

CLAN Online Policy Handbook

VERSION CONTROL

Classification:	Open – for access and dissemination via website to all volunteers, workers, donors, stakeholders, partners and communities with whom CLAN works.
Communication:	CLAN’s Online Policy Handbook is available on www.clanchildhealth.org in the Contact Us section. CLAN’s web address is communicated widely to all community leaders and members with whom we work.
Version:	3.2
Date:	30 June 2017
Review Date:	June 2020
Maintenance:	<p>The CLAN Online Policy Handbook will be updated regularly to reflect changes in organisational practice and Code of Conduct instruction and advice.</p> <p>The CLAN Online Policy Handbook is maintained by the CLAN Executive Committee.</p>

CONTENTS

Welcome to CLAN	4
What is CLAN?	5
• Vision Statement	
• Mission Statement	
• CLAN’s Five Pillars	
How CLAN Works	5
Framework for Action	6
The Broader Operational Framework	7
CLAN’s Policies	10

Our policies are listed below in alphabetical order and appear in full in the following pages of this CLAN Policy Handbook. This Policy Handbook is a living document and is regularly updated and expanded:

CLAN Building Capacity and Sustainability Policy
CLAN Child Inclusive Policy
CLAN Child Protection Policy
CLAN Code of Ethics and Professional Conduct Policy
CLAN Complaint Management Policy
CLAN Conflict of Interest Policy
CLAN Copyright and Intellectual Property Policy
CLAN Counter Terrorism Policy
CLAN Disability Inclusiveness Policy
CLAN Drug Donations to Developing Countries Policy
CLAN Equal Employment Opportunity & Anti-Discrimination Policy
CLAN Financial Impropriety Risk Management Policy
CLAN Financial Management Policy
CLAN Fundraising Policy
CLAN Gender Equality Policy
CLAN Grievance & Dispute Resolution Policy
CLAN Human Resources Policy
CLAN Managing Social Media Policy
CLAN Non-Aid and Development Activities Policy
CLAN Privacy Policy
CLAN Preventing Sexual Exploitation, Abuse and Harassment Policy
CLAN Project design, Monitoring and Evaluation Policy
CLAN Risk Management Policy
CLAN Safety and Security Policy
CLAN Staff Training & Development Policy
CLAN Work Health & Safety Policy

WELCOME TO CLAN

CLAN (Caring & Living as Neighbours) is an exciting vehicle for effecting large-scale change for children who are living with chronic health conditions in low-middle income countries. CLAN works in the field of non-aid and development and we do this independently of any religious or political affiliation. Change alone is not enough. It is essential to CLAN that we work with integrity and strive for long-term, sustainable outcomes in all we pursue.

CLAN aims to build creative and trusting relationships with people of developing countries and to meet quality Principles and commitments based on¹:

- 1 Rights, protection and inclusion
- 2 Participation, employment and local ownership
- 3 Sustainable change
- 4 Quality and effectiveness
- 5 Collaboration
- 6 Communication
- 7 Governance
- 8 Resource management
- 9 People and culture

CLAN's Statement of Intent (read at the start of every CLAN committee meeting) is an appropriate place to start this Handbook. "CLAN (Caring & Living As Neighbours) will:

"Put the children first, seeking always to improve their quality of life and longer term health outcomes, so as to redress the global inequity associated with chronic medical conditions for children living in resource poor countries.

We will take an holistic approach, ensuring the basic pillars of CLAN are maintained:

1. ***Optimise affordability and availability of medications***
2. ***Education (of patients, families, health care workers, government bodies, policy makers and the international community), research and advocacy***
3. ***Optimal medical management***
4. ***Encourage family support groups***
5. ***Assist in reducing the financial burden of chronic medical conditions in childhood that lead to poverty***

*We will think laterally and **remain open to novel and unusual** activities if there is an opportunity to benefit the children. Our first response should always be, "that sounds interesting, let's think about that and see what we can do", rather than, "that sounds hard, not sure if we can do that".*

The *CLAN Online Policy Handbook* is a living document. New policies and procedures will continuously be developed in response to the increasing breadth and depth our activities. We welcome comments or feedback with on ways that we could improve it to better meet the needs of our stakeholders, partners and those communities with who we work.

We hope that this handbook will be a useful introduction for volunteers, staff and partners who are joining our organisation, to help them learn more about the way CLAN works and the ethos and policies that underpin our action.

¹ ACFID Code of Conduct June 2017; ACFID Code of Conduct Quality Assurance Framework June 2017.
[Type text]

WHAT IS CLAN?

CLAN (Caring & Living As Neighbours) is a not-for-profit, Non Government Organisation (NGO), approved by AusAID for Overseas Aid Gift Deduction Scheme (OAGDS) status and endorsed by the Australian Taxation Office as a Deductible Gift Recipient (DGR).

Vision Statement

That all children living with chronic health conditions in resource-poor countries of the world will enjoy a quality of life equivalent to that of their neighbours' children in higher-income countries.

Mission Statement

To maximise the quality of life of children (and their families) who are living with chronic health conditions in resource-poor countries of the world.

CLAN's Five Pillars

With a rights-based foundation, CLAN's strategic framework for action to maximise quality of life for children with chronic health conditions is based on our Five Pillars:

- Access to affordable medication and equipment
- Education, research and advocacy
- Optimising medical management
- Encouraging family support groups
- Reducing poverty and promoting financial independence.

HOW CLAN WORKS

CLAN (Caring & Living as Neighbours) is an Incorporated Organisation (NSW Department of Fair Trading) and as such the Constitution is a guiding document.

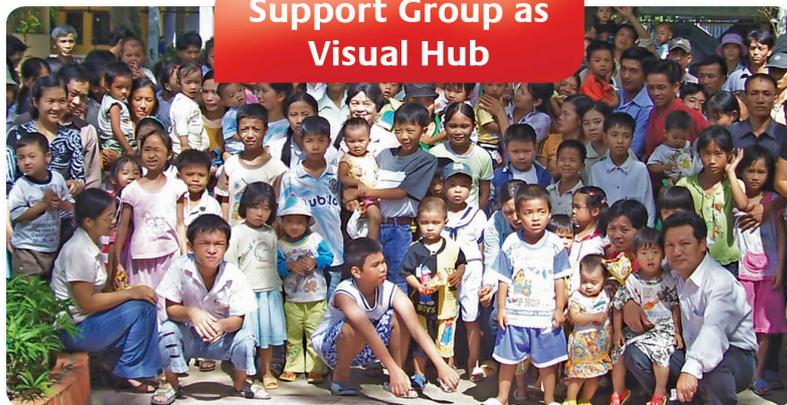
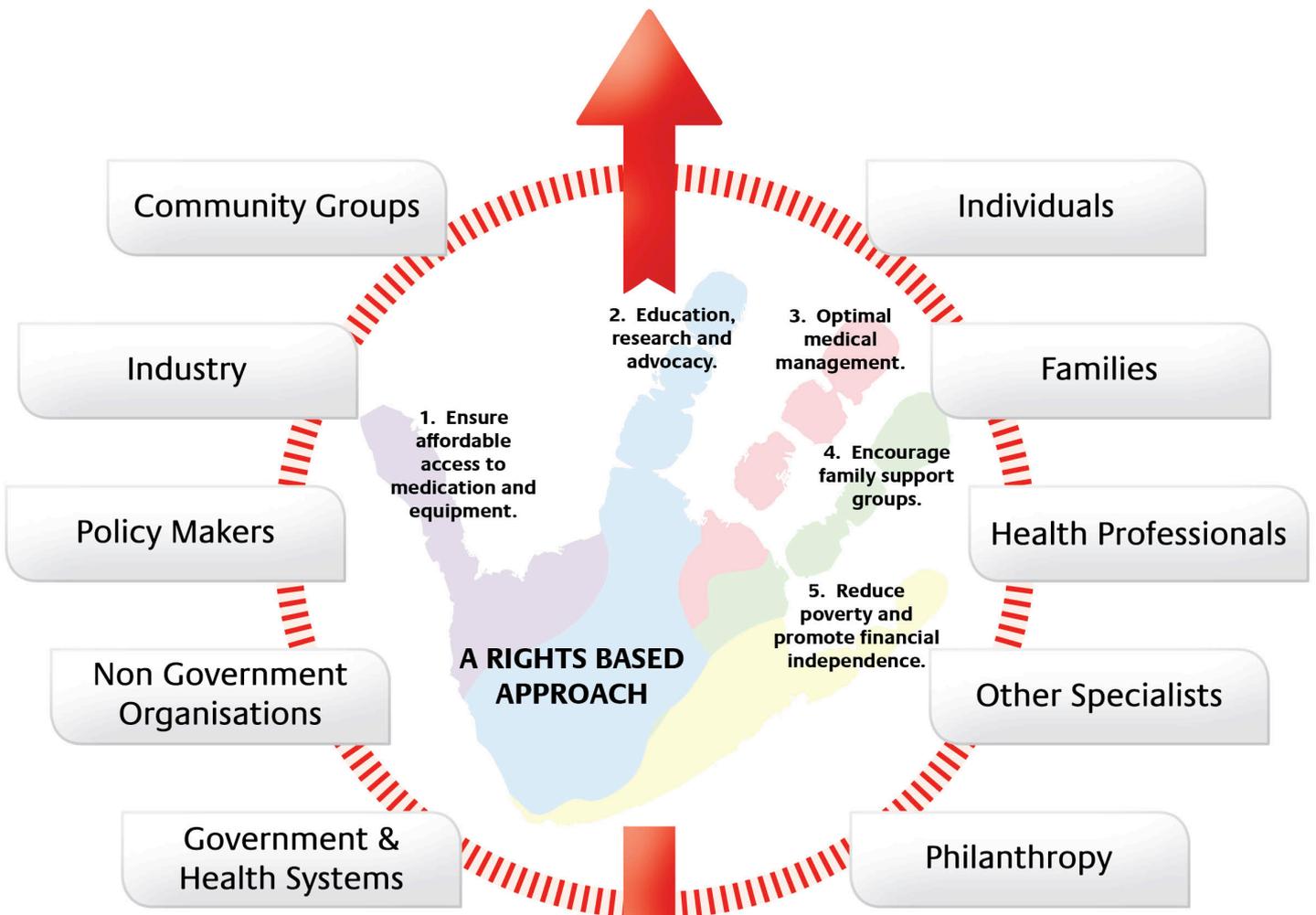
As a brief guide to CLAN's operation: CLAN Annual General Meetings are held each year, and CLAN Committee meetings every 2 months. The CLAN Committee has 5 Executive members (President, Vice President, Secretary, Treasurer and Public Officer) and a variable number of ordinary committee members who are involved in project work for CLAN, or work in an advisory capacity. Executive positions are voted on at each Annual General Meeting as per the Constitution.

The CLAN Committee is broken into several distinct project-orientated sub-committees (Working Groups), and these groups are in regular email contact between meetings, engaging in various projects for CLAN. The groups report back to the CLAN Committee at meetings on the progress of their projects. The CLAN website, Annual Reports and newsletters are key mechanisms that are used for disseminating reports on CLAN's work.

Clan A Framework for Action

Our mission is to maximise quality of life for children (and their families) who are living with chronic health conditions in resource-poor countries of the world

HIGHEST QUALITY OF LIFE



A community of children. Hanoi 2007. All children in this photo have the same chronic

THE BROADER OPERATIONAL FRAMEWORK

CLAN is committed to adhering to recognised international ethical practice developed and informed by the following codes and standards:

ACFID Code of Conduct 2017

In its Preamble, the Code states that ‘The Australian Council for International Development (ACFID) is the peak body for Australian non-government organizations (NGO’s) involved in the international development and humanitarian action. ACFID aims to lead and unite its Members in action for a just, equitable and sustainable world. ...’

The Code sets standards for practice rather than standards for results’ and ‘it is underpinned by a set of values which inform the behaviors of all Members all of the time.’

The Code states the Quality Principles and attached Commitments for NGO accreditation requirements. The Quality Principles include:

- 1 **Rights, Protection & Inclusion**
Development and humanitarian responses respect and protect human rights and advance inclusion.
- 2 **Participation, empowerment & local ownership**
Development and humanitarian responses enable sustainable change through the empowerment of local actors and systems.
- 3 **Sustainable change**
Development and humanitarian responses contribute to the realization of sustainable development.
- 4 **Quality and Effectiveness**
Development and humanitarian organizations and responses are informed by evidence, planning, assessment and learning.
- 5 **Collaboration**
Development and humanitarian responses are optimized through effective coordination, collaboration and partnership.
- 6 **Communication**
Development and humanitarian organizations communicate truthfully and ethically.
- 7 **Governance**
Development and humanitarian organizations are governed in an accountable, transparent and responsible way.
- 8 **Resource management**
Development and humanitarian organizations acquire, manage and report on resources ethically and responsibly.
- 9 **People and Culture**
Development and humanitarian organizations manage and support their people fairly and effectively.

The governing body of CLAN is responsible for self-assessment against the regulations and reporting to ACFID. Members are also expected to support their partners to meet the requirements of the Code.

The ACFID Quality Assurance Framework is linked to the Code of Conduct, and provides guidance for Members to demonstrate evidence of compliance with the Code. For each Quality Principle stated, Members must demonstrate compliance to the Compliance Indicators through fulfilling the requirements of the associated Verifiers. The Framework also includes Good Practice Indicators for Members to self-assess against to strengthen and improve their practice.

A Code of Conduct Good Practice Toolkit is provided to support Members to meet the requirements of the Code.

For more information go to: <http://www.acfid.asn.au/code-of-conduct>

Core Humanitarian Standard on Quality and Accountability 2014

The Standard was developed in partnership with many humanitarian organizations after a global consultation process. The focus of the Standard is humanitarian action, guided by four principles:

- i. **Humanity:** Human suffering must be addressed wherever it is found. The purpose of humanitarian action is to protect life and health and ensure respect for human beings.
- ii. **Impartiality:** Humanitarian action must be carried out on the basis of need alone, giving priority to the most urgent cases of distress and making no adverse distinction on the basis of nationality, race, gender, religious belief, class or political opinion.
- iii. **Independence:** humanitarian action must be autonomous from political, economic, military or other objectives that any actor may hold with regard to areas where humanitarian action is being implemented.
- iv. **Neutrality:** Humanitarian actors must not take sides in hostilities or engage in controversies of a political, racial, religious or ideological nature.

The Standard is a set of Nine commitments to communities and people affected by crisis, stating what they can expect from organizations and individuals delivering human assistance. Each Commitment is supported by a Quality Criterion. The Nine Commitments are for humanitarian organisations to use to improve the quality and effectiveness of the assistance they provide to people affected by crisis. The Commitments include key actions, organisational responses and the policies, processes and systems that organizations should have in place to provide high-quality and accountable humanitarian assistance.

The Nine Commitments and Quality Criteria are:

1. Communities and people affected by crisis receive assistance appropriate and relevant to their needs.
Quality Criterion: Humanitarian response is appropriate and relevant.
2. Communities and people affected by crisis have access to the humanitarian assistance they need at the right time.
Quality Criterion: Humanitarian response is effective and timely.
3. Communities and people affected by crisis are not negatively affected and are more prepared, resilient and less at-risk as a result of humanitarian action.
Quality Criterion: Humanitarian response strengthens local capacities and avoids negative effects.
4. Communities and people affected by crisis know their rights and entitlements have access to information and participate in decisions that affect them.
Quality Criterion: Humanitarian response is based on communication, participation and feedback.
5. Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints.
Quality Criterion: Complaints are welcomed and addressed.
6. Communities and people affected by crisis receive coordinated, complementary assistance.
Quality Criterion: Humanitarian response is coordinated and complementary.
7. Communities and people affected by crisis can expect delivery of improved assistance as organisations learn from experience and reflection.

Quality Criterion: Humanitarian actors continuously learn and improve.

8. Communities and people affected by crisis receive the assistance they require from competent and well-managed staff and volunteers.

Quality Criterion: Staff are supported to do their job effectively, and are treated fairly and equitably.

9. Communities and people affected by crisis can expect that the organisations assisting them are managing resources effectively, efficiently and ethically.

Quality Criterion: Resources are managed and used responsibly for their intended purpose.

For more information go to: <https://corehumanitarianstandard.org/the-standard>

IFRCRC Code of Conduct (International Federation of Red Cross/Red Crescent Societies)

The humanitarian imperative comes first

Aid is given regardless of the race, creed or nationality of the recipient(s) and without adverse distinction of any kind. Aid priorities are calculated on the basis of need alone.

Aid will not be used to further a particular political or religious standpoint

We shall endeavor not to act as instruments of government foreign policy

We shall respect culture and custom

We shall attempt to build disaster response on local capacities

Ways shall be found to involve program beneficiaries in the management of relief aid

Relief aid must strive to reduce future vulnerabilities to disaster, as well as meeting basic needs

We hold ourselves accountable to both those we seek to assist and those from whom we accept resources

In our information, publicity and advertising activities, we shall recognise disaster victims as dignified human beings, not hopeless objects.

WANGO Code of Ethics and Conduct for NGOs 2004 (World Association of Non Government Organisations)

- 1 Guiding Principles – Responsibility, service and public mindedness; co-operation beyond boundaries; human rights and dignity; religious freedom; transparency and accountability; truthfulness and legality
- 2 NGO Integrity – It is not-for profit, non-governmental, organised, independent, self-governing, and voluntary
- 3 Mission and Activities – Has a well-defined mission which serves as the foundation and frame of reference for all activities and organisational planning of the NGO; the NGO has an obligation to utilise its resources in an effective and efficient manner toward accomplishment of its stated purpose
- 4 Governance – An effective governance structure and a strong, active, and committed governing body is crucial to the soundness of an organisation and its ability to achieve its mission and objectives
- 5 Human Resources – A committed, capable and responsible staff is vital for the success of an NGO
- 6 Public Trust – Trust is the lifeblood of an NGO – to develop and maintain trust; each NGO should exhibit genuine public accountability and transparency, and should be honest in the information that it makes available to the public
- 7 Financial and Legal – NGOs should have proper financial and legal procedures and safeguards in place, not only to stay within the law, but also as a measure of the organisation's health and to assure donors, members, and the general public that investments in the organisation are safe and being correctly used.

- 8 Fundraising – As a recipient of such funds, it is important that the NGO be open and transparent, be accountable to the donor, use the funds responsibly and according to the intent of the donor, and allow the funding individuals and organisations to be able to have insight into the project at all times. It is important that the fundraising activity also be consistent with the mission of the NGO.
- 9 Partnerships, Collaboration and Networking - When appropriate, NGOs may find that cooperation with other civil society organisations, government and intergovernmental agencies, and for-profit corporations may be beneficial in advancing their mission related objectives.

CLAN also proudly aligns its work and professional practice in accordance with the following:

UN Sustainable Goals: 17 goals to transform our world

In 2015 the United Nations built on the Millennium Development Goals to create the 17 Sustainable Development Goals as part of a wider 2030 Agenda for Sustainable Development. In 2015 countries adopted a set of goals to end poverty, protect the planet and ensure prosperity for all as part of the new sustainable development agenda. Each goal has specific targets to be achieved over the next 15 years. For the goals to be reached, everyone needs to do their part: governments, the private sector, civil society and people.

- 1 End poverty in all its forms everywhere
- 2 End hunger, achieve food security and improved nutrition and promote sustainable agriculture
- 3 Ensure healthy lives and promote well-being for all at all ages
- 4 Ensure inclusive and quality education for all and promote lifelong learning
- 5 Achieve gender equality and empower all women and girls
- 6 Ensure access to water and sanitation for all
- 7 Ensure access to affordable, reliable, sustainable and modern energy for all
- 8 Promote inclusive and sustainable economic growth, employment and decent work for all
- 9 Build resilient infrastructure, promote sustainable industrialization and foster innovation
- 10 Reduce inequality within and among countries
- 11 Make cities inclusive, safe, resilient and sustainable
- 12 Ensure sustainable consumption and production patterns
- 13 Take urgent action to combat climate change and its impacts
- 14 Conserve and sustainably use the oceans, seas and marine resources
- 15 Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity and loss
- 16 Promote just, peaceful and inclusive societies
- 17 Revitalise the global partnership for sustainable development.

For more information go to: <http://www.un.org/sustainabledevelopment/sustainable-development-goals>

CLAN'S POLICIES

1 Introduction

CLAN (Caring & Living as Neighbours) has a range of policies that inform our framework for action. As our organisation grows, it is anticipated that new policies will be developed to cover new activities.

2 Application

These policies apply to all members of CLAN, CLAN staff, contractors and volunteers (whether casual or permanent), CLAN partners and those who represent CLAN in any capacity.

3 Responsibility

The CLAN Committee is responsible for ensuring application and review of the policies.

4 Policies

Our policies are listed below in alphabetical order and appear in full in the following pages of this CLAN Policy Handbook. This Policy Handbook is a living document and is regularly updated and expanded.

