations and individuals the Board considers ethical.

MC.6 Ethical Fundraising Procedures

Procedures number	MC6	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

The Management Committee of FONAI is responsible for the implementation and review of this policy.

All Management Committee of FONAI members and volunteers are responsible for adhering to this policy.

PROCEDURES

A Fundraising Sub-Committee will be formed to oversee the major fundraising tasks. The Fundraising Sub-Committee will report regularly to the Management Committee of FONAI, including tabling of meeting minutes at committee meetings.

All fundraising activities must have the prior approval of the Management Committee of FONAI, as recorded in Management Committee of FONAI meeting minutes.

A statement estimating income and expenses will be prepared prior to the commencement of any new fundraising activity that may present a financial risk to FONAI.

Fundraising activities should not be undertaken if they will expose the organisation to significant financial risk.

MC.7 Sponsorship Policy

Policy number	MC7	Version	1
Drafted by	Denise Roscrow	Approved by C/mee	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

The Board of FONAI is committed to ensuring that its financial arrangements are carried out in an ethical manner.

PURPOSE

The purpose of this policy is to establish the framework and guidelines for the creation of productive partnerships between FONAI and the private sector, i.e. sponsorship alliances with corporations, foundations, individuals and other non-government organisations.

A sponsorship is about relationship building and can be a powerful way to build and strengthen partnerships. It is recognised that such alliances can provide important financial and marketing support to potential partners of FONAI while at the same time generate additional revenues to support FONAI's mission and mandate.

POLICY

The fundamental principles that shape FONAI's relationships with sponsors are:

1. Sponsorship of FONAI or of any symposium, project, program or event held by FONAI will not entitle any sponsor to influence any decision of the organisation.
2. FONAI will not enter into any alliance or partnership with any corporation or organisation where the association with the prospective partner or acceptance of the sponsorship would jeopardise the financial, legal or moral integrity of [Name of Organisation] or adversely impact upon FONAI's standing and reputation in the community. All [tobacco/alcohol/gambling/etc.] sponsorships are prohibited. If a sponsor's products work against FONAI's aims (e.g. unhealthy food for a health or fitness organisation) the sponsorship is prohibited.
3. FONAI will accept sponsorships as an additional source of revenue generation provided that all sponsorship alliances are developed and maintained within the regulations embodied in this sponsorship policy.
4. All sponsorship alliances or partnerships must be consistent with existing FONAI policies.

MC 7 Sponsorship Procedures

Procedures number	MC7	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

The Board is responsible for the development and review of this policy.

All Board members, casual, permanent and contract staff and volunteers are responsible for adhering to this policy.

PROCEDURES

All event and project sponsorships must have significant financial commitment from the sponsor to help offset the costs associated with the activity.

All sponsorship relationships involving FONAI must be identified and recorded for information purposes to encourage a donor-centred approach to revenue generation.

Naming rights associated with any sponsorship must be approved by the Board.

Sponsorship over \$500 will be embodied in written contractual agreements between FONAI and the sponsorship partner (See Appendix A).

APPENDIX A

Sponsorship contracts/letters of agreement guidelines.

Sponsorship contracts and letters of agreement involving FONAI must include the following clauses:

1. **Description of the Sponsorship Alliance:** The contract will contain a comprehensive description of the item, project or event around which the sponsorship alliance is constructed, including a list of obligations for both parties. Obligations of the parties in market research or sponsorship analysis will be explicitly itemised in the contract. (See also item 7 below.)
2. **Terms of Agreement:** the dates for commencement and conclusion of sponsorship alliances must be included in the contract.
3. **Key Personnel:** The contract will include the names of the individuals from both parties primarily responsible for the sponsorship, and to whom issues regarding the contract are to be referred.
4. **Limitations on and Approval of the Use of the FONAI's Name:** The following clause limits the use of our name by the sponsor in its own internal and external promotion and advertising as per the negotiated arrangements: "*Neither party, in any situation, whether within or outside the parameters of the sponsorship, shall be deemed to be the spokesperson for, or the representative, of the other party.*" The accepted use of

the FONAI 's word mark, logo or crest must be stipulated in all contracts and agreements.