CLAN Building Capacity and Sustainability Policy
CLAN Child Inclusive Policy
CLAN Child Protection Policy
CLAN Code of Ethics and Professional Conduct Policy
CLAN Complaint Management Policy
CLAN Conflict of Interest Policy
CLAN Copyright and Intellectual Property Policy
CLAN Counter Terrorism Policy
CLAN Disability Inclusiveness Policy
CLAN Drug Donations to Developing Countries Policy
CLAN Equal Employment Opportunity & Anti-Discrimination Policy
CLAN Financial Impropriety Risk Management Policy
CLAN Financial Management Policy
CLAN Fundraising Policy
CLAN Gender Equality Policy
CLAN Grievance & Dispute Resolution Policy
CLAN Human Resources Policy
CLAN Managing Social Media Policy
CLAN Non-Aid and Development Activities Policy
CLAN Privacy Policy
CLAN Project Design, Monitoring and Evaluation Policy
CLAN Risk Management Policy
CLAN Safety and Security Policy
CLAN Staff Training & Development Policy
CLAN Whistleblower Policy
CLAN Work Health & Safety Policy

Policy: Building Capacity and Sustainability Policy

Version No: 1.0

Date Approved: March 2017

Date Updated: October 2019

Date Review Scheduled: 2021

1. Introduction

Background

CLAN is a not for profit, non-government incorporated association and its vision, mission and goals are based on the health and well-being needs of children in resource-poor countries. CLAN is committed to building relationships and working with partners to promote sustainable health strategies and strengthen community involvement to support children with Non-Communicable Disorders (NCD's) and their families, who live in resource poor countries.

CLAN'S Vision Statement

Our vision is that all children living with chronic health conditions in resource-poor countries of the world will enjoy a quality of life equivalent to that of their neighbours' children in higher income countries.

CLAN's Mission Statement

To maximise the quality of life of children and their families who are living with chronic health conditions in resource-poor countries of the world.

Commitment

CLAN is committed to working with partners to build capacity and empowerment as these are intrinsic to sustainable development. Partnership relationships are to be built on integrity, accountability and transparency. CLAN is committed to providing support without discrimination based on race, religion, gender or political affiliation.

Context

This policy is based on CLAN's strategic framework for action which is based on five pillars:

1. affordable access to medicine and equipment
2. education (of children, families, health professionals, policy makers, national and international communities), research and advocacy
3. optimisation of medical management (holistic care; primary, secondary and tertiary prevention)
4. encouragement of family support groups
5. reducing poverty and promoting financial independence.

2. Purpose

The purpose of this policy is to outline CLAN's approach to developing capacity and sustainable practices by working collaboratively with partners and communities in resource poor countries to support children with chronic health conditions.

3. Scope

This policy applies to CLAN's Committee, and implementation of the policy will apply to casual, permanent and contract staff, volunteers and representatives of CLAN where relevant.

4. Definitions

<u>Term</u>	<u>Definition</u>
Capacity Building	Capacity building is the process of enabling those living in poverty to develop skills and competencies, knowledge, structures, and strengths, so as to become more strongly involved in community, as well as wider societal life, and to take greater control of their own lives and that of the communities. (OECD)
Sustainable Development	Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs (WHO)

5 BUILDING CAPACITY and SUSTAINABILITY

i. Capacity and sustainability

CLAN recognises that sustainable development includes social, community, cultural and economic sustainability and that an holistic development plan integrates these aspects. CLAN projects are planned to build capacity at individual, community and system levels in order to achieve sustainable outcomes for the well being of children with NCD's. Implementation includes building multi-sectoral partnerships at local, national and international levels to meet the needs of children with NCD's and their families. Education and training, developing support groups, sharing knowledge and communicating about the needs of children with NCD's are integral to developing capacity and sustainability.

ii. Developing a project/program for building capacity and sustainability

CLAN recognises that capacity building involves people in different countries, their cultures, skills and expertise, values, commitment, and relationships, and that they are respected and are part of planning and implementing development programs. Consultation is a core component of CLAN programs as complex interactions may exist between individuals, groups, professional organisations and governments. The needs for each CLAN project or program are unique, depending on the focus group of children involved, the availability and quality of resources (human and non-human), community resources, cultural, economic and political factors.

The purpose of gathering data is to understand the needs of children and families with NCD's and community needs. When an application is received for support, or when CLAN identifies the need for a project or program, initial data is to be obtained to provide direction for planning. Data is obtained from research and working with partners and communities in order to provide direction to planning and outcomes of projects/programs. Data can determine the type of program required, specific needs of the group of

children, families and communities, the capacity and skills of personnel required, services available, financial costs, location, management, resources, safety and security.

iii. Planning and implementing projects/programs to build capacity and sustainability.

Planning for sustainable programs is based on the data and identified needs for a project/program.

Data may include, but is not limited to:

- a. identification of the needs of children with NCD's and their families (and/or other focus need)
- b. the need for, and role of partners and community resources
 - identification and selection of personnel to be involved in the project/program
 - education and training prior to personnel to be involved in the project/program
 - formal and informal training workshops for children, families and community
- c. the type of program required for the development of continuing and long-term support programs, for example, clinical mentoring, medical and financial support, networks and social support groups such as NCD clubs, e.g. CAH, diabetes, autism
- d. the need for development of community support through partnerships and strategies to support children and families in their local community
- e. partnerships required, e.g. building partnerships with hospitals, pharmacy suppliers, and other NCD groups
- f. the potential for government support, for example, availability and costs of medicines for long-term sustainability

A cycle of continuous evaluation throughout a program will demonstrate levels of effectiveness or the need for change or modification of strategies and/or outcomes.

iv. Capacity Building

Building capacity in children, parents, community members, medical and other professionals are essential strategies for project sustainability. To build capacity effectively, participants must be empowered to manage situations and challenges with caring for children with NCD's. Strategies designed to develop capacity include:

- a. building partnerships, participation and a sense of belonging in a community, in order to work together to achieve an improved quality of life for children with NCD's
- b. education and training to children, families and professionals to provide knowledge, skills and confidence to manage child health challenges effectively
- c. empowering families, professionals and the community to 'own' processes to achieve desired outcomes both short-term and long-term
- d. seeking resources to provide resources to children, families and professional services where required or possible
- e. encouraging families in poverty to improve their financial situation through seeking and developing small business operations.

iv. Sustainability: overview

CLAN acknowledges that development cannot be sustainable unless the children, families and communities are involved in, and committed to strategies designed to improve their situation. They need to have a say, be heard, have their rights respected, and are able work to achieve a degree of economic independence to access education and health care.

CLAN recognises the need to be involved in working with children, families and health professionals in resource poor countries to build capacity and achieve sustainability. CLAN also recognises that sustainability can be further supported by national and international support groups such as NCD Child. CLAN is committed to working at national and international levels to support children with NCD's and their families around the world. This includes building partnerships with professionals in overseas countries, advocacy and efforts to change to legislation where needed, to improve health practices and improve the availability of medicines to poor countries. CLAN endeavours to act in consultancy and advocacy roles, and participate in conferences at national and international levels to build partnerships and understanding about children with NCD's. Strategies to support sustainability include increased recognition of needs and improved funding outcomes for children in resource poor countries, and change in societal norms and values.

CLAN is committed to maintaining sustained improvement outcomes from projects/programs. Measuring capacity development is undertaken for short-term outcomes at the end of a project/program. Sustainability is evidenced by long-term relationships with partners and follow-up programs and/or visits to review the quality of ongoing outcomes achieved, and the level of sustainability being achieved. As many of CLAN's projects involve partners, hospitals and support groups at each stage of a project/program, CLAN realises the importance of support during follow-up visits as partners and families take 'ownership' of strategies and implement processes to achieve sustainability and on-going support for the children and families involved in the project. Sustainability for long-term projects will considered to be achieved when partners and families in-country are able to act independently to provide on-going quality services. Measuring sustainability involves monitoring the desired outcomes of a project over time, based on CLAN's five pillars and the specific pillars that are addressed in each project.

CLAN will report to the Committee on each project undertaken and progress achieved during the term of the project and following implementation of programs and strategies.

6 Measuring sustainability.

Domains including economics, politics, the ecology and culture are viewed as areas for measuring sustainability of a project. These general areas can be used as a basis for CLAN's projects. As each CLAN project is unique, the lens through which to assess sustainability of projects must be based on the initial needs and outcomes of the specific project to be reviewed, and based on the relevant CLAN pillar/s of the project. For example, specific indicators such as gains in knowledge, autonomy, well-being, medical care, inclusion and participation, provision of medicine and equipment, support and reducing poverty can be used for setting benchmarks, undertaking audits, assessment, appraisals, audits and financial reporting. Monitoring and reflection on data received can indicate outcomes of the project for building capacity and developing sustainability.

Associated Documents

Disability Inclusive Policy

Risk Management Policy

Staff Safety and Security Policy

Building Capacity and Sustainability: Report to CLAN Committee

Application or Planned Project Title.....

Source of Application or Project.....

Country.....

Committee Date and decision

Committee Date and review..

Summary of the Planned Project:

Topics	Details of the Project	Person/s responsible
Non Communicable Disease and any other needs to be addressed		
Number of Children and ages		
Number of Families		
Project focus and outcomes		
Medical Professionals required		
Other Professionals required		
Location and resources required		
Project Time period		
Monitoring and Review times		
Evaluation: Building capacity		
Evaluation: Developing sustainabilitiy		

Policy: **CLAN Child Commitment Policy**

Version No: 1.0

Date Approved: March 2017

Date Review Scheduled: 2020

1. Introduction

CLAN is a not-for-profit, Non Government Organisation (NGO) created with the mission to ‘Maximise the quality of life for children and their families who are living with chronic health conditions in resource-poor settings of the world.’ CLAN’s strategies include identifying groups of children who have the same chronic health condition, and then working with partnerships at local, national and international level to implement their strategic framework to support the children and their families.

CLAN’s strategic framework rests of five pillars:

1. Affordable access to medication & medical equipment
2. Education (of individuals, families, communities, health professionals, policy makers and the international community), Research & Advocacy
3. Optimisation of medical management (including primary, secondary and tertiary prevention, with a bio-psycho-social focus)
4. Encouragement of family support networks
5. Reducing financial burdens on families that result in poverty, helping people to become financially independent so that they can provide the necessary health care for their children longer-term.

2. Purpose

This Policy is to confirm and outline CLAN’s commitment and strategies to supporting children with chronic health conditions, and their families to improve the quality of life for their children.

3. Scope

This policy applies to all staff and other key groups. ‘Staff’ refers to: full time, part time, international and national and also those engaged on short term contracts such as: consultancies, researchers, photographers etc. ‘Others’ refers to: visitors, volunteers, board members, trustees, staff/volunteers in partnership agencies, and any other individuals or groups that have a responsibility with respect to CLANs programs.

4. Definitions

Chronic health condition A chronic condition is a human health condition or disease that is persistent or otherwise long-lasting in its effects or a disease that comes with time. The term chronic is often applied when the course of the disease lasts for more than three months. It can have a significant impact on the life of a person and require more than the usual amount of medical care.

A chronic health condition is not a disability, but may result in a disability.

Classifications Chronic health conditions may be classified as congenital, acquired, preventable, non-preventable, communicable, or non-communicable.

5. Policy and Guidelines

CLAN is committed to, and endeavors to include opportunities for children's contributions and responses in all their programs and projects where children are included in presentations and activities. It has been shown that children with a chronic health condition who live in resource poor countries are more susceptible to disability and death than children in resource wealthier countries. CLAN believes that these children in resource poor countries have the right to health and life and CLAN is committed to building capacity and sustainability through programs to support these children to improve the quality of their lives.

CLAN's programs and projects are based on the principles of community development and comprehensive primary health care for children with chronic health disorders. CLAN's strategies prioritise the needs of children and their families.

- i. groups of children are identified, who are living with the same chronic, long-term health conditions as members of a distinct, non-geographically based community.
- ii. identification of target groups, and consultation and collaboration with these communities including information obtained from the children and their families, enables CLAN and their partner/s to plan effective strategies to collectively determine the most appropriate actions for change.
- iii. CLAN's strategies include building communities which include children who have a chronic health condition, their families, professionals, and community personnel as these communities can provide ongoing and effective support. Communities may include chronic disorders such as Congenital Adrenal Hyperplasia, Diabetes, Autism, Down Syndrome, Chronic Kidney Disease, Laron Syndrome, Hearing Impairment, Osteogenesis Imperfecta, Epidermolysis Bullosa, and Duchenne Muscular Dystrophy.

CLAN's design for each project includes research with partners, families and their children to identify specific needs for each group. Information and views from partners, families and children underpin planning initiatives for programs and projects. Projects are designed collaboratively with partners to include the children and their families and to build communities to achieve positive outcomes.

CLAN is committed to promoting the participation of children in programs and projects. Outcomes aim to involve children in learning more about their health condition and to make decisions about managing their condition effectively. A focus of community projects involves providing opportunities for children to share their experiences with other children who have the same chronic health condition, as this can build friendships, confidence and encourage inclusiveness. Families are also involved in projects with their children and participate in learning how to manage the chronic health condition more effectively. Responses are sought from children and their families at the conclusion of each project to assess effectiveness of the project and outcomes achieved.

CLAN's partners in projects that involve children may include medical professionals, community members, and/or other relevant in-country or external professionals. CLAN will review and assess the capacity of partners prior to any agreement made. Partners need to demonstrate their commitment to be aligned to CLAN's mission and agreed goals. The need for training pre-delivery of a project includes collaboration with partners and any others who are to be involved in the program or project.

Each project is monitored during implementation to assess the outcomes being achieved for the group of children and their families. Monitoring also includes the opportunities to manage any changes that are needed to achieve outcomes more effectively.

Evaluation of child focused programs and projects will determine if the initial outcomes were achieved effectively and efficiently. CLAN evaluates each program/project to determine the quality of outcomes achieved for the children and their families, including outcomes associated with participation of children and families in the program/project. Such evidence is used to provide information for CLAN to feedback and future planning.

Associated Documents

Child Protection Policy

Code of Ethics and Professional Conduct

Disability Inclusiveness Policy

Project Design Monitoring and Evaluation

Policy: CLAN Child Protection Policy

Version No: 2.0

Date Approved: 28 January 2011

Date Updated: 2018

Date Review Scheduled: 2020

1. Purpose

This child protection policy articulates CLAN's zero tolerance approach to child abuse and child pornography. It provides a framework for managing and reducing risks of child abuse by persons engaged in delivering CLAN's programs and activities.

CLAN adheres to the UN Convention on the Rights of the Child (UNCRC). CLAN is committed to the safety and well being of all children, and to the protection of children from harm, abuse and exploitation. Children have a right to survival, development, protection and participation as stated in the United Nations Convention on the Rights of the Child.

2. Legislation

Australian State and Territory child protection legislation applies to CLAN and children and families who live within Australia (Supporting Document 1).

The Australian Federal *Criminal Code Act 2017* covers child sex offenses, sexual misconduct offenses, trafficking, child pornography and telecommunication offenses with children outside Australia. CLAN will adhere to Australian legislated Child Protection Acts and Regulations, and comply with ACFID and DFAT requirements for non-government organisations. CLAN staff, volunteers, representatives and CLAN sponsored visitors to CLAN activities overseas must also abide by relevant local legislation.

3. Application

CLAN's Child Protection Policy applies to all 'staff' and 'others'. 'Staff' refers to full time and part time national and international persons involved in CLAN programs, and also those engaged on short term contracts such as consultants, researchers, photographers, contractors, and grant recipients. 'Others' refers to visitors, volunteers, board members, trustees, staff/volunteers in partnership agencies, and any other individuals or groups that have a responsibility with respect to CLANs programs.

The Child Protection Policy is disseminated to relevant persons and groups prior to implementing programs or activities to ensure safe environments for children.

4. Definitions Term

Child and young person

Child protection

Child abuse

Conduct

Duty of care

Physical abuse

Definition

A child or young person is regarded to be any person under the age of 18 years, unless a nation's laws recognise adulthood earlier.

Describes the responsibilities and activities undertaken to prevent or stop children being abused or maltreated or exploited.

Child abuse includes physical, sexual, emotional, neglect, bullying, child labour and domestic violence. Abuse may occur to male and female children of all ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Abuse can be inflicted on a child by both men and women, by other young people or by professionals and other adults working with children in a position of trust.

Inappropriate behavior: conduct contrary to CLAN's expectations Professional misconduct includes conduct contrary to CLANs Child Protection Policy and Code of Ethics and Professional Conduct Policy Reportable conduct: any sexual offence, sexual misconduct, assault, ill-treatment or neglect of a child, and any behavior that causes psychological harm to a child

Duty of Care is a common law concept that refers to the responsibility of the organisation to provide children with an adequate level of protection against harm. It is the duty of the organisation to protect children from all reasonably foreseeable risk of injury.

This occurs when a person purposefully injures or threatens to injure a child or young person. This may take the form of slapping,

Term

Emotional abuse

Neglect

Sexual abuse and ^{SEP}Sexual Misconduct

Child-Sex Tourism

Bullying

Exposure to Domestic Violence

Children in emergencies

Definition

punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

This occurs when a child is repeatedly rejected or frightened by threats. This may involve name-calling, being put down or continual coldness from parent or caregiver, to the extent that it affects the child's physical and emotional growth and well-being.

The persistent failure or the deliberate denial to provide the child with clean water, food, shelter, sanitation or supervision or care to the extent that the child's health and development are placed at risk.

This occurs when a child or young person is used by an older or bigger child, adolescent or adult for his or her own sexual stimulation or gratification regardless of the age of majority or age of consent locally. It may include contact or non-contact acts, including threats and exposure to pornography. It also includes any unwelcome behaviour of a sexual nature committed without consent or by force, intimidation, coercion or manipulation.

ECPAT International defines child-sex tourism as '...the commercial sexual exploitation of children by men or women who travel from one place to another, usually from a richer country to one that is less developed, and there engage in sexual acts with children, defined as anyone aged under 18 years of age.' (ECPAT International, 2006. ECPAT - End Child Prostitution, Child Pornography & Trafficking of Children for Sexual Purposes).

The inappropriate use of power by an individual or group, with intent to injure either physically or emotionally. It is usually deliberate and repetitive. The bullying may be physical or psychological (verbal and non-verbal).

Physical bullying includes pushing, hitting, punching, kicking or any other action causing hurt or injury. Verbal bullying includes insults, taunts, threats and ridicules Psychological bullying includes physical intimidation and ostracism.

Domestic violence occurs when children and young people witness or experience the chronic domination, coercion, intimidation and victimisation of one person by another by physical, sexual or emotional means within intimate relationships. (Adapted from the Australian Medical Association definition.)

Child abuse takes place not only within the family environment, but also outside the family, including: institutions, at work, on the streets, in war zones and emergencies.

Children in emergencies are especially vulnerable to abuse and exploitation. In an emergency or crisis situation, children are

Term Definition

5. Policy Statement

extremely vulnerable when they become part of a displaced or traumatised population.

The United Nations Convention on the Rights of the Child is the universal foundation for child protection. The fundamental principle of the Convention is that children have their own indivisible rights.

The Australian Government requires that organizations working with children implement a Child Protection Policy and meet compliance standards. Any form of child abuse and exploitation is unacceptable and will not be tolerated.

CLAN believes that all children have a right to be safe at all times, and that they should be equally protected and assisted regardless of their gender, nationality, religious or political beliefs, family background, economic status, physical or mental health or criminal background. All decisions regarding the welfare and protection of children are made based on the Best Interests of the Child Principle. This principle underpins decisions and planning that the child will receive maximum benefit possible from services provided, and that the positive impacts of any course of action outweigh any negative impacts.

6. Procedures

The following procedures outline CLAN's approach to provide a safe and secure environment for children involved in its programs undertaken by CLAN and its partners.

6.1 Human Resource Management

Persons involved in CLAN activities may include staff, employees, consultants, volunteers, visitors, photographers. CLAN is committed to ensuring that children are safe in CLAN programs and when recruiting, will screen all person/s for suitability to work with children and young people. Prior to any engagement, CLAN's Code of Conduct and Code of Conduct for Working with Children must be signed by all relevant persons involved in CLAN programs and activities. CLAN reserves the right to refuse employment to or terminate any person's employment or involvement that may pose a risk to children before, during a program or after an investigation into allegations of child abuse.^[1] (Reference: Supporting Document 2: Child Protection: Employment of Staff and Volunteers)

6.2. Person responsible for Child Protection:

The President of CLAN is responsible for the oversight of child protection policies, procedures and practices, management of investigations and reports, and training.

6.3 Child Protection Induction and Training

CLAN's executive will provide annual training on child protection for Committee members and to review current practice and ensure compliance to current legislation and NGO requirements. Induction and training will be provided to persons who are to be involved in CLAN's activities where children and young people are involved. Training will include knowing about, and understanding what constitutes child abuse, receiving and reporting child abuse incidents, and management of child protection issues.

Children and young people who are involved in programs may be consulted during planning stages for a program. They will be informed at the start of each program about child safety procedures including the process for reporting abuse incidents. They will also be consulted at the conclusion of each program for their responses about outcomes of the program and their perceptions of a safe and supportive environment.

6.4 CLAN and Partner Programs

In a situation where CLAN provides funding to a project that is either managed with CLAN as a partner or independently, the project being funded must demonstrate compliance to child protection policies.

Australian Partners involved in CLAN's programs and activities must:

- i. demonstrate commitment to CLAN's Policies related to Child Protection Policy and Codes of ^{[[]]}Conduct _{[[SEP]]}
- ii. have a current Child Protection Policy onsite for CLAN programs ^{[[]]}_{[[SEP]]}
- iii. undertake training in Child Protection when required ^{[[]]}_{[[SEP]]}
- iv. have an onsite trained child protection officer or person delegated to manage child safety ^{[[]]}_{[[SEP]]} and to provide information, reports and complaints to CLAN ^{[[]]}_{[[SEP]]}
- v. work collaboratively with CLAN to identify and manage potential level of risks to ensure the ^{[[]]}safety and welfare of staff, visitors, children and families involved in CLAN programs ^{[[]]}_{[[SEP]]}
- vi. notify CLAN personnel immediately of any serious allegations and/or breaches demonstrate ^{[[]]}processes for providing information to those involved in projects about reporting child ^{[[]]}protection complaints and allegations ^{[[]]}_{[[SEP]]}
- vii. review and assess child protection procedures implemented and outcomes for each project. ^{[[]]}_{[[SEP]]}

6.5 Risk Management for Child Protection

In CLAN's programs where children and young people are involved, the following risk management processes will be undertaken:

- i. establish the context of each program, e.g. number of children, ages and specific needs of children, parent involvement in program, activities in the program, experience and expertise of presenters and others involved in the program
- ii. identify risks where programs are to be delivered, analyse and evaluate risks to determine actions to provide a safe environment
- iii. develop controls to mitigate identified risks, including a written risk assessment
- iv. monitor the safety of children and evaluated activities during the program to identify and manage any risks.

(Reference: Supporting Document 3: Child Protection Risk Guidance Process)

7. Reporting Child Abuse

7.1 Who should report:

All CLAN staff and others involved in CLAN programs, including partners, visitors, children and their families.

7.2 What should be reported?

- (a) Any disclosure or allegation from a child/community member or staff regarding the safety/abuse/exploitation of a child.
- (b) Any observation or concerning behaviour exhibited by a CLAN staff, volunteer or other relevant stakeholder that breaches the CLAN code of conduct for working with children. This includes inappropriate behavior, professional misconduct, and reportable conduct.
- (c) Inappropriate use of the organisation's photographic equipment or computers including evidence of child pornography.
- (d) Staff engaging in suspicious behaviour that could be associated with sexual exploitation or trafficking.

7.3 Who to report to?

Australia: Child abuse reports should be made to the President of CLAN and will be managed with expediency. If there is an allegation or suspicion of child sexual abuse by a staff member or volunteer in the organisation, these matters will be reported to the state police or the state child protection authorities.

Reports received of any suspected or alleged case of child exploitation, abuse or policy non-compliance

must be reported immediately to DFAT (childwelfare@dfat.gov.au)

Concerns about people engaging in child sex tourism, child sex trafficking and child pornography should be reported to the Australian Federal Police (Transnational Sexual Crimes Squad). Contact details (Phone 1800 123 400; www.afp.gov.au)

Overseas:

Child abuse reports should be made to the project or line manager or Country Director who will then contact the President of CLAN. If this is not possible, reports can be made directly to the President of CLAN. In cases of suspected child abuse overseas, an initial assessment will be made based on the quality and reliability of the information and a decision will be made in consultation with the President of CLAN for managing the incident report.

Local reporting procedures will guide the process based on whether the allegation constitutes a criminal offence in the country, and/or if it is a breach of the CLAN's Child Protection Policy or Code/s of Conduct. Evidence will determine whether it is a disciplinary matter, or if it should be managed by local child protection agencies, and if it is a matter that should be reported to Australian authorities.

If there are concerns that a child is being sexually abused by someone external to CLAN or if the incident has occurred outside of the program the matter will be referred to an external body or agency dealing with child protection matters in the country. CLAN must also determine if it may also constitute a matter to be dealt with by Australian authorities.

7.4 When and how to report?

Child abuse concerns should be reported immediately.

7.5 How should it be reported?

Verbally to a designated staff member and/or by completing and submitting CLAN's written Incident Report Form. (Supporting Document 4)

7.6. CLAN's commitment

CLAN will treat all concerns raised seriously and ensure that all parties will be treated fairly and the principles of natural justice will be a prime consideration. All reports will be handled professionally, confidentially and expediently. CLAN will ensure that the interests of anyone reporting child abuse in good faith are protected. Children and community members with whom CLAN works will be provided with information about how to report any child protection concerns about CLAN staff members and others.

When an allegation is made there should be an immediate response that protects the child from further potential abuse or victimisation. The child may require medical assistance or counselling support. Where

possible the child should remain in the place of residence or relevant program. If the child is in immediate danger, arrangements should be made for the child to go to a safe place.

Any employee who intentionally makes false and malicious allegations, will face disciplinary action. An employee, staff member or volunteer accused of abuse may be stood down of a staff while an investigation is undertaken into the allegation's.

CLAN is committed to child and youth participation and children involved in CLAN's programs will be asked for their feedback about staff, services for review of the Child Protection Policy and Codes of Conduct. They will also be informed about CLAN's child abuse reporting process and who to contact if they are at risk, have been abused or are concerned about another child.

7.7. Management of a report

The President of CLAN will manage reports of child abuse in Australia. Abuse reports in an overseas country will be collegially managed by the In-Country Manager in consultation with the Country Director and the President of CLAN to discuss the allegations and decide upon processes to follow.

Management of a child abuse report will normally include the procedures outlined below:

. **1 Obtain information and details of abuse** Complete the Child Incident Report Form (Support Document 4)

. **2 Process for making decision about child abuse report**

i. appraise the risk and needs of the child or young person to determine if matter requires reporting to a government agency, for example, DFAT when CLAN has received funding from this organization. (Resource: Mandatory Reporting Guide NSW. www.keepthemsafe.nsw.gov.au)

ii. decision:

a. b. c. d. e. d.

CLAN to manage report internally or no further action taken or

report to relevant authority: local police; or report to Australian Federal police (1800 123 400. www.afp.gov.au), or

report to state child protection authority; child abuse must be reported to DFAT (childwelfare@dfat.gov.au)

8 Supporting Documents

1 State and Territory Child Protection Legislation
2 Child Protection: Employment of Staff and Volunteers
3 Child Protection Risk Guidance Note
4 CLAN Incident Report Form
5 Code of Conduct

for Working with Children^[1]6 Principles for Prevention of Sexual Exploitation and Abuse 7 Code of Conduct for Use of Children’s Images^[1]8 Sponsorship Guidelines^[1]9 Supporting Policies
(Telephone +61 2 6261 9048)

2

Supporting Documents

1

State and Territory Child Protection Legislation New South Wales^[1]Child Protection (Working with Children) Act 2012. Victoria

Working With Children Act 2005

Queensland

Commission for Children and Young People and Child Guardian Act

Western Australia

Working with Children (Criminal Record Checking) Act 2004

South Australia

Children’s Protection Act 1993

Tasmania

Education and Care Services National Regulations 2011 Education and Care Services National Law 2011

Australian Capital Territory^[1]Children and Young Persons Act 2008

Working with Vulnerable People (Background Checking) Act 2011

Northern Territory

Care and Protection of Children Act 2007

Child Protection: Employment of Staff and Volunteers

CLAN is committed to child safe recruitment, selection and screening practices. These practices aim to recruit the safest and most suitable people to work in our programs. Our child safe practices include:

1 Promoting our child safe commitment on our website, in other promotional materials and in ^[1]all job advertisements. ^[1]

2 Contracts will include statements of potential sanctions for breach of the Child Protection [SEP] Policy and the Code of Conduct. [SEP]

3 A copy of CLAN's Child Protection Policy will be available to all applicants and they will be [SEP] informed of the screening requirements when they are sent the application form. Applicants [SEP] will need to sign that they have read and understood the Child Protection Policy and the [SEP]

Code of Conduct before interacting and engaging with children as a representative of CLAN.

4 Applicants will be required to submit a detailed application form when applying for a [SEP] position. This form will ask for extensive information about the applicant's background such [SEP] as dates and places of employment, education and other activities. [SEP]

5 All positions will be assessed for the level of risk in relation to contact with children. [SEP] Positions working directly with children will require the highest level of screening and the [SEP] applicant must possess relevant qualifications and experience in working with children. [SEP]

6 Job descriptions are required for all positions (staff, volunteers, consultants –short long term [SEP] etc), which describe key selection criteria and outline tasks and accountabilities. [SEP]

7 Interviews will be conducted for all positions, ideally face-to-face, but skype/telephone [SEP] interviews may be necessary in the international context. [SEP]

8 Behavioural-based questions will be used to ask for examples of the candidate's past [SEP] behaviour and experiences. In positions working directly working with children, the panel [SEP]

will explore the candidate's motivations for working with children, which will include value- based questions seeking information about the candidate's attitudes to children, professional boundaries, accountability, team work and how they have responded to ethical dilemmas.

9 A minimum of two reference checks will be required for all preferred candidates. This would include short and long terms positions, volunteers on placement and consultants. The candidate's most recent employer/supervisor should be one of these referees. CLAN will verify the identity of the referee and make direct contact with each of these referees. [SEP]

10 Written references may not be accepted. CLAN reserves the right to request additional references. [SEP]

11 All staff and all others involved with the organisation will be required to have a police clearance or relevant criminal history checks depending on the country of origin if working directly with children. [SEP]

12 Where the candidate is working directly with children in Australia, they will require a Working with Children Check (depending on the jurisdiction) or a Police Check. [SEP]

13 All staff will be required to provide proof of identify which may include including birth certificate,

passport, drivers licence and relevant qualifications. Original documents may be required. [SEP]

14 All positions will be subject to a probationary period depending on the length of the contract. [SEP]

15 Issues relating to child protection will be included in staff performance reviews. [SEP]

16 All staff and others will be required to read and sign the CLAN Child Protection Policy. [SEP]

17 CLAN may suspend, transfer to other duties any employee who breaches the Child [SEP]Protection Code of Conduct, or is under investigation for a child protection matter. CLAN reserves the right to terminate or suspend any employee after an investigation on assessment of the seriousness of the allegation. [SEP]

18 CLAN reserves the right to refuse employment to or terminate any person's employment that may pose a risk to children. [SEP]

3 Child Protection Risk Guidance Note

Note: Working with children means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid work.

Risk Assessment	Risk	Level of risk: [SEP]low, moderate, high
Contact with children	Program [SEP]Interaction with children	
Working with children	Vulnerability of children	
Skills and knowledge required for CLAN personnel involved in program		
Controls in place Child Protection Policy [SEP]Codes of Conduct Recruitment Practices Incident reporting procedures Child protection training Feedback on programs Record		

keeping procedures Partner checks for child safety		
---	--	--

Determine overall level of risk and controls to be implemented at each stage of project

*project planning^[1]_[SEP]*project activities *monitoring and evaluation *future planning

4 CLAN Incident Report Form

Name of person receiving report: Position:	
Name/s of person reporting and contact details	
Name Position	Address: Phone: Email:
CLAN Program or Activity	Country: [] [] [] Date when report received:
Type of Allegation: circle [] [] Sexual Abuse/Sexual Misconduct Physical Abuse [] [] Psychological Abuse [] [] Neglect [] [] Other	Details: Date, Place Other relevant details: (For example implements used, vulnerability, or disability factors):
Details of Person/s subject to allegation. Circle descriptor CLAN employee [] [] CLAN contractor/subcontractor CLAN volunteer Australian citizen or resident	Family Name Given Name Gender Date of birth Nationality [] [] [] Contact details
Details of Victim/s [] [] [] Age of child at time of alleged incident:	Family Name Given Name Gender Date of birth Nationality [] [] [] Contact details
Name of witness/s (complete separate incident report form)	Family Name Given Name Gender Date of birth Nationality [] [] [] Contact details
Impact on child and details of any injuries observed or reported	
Network of support around the young person	
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? [] [] [] If relevant, have Australian Federal Police in country been informed?	
Any other pertinent information	

5 Code of Conduct for Working with Children

Staff members and others are responsible for maintaining a professional role with children, which means establishing and maintaining clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship. All staff should conduct themselves in a manner consistent with their role as a CLAN representative and a positive role model to children.

This Code of Conduct for Working with Children aims to protect children, staff and the organisation by providing clear behavioural guidelines and expectations. All relevant staff, volunteers, partners and project visitors must sign this Code of Conduct prior to participating in CLAN activities where children are involved. The Code requires the following behaviours:

- I WILL treat all children and young people in our program with respect and use appropriate language and communication at all times [SEP]
- I WILL conduct myself in a manner that is consistent the values of CLAN [SEP]
- I WILL avoid physical contact with children unless it is necessary for medical or safety purposes [SEP]
- I WILL provide a welcoming, inclusive and safe environment for all children, young people, parents, staff and volunteers [SEP]
- I WILL wherever possible, ensure that another adult is present when working near children [SEP]
- I WILL respect cultural differences [SEP]
- I WILL encourage open communication between all children, young people, parents, staff and volunteers and have children and young people participate in the decisions that affect them [SEP]
- I WILL report any concerns of child abuse [SEP]
- I WILL ensure at all times that I and other staff are transparent in actions and whereabouts [SEP]
- I WILL take responsibility for ensuring that I and other staff are accountable and do not place ourselves in positions where there is a risk of allegations being made [SEP]
- I WILL self-assess my own and staff behaviours, actions, language and relationships with children [SEP]
- I WILL speak up when I observe concerning behaviours of colleagues [SEP]
- I WILL NOT engage in behaviour that is intended to shame, humiliate, belittle or degrade [SEP] children [SEP]
- I WILL NOT use inappropriate, offensive or discriminatory language when speaking with a child or young person [SEP]
- I WILL ban the use of alcohol and drugs when I am with children [SEP]
- I WILL NOT not use language or behaviour towards children that is harassing, abusive, sexually [SEP] provocative, demeaning or culturally inappropriate [SEP]

- I WILL NOT do things of a personal nature that a child can do for him/herself, such as assistance with toileting or changing clothes [SEP]
- I WILL NOT take children to their own home/hotel or sleep in the same room or bed as a child [SEP]
- I WILL NOT smack, hit or physically assault children or use physical punishment on children [SEP]
- I WILL NOT develop sexual relationships with children or relationships with children that may be deemed exploitative or abusive [SEP]
- I WILL NOT behave provocatively or inappropriately with a child [SEP]
- I WILL NOT condone or participate in, behaviour of children that is illegal, unsafe or abusive [SEP]
- I WILL NOT act in a way that shows unfair and differential treatment of children [SEP]
- I WILL NOT photograph or video a child without the consent of the child and his/her parents or guardians [SEP]
- I WILL NOT hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way [SEP]
- I WILL NOT seek to make contact and spend time with any child or young person outside the program times [SEP]
- I WILL NOT use CLAN's computers, mobile phones, video and digital cameras inappropriately, nor use them for the purpose of exploiting or harassing children [SEP]
- I WILL NOT hire minors as domestic labour or other labour: which is inappropriate given their age or developmental stage; which interferes with their time available for education and recreational activities; or which places them at significant risk of injury. I will comply with all relevant Australian and local legislation, including labour laws in relation to child labour [SEP]
- I WILL NOT give gifts to children. [SEP]

6 Principles for Prevention of Sexual Exploitation and Abuse

CLAN adheres to the Inter-Agency Standing Committee (IASC) Task Force on Prevention of Sexual Exploitation and Abuse which outlines six core principles:

- 1 Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct [SEP] and are therefore grounds for termination of employment [SEP]
- 2 Sexual activity with children is prohibited regardless of the age of majority locally. Mistaken [SEP] belief in the age of a child is not a defense [SEP]
- 3 Exchange of money, employment, goods or services for sex including sexual favours or other [SEP] forms of humiliating, degrading or exploitative behaviour is prohibited. This includes [SEP] exchange of assistance that is due beneficiaries [SEP]

4 Sexual relationships between humanitarian workers and beneficiaries are not permitted, since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work

5 Where a humanitarian worker develops concerns or suspicions regarding sexual abuse by a fellow worker, whether in the same agency or not, s/he must report such concerns via established agency reporting mechanisms

6 Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse, and which promotes the implementation of their code of conduct.

6 Code of Conduct for Use of Children's Images

CLAN will at all times portray children in a respectful, appropriate and consensual way. Our guidelines on the use of images children's images, in line with the ACFID Code of Conduct are:

1 A child should always be portrayed in a dignified and respectful manner and not in a vulnerable or submissive manner.

2 Children should be adequately clothed and not in poses that could be seen as sexually suggestive

3 A child and its family must always be asked for consent when using their images. When asking for consent to use the image, details should be given as to how and where this image will be used

4 There should be no identifying information of the child used in the publication of images or location.

5 Children should be portrayed as part of their community.

6 Ensure that images are honest representations of the context and facts.

7 Local cultural traditions should be assessed regarding restrictions for reproducing personal images.

8 Images should be an honest representation of the context and the facts.

9 When sending images electronically, file labels should not reveal identifying information.

10 All photographers will be screened for their suitability, including police checks where appropriate.

8 Sponsorship Guidelines

CLAN recognises the need to implement specific guidelines to manage the child protection risks within its sponsorship programs. These guidelines include ensuring that:

1 Letters which contain political or religious comments which could cause offence or be inappropriate are not permitted

- 2 All sponsors will receive clear child protection and behavioural guidelines upfront
- 3 All visits should be arranged in advance through CLAN's office and sponsors interviewed
- 4 Sponsors inform agency at least 3 months in advance
- 5 Police checks are required for visiting sponsors and any accompanying family members
- 6 All visiting sponsors will sign the child protection policy or provide an acknowledgement of having read and understood the policy.
- 7 Partner agency staff will be present at all times during the visit
- 8 Children should not be invited to leave or taken away from their communities
- 9 Invitations to the sponsor's country are not allowed
- 10 Sponsors will be interviewed before each visit
- 11 All gifts and correspondence will be screened by the agency
- 12 Sponsors and sponsored families should not exchange mailing addresses during visits
- 13 After every visit a report will be sent to the head office
- 14 All visits will be monitored
- 15 Where sponsors go against policies the organisation can bring sponsorship to a close.

9 Relevant CLAN Policies

Child Inclusive Policy
Code of Ethics and Professional Conduct Policy
Complaint Management Policy
Disability Inclusiveness Policy
Gender Equality Policy
Grievance and Dispute Resolution Policy
Human Resources Policy
Project design, Monitoring and Evaluation Policy
Risk Management Policy
Safety and Security Policy
Staff Training and Development Policy

Policy: **CLAN Code of Ethics and Professional Conduct Policy**

Version No: 2.0

Date Approved: 28 January 2011

Date Updated: March 2015

Date Review Scheduled: 2020

1. Introduction

Organisations have a legal and moral responsibility to manage their business in the best interests of the communities they work with. This requires all staff, others and stakeholders to demonstrate professional ethical behaviour at all times – in their responsibilities to the organisation, in their professional relationships with each other, and in their professional service to the community. Codes of conduct and ethics provide guidance in this regard in the conduct of operations. Failure to comply with such codes may result in investigation and potential legal and financial penalty.

2. Purpose

The purpose of this document is to identify CLAN's position on ethics and proper professional practice and to document the standards expected in providing a service to international and local communities. It provides an ethical framework for all Committee Members, Staff and, Volunteers and Partner Organisations of CLAN.

3. Scope

This policy applies to the Committee, casual, permanent and contract staff, volunteers and representatives of CLAN.

4. Definitions

<u>Term</u>	<u>Definition</u>
Ethics	The moral principles that govern a person's behaviour or the conducting of an activity.

5. Policy

CLAN is committed to complying with the ACFID Code of Conduct (2017), and when working with partners, will require partners to comply with, but not limited to, CLAN's Policies for child protection, separation of development and non-development activity, financial impropriety, complaints handling. In all of its activities and particularly its communications to the public, CLAN will accord due respect to the dignity, values, history, religion, and culture of the people with whom it works consistent with principles of basic human rights.

CLAN will oppose and not be a willing party to wrongdoing, corruption, bribery, or other financial impropriety in any of its activities. CLAN will not be a willing party to the abuse or misuse of resources designated for the purposes of aid and development will be used only for those purposes and will not be used to promote a particular religious adherence or to support a political party, or to promote a candidate or organisation affiliated to a political party.