5. **Exclusivity:** FONAI may wish to offer outright or industry exclusivity to a sponsor, or the sponsor may request such exclusivity within the sponsorship alliance. Where relevant, the following statement regarding exclusivity will be included in the contract: *" FONAI agrees that FONAI shall be the sole and exclusive sponsor of the Event for the term of this agreement."*
6. **Financial Terms and Schedule of Payments:** The total value and payment schedule of the sponsorship agreement between the parties will be clearly identified in the contract.
7. **Obligations of the Parties to Each Other:** The obligations of the parties are dependent upon the form of the alliance and will be determined on an individual basis. Responsibility for any market research or program or evaluation duties, reporting, and approvals will be specified in the contract, along with specific criteria and methodologies for the evaluation of the sponsorship.
8. **Breach of Contract:** The contract should stipulate what shall occur in the case of a breach of contract; for example: *"Prior to initiating formal notification of breach of contract, the parties will undertake all appropriate and reasonable efforts to resolve the matter. Should these efforts not prove successful within a reasonable time, either party may notify the other of breach of contract in writing. Such notification will require rectification within 14 days. If the breach is not rectified within that time then the non-breaching party may terminate the contract by written notice."*
9. **Right to Discontinue the Sponsored Program or Event:** The contract shall ensure FONAI reserves the right to cancel the sponsorship should circumstances dictate; for example: *"When circumstances beyond the control of FONAI force the cancellation or substitution of a sponsored event or project, FONAI reserves the right to cancel without finding itself financially liable or in breach of contract."* If it is intended that FONAI be entitled to retain any sponsorship funds already paid then this should be specified in the contract.
10. **Right to Cancel Sponsorship for Reputational Reasons:** The contract shall ensure FONAI reserves the right to cancel the sponsorship if matters occurring or becoming known after the signing of the contract make it likely, in FONAI's reasonable opinion, that the continued association of the sponsor with FONAI may cause FONAI to become subject to criticism or otherwise held in disrepute.

Part 3. Internal Financial Management

Policy	Page #
FM 1 Investment Planning	126
FM 2 Financial Transactions Cards	129
FM 4 Authority To Sign Cheques	133
FM 5 Reimbursement of Expenses	134
FM 6 Petty Cash	137

FM.1 Investment Planning Policy

Policy number	FM 1	Version	1
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

Introduction

The Management Committee of FONAI is responsible for ensuring that the organisation operates within a responsible, sustainable financial framework and that the organisation has adequate resources to carry out its work. FONAI's Investment Plan forms an important part of fulfilling this responsibility.

Purpose

This policy is designed to:

- Direct the use of investment funds of FONAI; and
- Determine FONAI's future financial planning strategies to ensure the organisation is able to maintain its operating budget and create growth.

POLICY

The Management Committee of FONAI is responsible for maintaining and extending the assets of the organisation, to provide for its long-term financial viability. In its stewardship of FONAI's financial assets, the Management Committee of FONAI has adopted this policy to ensure that any assets not required for the current operating budget will be invested in accordance with FONAI's Investment Plan.

The purpose of FONAI's Investment Plan is to manage the cash assets not required for current operating expenses so as to maximise the earnings of such assets, while retaining security and minimising risks.

All interest and other earnings from such investments are deposited into FONAI's operating account and thus become part of the annual operating budget.

The Investment Plan should be designed to ensure that:

- FONAI's funds are utilised to achieve a balanced operating budget.
- FONAI creates capital growth and generates income.
- There will be access to cash to cover current liabilities.
- FONAI will have access to cash for establishing new projects.
- FONAI will have access to cash for unforeseen expenses.

FONAI's Investment Plan must conform with the following principles:

- Priorities set in the Business Plan are to be adhered to.
- Investments are to be made with low to medium risk ventures; that is, investments that provide for security of capital over the medium to long term.
- FONAI will only invest with reputable, established, proven, financial institutions.

FM.1 Investment Planning Procedures

Procedures number	FM1	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

The Management Committee of FONAI in consultation with Treasurer & Auditor, are responsible for recommending an Investment Plan portfolio for consideration by the Management Committee in the context of the annual Business Plan.

PROCEDURES

- The Treasurer will investigate investment options and make recommendations to the Management Committee, in the form of an Investment Plan, as part of the annual Business Plan. The Investment Plan must conform with the principles laid out in the FONAI Investment Policy.
- FONAI will retain an independent investment consultant to provide advice about investment opportunities and maintain a portfolio of investments.
- FONAI's Chairperson & Treasurer will meet biannually with the investment consultant to discuss the performance of the investment portfolio and report to the Management Committee.
- The Treasurer will receive information about and keep track of the progress of all investments, and report on the progress of the investments to the Management Committee.
- The Investment Plan will be reviewed every 6 months as part of the strategic planning for the Business Plan.