CLAN will take prompt and firm corrective action whenever and wherever wrongdoing is found among its Governing Body, paid staff, contractors, volunteers and partner organisations. Any issues of misconduct will be dealt with confidentially.

CLAN will promote the safety and well being of all children accessing their services and programs, particularly to minimise the risk of abuse of children. CLAN's Child Protection Policy is consistent with the following principles: Zero tolerance of child abuse; recognition of children's interest; sharing responsibility for child protection and a risk management approach. CLAN will not tolerate the use of Internet and other soft and hardware for unlawful purposes. Any such crime will be reported immediately to the appropriate authority and CLAN will support any following investigation.

CLAN will not contravene any Acts of Australian and State Parliament (nor the laws of any country within which we are operating) in the conduct of its business, and in particular those relevant to the general business of CLAN, including the Sex Tourism Act, the Privacy and Personal Information Protection Act (PPIPA, 1998), Anti-Terrorism Act (2005), and the Work Health & Safety Act (WHS, 2011).

CLAN is committed to ethical practices in designing and implementing quality projects to fulfill its vision and mission.

This is evidenced by compliance to the Code to:

- i. respect and protect human rights
- ii. participate with communities to build capacity and sustain change
- iii. undertake research to identify needs to plan projects
- iv. effectively collaborate and coordinate projects with partners
- v. communicate truthfully and ethically
- vi. be transparent and accountable
- vii. acquire, manage and report on resources in an ethical and responsible way
- viii. support and manage people fairly and effectively.

6. Guidelines/Procedures

The Committee shall:

- i. be diligent, attend Committee meetings (in person or via teleconference) and devote sufficient time to preparation for meetings to allow for full and appropriate participation in the Committee's decision-making
- ii. observe confidentiality relating to non-public information acquired by them in their role as Committee Members and not disclose such information to any other person
- iii. meet regularly to monitor the performance of management and the organisation as a whole. To do this the Committee will ensure that appropriate monitoring and reporting systems are in place and that these are maintained and utilised to provide accurate and timely information to the Committee
- iv. ensure that no individual has unfettered powers of decision-making
- v. ensure that the independent views of Committee members are given due consideration and weight
- vi. ensure that stakeholders are provided with an accurate and balanced view of the organisation's performance, including both financial and service provision
- vii. regularly review its own performance as the basis for its own development and quality assurance
- viii. carry out its meetings in such a manner as to ensure fair and full participation of all Committee members
- ix. ensure that the organisation's assets are protected via a suitable risk management strategy
- x. ensure that personal and financial interests do not conflict with the duty to the organization
- xi. determine what information is to be made to primary and secondary shareholders, what is to be made public and when
- xii. review information to be made public to ensure that it is suitable, transparent, and ethically presented.

The 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 Committee

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

See CLAN Policy – Conflicts of Interest.

Individual Committee Members shall:

Review their own performance with a view to ensuring a suitable contribution to Committee deliberations and decision-making and, if found lacking, should either pursue training or assistance to improve their performance.

CLAN personnel – casual, permanent and contract staff, volunteers and partner organisations shall:

- i. Take a professional approach and act with courtesy and respect at all times
- ii. Act honestly and in good faith at all times in the interests of the organisation and its objects ensuring that in all interactions people are treated fairly according to their rights
- iii. Perform their duties as best they can, taking into account their skills, experience, qualifications and position
- iv. Act in a safe and responsible manner
- v. Exercise due diligence in the expenditure of CLAN funds
- vi. Be punctual and reliable in their attendance and adhere to their prescribed and authorised hours of duty
- v. Comply with the prescribed terms and conditions of their employment/engagement
- vi. Record their attendance for duty in the manner prescribed
- vii. Notify the organisation of any inability to attend duty as early as possible so as not to inconvenience others or delay the work of the organization
- viii. Carry out their duties in a lawful manner and ensure the organisation carries out its business in accordance with the law, and recognise both legal and moral duties of their role
- ix. Respect and safeguard the property of the organisation, the public and colleagues; and observe safe work practices so as not to endanger themselves or others. Act in accordance with the NSW Work Health and Safety Act (2011) and Work Health and Safety Regulation (2011)
- x. Maintain confidentiality regarding any information gained through their work and not divulge personal information or the address or phone numbers of Staff, Committee or service users without the express permission of the individual
- xi. Accurately and openly maintain records
- xii. Ensure that CLAN will market services with integrity and accuracy
- xiii. Ensure that personal and financial interests do not conflict with the duty to the organisation and declare any conflict of interest at the earliest opportunity to a person of authority within the CLAN organization
- xiv. Not undertake personal or business activities for personal gain while on duty at the organisation or while conducting business of the organization
- xv. Not use CLAN resources without open and express permission of a higher authority
- xvi. Work within the organisation's policies. Guidelines/procedures and principles
- xvii. Where there are any concerns about the ethical nature of a particular issue or course of action, discuss with other staff and Committee members at the earliest opportunity to determine whether or not a contemplated action is ethical.

Associated Documents

Child Protection Policy

Complaint Management Policy

Disability Inclusiveness Policy

Gender Equality and Equity Policy

Policy: **CLAN Complaint Management Policy**

Version No: 1.0

Date Approved: 19 January 2014

Date Updated: 30 March 2015

Date Review Scheduled: 2020

1. Introduction

CLAN is a non-government organization whose mission is ‘To maximize the quality of life for children and their families who are living with chronic health conditions in resource-poor settings of the world.’ This involves CLAN working with partners and communities to achieve outcomes to build capacity and sustainability for their projects and activities. CLAN is committed to managing any complaints promptly in a fair and ethical manner.

2. Purpose

This policy has been developed to provide an appropriate complaints management framework for all Committee Members, Staff and, Volunteers, Partner Organisations of CLAN and communities with whom we work, including children involved in CLAN activities.

3. Scope

This Policy is intended to apply to any complaint, regardless of who makes it.

CLAN will accept complaints relating to our paid staff, our volunteers, our partners, our contracted service providers or anyone else acting on behalf of CLAN. Complaints may be made by those involved in CLAN activities, including families and children.

A complaint may be made by a person, community groups, those receiving goods and services or those who may be affected by services, a partner, a local organisation involved with CLAN, staff, volunteers, donors or a member of the public.

Anonymous complaints can be made, but this will likely have implications for the validity of investigations undertaken and thus may create potential legal issues depending on the complaint.

4. Definitions

<u>Term</u>	<u>Definition</u>
Complaint	An expression of dissatisfaction made to an organisation, related to its products or services, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.
Complainant	A person, organisation or its representative, making a complaint.
Inquiry	A request for information or an explanation
Feedback	opinions, comments, suggestions and expressions of interest in the products or the complaint handling process
Stakeholder or interested party	a person or group having an interest in the performance or success of the organization

5. Commitment

CLAN is committed to managing complaints effectively. The Policy for managing complaints is made available publically and when projects are implemented, people involved are made aware of the complaint management policy and about reporting and procedures to make a complaint.

CLAN seeks to ensure all actions taken are ethical, transparent and done with integrity. However, if this does not happen, and a complaint is made to CLAN, it will be addressed in accordance with the set procedure for complaint management. CLAN will assess all complaints made against individuals acting on behalf of CLAN or the organization, and deal with them professionally and transparently and with absolute confidentiality to respect the rights of the complainant and the person against whom the complaint is made.

CLAN believes that being open to complaints and taking them seriously is an important component of our organisational culture of continuous quality improvement. Every effort will be made to resolve complaints in a satisfactory manner and to protect the rights of the complainant, including maintaining confidentiality and privacy of identity. CLAN is committed to effective and efficient management of complaints and, as such, has a clearly articulated process for managing complaints documented within this policy. Reports about any complaint/s received and the management of such complaint/s will be presented at the following CLAN Executive Committee meeting. As complaints are classified as a risk to CLAN, the topic of Complaint Management is a standing agenda item.

Where appropriate, CLAN's personnel working in communities will have all necessary training to encourage and handle inquiries, expressions of concern, and management of complaints. This is required so that cultural and gender sensitivities are understood and managed effectively, and also to ensure that cases involving children are appropriately handled.

CLAN will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. Similarly, a person implicated in a complaint is not to be involved in any way with the handling of that complaint.

6 Procedures

To familiarise CLAN's Executive Committee members with the Complaints Policy, induction programs are undertaken for governing board members and all relevant personnel. Personnel directly involved in complaint handling are fully trained in all aspects of this policy and its implementation. Staff and volunteers will also be inducted into the complaints management policy and procedures.

CLAN will provide inductions to train field personnel to encourage, receive and handle complaints taking account of language issues and cultural sensitivities.

The Complaints Policy is distributed to all CLAN's paid staff, volunteers, partners, contracted service providers at induction sessions. Others personnel acting on our behalf are made aware of the Complaint Policy on the website and the overarching CLAN Policy Handbook. It is required that all who may be involved in any way with a complaint must formally signify their commitment

to this policy. This acknowledgement is recorded in the CLAN Executive Committee meeting minutes under the heading of 'Complaint Management'.

Where staff, volunteers, contractors or partners become aware of any wrongdoing, it is their responsibility to disclose such information to the CLAN President or a member of the Executive Committee. Protection and confidentiality will be provided for the person reporting the matter.

All relevant communications provide explanations about procedures for handling complaints. This includes CLAN's website, newsletters, annual reports, partnership agreements, inductions and staff/volunteer policies.

CLAN values receiving concerns and complaints in all relevant communications. CLAN's website provides information about making a complaint. The opening page has a prominent tab with the word 'complaint' linking to Complaint Management Policy and, therein, information on how to make a complaint. Where literacy or is a constraint or language a barrier, CLAN will orally, and through interpreters or through the health care professionals who treat the communities CLAN works with, invite expressions of concern and complaint on a regular basis, generally during the conduct of a support club meeting. Care will be taken to give this invitation in a way that is culturally appropriate, recognising that in some cultures people require greater encouragement to make a complaint. CLAN will take special care to manage complaints from vulnerable populations including children and marginalised groups. If required, CLAN will use pictorial means of communication.

CLAN will ensure that making a complaint is as easy as possible. Complaints will be received orally in person, over the phone, via the website form and by any written means. Every effort will be made to assist a complainant to put their complaint in writing or if made orally, it will be recorded as accurately as possible. Complaints by our community members will be carefully addressed when reported to us by the health care professionals and partners that we communicate with through our usual business.

7 Lodging a complaint

A complaint can be lodged with the President of CLAN or the Committee in accordance with this policy.

Complaints can be made in any form – verbal or written (electronic or hard copy form). However, if the complaint is of a serious or substantive nature, the aggrieved person is encouraged to put their complaint in writing, addressed to the President.

Where the President is the subject of, or otherwise closely linked to the cause of the complaint, the written complaint will be directed to another member of CLAN's Committee. Depending on the circumstances, CLAN may engage an external party to engage in a component of the complaint process.

Where a complaint involves a breach of the ACFID Code of Conduct, the complainant will be advised that they can make a complaint to ACFID, and will be given information about the ACFID website.

8. Categories of complaints

The main categories of complaints and the way they are dealt with is as follows:

- i. Complaints from donors and partners are logged and managed by members of the Committee. This may also include complaints from participants involved in CLAN programs or projects, including families and children.
- ii. Complaints from members of the public and supporters are logged and are managed by members of the Committee
- iii. All other external complaints are logged and are managed by a person designated by the Committee
- iv. Complaints about CLAN members that fall within the bounds of the CLAN Constitution will be dealt with in accordance with the Constitution (Sections 10 – 12).

9. Complaints to the Australian Council for International Development

If CLAN is not seen to be acting in accordance with the ACFID Code of Conduct, contact can be made with the ACFID Code of Conduct Committee by following this link:

<http://www.acfid.asn.au/code-of-conduct/complaints>

10. CLAN Complaint Register

The secretary is responsible for maintaining the CLAN Complaint Register including updating information in relation to complaints from receipt to finalisation.

11. Procedure for all complaints

All complaints are assessed and directed to the appropriate person for investigation, response and resolution (*see table below*).

- i. All complaints, including those forwarded anonymously, will be assessed and responded to (where possible).
- ii. An entry is made in the CLAN Complaints Register.
- iii. An acknowledgement receipt of the complaint will be forwarded to the complainant, preferably in writing, within five working days of receiving the complaint. If the receipt is made verbally, a note to this effect is placed in the complaints register.
- iv. The complaint will be assessed by the CLAN Executive Committee where a determination will be made as to the veracity of the complaint and whether to decline to investigate or to investigate it.
- v. In the event the complaint is declined, the complainant will be advised in writing of this decision and the reason why. For example, complaints that are deemed to be vexatious or frivolous will be responded to but not investigated further.
- vi. In the event the CLAN Executive Committee determine to investigate the complaint, the investigation will be allocated for investigation.
- vii. Whether a complaint is investigated or declined the complainant will be advised within ten working days of the proposed action.
- viii. An entry is made in the CLAN Complaints Register.
- ix. The complaint will be investigated as swiftly yet thoroughly as is reasonably practicable given the circumstances. This will include making all reasonable enquiries and making records of same (for example, making a written record of responses of person of which enquiries have been made, making copies of documents, screen shots from electronic records, etc).
- x. At the conclusion of enquiries the investigator prepares a report for consideration of the CLAN Executive Committee.

- xi. The CLAN Executive Committee will review the investigation outcome and make a determination as to what remedial action, if any, is to take place.
- xii. An entry is made in the CLAN Complaints Register.
- xiii. In the event remedial action is to be taken, the management of this action is to be allocated to the most appropriate representative of the CLAN Executive Committee. This Committee Member is required to update the CLAN Executive Committee until the matter is completely resolved.
- xiv. In the event of that there is no further action the matter will be closed.
- xv. Throughout the investigation, and at reasonable intervals if the complaint is protracted, complainants will be kept informed of progress by the investigator. This will provide the opportunity to ensure that the complainant is satisfied and confident that their complaint is being dealt with accordingly, in particular, if the matter is of a more complex nature and time is required to investigate the matter thoroughly.

12. Responsibilities for categories of complaints

<u>Type or source of complaint</u>	<u>Person responsible to investigate and resolve</u>
Decision of the organisation	President and/or member of CLAN's Committee
Any complaint from a member of CLAN	President and/or member of CLAN's Committee
Fundraising activities	President and/or member of CLAN's Committee or member in charge
Media and publicity eg, advertising or TV program	President and/or member of CLAN's Committee or staff member in charge
A particular program or project	Relevant Project Manager
Donations errors or concerns	Relevant Project Manager
About a staff member or volunteer	President and/or member of CLAN's Executive Committee
President	Other member of the Committee
A member of the Executive Committee	President
Other person associated with CLAN (eg, Ambassadors, volunteers, community fundraisers)	President or Vice President (who will refer on as relevant)
CLAN member	Member of the Committee representing the Committee in accordance with the Constitution

13. Reviewing and Reporting

As part of the complaint management process, the Committee will review any complaints made at the following Committee meeting. The Committee will review the complaint, the management process and findings, outcomes, and any recommendations or legal issues that have, or may arise from the complaint.

A summary analysis of all complaints will be prepared by the Secretary and for the Committee on an annual basis or as deemed necessary for inclusion in the Annual Report. The Committee will analyse complaints, decide if the report reveals systemic problems and, if so, how these will be addressed.

Associated Documents

Child Protection Policy

Human Resources Policy

Workplace Health and Safety Policy

Policy:	CLAN Conflict of Interest Policy
Version No:	2.0
Date Approved:	28 January 2011
Date Updated:	30 March 2015, Conflict of Interest Guide 2018
Date Review Scheduled:	2020

1. Introduction

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

Conflict of interest means a situation where an individual or organisation is involved in multiple interests, one of which could possibly corrupt the motivation for an act in the other. The presence of a conflict of interest is usually independent from the execution of impropriety. Hence, a conflict of interest can be discovered and voluntarily defused before any corruption occurs.

2. Purpose

This policy has been developed to provide a framework for all Committee Members of CLAN to effectively identify, disclose and manage any real or perceived conflicts of interest in order to protect the integrity of CLAN and manage risk.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN in whilst in the delivery of CLAN programs.

4. Definitions

<u>Term</u>	<u>Definition</u>
Conflict of interest	A set of circumstances that creates a risk that professional judgement or actions regarding a primary interest will be unduly influenced by a secondary interest. This situation presents a risk that the person may make a decision that is not based on the best interests of CLAN.

5 Policy

It is the policy of CLAN as well as the responsibility of the Committee that financial, ethical, legal or other conflicts of interest are avoided and that any such conflicts, if they do arise, will not conflict with the responsibilities and obligations of CLAN.

6 Responsibilities of the Committee.

The Committee is responsible for:

- i. the inclusion of a standing agenda item at governing body meetings
- ii. the documentation of any examples of conflict of interest in the minutes of governing body
- iii. establishing a quorum for dealing with any conflict of interest matters which may arise among Executive Committee members from a single family
- iv. monitoring compliance with this policy
- v. reviewing the policy on an annual basis to ensure that the policy is operating effectively.

Clan will strive to manage conflicts of interest by requiring Committee members to:

- i. avoid conflicts of interest where possible
- ii. identify and disclose any real or perceived conflicts of interest
- iii. carefully manage conflicts of interest as aligned to this Policy
- iv. follow this policy and respond to any breaches.

7. Procedures

- i. CLAN will strive to manage conflicts of interest by requiring Committee members to avoid conflicts of interest where possible.
- ii. CLAN 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 Committee Conflicts of Interest Register. A Committee member who believes another Committee member has an undeclared conflict of interest should specify in writing the basis of this potential conflict.
- iii. Members shall declare any conflicts of interest either at the start of the Committee meeting concerned or when a relevant issue arises. The nature of this conflict of interest should be entered into the meeting minutes. The interest should also be documented in the Conflict of Interest Register.
- iv. Where a conflict of interest or potential conflict of interest is identified and/or registered, the Committee member concerned shall leave the room (or leave the conference call as appropriate) as soon as that item comes up for discussion. The concerned Committee member shall not vote on that issue, nor initiate or take part in any Committee discussion on that topic (either in the meeting or with other Committee members before or after the Committee meetings), unless expressly invited to do so by unanimous agreement by all other members present.
- v. If a person declares themselves to have existing or potential conflict of interest confidentiality will be respected.
- vi. If a person alleges that another person has a conflict of interest, whether existing or potential, the Committee will make a recommendation as to what action shall be taken.
- vii. The Committee will consider and decide what action to take where a conflict of interest may arise. Options include decisions such as:
 - a. whether the conflict needs to be avoided or just documented
 - b. whether the conflict will impair the committee member's capacity to participate in discussions and/or decision-making
 - c. alternative options to avoid the conflict
 - d. potential impact on CLAN which may include reputation, outcomes, resources.

8. Compliance with this Policy

Where it appears that a Committee member has failed to comply with the policy, CLAN will investigate the circumstances. If evidence exists that the person has failed to disclose, or has engaged in actions that constitute a conflict of interest, the Committee will analyse all facts and outcomes before making a decision. A decision may involve continuing membership with or without conditions, or termination of their relationship with CLAN.

9. Examples of Conflict of Interest

The following activities illustrate examples of potential or actual conflicts of interest that should be avoided, and if they exist, should be disclosed in accordance with this policy.

i. Self-benefit may occur when:

- a. an Committee member or his/her immediate family or business interests stands to gain financially from any business dealings, programs or services of the organisation.
- b. an Committee member stands to gain personally or professionally from any insider knowledge gained in his or her capacity as a member of the organisation, and that knowledge is used to personal advantage.
- c. use of CLAN property for personal advantage, such as equipment, personnel, supplies for private use.

ii. Conflicting relationships:

- a. When a Committee member, personally, offers the services of a relative to the organisation.
- b. Where an Committee member or the ex/officio member of the Committee 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 CLAN.
- c. If multiple family members are involved in the governance and operations of CLAN, there must be a clear delineation of roles, responsibilities and decision-making procedures, including financial management decisions. The Committee is to approve any such arrangements.
- d. Where an Committee member has, or is involved in a service or is able to provide goods to meet an identified need, the Committee must take all possible steps to ensure that decisions related to the procurement of goods and/or services are fair, ethical, transparent and in the best interests of CLAN's mission. This may require the Committee to research and/or advertise for the required goods and/or services prior to making a decision.

iii. Gifts:

When a Committee member receives or potentially receives a gift or favour from an interested party, which goes beyond an expression of goodwill and amity and is intended or designed to create indebtedness.

iv. Other business relationships and dealings.

When a Committee member may be in a position to approve grants, contracts with other organisations in which the Committee member has a financial or other interest or relationship.

v. Intellectual Property.

When a member may use CLAN materials inappropriately or without authorisation.

vi. False Information.