Related Documents

Fraud
Code of Conduct
Complaints

FM. 2 Financial Transactions Cards Policy

Policy number FM2	Version 1	
Drafted by	Approved	Jan 2018
Responsible person Denise Roscrow	Scheduled review date	2019

INTRODUCTION

The use of financial transaction cards, including credit cards, is a major convenience for FONAI and for members, and can, if properly managed, contribute to easier and more secure accounting of expenses. To achieve these benefits a number of precautionary procedures should be put in place.

PURPOSE

The purpose of this policy is to:

- ensure that organisational transactions are carried out as efficiently as possible through the use of credit cards and transaction cards as appropriate.
- guard against any possible abuse of organisational transaction cards.

POLICY

Transaction cards issued to FONAI will only be used for those activities that are a direct consequence of the cardholders' function within the organisation. Their use will be monitored according to the procedures listed below. Any use of the card inconsistent with this policy and these procedures will be grounds for dismissal.

FM. 2 Financial Transactions Cards Procedures

Procedure number FM2	Version 1	
Drafted by Denise Roscrow	Approved	
Responsible person Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

It is the responsibility of the Chairperson to ensure that:

- members and volunteers are aware of this policy;
- any breaches of this policy coming to the attention of management are dealt with appropriately.

It is the responsibility of all members to ensure that their usage of credit cards conforms to this policy.

PROCESSES

1. Card Issue

Any organisational financial transaction cards may only be issued to a committee member, where their functions and duties would be enhanced by their use. Cards will thus be issued only to people on the approved Organisational Financial Transaction Card List. The list shall be held by the Chairperson.

Other persons may be added to the list by the Management Committee. The auditor.

Cards may be issued on a temporary basis and recovered afterwards.

Each financial transaction card will be issued to a specific person, who will remain personally accountable for the use of the card. Cardholders will sign a declaration to this effect.

Only the authorised signatory may use the card. No more than one card shall be issued per cardholder. Credit limits as appropriate shall be set for each card by the issuing authority.

2. Cardholder's Responsibilities

The Cardholder shall:

- In all cases obtain and retain sufficient supporting documentation to validate the expense (e.g. tax invoice) or shall in lieu provide a statutory declaration.
- Attach supporting documentation to the monthly statement from the bank.
- Review the monthly statement for inaccuracies (and report these to the CEO).
- Verify that goods and services listed were received.
- Sign the monthly statement to verify that transactions have been made for official purposes.
- Forward the papers to the authorised signatory for approval .
- Notify the bank and the Chairperson & or Committee members, immediately if
 - The card is lost or stolen; and/or
 - Any unauthorised transaction is detected or suspected.
- Notify the Chairperson and the bank of any change in name or contact details.
- Take adequate measures to ensure the security of the card.
- Return the card to the Chairperson if
 - The cardholder resigns;
 - the Management Committee determines that there is no longer a need for the cardholder to retain his or her card; or
 - the card has been cancelled by the bank.
- Be personally liable for any unauthorised transaction unless the card is lost, stolen or subject to fraud on some part of a third party.

The Cardholder shall not:

- exceed any maximum limits set for the card from time to time.
- obtain cash advances through the card.
- use the card for any non -proscribed purchases.
- authorise their own expenditure.
- claim double allowances (i.e. request reimbursement for an expense already paid by the card).

3. Card Expenditure

The card will only be used for those activities that are a direct consequence of the cardholders' function within the organisation.

Where coincident and/or private expenditure occurs on the same transaction (where, for example, a person incurs a debt for personal telephone calls during a hotel stay) the cardholder must settle the private expense prior to charging the balance on the organisational card.

Where doubt exists as to whether or not an item is function-related, prior authorisation should be obtained from the Management Committee.

The use of the corporate card for "services of a dubious nature" is expressly prohibited. "Services of a dubious nature" are defined as any goods or services that might bring the name of the organisation into disrepute.

4. Card Misconduct

Wherever a breach in this policy occurs, the Management Committee must assess the nature of the breach and institute an appropriate disciplinary process, including Item of the Rules of The Association.

The Management Committee may determine whether to report a breach of the policy to the police for criminal investigation.

At the next Management Committee meeting the chairperson shall report:

- the investigation of the circumstances of the breach;
- police reports and action (if any); and
- disciplinary action taken (if any).

Electronic Transfer Of Funds Between Accounts

The Cardholder shall:

- In all cases obtain and retain sufficient supporting documentation to validate the transfer of funds.
- Attach supporting documentation to the monthly statement from the bank.
- Review the monthly statement for inaccuracies and report these to the Management Committee.
- Verify that funds were received.

- Sign the monthly statement to verify that transactions have been made for official purposes.
- Notify the bank and the Chairperson & or Committee members, immediately if
 - Any unauthorised transaction is detected or suspected.
 - Problems with transfer of funds occur.
- Notify the Chairperson and the bank of any change in name or contact details for fund recipients.
- Take adequate measures to ensure the security of the card.
- Complete the authorization to transfer funds between accounts forms & submit to monthly management committee meetings.

FONAI AUTHORIZATION TO WITHDRAW or TRANSFER FUNDS BETWEEN ACCOUNTS

This form must be signed by two authorised check signers before any transfer may be made. Signatures by facsimile copy will be accepted.

Reason for transfer:	
Date requested	
Date required	
Transfer from account:	
Transfer to Account:	
Amount to transfer:	
Requested by:	
Authorized by:	
Authorized by:	
Date of Funds Transfer:	
Transaction #	
Date of Notification of Receipt Funds in Nepal:	

FM.3 Authority To Sign Cheques Policy

Policy number	FM3	Version	1
Drafted by	Denise Roscrow	Approved	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

An organisation without cheque signing procedures may be vulnerable to fraud or error.

PURPOSE

To spell out procedures that must be followed in the signing of cheques on behalf of FONAI.

POLICY

All cheques issued on behalf of the organisation must be signed by a sufficient number of authorised persons and documented adequately.

FM. 3 Authority To Sign Cheques Procedures

Procedure number	FM4	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

It is the responsibility of the Chairperson to ensure that:

- members are aware of this policy;
- any breaches of this policy coming to the attention of management are dealt with appropriately.

It is the responsibility of the members to ensure that their usage of organisational cheques conforms to this policy.

PROCESSES

All cheques must contain two eligible signatories. Eligible signatories are committee members who have been previously nominated and endorsed by the committee.

Any two of the above have the authority to sign cheques.

Signatories cannot sign a cheque made payable to themselves, or a blank cheque. All details on the cheque form must be filled in before signature. A list of all cheques will issued each month, featuring amount, recipient, signatories, and explanation, will be provided to the Management Committee.

FM.4 Reimbursement of Expenses Policy

Policy number	FM4	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

Management Committee members may on occasion be required to pay expenses consequent on their roles out of their own pockets. Under certain circumstances, as outlined in this policy, these expenses may be reimbursed by the FONAI.

PURPOSE

The purpose of this policy is to spell out under what circumstances reimbursement of expenses may occur on behalf of FONAI, and the process for doing so. This policy relates to both management committee members acting on authorised FONAI business.

POLICY

FONAI will reimburse its management committee expenses incurred by them on behalf of FONAI or in the course of FONAI business so long as such expenses are:

- Reasonable and Authorised.

Reimbursement of reasonable but unauthorised expenses may be made on an *ex gratia* basis at the discretion of the CEO in exceptional circumstances only.

Management Committee members incurring authorised expenditure must, wherever possible, receive, retain and produce receipts, invoices, vouchers, tickets, or other evidence of such expenditure.

FM. 4 Reimburse of Expenses Procedures

Procedures number	FM4	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

It is the responsibility of Chairperson to ensure that:

- Management Committee members are aware of this policy.
- Any breaches of this policy coming to the attention of management are dealt with appropriately.

It is the responsibility of the all Management Committee members and volunteers to ensure that their applications for reimbursement conform to this policy.