When a Committee member may withhold, misrepresent, falsify information to external parties, or use internally to gain personal benefit.

vii. Gifts

When a Committee member personally accepts gifts or similar benefits from organisations or individuals that have partnerships with CLAN or have received grants or other benefits from CLAN.

9 Review

The Committee will review this Policy annually and when any conflict of interest occurs.

Attachment: Register of Conflict of Interests

Associated Documents

Code of Ethics and Professional Conduct Policy
Financial Impropriety Risk Management Policy

Financial Management Policy

Attachment: Register of Conflict of Interests

Name of Committee member	Description of interest	Has the Committee been notified of the interest?	Date of disclosure	Steps taken by board for dealing with the conflict	Actions taken by the board member to address the conflict

CLAN: CONFLICT OF INTEREST GUIDE

(2018)

Purpose

CLAN employees, staff, volunteers, partners and any other relevant participants are obligated to avoid and to disclose any ethical, legal, financial or other conflicts of interest involving CLAN, and to remove themselves from a position of decision-making authority relevant to any conflict situation involving CLAN.

Who must complete this Form

- 1 CLAN Association members
- 2 any employee, contractor, partner, volunteer or participant who has identified a conflict of interest
- 3 any employee or volunteer engaged in a consensual personal relationship
- 4 all employees, partners and volunteers involved in a CLAN project (e.g. procurement, tendering, supply of goods or items)

When the Form is to be completed

The Conflict of Interest Form must be completed:

- 1 at the time a conflict of interest is identified
- 2 when a member of CLAN's Association or a partner, a volunteer or a person associated with CLAN's activities has an actual, potential or perceived conflict of interest
- 3 by members at CLAN's Annual General Meeting
- 4 as determined by CLAN CEO and Chair, and/or by CLAN's Association members

Conflict of Interest Guide

A conflict of interest may be identified as:

- **a real conflict of interest:**
where a direct conflict exists between current official duties and existing private interests
- **an apparent conflict of interest:**
where it appears or could be perceived that private interests are improperly influencing the performance of official duties whether or not that is actually the case
- **a potential conflict of interest:**
where private interest are not, but could come into direct conflict with official duties
- **pecuniary interest**
where an actual or potential financial gain or loss or other material benefits or costs occur
- **non-pecuniary interest**
where there are private or personal interests that do not amount to a pecuniary interest which may arise out of family, or personal relationships, social or other cultural groups and associations and may include interest of a financial nature.

Examples of Conflict of Interest

Self-dealing, influence peddling, misuse of information or property, misuse of intellectual property, accepting undue benefits.

Management of a Conflict of Interest

For each conflict of interest reported or identified, a management plan will state conflict risks and determine actions to manage risk/s and resolve in favour of CLAN rather than that of the employee/CLAN volunteer or participant.

CLAN's President/Chair will review the plan and outcomes within a determined time or as required.

CLAN: CONFLICT OF INTEREST DISCLOSURE FORM

(Confidential)

Date:

Name:

Position/relationship with CLAN:

The conflict of interest has been identified as: *(Please select one or more of the following)*

- 1 A real conflict of interest
- 2 An apparent conflict of interest
- 3 A potential conflict of interest
- 4 Pecuniary interest
- 5 Non-pecuniary interest

OR

There is no conflict of interest

Declaration

I declare that to the best of my knowledge, the information in this form is true and correct. and am aware of my responsibilities to take reasonable steps to avoid any real, potential or apparent conflict of interest in connection with CLAN and to advise CLAN of any relevant changes where a risk of conflict may or does occur. I undertake to adhere to any conflict of interest risk management plan to ensure that CLAN's reputation and the public interests are adequately protected.

Signature

Name: (please print)

Date:

Management Plan *(if required, and to be discussed with the relevant person)*

Signature of President/Chair

Signature of CLAN employee/volunteer/partner/participant endorsement

Date:

Date management plan actions reviewed:

Result:

Policy:	CLAN Copyright and Intellectual Property Policy
Version No:	2.0
Date Approved:	28 January 2011
Date Updated:	March 2015
Date Review Scheduled:	2020

1. Introduction

CLAN is responsible for managing its assets, including its intellectual assets, in such a way as to maximise their contribution to the goals of the organisation. Subject to these responsibilities, CLAN is committed to the widest possible dissemination of its ideas and findings where these may assist others.

2. Purpose

The purpose of this policy is to provide a framework for all members with respect to copyright and intellectual property rights.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN in whilst in the delivery of CLAN programs.

4. Definitions

<u>Term</u>	<u>Definition</u>
Copyright	Copyright is a legal concept, enacted by most governments, that grants the creator of an original work exclusive rights to its use and distribution, usually for a limited time, with the intention of enabling the creator of intellectual wealth (eg, the photographer of a photograph or the author of a book)to receive compensation for their work and be able to financially support themselves.
Intellectual property	Intellectual property (IP) rights are the legally recognized exclusive rights to creations of the mind.[1] Under intellectual property law, owners are granted certain exclusive rights to a variety of intangible assets, such as musical, literary, and artistic works; discoveries and inventions; and words, phrases, symbols, and designs. Common types of intellectual property rights include copyright, trademarks, patents, industrial design rights, trade dress, and in some jurisdictions trade secrets.

5. Policy

Material created by staff of CLAN entirely on their personal time and not involving the use of CLAN's facilities, materials or intellectual property shall be the property of the creator, and an individual's "personal time" shall mean time other than that for which they receive salary (in the case of staff) or perform assigned functions (in the case of volunteers). If the material was created as part of stated duties and done in personal time, the material belongs to CLAN.

Staff or volunteers who claim that material was made or created on personal time have the onus of demonstrating this proposition. Staff engaged in work during personal time where later confusion may possibly occur are encouraged to discuss this with their supervisors.

With the exception of material created on personal time, all materials that result from activities carried out at CLAN, or developed with the aid of CLAN's facilities, staff, intellectual property or developed through funds administered by CLAN, shall be the property of CLAN except by specific prior written agreement. Materials written for the purposes of publication are excluded from this section.

Works by independent contractors shall be owned in accordance with the contract under which the work was created. CLAN shall insure that there is a written contract for work by an independent contractor specifying institutional ownership.

Any dispute between CLAN and its staff or volunteers, or between staff or between volunteers, on issues of copyright ownership shall be determined by the organisation's dispute resolution procedures.

Staff and volunteers are required to observe all applicable copyright laws and regulations. The copyright policies of CLAN are binding on all staff, whether paid or voluntary. The copyright policies of CLAN, as amended from time to time, shall be deemed to be a part of the conditions of employment of every employee and shall be included in the orientation material given to every volunteer.

The Committee is to develop and maintain procedures in accordance with this Policy.

6. Procedures

A statement of this copyright policy shall be included in the organisation's terms and conditions of employment.

CLAN will keep records of any discussions made with any staff member regarding any agreements as to the copyright status of any material.

Contracts made by CLAN with third parties shall specify in writing the copyright status of any material produced under that agreement.

Any dispute between CLAN and its staff or volunteers, or between staff or between volunteers, on issues of copyright ownership shall be determined by the organisation's dispute resolution procedures.

All uses of copyright materials are recorded.

All compensable uses of copyright material are appropriately processed.

7. Copyright on CLAN's materials

The Committee is required to ensure:

- i. that all uses of copyright materials are recorded
- ii. all compensable uses of copyright material are appropriately processed
- iii. all materials produced by or on behalf of CLAN are copyright. Permission to
- iv. reproduce such materials depends on the category into which they fall.
- v. all materials produced by or on behalf of CLAN will be classified.

8 Categories for classification into one of the following classes:

- i. Those materials that are copyright and that cannot be reproduced by any process other than for the purposes of and subject to the provisions of the Copyright Act and any licensing agreement between the user and CLAN.
- ii. Those materials that are copyright and that may nonetheless be circulated and/or reproduced as long as any reproduction features specified credits and disclaimers.
- iii. Those materials that are copyright and that may nonetheless be reproduced without conditions.
- iv. Those materials that are not copyright.

Legislation

Copyright Act 1968

Copyright Amendment Act 2006

Policy: CLAN Counter-Terrorism Policy

Version No: 1.0
Date Approved: March 2017
Date Review Scheduled: 2020

1. Introduction

CLAN is a not for profit, non-government organization operating in Australia and overseas. CLAN is committed to compliance with Australian and international counter-terrorism legislation. Australia’s Criminal Code Act 1995 Division 103 covers preventing the financing of terrorism by collecting, providing, or donating money to finance terrorism. The Criminal Code Charter of the United Nations Act 1945 (Sections 103.1 and 103.2) and the Charter of the United Nations (Terrorism and Dealing with Assets) Regulations 2008 also include legislation against financing of terrorism. In Australia the Attorney-General’s Department ‘List of Terrorist Organisations’ (Criminal Code Act 1995), and the DFAT ‘Consolidated List’ of individuals and DFAT entities subject to financial sanctions and/or travel list of terrorist organisations, are available to be checked by non-government organisations for information about terrorist organisations. CLAN will never knowingly support, tolerate or encourage terrorism or related activities.

2. Purpose

This policy outlines CLAN’s efforts to avoid engagement in terrorism activities whether by design or by consequence or coincidence, and to prevent the misapplication of CLAN’s funds and resources to support terrorist groups or activities, and/or if this is suspected.

3. Scope

This policy applies to CLAN, its governing body, members, partners, affiliates, contractors, staff, volunteers, and supporters.

4. Definition

Term	Definition
Counter-terrorism	Counter-terrorism (also called anti-terrorism) incorporates the practice, counter terrorism <u>military tactics</u> , techniques, and strategy that government, military, law enforcement, business, and <u>intelligence agencies</u> use to combat or prevent terrorism. Counter-terrorism strategies include attempts to counter financing of terrorism. (Wikipedia)

5. Policy

CLAN is primarily engaged in providing services, and not funding grants, to support children with non-communicable diseases and their families. CLAN plans and implements projects/programs in partnership with other groups or professionals, and is normally responsible for organising and funding the project/program. However, CLAN recognises that risks of vulnerability do exist in relation to potential misuse of its funds and resources.

CLAN will make all reasonable efforts to meet its obligations under Australian and International legislation which prohibit dealings with terrorist organisations and/or listed entities or persons.

CLAN will act with diligence in the oversight of delivery of funds and any other resources for the operation of programs and projects to ensure that they are not misused to support any individuals or organisations associated with terrorism.

CLAN will not knowingly receive funds or resources from questionable sources that may be linked to terrorism.

CLAN will share and discuss this policy with all partners and persons supporting CLAN and its activities. CLAN will need evidence from partners that they comply with CLAN's policies.

CLAN will assess risks and implement practices to protect funding to avoid any misuse of funds.

This policy is reviewed and may be amended whenever necessary to respond to new risks or legal requirements.

Templates for Agreements and MOU's will also be reviewed for relevance and currency to counter-terrorism legislation.

6. Procedures

i. Risk Assessment

CLAN recognises risks associated with contributing to projects overseas. Risk assessments and financial safeguards are planned to ensure a minimum risk level.

CLAN will exercise due diligence to confirm that recipients of funding or other aid given, are not identified terrorist individuals or organisations by consulting the Attorney-General's Department 'List of Terrorist Organisations' and the DFAT 'Consolidated List' of persons and entities subject to subject to financial sanctions and/or travel list of terrorist organisations.

In situations where funding may be requested to support an aid program, CLAN will assess applications for funding based on the applicant's identity and credentials. This may include and the applicant's Board/Committee members, staff, volunteers and partners of the applicant, associations, financial management, management practices, and fraud and anti-terrorism policies.

Other factors to be assessed may include, where relevant, funding to the applicant from other external sources and the applicant's relationships with other partners. Police checks and reference checks may be requested where relevant. Partners involved in programs with CLAN will need to formally agree to accept and implement this policy.

ii Management of Funds

CLAN will only conduct financial transactions through regulated financial institutions, for both receiving and sending funds. Documentation will be maintained for all financial assistance for beneficiaries.

iii Contracts, MOU's, Agreements

Contracts and agreements with partners will include requirements that the recipients of funding or other aid are to adopt and comply with CLAN's policies, including counter-terrorism legislation as required by the Australian Government.

iv Evidence

Recipients of funding are required to submit detailed accounting reports annually or as requested, and which have been audited externally by a validated authority or auditor in that country. Evidence will also be required from recipients of funding of how they comply with Australian

legislation for use of funding if any sub-partner or contractor receives funding as part of a plan or project supported by CLAN.

CLAN will review financial and other aid given by follow up checks, audits, and review of financial records to ensure assistance is delivered as intended. Any suspicious activity will be reported to the funding body and/or the Australian Federal Police, as required.

v Monitoring

CLAN's role in all plans or projects is determined by the Executive Committee. This may include, but not limited to, direct participation and involvement in plans and programs, supervising programs or projects, monitoring programs/projects, field visits, consultancy, contracts with organisation/s or individual/s. Where funding is provided to other entities or groups, monitoring of financial management will continue throughout the project/program to ensure that the funding is used as aligned to CLAN's goals and outcomes for the project/program.

7. Reporting

Reports will be given to the Committee for each project/program undertaken by CLAN. The Committee will assess the use of funds according to funding criteria as stated in the Contract, Agreement, or MOU, and aligned to CLAN's Policies that apply to the application.

Associated Documents

Project Design, Monitoring and Evaluation Policy
Risk Management Policy

Legislation

Anti-Money Laundering and Courter Terrorism Financing Act 2006 (Cth)

Policy: CLAN Disability Inclusive Policy

Version No: 1.0

Date Approved: March 2017

Date Review Scheduled: 2020

1. Introduction

CLAN is a not for profit, non-government organisation whose mission is ‘To maximise the quality of life for children and their families who are living with chronic health conditions in resource-poor settings of the world.’ CLAN’s primary role is focused on support for children with chronic health disease and their families. A chronic health condition may be due to a medically identified non-communicable disease (NCD) and the disorder may or may not result in a classified disability. Disability inclusiveness is a basic premise underlying planning for all CLAN’s projects/programs, advocacy activities and fundraising through its efforts to improve health and community support for children with specific needs.

2. Purpose

This policy provides a framework for promoting inclusiveness and equality for children with chronic health conditions in the context of CLAN’s projects/programs to provide specific support to children with NCD’s and their families, and advocacy activities.

3. Scope

This policy applies to all staff and other key groups. ‘Staff’ refers to: full time, part time, international and national and also those engaged on short term contracts such as: consultancies, researchers, photographers etc. ‘Others’ refers to: visitors, volunteers, board members, trustees, staff/volunteers in partnership agencies, and any other individuals or groups that have a responsibility with respect to CLANs programs.

4. Definitions

Term	Definition
Disability	The UN Convention on the Rights of Persons with Disabilities proposes the following definition: “persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others” (UN, 1998).
Non-communicable	Non-communicable diseases (NCDs) do not result disorder from an acute or infectious process and hence are ‘not communicable’. The disease may be the result of genetic, physiological, environmental and behaviours factors.

In children, chronic health conditions may be classified as:

Congenital - meaning a child is born with the conditions (eg Down syndrome; hypothyroidism)

Acquired - meaning a child develops the condition at some time after birth e.g. Type 1 Diabetes; Epilepsy.

Preventable - meaning the child could possibly not have acquired the disease if a specific action had been taken to stop it (eg HIV; traumatic injuries)

Non-Preventable -meaning there is nothing that could have been done (that we yet know of) to stop the child from having the condition (eg Autism; CAH)

Communicable – meaning the chronic disease is somehow infectious (eg HIV, TB)

Non-Communicable meaning the chronic condition is not infectious in any way eg Asthma, Epilepsy.

5. Disability Inclusiveness

Disability inclusiveness involves implementing policies and practices in a community or organisation to promote conditions, to protect and ensure that children with disabilities can enjoy a quality of life similar to other children in their community.

The child with a non-communicable disease may or may not experience a classified disability. However, a child with a chronic health condition will experience challenges and demands similar to a child with a classified disability, and which will impact on their quality of life compared to other children. And for all children it is important that they also are accepted, included without discrimination, and not excluded.

6. Rights of the Child

CLAN supports the UN Convention on the Rights of the Child (UNCRC), particularly Articles 23, 24, and 27 which state the rights of the disabled child to enjoy a quality of life and to be part of their community. The rights state that ‘a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community. And that ‘ the disabled child has effective access to and receives education, training, health care services, rehabilitation services, preparation for employment and recreation opportunities in a manner conducive to the child achieving the fullest possible social integration and individual development, including his or her cultural and spiritual development.’ (Article 23)

7. Policy and Procedures

CLAN’s Mission and Vision are aligned to the UN Convention rights for a disabled child, and CLAN’s endeavours are planned to achieve positive outcomes stated in the UNCRC rights for disabled children, particularly for children with NCD’s. CLAN is involved in activities to support children with NCD’s such as, but not limited to, Autism, Congenital Adrenal Hyperplasia (CAH), Diabetes, and Osteogenesis Imperfecta.

CLAN will include a risk assessment of any potential areas of discrimination when planning projects/programs or other activities. Planning will take into account the following attitudes and practices:

- i. cultivating a culture of inclusiveness and acceptance in projects/programs for children with NCD’s
- ii. working with disabled children and their families with dignity and respect
- iii. respecting the cultures, customs, beliefs of the country where it is involved in undertaking projects
- iv. promoting partnerships through collaboration and discussion with partners, community, families and children involved in projects/programs
- v. preventing any bullying or discrimination occurring during CLAN’s projects/programs.

CLAN's scope of activities which include disability inclusiveness of children with NCD's involve:

- i. multi-sectoral partnerships and projects to work directly with children and their families
- ii. partnerships with in-country medical professionals
- iii. partnerships and advocacy, at community, national, and international levels
- iv. involvement with NCD Child
- v. advocacy activities to increase knowledge and awareness of the needs of children with NCD's
- vi. fundraising to finance projects/programs

CLAN will review each activity undertaken to determine effectiveness of inclusive strategies for the group of children involved in each project/program.

Associated Documents

Child Protection

Code of Ethics and Professional Conduct Policy

Development Principles in Project Design, Monitoring and Evaluation Policy

Equal Employment Opportunity & Anti-Discrimination Policy

Gender Equality

Staff Training & Development Policy

Policy: **CLAN Drug Donations to Developing Countries Policy**

Version No: 1.0

Date Approved: March 2017

Date Review Scheduled: 2020

1. Introduction

CLAN's mission has highlighted the need for correct medicines to be available to families with few resources in resource poor countries. However, due to legislation in some countries, the drugs required may not be produced within the country. Also, the correct medicines are sometimes not allowed to be imported, or the drugs may be imported but costs of import taxes and other factors such as storage and distributions may make the drugs unaffordable for families.

CLAN endeavours to work with partners for change to improve the availability, accessibility and costs of drugs to health services and families so that children may have a better life. CLAN is committed to working in an advocacy role to support legislative change in order to make medications and/or medical equipment more accessible for children with needs. CLAN also seeks opportunities to partner with pharmaceutical companies for drug donations to support children with CAH and other rare diseases in resource poor countries such as Vietnam, Philippines, Indonesia and Pakistan.

2. Purpose

This Policy is to guide CLAN's decisions about their role and responsibilities relevant to the donation of drugs given to developing countries for children participating in CLAN's programs or projects. It is essential that when drugs are donated to resource poor countries, the medicines provided are to meet specific health needs, and that they will be distributed ethically and administered correctly.

3. Scope

This Policy applies to CLAN's governing body and all partners and affiliates involved in CLAN programs.

4. Definitions

Term	Definition
Drug Donation	The act of presenting drugs as a gift, grant, or contribution.

5. Policy

CLAN is committed to adhering to the WHO Guidelines for Drug Donations (1999) (specifically s.VI, Management of drug donations by the recipient) and the APAC Australian guidelines for drug donations to resource poor countries (2001). CLAN will also work with partners to ensure adherence to the guidelines.

6. Procedures

CLAN will work with the donor of drugs to ensure that donated drugs are appropriate, appropriate

and affordable, and will meet the specific requirements of children with Non Communicable Diseases (NCD's).

The following guidelines presented in the APAC Australian guidelines will be the basis for discussions and written contracts or agreements with any donor wishing to donate drugs for children participating in CLAN programs or projects.

1 All drug donations are to be based on an expressed need

For each donation, and before it is accepted and distributed, CLAN will collate evidence of specific needs, distribution processes, information about recipients, and assessment of any needs for training of professionals or persons who administer the drugs to children. All drugs should be on the national list of essential drugs of the recipient country, or if such a national list is not available, on the WHO List of Essential Drugs for Children. In cases where drugs are not available or affordable in the country, CLAN will endeavour to work with partners and government agencies to facilitate change in order improve the health of children with NCD's.

2 All drugs should comply with quality standards in both the donor and recipient country.

As part of its risk management strategies, CLAN will work closely with pharmaceutical companies who agree to donate drugs to developing countries to ensure the quality, suitability and shelf-life of donated drugs. No drugs should be donated that have been previously given to other recipients and returned. Timeframes for sending, receiving and administering the drugs will be part of each contract or agreement. Documentation will be kept if donated drugs need government permission to be exported. Recipients should formulate their own national guidelines for drug donations, based on international guidelines.

3 Presentation, packaging and labelling.

Drugs should be labelled to meet the needs of recipients, and include information such as name, dose, strength, manufacturer, storage conditions, expiry date. Planning should involve research and determination of quantities of drugs desired as donations for specific medical conditions, for example, children with Congenital Adrenal Hyperplasia (CAH).

4 Export and transport

To achieve desired outcomes, CLAN will work with all partners to determine quantities, dates, persons responsible in sending and receiving and distributing the donated drugs. Documents must be kept covering costs (and who is responsible for costs), transport and clearance arrangements, and storage of drugs until distributed. Costs of getting the donated drugs to the recipients should be covered by the donor unless otherwise agreed.

5 Management

CLAN will work closely with the donor/s of drug donations at all stages of planning and sending the drugs to developing countries. Where relevant, CLAN will be involved in programs and projects where education and training seminars are aligned with drug donations. Disposal of any drug donations that are not suitable will be by the recipient medical service according to their policies and procedures.

6 Review

CLAN will review the processes and outcomes of drug donation's with the relevant pharmaceutical company, distributors and professionals who work with the families of children with NCD's. Any issues will be recorded and researched further to aid planning for efficiency and effectiveness for any future donations.

CLAN: RECORD FOR DRUG DONATIONS: Plan or Project Details

Country and location	
Plan or project aligned with drug donation	
Donor for the drug donation Pharmaceutical company	
Purpose, statement of needs	
Goals and stated outcomes	
Name of Drug	
Amount of drugs donated	
Governing authority approval	
Recipient Administrator of drug donation. Name, title, Contact details	
Other Personnel involved	
Estimated number of: * ages of children, *NCD * number of families	
Community involvement (where applicable)	
Sustainability Plan	
Monitoring and reporting on program implementation	
Other Partners involved in the program/project (if relevant)	
Estimated risks	
Estimated timeframes: planning, sending, receiving	
Estimated budget (costs?)	
Recognition of CLAN and donor's contributions	
Monitoring procedures	
Final report	

Date presented to CLAN Executive Committee:

Initial plan..... Final report.....

Signature of President.....

References

- Australian Pharmaceutical Advisory Council (APAC), Australian guidelines for drug donations to developing countries 2000.
- WHO Guidelines for Drug Donations 1999

Policy: **CLAN Equal Employment Opportunity and Anti-Discrimination Policy**

Version No: 2.0

Date Approved: 28 January 2011

Date Updated: March 2015

Date Review Scheduled: 2020

1. Introduction

CLAN is a not-for-profit Non Government Organisation (NGO) who is committed to supporting human rights for all people including children. CLAN supports human rights as its projects and activities are about respecting the inherent value and dignity of all people, including those who are vulnerable, marginalised or excluded. These rights include the right to equality and non-discrimination for adults and children that CLAN works with as CLAN's mission is to support children with chronic health conditions. This is achieved through professionals working with partners in resource poor countries to achieve positive outcomes for children.

CLAN recognises that equal employment opportunities are an employment obligation, social justice and legal responsibility. CLAN also recognises that prohibiting discriminatory policies and procedures is sound management practice. This policy is designed to ensure that CLAN complies with its obligations under relevant legislation.

2. Purpose

This policy has been designed to facilitate the creation of a workplace culture that maximises company performance through employment decisions based on the identified needs of CLAN. As CLAN is involved in a wide scope of activities, the needs for personnel may change based on the programs or projects undertaken at different times. Personnel required for different activities will be selected based on merit.

3. Scope

This policy applies to all managers, supervisors, staff volunteers and others. They are to be aware of their obligations, responsibilities and rights in relation to Equal Employment Opportunity and anti discrimination. Paid employment may be for temporary positions or contracts. Where CLAN's work is undertaken by volunteers and others in unpaid roles, these individuals will also be given equal opportunities without discrimination.

4. Definitions

<u>Term</u>	<u>Definition</u>
Equal Employment opportunity	<p>Equal Employment Opportunity (EEO) means equal access to jobs and benefits and services for all employees and prospective employees in the workplace. EEO aims to ensure fair and equitable outcomes in all areas of employment which relate to recruitment, selection, access to information, supervision and management. Equal Employment Opportunity is about:</p> <ul style="list-style-type: none">• fair practices in the workplace• management decisions being made without bias• recognition and respect for the social and cultural backgrounds of all staff and customers

- employment practices which produce staff satisfaction, commitment to the job and the delivery of quality services to customers
- improving productivity by guaranteeing that:
 - the best person is recruited and/or promoted
 - skilled staff are retained
 - training and development are linked to employee needs and customer needs
 - the workplace is efficient and free of harassment and discrimination.

Anti Discrimination Legislation Anti-discrimination legislation refers to the law on the right of people to be treated equally.

Discrimination Discrimination is treating an individual with a particular attribute less favourably than an individual without that attribute or with a different attribute under similar circumstances. It can also be, seeking to impose a condition or requirement on a person with an attribute who does not or cannot comply, while people without that attribute do or can comply.

Victimisation Occurs where an employee is treated harshly or subjected to any detriment because they have made a complaint of discrimination or harassment. Victimisation will also happen if a person is subjected to a detriment because they have furnished any information or evidence in connection with a discrimination complaint.

5. Policy

CLAN is an equal opportunity employer and will provide equality in employment for all individuals who are employed, seeking employment or contributing as a volunteer. Each person will be given a fair and equitable chance to compete for appointment, promotion or transfer, and to pursue their career as effectively as others. CLAN will not condone and regards as unfair all forms of unlawful discrimination or vilification including that which relates to:

- | | |
|--|---|
| • gender | • HIV/AIDS vilification |
| • sexual harassment | • religious belief or activity |
| • pregnancy | • political belief or activity |
| • potential pregnancy | • physical features |
| • marital/domestic status | • industrial activity |
| • disability | • employer association activity |
| • race, colour, national extraction, social origin, descent, and ethnic, ethno-religious, or national origin | • trade union activity |
| • age, compulsory retirement | • breastfeeding |
| • family responsibilities, family status, status as a parent or carer | • sexuality |
| • racial vilification | • trans-sexuality |
| • homosexual vilification | • transgender |
| • physical or mental disability | • profession, trade, occupation, or calling |
| • displacement | • medical record |
| | • criminal record |
| | • living in poverty |
| | • class or socio-economic status |

For all positions, performance and competence are to be used as the basis for initial employment, performance assessment, training and development opportunities and promotions.

6. Procedure

- i. All decisions relating to appointment, promotion and career development must be made without regard to any matters, other than the individual's inherent ability to carry out the position. Any concerns or queries should be directed to the Committee.
- ii. Employees who believe they being treated unfairly as a result of discrimination should notify their manager or the CLAN Executive Committee.
- iii. Any matter which does not comply with the principles of equal employment opportunity must be addressed as promptly and sensitively as possible;
- iv. Ongoing support and guidance is provided to all employees in relation to Equal Employment Opportunity principles and practice.

7. The Committee is to ensure that:

- i. all staff/volunteers and others understand and are committed to the principles and legislation relating to equal opportunity and that they are applied in the workplace;
- ii. all decisions relating to appointment, promotion and career development are made without regard to any matters, other than the individual's inherent ability to carry out the job
- iii. an environment is provided which encourages EEO and set an example by their own behaviour
- iv. all staff are aware of the EEO and Anti-discrimination policy
- v. all employees, contractors and volunteers must treat all colleagues and customers with respect and professionalism without regard to non-relevant criteria or distinctions.

8 Reporting

A report will be made to the Committee of any incident or complaint made relating to an equal opportunity issue. This Policy will be reviewed as needed and at least every three years.

References:

The following legislation operates at a Federal level and the Australian Human Rights Commission has statutory responsibilities under them:

Age Discrimination Act 2004 (Cth)

Australian Human Rights Commission Act 1986 (Amended 13 April 2017) (Cth)

Disability Discrimination Act 1992 (Cth)

Racial Discrimination Act 1975 (Cth)

Sex Discrimination Act 1984. (Cth)

New South Wales – Anti-Discrimination Act 1977

Policy:	CLAN Financial Impropriety Risk Management Policy
Version No:	2.0
Date Approved:	28 January 2011
Date Updated:	October 2019
Date Review Scheduled:	2021

1. Introduction

In the Non-Government Organisation setting it is imperative to have safeguards in place to minimize the risk of financial impropriety whether deliberate or not by any member of the organisation. Such activity could be found to be illegal and attract a serious legal penalty. More importantly it could irreparably damage the reputation of CLAN.

CLAN prohibits fraud and financial impropriety in the actions of its Committee members, employees, vendors, contractors, consultants, volunteers, and others seeking or maintaining a business relationship with CLAN.

2. Purpose

The purpose of this policy is to:

- i. ensure that all parties are aware of their responsibilities for identifying exposures to Financial impropriety, including but not limited to fraud, bribery, corruption, counter-terrorism, money=laundering, and theft. Responsibilities also include undertaking risk management procedures to establish controls and procedures for preventing such financial impropriety and/or detecting it when it occurs
- ii. provide guidance to staff as to action which should be taken where they suspect any financial impropriety
- iii. provide a clear statement to staff forbidding any illegal activity including financial impropriety for the benefit of the organization
- iv. provide assurance that any and all suspected financial impropriety will be fully investigated.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN whilst in the planning and /or the delivery of CLAN programs. This policy also applies to partners who receive funding and resourcing from CLAN.

4. Definitions

<u>Term</u>	<u>Definition</u>
Financial Wrongdoing:	Behaviour that is illegal or immoral with regards to financial transactions. Includes bribery, corruption, fraud, money-laundering, terrorism financing and violation of sanctions imposed by the Australian government.
Fraud:	Dishonestly obtaining a benefit, or causing a loss, by deception or other

means.

Terrorism Financing Intentionally providing or collecting funds and being reckless as to whether those funds would be used to facilitate or engage in a terrorist act.

Fraud and financial impropriety Fraud and financial impropriety shall include, but is not limited to, the following:

- forgery or unauthorized alteration of any document or account
- forgery or unauthorized alteration of a cheque, bank draft, or any other financial document
- misappropriation of funds, securities, supplies, or other assets, including employee time
- impropriety in the handling of money or reporting of financial transactions
- profiteering as a result of insider knowledge of information or activities
- unauthorised disclosure of confidential or proprietary information to any unauthorised individual or organisation
- unauthorised disclosure of investment activities engaged in or contemplated
- accepting or seeking anything of material value from contractors, vendors, or other persons providing services or materials, except as otherwise permitted by law or policy
- inappropriately destroying, removing, or using records, furniture, fixtures, or equipment
- failure to provide financial records required by government or other entitled entities
- failure to disclose conflicts of interest as required by law or policy
- disposing of property for personal gain or benefit
- any other dishonest act regarding the finances
- violation of sanctions imposed by the Australian Government

Financial Wrongdoing: Behaviour that is illegal or immoral with regards to financial transactions. Includes bribery, corruption, fraud, money-laundering, terrorism financing and violation of sanctions imposed by the Australian government. (Authored by Michelle Pearce based on requirements of Compliance Indicator 8.2.1).

Fraud: Dishonestly obtaining a benefit, or causing a loss, by deception or other means (Fraud Control Framework, Commonwealth Attorney General's Department).

Risk management	AS/NZS 4360:2004 defines as, "the systematic application of management policies, procedures and practices to the tasks of establishing the context, identifying, analysing, assessing, treating, monitoring and communicating". It is an iterative process that, with each cycle, can contribute progressively to organisational improvement by providing management with a greater insight into risks and their impact.
Terrorism financing	The financing of terrorism involves providing finance or financial support to individual terrorists or non-state actors. Funds may be raised through donations, self-funding or criminal activity and transferred to a terrorist network, organization or cell.

5. Policy

The Committee of CLAN has ultimate responsibility for the prevention and detection of fraud and financial impropriety and is responsible for ensuring that appropriate and effective internal control systems are in place.

All managers/supervisors must ensure that there are mechanisms in place within their area of control to:

- i. assess the risk of financial impropriety
- ii. educate employees about prevention and detection of financial impropriety
- iii. facilitate the reporting of suspected financial impropriety

All staff, volunteers/others share in the responsibility for the prevention and detection of financial impropriety in their areas of responsibility. All staff have the responsibility to report suspected financial impropriety. Any staff member/volunteer/other who suspects financial impropriety must immediately notify the Executive Committee or their supervisor. In situations where the supervisor is suspected of involvement in the financial impropriety, the matter should be notified to the next highest level of supervision.

All complaints of suspected fraud or financial impropriety will be investigated by the appropriate body pending the nature of the suspected activity. If the activity is suspected of being illegal the matter will be referred to the respective law enforcement agency.

Any finding of fraud or financial impropriety by any staff member shall constitute grounds for dismissal.

6. Procedures

- i. Financial impropriety prevention accounting procedures shall be incorporated in the organisation's policies related to Cash Management, Credit Card Use, Commercial Transactions, and Investment.
- ii. Authority to issue and sign cheques on behalf of CLAN is limited to the following rules:
 - a. All cheques must contain two eligible signatures.
 - b. Eligible signatories are Committee members or staff members who have been previously nominated and endorsed by the Committee.
 - c. Any two of the above have the authority to sign cheques.

- d. Signatories cannot sign a cheque made payable to themselves.
- e. A list of all cheques issued each month will be provided to the Treasurer
- f. Family members may not sign the same cheques
- iii. Company credit card and internet banking Transactions must be for business-related goods and services.
- iv. Copies of official receipts and transaction verification slips must be kept and presented to the Treasurer /Accounts section in a timely manner. In instances where such official documentation is unavailable, a written explanation describing the transaction's detail must be provided.
- v. No one transaction must exceed the purchase or payment limit set.
- vi. A requisition or purchase order must be made within the accounting system pending payment, where possible, in particular for goods and services above the prescribed amount.
- vii. Recruitment strategies shall incorporate prevention to financial impropriety risks:
 - a. Applicants may be required to undergo police checks where required by the duties of the position
 - b. Previous employers and referees shall be contacted
 - c. Requests may be made of potential applicants for validation of transcripts, qualifications, publications and other certification or documentation.
- viii. Financial impropriety prevention and detection issues will be included in relevant staff development and induction activities. Accounting records will be regularly examined and monitored by the finance manager, or functionary, on a monthly basis
- ix. Financial Management reports will be regularly tabled for examination during Committee meetings.
- x. Vendors and contractors shall be asked to agree in writing to abide by these policies and procedures.

7. Reporting and Investigation

- i. Reports of alleged financial impropriety or wrongdoing are to be reported to the President of CLAN. Information and contact details are provided on CLAN's website: www.clanchildhealth.org.au
- i. All complaints of suspected financial impropriety or wrongdoing will be investigated providing protection of those individuals making the complaint and natural justice to those individuals being the subject of any such complaint.
- ii. Where, as a result of that investigation financial impropriety has been established or suspected the matter shall be referred to the respective law enforcement agency. Any action taken by police shall be pursued independently of any employment-related investigation by the organisation.
- iii. If a staff member/volunteer/other is found to have committed fraud or financial impropriety, the Committee shall take or recommend appropriate disciplinary action up to and including termination of engagement.
- iv. In cases involving monetary loss, CLAN may seek to recover lost or misappropriated funds.

8 Sanctions

The Committee may suspend, transfer to other duties any employee who is under investigation for fraudulent behavior or financial impropriety, and reserves the right to terminate any employee after an investigation.

References

Australian Auditing Standards
Australian Accounting Standards

Supporting Documents

Counter Terrorism Policy
Financial Management Policy
Fund Raising Policy
Risk Management Policy
Whistleblowing Policy

Policy:	CLAN Financial Management Policy
Version No:	1.0
Date Approved:	March 2017
Date Review Scheduled:	2020

1. Introduction

CLAN is a not for profit, non-government Incorporated Association committed to supporting children with non-communicable disorders in resource poor countries. CLAN is reliant on fundraising and donations to support its mission and vision. The mission of CLAN and budget requirements determine strategies for the scope of activities it can undertake over a three to five years timeframe. The Committee is responsible for overseeing the budget and that it operates within a sustainable financial framework.

2. Purpose

As a registered Non-Government Organisation, CLAN is accountable to government agencies, donors, supporters and partners. This policy is designed to set out the Terms of Reference for CLAN's Committee. It outlines the financial responsibilities including the process for compiling, monitoring and reviewing the annual budget, interactions with auditors, reporting requirements and meeting procedures.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN in the delivery of CLAN programs.

4. Definitions (a summary)

Term	Definitions
Assets	These are things that belong to CLAN, including intangible assets such as goodwill and reputation.
Audit	An audit is a thorough check of an organisation's financial records by an auditor or Certified Practicing Accountant. It ensures that the accounting is correct and that financial obligations are met.
Balance Sheet	A financial statement that shows the organisation's financial position at the close of business on a certain date.
Capital	Capital is the funding and financing available to an organisation.
Equity	The organisation's net worth, including accumulated funds and reserves, less liabilities.
Operating Expenditure	The money used to run CLAN and implement its activities.
Revenue	Revenue is the total income that CLAN receives.

5. Policy and Procedures

The Committee conducts a budget planning process each year as an integral part of its annual business planning processes. CLAN is committed to, and responsible for quality financial management that is compliant with legislation, is sustainable, and that will maximise the capacity of CLAN to fulfill its goals. CLAN operates under a budget that must be flexible and therefore it is regularly monitored and reviewed. The mission of CLAN and budget requirements will determine programs, projects and activities that are over a three to five year timeframe.

6. Responsibilities of the Committee

Financial management governance is a core component of the Committee's responsibilities. The Committee will decide on strategy for CLAN programs, projects and activities, in order to ensure financial viability, risks and controls, and value for the project proposal related to CLAN's goals.

As part of managing budgets for projects and activities, the Committee will assess a partner's capacity to support a CLAN project or activities. This may include assessment of funds, personnel involved, resources, time, and any other factor relevant to a specific project or activity. As part of a risk assessment for financial costs, the Committee will also determine the right of potential partner/s to be involved in CLAN projects and activities, based on factors such as prohibited listings, experience and capacity of partners, and potential for a partner's involvement in sustainable programs or projects .

7. Delegations of Authority

The Committee is delegated to:

- i. exercise budgetary control including certification of accounts and acquittals
- ii. write off debts
- iii. approve project expenses, including overseas transfers and payments, and travel
- iv. approve credit cards
- v. control physical assets
- vi. approve purchasing and contracting arrangements

8. Meeting Procedures and Reporting Requirements

Committee meetings will be held regularly to determine finances measured against the agreed annual work plan. The Agenda is shared at least 5 work days prior to each meeting.

Finance reports are to be presented to each Committee meeting should include:

- i. monthly financial statements
- ii. any risks as identified under the Risk Management Policy
- iii. recommendations on policies including financial policies
- iv. annual financial statements
- v. internal and external audits
- vi. any recommendations requiring the Committee's approval.

9. Review

The Committee will conduct an annual reviews of its financial responsibilities and functions.

10. Financial Controls

The role of CLAN's Committee is to ensure sound financial management for CLAN programs, projects, activities and partnership arrangements

Areas of responsibility include monitoring and reviewing areas of financial management processes that:

- i. ensure that CLAN is solvent
- ii. determine a budget that is sustainable and approved
- iii. ensure financial statements are accurate and audited
- iv. ensure that controls are in place to prevent fraud and mismanagement
- v. manage financial risk, and handle errors
- vi. ensure safety and security of financial records
- vii. segregate duties of Committee members for different financial responsibilities
- viii. determine value of funds provided for CLAN's mission and vision
- ix. review program and project costs to determine viability of implementing the proposal

11. Management of donations (see also Fundraising Policy)

CLAN's income is due primarily to donations. Other income may be gained from interest, consultations, and member's subscriptions. All income is used to support CLAN's mission and vision. All funds raised via fundraising activities will be used for the stated purpose of the appeal and will comply with CLAN's stated mission.

12. Monitoring and Review

This Policy is to be reviewed on an annual basis and aligned to the external annual audit.