PROCEDURES

Prohibited reimbursements

FONAI will not reimburse Management Committee members for

- Unauthorised expenses
- Expenses claimed by an employee as a tax deduction
- Expenses normally recoverable from a third party
- Claims for purchases that are required to be made under a FONAI purchase order
- Expenses that are not incurred for business purposes
- Late payment interest on credit cards
- Parking, traffic, or other fines and penalties

Provision of hospitality

- Management Committee members will be reimbursed for hospitality expenses incurred in the course of FONAI business, as appropriate.
- Appropriate hospitality charges include events hosted or sponsored for the purpose of promoting FONAI's work or enhancing its image, and include meals that are related to the transaction of FONAI business.
- When FONAI management committee members dine together while on FONAI business, it is appropriate for the senior person (if any) to arrange payment and submit the claim for reimbursement.
- Management Committee members travel costs while on FONAI business in Nepal, will be reimbursed
- Advance payments may be authorised where appropriate. Such payments will be subtracted from the amount of any later reimbursements. If expenditure is, for whatever reason, not incurred then any advance payments made, or any unspent portion of such payments, must be returned.

- Management Committee members incurring authorised expenditure must, wherever possible, receive and retain receipts, invoices, vouchers, tickets, or other evidence of such expenditure.
- Management Committee members incurring authorised expenditure must submit requests for reimbursement to the designated person (depending on the sum in question) on the standard form (see Appendix A, describing the nature and purpose of the expenses. The completed form must be signed by the applicant.
- Management Committee members incurring authorised expenditure must present all relevant original receipts, invoices, vouchers, tickets, or other evidence of such expenditure when seeking reimbursement. Where such evidence is for any reason lacking, statutory declarations may be sought.
- Board members are responsible for determining if the expenses being claimed are reasonable given the circumstances, and for ensuring they are charged against the appropriate account, and that any requirements under the Fringe Benefits Tax legislation have been met.
- Claims that have not been properly prepared, authorised, or supported by adequate documentation will be returned to the claimant and the reasons will be given for not processing the claim.

FM.5 Petty Cash Policy

Policy number	FM56	Version	1
Drafted by	Denise Roscrow	Approved by Board on	Jan 2018
Responsible person	Denise Roscrow	Scheduled review date	2019

INTRODUCTION

To deal with minor expenses, administrative units within FONAI need a procedure that is flexible yet consistent with the need to protect the organisation's funds.

PURPOSE

This policy seeks to ensure that petty cash floats are established and managed appropriately and that stakeholders are not financially disadvantaged as a result of incurring minor work-related expenses.

POLICY

Members may seek the approval of the Management Committee to establish petty cash floats to deal with minor expenses. Any such floats must observe the nominated procedures.

FM.5 Petty Cash Procedures

Procedures number	FM5	Version	1
Drafted by	Denise Roscrow	Approved	
Responsible person	Denise Roscrow	Scheduled review date	2019

RESPONSIBILITIES

It shall be the responsibility of the Management Committee to consider any application by a member for a petty cash float. If approved, it is the responsibility of the member to manage the amount of the float and to ensure that the procedures specified in this policy are implemented appropriately.

PROCEDURES

Petty Cash Limit

The amount of the petty cash float shall be as determined by the Management Committee from time to time, but in general should not exceed \$250. Any amount in the petty cash float over \$250 shall be returned to general funds.

Petty Cash Use

Each Management Committee member shall ensure that petty cash is used to cover only those expense reimbursements for which it is not feasible, or for which it is unreasonably inconvenient, to use normal purchasing method. Any expense that is predictable, regular and significant should be dealt with through normal accounting procedures. The limit of \$250 shall not be evaded through splitting of items into smaller amounts.

Each Management Committee member shall require all expenses incurred using petty cash funds to be substantiated by acceptable supporting documentation such as receipts, tax invoices, invoices, copies of staff travel diaries, etc., and the documentation relating to each item shall be sufficient to establish the nature of the expenditure.

Each Management Committee member shall retain acceptable supporting documentation of payments from the Petty Cash float and shall submit these with their accounts to the treasurer each month.

Each Management Committee member shall report the loss of any Petty Cash funds to the Chairperson as soon as the loss is discovered.

A tax invoice must be obtained for all purchases exceeding \$55 (GST inclusive).

Petty cash should be kept in a secure (locked) location and the key held securely.

The Management Committee member cannot delegate control of the float to other employees. If the Management Committee member is unavailable, payment cannot be made by that means.

Petty Cash Replenishment

Total yearly petty cash requirements shall be estimated by the Management Committee and submitted to the budget process. The Management Committee can draw on replenishments during the year up to this amount.

If there is a need for additional finance, or if it is desired to increase the amount of the float, a special request must be made to the Management Committee .

Replenishments should be sought when sufficient funds remain for five business days of expected use.