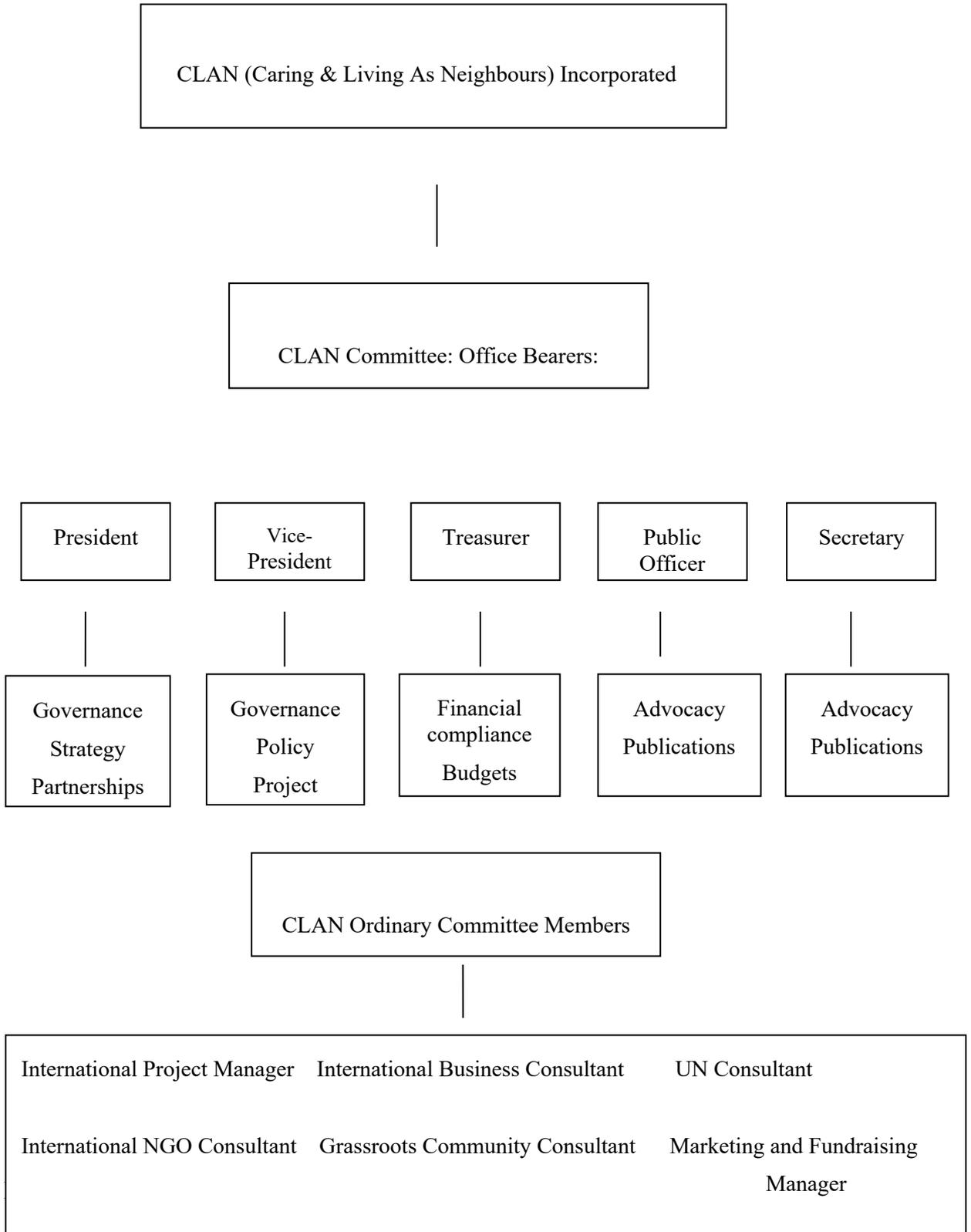
Associated Documents

Drug Donations to Developing Countries
Financial Impropriety Risk Management Policy
Fundraising Policy
Non-Aid and Development Activities Policy
Project Design, Monitoring and Evaluation

References

Australian Auditing Standards
Australian Accounting Standards

CLAN Organisation Chart



Policy: **CLAN Fundraising Policy**

Version No: 2.0

Date Approved: 28 January 2011

Date Updated: March 2015

Date Review Scheduled: 2020

1. Introduction

Not for profit, non government organizations rely heavily on the generosity of others to thrive and deliver on their vision, mission and objectives. The Committee is committed to ensuring that fundraising activities are carried out in a legal, transparent and ethical manner and that the funds are used as per their stated purpose in the fundraising communications.

2. Purpose

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

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN in whilst in the delivery of CLAN programs.

4. Definitions

Term	Definition
Fundraising	The seeking of financial support for a charity, cause, or enterprise.

5. Policy

CLAN's guiding fundraising principle is that decisions to accept or reject donations are governed by the criteria that all donations are to support CLAN's mission. Further, fundraising techniques are to be undertaken in a transparent and ethical manner, designed to avoid any offense.

CLAN is committed to portraying children with chronic health conditions and their families in a manner that respects their dignity, values, history, language and culture. Where partners are involved in programs or projects, they will be invited to collaborate with CLAN for planning fundraising.

6. Fundraising Standards

CLAN is committed to complying to the following standards:

- i. fundraising activities carried out by CLAN will comply with all relevant legislation
- ii. any communications to the public made in the course of carrying out a fundraising activity shall be truthful and non-deceptive
- iii. 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
- iv. all personal information collected by CLAN is confidential and is not for sale or to be given away or disclosed to any third party without consent

- v. no person who is directly or indirectly employed by or volunteering for CLAN shall accept commissions or bonuses for fundraising activities on behalf of the organization
- vi. advertising materials will include CLAN's identity, address, ABN and purpose
- vii. donors will be acknowledge as appropriate with regard to the situation and beneficiaries
- vii. where images and stories are used for fundraising purposes, free, informed consent is to be obtained prior to use
- vii. images and messages for fundraising will not:
 - a. be untruthful, exaggerated or misleading (e.g. not doctored, created as fiction or misrepresenting the country, etc)
 - b. be used if they may endanger the people they are portraying
 - c. be used without the free, prior and informed consent of the person/s portrayed, including children, their parents or guardians
 - d. present people in a dehumanized manner
 - e. infringe child protection policies and in particular show children in a naked and/or sexualized manner
 - f. feature dead bodies or dying people.

7. Fundraising Committee

A Fundraising Sub-Committee may be formed to carry out the major fundraising tasks. The Executive Committee will determine the terms of reference for the sub-committee and approve any public use of images and messages used. The Sub-Committee will report regularly to the Committee, including tabling of meeting minutes at Committee meetings.

8. Outsourced fundraising

CLAN will ensure that:

- i. contracts are in place which meet all the relevant legislative and regulatory requirements
- ii. specific expectations, responsibilities and obligations of each party are clear and in writing
- iii. CLAN is identified as the beneficiary of the funds
- iv. contractors are clearly identified.
- v. CLAN retains the responsibility for approval of public use of images and messages.

9. Fundraising Risks

- i. Fundraising activities should not be undertaken if they will expose the organisation to significant financial risk.
- ii. Fundraising activities should not be undertaken if they may be detrimental to the good name or community standing of CLAN.
- iii. CLAN Fundraising campaigns will meet the following criteria:
 - a. they will not include overly emotive appeals to donors or exaggerate the negative consequences of donor inactivism
 - b. they will accurately portray intended recipients' situation and the intended solutions
 - c. they will adhere with the provisions of the Privacy Act 1988 with regards to the use of donor information.
 - d. Companies and organisations specifically excluded from making financial contributions to CLAN include gambling/tobacco/alcohol companies.

10. Reporting

A fundraising report will be prepared by a representative of the fundraising sub-committee for inclusion in CLAN's Annual Report. The Report may include for example, costs of fundraising versus funds raised, associated costs including time, management of events and volunteers, risks, unexpected situations and any challenges.

Associated Documents

Counter Terrorism Policy

Financial Impropriety Risk Management Policy

Financial Management Policy

References

ACFID Code of Conduct 2017 Quality Assurance Framework

Fundraising Institute Australia (FIA), FIA Principles & Standards of Fundraising Practice

FIA Code of Ethics and Professional Conduct

FIA Code of Acceptance and Refusal of Donations

Policy: **CLAN Gender Equality Policy**

Version No: 2.0

Date Approved: 28 January 2011

Date Updated: March 2015

Date Review Scheduled: 30 June 2017

1. Introduction

CLAN's vision of 'Maximising the quality of life for children and their families who are living with chronic medical conditions in resource-poor countries', challenges the organisation to work towards the eradication of discrimination in all its forms, in particular that of gender discrimination. CLAN recognises that in different societies and organisational cultures, biased stereotypes and social norms prevent women and men from exercising their free choice, and from taking full and equal advantage of opportunities for individual development, contribution and reward. Through its work with children, CLAN has unique opportunities to transform social attitudes towards boys and girls, as well as gender relations among boys and girls for the next generation.

CLAN takes as the foundation of our practice the UN Convention on the Rights of the Child (CRC) to work to eliminate gender discrimination in societies at all levels. In particular Article 2 which specifies:

"Parties shall respect and ensure the rights set forth in the present Convention to each child within their jurisdiction without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status."

CLAN recognises that in many societies, women have the primary responsibility for caring for children, and that the material condition, health and nutrition of children are positively associated with the skills, education and income of women. Therefore the rights of children and the rights of women are mutually reinforcing. Used in combination, the CRC and the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) provide internationally accepted standards for addressing the rights of children and the rights of women in the family and in society. CLAN has undertaken to use both conventions and reporting procedures to raise issues of concern regarding the equality of both girls and women.

2. Purpose

CLAN recognises that gender equity is a critical component of the organisation's commitment to diversity. This Gender Equity Policy, along with related policies that support diversity, seeks to clarify the organisation's expectations and guidelines to assist staff in their efforts to advance gender equity. The policy is marked by two fundamental principles:

- i. That all people, by virtue of their shared humanity, carry inherently equal dignity and rights. Therefore, CLAN should always affirm and uphold the equal rights, opportunities and status of men and women.
- ii. That each person, by virtue of her or his particular character and context, has a unique identity and combination of aspirations and abilities. Therefore, CLAN must strive to understand how

the particular conditions of each individual or social group shape its ability to achieve equal fulfilment, and create tailored opportunities for each to thrive.

To uphold CLAN's vision, mission and core values, staff will be required to apply standards to organisational behaviours that support and reaffirm the fulfilment of equal dignity and rights of all human beings.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN in whilst in the delivery of CLAN programs.

4. Definitions

<u>Term</u>	<u>Definition</u>
Quality	<p>Equality (social) is a state of affairs in which all people within a specific society or isolated group have the same status in certain respects. At the very least, social equality includes equal rights under the law, such as security, voting rights, freedom of speech and assembly, property rights, and equal access to social goods and services. However, it also includes concepts of health equity, economic equity and other social securities. It also includes equal opportunities and obligations, and so involves the whole of society.</p> <p>Social equality requires the absence of legally enforced social class or caste boundaries and the absence of discrimination motivated by an inalienable part of a person's identity. For example, sex, gender, race, age, sexual orientation, origin, caste or class, income or property, language, religion, convictions, opinions, health or disability must not result in unequal treatment under the law and should not reduce opportunities unjustifiably.</p>

5. Policy

To fulfill its vision and mission, CLAN will ensure that its work is based upon, and promotes equity and justice towards all groups of children. CLAN will work to change discriminatory social values and attitudes in order to promote a more equitable allocation of government and NGO resources as well as family resources, between boys and girls.

CLAN aims to improve the ability of men and women to work creatively and effectively in the organisation and in communities in the developing world by increasing awareness of gender inequities and, by working with women and men to change the conditions that create and maintain inequities.

CLAN will endeavour to advance gender equity within the organisation through management of human resources and organisational culture. Gender equity will also be promoted through programming and advocacy within the communities that CLAN is involved with. Strategies to achieve the potential positive contributions of all women and men will improve organisational effectiveness and the quality and impact of CLAN programs.

CLAN recognises that boys and girls have different socially defined gender roles and responsibilities, and as a result CLAN will seek to be aware of these differences and design appropriate program and advocacy strategies to respond to these needs.

CLAN recognises that gender issues vary between cultures and will endeavour to address issues of gender equity with sensitivity and tact in different cultural contexts. Equality, partnership, respect and co-operation between the sexes are values that will be promoted throughout CLAN's activities.

6. Activities programming

To enhance program quality and to affirm CLAN's commitment to uphold the dignity and rights of all, gender equity will be promoted through programming systems and structures where:

- i. CLAN analyses gender relations as a critical element of the programs it runs, and uses this gender analysis to design and implement projects that maximise impact on gender equity.
- ii. CLAN targets project activities towards appropriate participants, balancing consideration of gender roles and responsibilities with a commitment to also advancing long-term strategic gender interests.
- iii. CLAN will assess the need for, and where relevant, will provide induction training for all new persons involved in programs, covering topics specifically including child protection and gender equality.
- iv. CLAN will monitor and evaluate projects to measure the relative impact on women and men, and on the relationships between them.

7. Organisational Culture

CLAN recognises that gender equity will progress at different rates and by different means around the world. While this process requires flexibility, CLAN's staff are accountable for achieving measurable progress toward a situation where men and women enjoy equal opportunities, rights and access to power and resources. During project activities, assessment will be undertaken to determine if changes are required to CLAN's strategy and design of programs and projects. In addition, staff and partners are encouraged to develop innovative approaches that provide responsible support to communities to explore gender dynamics and advance gender equity.

CLAN will integrate gender perspectives into all projects and program work and will promote gender equity in the workplace culture and organisational structures. CLAN will seek to create and maintain a gender sensitive work environment based on the following strategies.

- i. Dependent upon available talent, an equitable gender balance will exist at all levels of the organisation, where women and men are represented in senior management positions and the decision-making process.
- ii. All employment decisions related to hiring, transfers, compensation and promotion at CLAN will be uniformly considered based upon qualifications, including skills, abilities, knowledge, experience, and responsibilities.

CLAN's approach to providing benefits is equitable and responsive to the need to balance work, family, civic life, and the different gender roles of staff, for example, responsibilities of pregnancy, childrearing, and family care.

CLAN fosters an environment where non-discriminatory working relationships and respect for diversity in work and management styles is encouraged.

A review of outcomes will be undertaken annually and reported to the Executive Committee.

Associated Documents

Child Protection Policy

Code of Ethics and Professional Conduct Policy

Disability Inclusiveness Policy

Human Resources Policy

Policy: **CLAN Grievance and Dispute Resolution Policy**

Version No: 2.0

Date Approved: 28 January 2011

Date Updated: March 2015

Date Review Scheduled: 2020

1. Introduction

CLAN encourages its employees and volunteers to resolve any issues or concerns that they may have at the earliest opportunity with their immediate supervisor.

The preferred process involves employees and volunteers being able to resolve issues to their satisfaction internally, without feeling they have to refer to external organisations or authorities for assistance.

2. Purpose

The purpose of this policy is to provide an avenue through which staff, volunteers, others and their managers, can resolve work related complaints as they arise.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN in whilst in the delivery of CLAN programs.

4. Definitions

<u>Term</u>	<u>Definition</u>
Grievance	A real or imagined cause for complaint, especially unfair treatment.
Dispute resolution	Dispute resolution is the process of resolving disputes between parties.

5. Policy

Open communication and feedback are regarded as essential elements of a satisfying and productive work environment.

CLAN will establish mechanisms to promote fast and efficient resolution of workplace issues.

Employees and volunteers should feel comfortable with discussing issues with their manager or supervisor in accordance with the procedures outlined below.

All formal avenues for handling of grievances will be fully documented and the employee or volunteer's wishes will be taken into account in the determination of appropriate steps and actions.

No employee will be intimidated or unfairly treated in any respect if they utilise this policy to resolve an issue.

Staff, volunteers and others are to attempt to resolve any issues through their immediate supervisor and through internal processes at the earliest opportunity.

6. Procedures

The Committee is to:

- i. identify, prevent and address potential problems before they become formal grievances
- ii. be aware of, and commit to the principles of communicating and information sharing with their employees and volunteers
- iii. give consideration to the ramifications for the individual, as well as the organisation in general in all decisions relating to employment practices
- iv. handle any grievance in the most appropriate manner at the earliest opportunity
- v. ensure all employees and volunteers are treated fairly and without fear of intimidation.
- vi. ensure all managers, supervisors, employees, volunteers and others are aware of their obligations and responsibilities in relation to communication and information sharing
- vii. provide ongoing support and guidance to all staff, volunteers and others in relation to employment and communication issues
- viii. ensure all managers, supervisors, employees, volunteers and others are aware of their obligations and responsibilities in relation to handling grievances
- ix. ensure any grievance that comes to the attention of managers or supervisors is handled in the most appropriate manner at the earliest opportunity.

7. Employment and engagement practices

CLAN's Executive Committee should be aware of the possible ramifications of their actions when dealing with employee/volunteer issues. They must ensure that all employees/volunteers are treated with fairness, equality and respect. If there are any doubts, or queries in relation to how to deal with a particular set of circumstances, the CLAN Committee should seek advice at the earliest opportunity.

Where a grievance or dispute has been brought to the Executive Committee's attention, they should assess whether the employee/volunteer involved is covered by an Award or Agreement, and if so should refer to that document for grievance procedures. If the employee/volunteer involved is not covered by such a document, the guidelines below should be followed.

8. Grievances and Dispute Resolution

An employee or volunteer who considers that they have a dispute or grievance should raise the matter with their immediate supervisor as a first step towards resolution. The two parties should discuss the matter openly and work together to achieve a desired outcome.

The manager or supervisor should check for clarification of the issue to ensure they fully understand the aggrieved person's concern. Managers should follow the standard procedure of offering the employee/volunteer the opportunity to have an independent witness at the discussion, ensuring they follow the steps outlined below:

- i. if more than one person is present, establish the role of each person
- ii. outline the process that is to be followed

- iii. inform the parties that any information obtained in the conduct of the review is confidential
- iv. listen to the aggrieved person and diagnose the problem
- v. take accurate and detailed notes of all conversations (including dates, people involved) and attach any supporting documentation.
- vi. if deemed necessary, provide the employee/volunteers with a written summary of the meeting and clarification of the next steps to be taken.

The Manager must ensure that the manner in which the meeting is conducted will be conducive to maintaining positive working relationships, and will provide a fair, objective and independent analysis of the situation. All parties are to maintain complete confidentiality at all times.

If the matter is not resolved and the employee/volunteer wishes to pursue it, the issue should be raised for discussion by the CLAN Committee. Again, the matter is to be discussed openly and objectively with management to ensure it is fully understood.

If the grievance/dispute is one of a confidential or serious nature involving the Employee or Volunteer's Manager, the complainant may discuss the issue directly with the CLAN Executive.

Grievances should be recorded as per complaints in the Complaint Management Register.

Reference

National Childcare Accreditation Council Inc. (NCAC), Managing Complaints

7. Association committee members and other members

CLAN's Committee has the overall responsibility for the management of persons associated with CLAN and its projects and activities, including association members, employees, contractors, partners and volunteers.

The Committee's responsibilities may include, but are not limited to:

- i. appointment of association members and acceptance of volunteers
- ii. the provision of information, guidelines and legal requirements to committee members, contractors and volunteers where relevant
- iii. induction of association members, employees, contractors, volunteers and visiting personnel
- iv. delegation and clarification of role descriptions, responsibilities, and/or accountabilities
- v. developing plans to manage and support designated professional personnel involved in CLAN projects, both in Australia and overseas
- vi. identification of safety and security strategies needed for CLAN projects/programs
- vii. management of training and education where required
- viii. undertaking risk management analysis and strategies relevant to programs and projects
- ix. implementing procedures for managing any personnel issues
- x. providing professional development sessions to association members and relevant staff and volunteers to improve professional practices and contributions

CLAN will review at association meetings the role of personnel involved in programs and projects and results.

8. Employees

Employees employed in Australia may be full-time, part-time, temporary or casual, and will be employed under the terms and conditions of Fair Work Australia, and CLAN's Policies. Pre-employment practices may include recruiting, interviewing and checking information provided by a potential employee. Professional development, performance management and personal improvement programs will be implemented during a period of employment. Termination will be determined by the employment contract and under the terms of the Award or Enterprise Agreement.

9. Consultants

Consultants are professional specialists employed by CLAN for a specific purpose such as a project, task, provision of advice, or other assignment related to its activities. A consultant may be employed on a contract or as a temporary employee. A contract will be provided containing conditions including the term of the contract, role description, duties, remuneration and any specific CLAN requirements specific to the contract position. An MOU may be made with employers of overseas consultants where relevant.

10. Partners

In most cases where partners are involved in CLAN activities, a legal agreement or MOU will be made for their contributions and working with CLAN.

11. Management of Volunteers

A volunteer is a worker who, without remuneration or reward, voluntarily engages in CLAN activities. Managing the work of volunteers is fundamental to achieving desired outcomes for CLAN.

CLAN is committed to applying the National Standards for volunteers where relevant to their contribution. CLAN will follow similar processes when working with partners in collaborative volunteer activities. A risk management approach is to be implemented to assess any compliance or organisation risks before accepting volunteers. A guide to managing volunteers includes the following processes where relevant.

- i. Screening of volunteers, including suitability for a role, level of commitment and ensuring each volunteer has a working with children check (NSW) or a police check if working with children.
- ii. A volunteer will be provided with a position description outlining roles and responsibilities, and other relevant information associated with a given program or project such as an estimate of time required in the position. The position will be discussed with the volunteer to determine any changes needed.
- iii. A volunteer is not paid for any work undertaken, but may be recompensed for any costs agreed to by CLAN, such as travel or accommodation costs.
- iv. An induction will be provided to volunteer/s, and include topics such as, but not limited to:
 - 1 volunteer rights including safety, insurance, reimbursement of expenses, working hours,
 - 2 access to CLAN policies, confidentiality of personal information,
 - 3 training and access to resources required to fulfill their role, and specifically if working with children
 - 4 procedures for managing certain situations, for example, accidents, dismissal
 - 5 supervision procedures relevant to position undertaken by the volunteer
- v. Recognition of volunteer contributions. CLAN's association will recognise volunteers efforts either informally or publically where relevant.

12 Review

CLAN's committee will review employment policies and processes annually. The review may include the effectiveness of volunteer contributions to CLAN's activities, financial costs, a review of risk assessments and management of any risks, and future needs.

Reference Documents

Fair Work Ombudsman, National Employment Standards
NSW Office of Communities, Risk Management Resource Volunteer
Volunteering Australia, National Standards for Involving Volunteers in Not-for-Profit Organisations,

Policy: **CLAN Managing Social Media Policy**

Version No: 1.0

Date Approved: 9 December 2015

Date Updated: March 2017

Date Review Scheduled: 2020

1 Introduction

CLAN recognises the value in using social media to build more meaningful relationships within global communities, and empowering individuals to engage with others to build their support networks on a local and global scale.

CLAN uses social media to increase awareness, advocate, promote support services and events, and share engaging human interest stories to help people understand and engage in the work we do.

2. Purpose

CLAN's Managing Social Media Policy has been developed to inform employees and volunteers of CLAN about the rules for using social media. It has also been developed to encourage and empower staff so they feel confident to participate online whilst being mindful of their responsibilities and obligations under CLAN's Code of Ethics and Professional Conduct Policy.

3. Scope

Social media are online services, platforms and tools that allow for interaction and/or participation as well as publishing, sharing and discussion of information. Social media provides an opportunity to engage and interact with our various audiences and promote staff expertise.

Examples include:

- i. Social networking and micro-blogging sites such as Facebook, Twitter, Pinterest, Instagram and LinkedIn
- ii. Video and photo sharing sites such as Flickr and YouTube
- iii. Online forums and discussion blogs, including comments on online news articles

4. Definitions

<u>Term</u>	<u>Definition</u>
Social Media	For the purpose of this policy, social media is defined as 'any conversation of activity that occurs online, where people can share information or data that might impact CLAN or the people who use our services'
Official use	Official use is when an employee, volunteer or supporter is using social media as a representative of CLAN with the relevant permission from CLAN Executive. An alternative definition is when an employee or volunteer is posting from a social media account that is labelled as an official CLAN account, i.e. not a distinct individual.
Personal use	Personal use is when an employee, volunteer or supporter is using social media as themselves, not officially representing CLAN as an organisation but identifying themselves as affiliated with CLAN through their online biographies, profiles or posts or through other digital platforms. People who are employees, volunteers or supporters who do not identify

themselves as being affiliated to CLAN are still counted as representing the organisation, as the nature of the online world means that they can be traced back to the organisation through their online presence.

Posts made during both official and personal accounts must:

- i. Comply with the CLAN Code of Ethics and Professional Conduct Policy
- ii. Must not harm CLAN or any person
- iii. Must not promote individual staff and/or volunteer businesses or money making ventures.

5. Guiding principles and conduct

CLAN employees and volunteers are encouraged to participate in social media. When interacting on social media sites, whether in an official or personal capacity, it is expected that every participant will comply with following behaviours:

- i. I will not criticise beneficiaries, colleagues, other service providers or CLAN
- ii. I will respond to others' opinions respectfully and professionally
- iii. I will not do anything that breaches my terms of employment – whether paid or unpaid as a volunteer
- iv. I will not harass, bully or intimidate
- v. I will acknowledge and correct mistakes promptly
- vi. I will disclose conflicts of interest where I am able
- vii. I will not knowingly post inaccurate information
- viii. I will link to online references and original source materials directly
- ix. I will be polite, considerate, kind and fair
- x. I will ensure my activity does no harm
- xi. I will champion CLAN and its services.

6. Official Accounts

An official account of an event or activity that represents CLAN should stipulate that within its bio, page or account description. An official social media page must be sanctioned by the CLAN Executive. The account must carry the following, or a version of the following words:

“This is the official account for CLAN” followed by a brief description of CLAN and the purpose of the account relating to the particular social media platform.

When representing CLAN, staff and volunteers should:

- i. disclose that you are an employee or volunteer of CLAN and clearly state what you are representing
- ii. ensure you adhere to the apolitical character of CLAN
- iii. be aware of the terms and conditions of use governing the website upon which you upload or contribute material. These terms and conditions may determine the intellectual property rights and access to content that is uploaded to that particular website.

When providing information on social media on behalf of CLAN the information should:

- i. disclose only publically available information or other information that is authorised to be released
- ii. offer only information, support or comment on topics that fall within an area of given responsibility
- iii. provide a direct link to information where it is available
- iv. ensure any content that is published is factually accurate and complies with privacy guidelines
- v. not disclose any information regarding the travel arrangements or whereabouts of CLAN staff or volunteers travelling to developing countries that may place the efforts of the travel or the CLAN representatives at risk
- vi. be mindful of the diverse cultures in which CLAN operates.

7. Personal Accounts

Staff and volunteers should not rely on a site's privacy settings for a guarantee of privacy, and personal privacy settings should be adjusted according to individual needs.

CLAN employees and volunteers who identify with CLAN on social media must understand potential risks as information given or statements made could be exposed and made public.

8. Inappropriate Use

Inappropriate use of social media includes, but is not limited to:

- i. conducting a private business on CLAN's social media presence
- ii. using discriminatory, defamatory, abusive or otherwise objectionable language
- iii. stalking, bullying, trolling or marginalising any individual or group
- iv. accessing or uploading pornographic, gambling or illegal content including extreme images of graphic content (blood and gore etc.) or information regarding dangerous activity including drugs, firearms etc.
- v. accessing sites that promote hatred or extreme/fundamental beliefs and values
- vi. direct political affiliation, unless an individual is running for election (but only on a personal account)
- vii. excessive debate on public policy, religion or cultural issues
- viii. uploading information of a confidential nature, especially in regards to CLAN services or beneficiaries
- ix. criticising CLAN or other organisation and our/their employees, volunteers or supporters
- x. activity that interferes with work commitments
- xi. paid or unpaid endorsement of any kind, including in kind services or gifts
- xii. activity that brings CLAN or the persons' professionalism or ability to act in a professional manner into disrepute.

It is the duty of everyone who is affiliated with CLAN to alert the CLAN Executive of any inappropriate content observed on social media. Legal consequences could result in a case where an offense occurs.

9. Complaints through social media

Complaints or negative comments regarding CLAN may be made through social media channels. Both official and personal users of social media are discouraged from arguing or refuting

complaints or negative feedback through social media channels. This behaviour can antagonise or fuel further attacks on CLANs services, brand and/or reputation. In the event of a complaint or negative comment, it is important to address the comment as soon as possible with a version of the following: *“Your feedback is important to help us improve the way we work. Please consider emailing info@clanchildhealth.org”*. Alternatively, the complainant should be encouraged to make a complaint to the President of CLAN or the CLAN Executive in accordance with the Complaint Management Policy.

10. Deleting Posts

Social media is fluid, two-way, busy and often self-regulating. Social media should be considered a form of two-way communication and a vehicle to listen to the ‘wider’ community views.

Organisations that heavily control content on their social media pages or accounts through the deletion of disapproving content, significantly reduce the impact and usefulness of social media as a channel for the distribution of information.

CLAN will not delete posts that are complaints, or negative except when they breach any of the conditions outlines for employees, volunteer and supporters in the ‘inappropriate use’ section outlined in this document.

11. Monitoring and Reporting

The Committee will monitor the risks and use of social media that may impact positively and/or negatively on CLAN’s reputation and activities. Management decisions will be made to support or to remedy social media activities.

Associated Documents

Code of Ethics and Professional Conduct Policy
Complaint Management Policy
Workplace Health and Safety Policy

Reference

NSW Law Society, Guidelines on Social Media Policies 2012
Workplace Health and Safety Act 2011 (NSW)
Workplace Health and Safety Regulation 2011 (NSW)

Policy: CLAN Non-Aid and Development Activities Policy

Version No: 1.0

Date Approved: 29 April 2015

Date Updated: March 2015

Date Review Scheduled: 2020

1. Introduction

CLAN is an organisation focused on long term sustainability and community development in resource poor settings to support children with chronic health conditions. CLAN is a secular organisation and does not engage in or support any non-development activities including welfare, evangelical or political activities.

2. Purpose

The purpose of this policy is to guide CLAN and its stakeholders, partners, and any other third party, to clearly identify the separation between aid and development, and non-aid and development objectives and activities.

This policy guides CLAN's communication and solicitation of donations from private donors and the public. This includes fundraising for restricted and unrestricted purposes from aid agencies, sponsors and supporters and fundraising from the general public.

3. Scope

This policy is intended to apply to all CLAN activities fundraising, programs and other activities, in public communication and in all reporting including annual reports.

The policy is applicable to all CLAN employees and volunteers.

The policy also extends to CLAN partners and associated implementing organisations.

5 Definitions

<u>Term</u>	<u>Definition</u>
Aid & development	Refers to activities undertaken in order to reduce poverty and address global justice issues. In the non government organization sector, this may occur through a range of engagements that includes community projects, emergency management, community education, advocacy, volunteer sending, provision of technical and professional services and resources, environmental protection and restoration, and promotion and protection of human rights.
Non-aid	Non-aid refers to limitations on the use of funds by NGO's. A NGO is not permitted to use government funding for welfare, religious or political purposes or activities. These are to be identified separately if the organization is involved in such activities.

Promoting a particular religious adherence	Activities undertaken with the intention of converting individuals or groups from one faith and/or denominational affiliation to another.
Supporting a particular party, candidate or organisation affiliated to a political party	Agency personnel or their representatives (when using the agency name or resources in paid time) being involved in party political activities; using funds or resources to facilitate or support a specific political party, candidate, or party political organisation in a local, regional or general/national election; using funds or resources to facilitate or support a particular politician or faction to gain power within a government or within a party political structure.
Transparency	‘An organisation’s openness about its activities, providing information on what it is doing, where and how this takes place and how it is performing’. (Pathways to Accountability, the GAP Framework, One World Trust, 2005).
Third parties	May be a contractor, partner or an affiliate of the non-government organisation.
Stakeholders	Individuals and groups that can affect or are affected by an organisation’s policies and/or actions (Pathways to Accountability, the GAP Framework One World Trust, 2005).
Partner	Partners are individuals, groups of people or organisations that collaborate with signatory organisations to achieve mutually agreed objectives in aid and development activities. This may include affiliates.
Affiliate	An organisation to which the signatory organisation has some form of membership, formal association or alliance.

6. Policy

CLAN is a secular organization that primarily applies a strategic framework for action to achieve long term sustainability and community development in resource poor settings. CLAN is not affiliated with any welfare, religious or political entity.

If CLAN were to be involved in non-aid activities, CLAN will ensure there is a clear separation between aid and development and non-aid and development objectives and activities, programming, expenditure reporting, fundraising, advocacy, communications and partners involved in a project. CLAN is resolute in ensuring funds and other resources appointed for non-aid and development are used for these purposes only, and will report accordingly.

CLAN's efforts are founded on a rights-based, community development model that provides a strategic framework for action (the Five Pillars) to help children who are living with chronic health conditions in resource-poor countries.

CLAN’s Mission is to support both also short-term and longer-term sustainable development projects in developing countries that are designed to provide aid to:

- i. work collaboratively with local communities or agencies based on the needs of those communities;

- ii. promote continuous improvement and wellbeing of children and families in those communities.

CLAN is committed to accurate representations of projects and activities to partners, donors and the public.

CLAN is committed to adhering to the ACFID Code of Conduct, Quality Principles and Commitments 2017. (Annexe 1)

7. Procedures

CLAN's fundraising solicitations will include references to both aid and development and non-development activities if both are proposed, and will provide donors with the choice of contributing to either or aid or development activity only.

CLAN will ensure that any such separation will be clear in all fundraising, programs and other activities, in public communications and in all reporting, including annual reports.

CLAN will appraise, record any issues and follow up to compliance to the policy.

CLAN will ensure that this policy also extends to partners who are involved in programs or projects involving fundraising, activities, public communications and reporting or any other related activities.

Partner assessment will require the partner to identify any engagement with non- development activities, and if so engaged, how the partner will account for aid and development activity separately.

A review of compliance will be undertaken annually.

This policy will be reviewed on a regular basis, and any updates approved by the Committee.

Associated Documents

Counter-Terrorism Policy

Fundraising Policy

Financial Impropriety Risk Management Policy

Financial Management Policy

Project Design, Monitoring and Evaluation Policy

Risk Management Policy

Reference

ACIF Code of Conduct 2017

Annexe 1

ACFID Code of Conduct: Quality Principles and Commitments

Quality Principles	Commitment
<p>1. RIGHTS, PROTECTION & INCLUSION Development and humanitarian responses respect and protect human rights and advance inclusion.</p>	<ol style="list-style-type: none"> 1. We respect and protect human rights. 2. We respect and respond to the needs, rights and inclusion of those who are vulnerable and those who are affected by marginalisation and exclusion. 3. We support people affected by crisis. 4. We advance the safeguarding of children.
<p>2. PARTICIPATION, EMPOWERMENT & LOCAL OWNERSHIP Development and humanitarian responses enable sustainable change through the empowerment of local actors and systems.</p>	<ol style="list-style-type: none"> 1. We promote the participation of primary stakeholders. 2. We promote the empowerment of primary stakeholders. 3. We promote gender equality and equity. 4. We promote the empowerment of people with disabilities. 5. We promote the participation of children
<p>3. SUSTAINABLE CHANGE Development and humanitarian responses contribute to the realisation of sustainable development.</p>	<ol style="list-style-type: none"> 1. We seek durable and lasting improvements in the circumstances and capacities of primary stakeholders. 2. We contribute to systemic change. 3. We promote environmental stewardship and sustainability
<p>4. QUALITY AND EFFECTIVENESS Development and humanitarian organisations and responses are informed by evidence, planning, assessment and learning.</p>	<ol style="list-style-type: none"> 1. We articulate clear strategic goals for our work. 2. We analyse and understand the contexts in which we work. 3. We invest in quality assessment of our work. 4. We reflect on, share and apply results and lessons with stakeholders.
<p>5. COLLABORATION Development and humanitarian responses are optimised through effective coordination, collaboration and partnership .</p>	<ol style="list-style-type: none"> 1. We respect and understand those with whom we collaborate. 2. We have a shared understanding of respective contributions, expectations, responsibilities and accountabilities of all parties. 3. We invest in the effectiveness of our collaborations and partnerships
<p>6. COMMUNICATION Development and humanitarian organisations communicate truthfully and ethically.</p>	<ol style="list-style-type: none"> 1. We are truthful in our communications. 2. We collect and use information ethically.
<p>7. GOVERNANCE Development and humanitarian organisations are governed in an accountable, transparent and responsible way.</p>	<ol style="list-style-type: none"> 1. We are not-for-profit and formed for a defined public benefit. 2. We meet our legal and compliance obligations. 3. We are accountable to our stakeholders. 4. We have responsible and independent governance mechanisms
<p>8. RESOURCE MANAGEMENT Development and humanitarian organisations acquire, manage and report on resources ethically and responsibly.</p>	<ol style="list-style-type: none"> 1. We source our resources ethically. 2. We ensure that funds and resources entrusted to us are properly controlled and managed. 3. We report on the acquisition and use of our resources.
<p>9. PEOPLE AND CULTURE Development and humanitarian organisations manage and support their people fairly and effectively.</p>	<ol style="list-style-type: none"> 1. We have the human resource capacity and capability to deliver our work. 2. We protect, value and support our people. 3. We manage our people effectively and fairly. 4. We enable our people to conduct themselves professionally and according to our stated values.

Policy:	Preventing Sexual Exploitation, Abuse and Harassment Policy
Date Approved:	CLAN Association Meeting 5 December 2019
Date Implemented:	This policy will be implemented incrementally from (date meeting) to each of CLAN's programs and activities where relevant.
Date of effect:	December 2019
Date Review Scheduled:	2021
Version:	1.0

1 Introduction

CLAN's Mission is 'To maximise the quality of life for children and their families who are living with chronic health conditions in resource poor settings of the world.'

CLAN's vision is 'That all children living with chronic health conditions in resource poor settings of the world will enjoy a quality of life on par with that of their neighbours' children in wealthier settings.'

This policy supports CLAN's Mission and Vision as CLAN's work is based on a community-centred approach where a safe, secure and supportive environment is essential for the delivery of CLAN programs involving vulnerable children and their families.

CLAN does not tolerate sexual exploitation, abuse or harassment (SEAH) of any kind in their work with and for vulnerable groups. It is expected that behaviours and actions undertaken by all those involved in CLAN programs are non-discriminatory, that respect is shown to others, that power is not abused or exploited, and that misconduct is not accepted.

Statement of Commitment

CLAN is committed, in consultation with partners, to improving standards, practice and culture to prevent SEAH, to manage reporting effectively and to provide quality support for any victim or survivor affected. The safety and well-being of all participants in CLAN programs is essential. This involves a shared responsibility for CLAN and its partners to assess risks, ensure accountability, and maintain a safe and supportive environment.

2 Scope of Policy

CLAN's SEAH Policy is applicable to the following groups:

- i. CLAN's Committee members, staff, contractors, representatives, volunteers
- ii. CLAN partners who have agreements in place with CLAN. This may include consultants, medical and health personnel, contractors, sponsorship partners, grant recipients
- iii. visitors to project sites, other persons who may become involved with, or associated with other CLAN activities.

The above groups are expected to act in accordance with the principles, processes and reporting requirements in this Policy. Partners and other relevant involved persons must also act in accordance with their own relevant policies, agreements, and domestic legal requirements to prevent SEAH, to manage complaints and to support vulnerable children and persons.

3 Key Definitions

Sexual exploitation:

Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.

Sexual abuse:

The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). Sexual activity with someone under the age of consent (in the law of the host country or under Australian Capital Territory law (16 years), whichever sets the greatest age) is considered to be sexual abuse.

Sexual harassment:

A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel.

Fraternalisation

Fraternalisation includes any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position including, but not limited to, voluntary sexual behaviours. It could include sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public express of intimate relations.

(Definitions source: DFAT 2019)

Transactional sex

Persons can be sexually exploited through transactional sex where the exchange of money, employment, goods or services is given for sex or sexual acts, even in places where sex work is legal.

4 Policy Principles

CLAN adopts the following Principles:

4.1 Zero tolerance of inaction

Sexual exposure, abuse or harassment are not acceptable. CLAN is committed to acting on every allegation, to report fairly and to ensure that support is given to victims/survivors. CLAN will work with partners to improve safeguards and procedures for reporting and managing complaints.

4.2 Strong leadership accelerates cultural change

Strong leadership is essential in organising and managing safe environments for programs. Leaders can promote positive cultural change through working collegially with partners and beneficiaries to set and model clear goals and expectations in relation to interactions in their work. Actions to diminish the risk of SEAH include acceptance of diversity, inclusion of vulnerable groups, gender equality and prevention of discrimination.

CLAN works with partners to build supportive communities where clear behavioural expectations are set including respect, and where victims/whistleblowers feel safe and to report concerns and be assured that their allegations are taken seriously. Strategies for creating safe environments include reviewing aspects such as structural inequalities, gender equality and inclusiveness, and identifying vulnerable persons and children.

Training including child safety and PSEAH will be provided annually and as required to CLAN's Committee members. Training will also be delivered to partners and participants in programs as

relevant. A leadership focus includes building community awareness about PSEAH, rights and responsibilities of participants, including victims/survivors. Cultural change includes building trust with participants in CLAN's programs so that those affected or who observe PSEAH will feel safe to report incidents or concerns and have assurance that these will be handled confidentially, sensitively and properly. Information shared with participants will include how to raise a concern about the safety of anyone involved in a CLAN program, including threats or actual incidents of SEAH. This may also include appointing specific person/s for managing PSEAH in relevant CLAN programs.

4.3 Victim/survivor needs are prioritised

A safe environment includes 'a do no harm' approach which focuses on procedural fairness for all parties but which also prioritises the rights, needs and wishes of the victim/survivor. A safe environment does not discriminate based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics. The victim/survivor is to be treated with respect, providing with comprehensive information and included in decision making. Privacy and confidentiality are protected, and relevant services are considered to provide support to the victim/survivor. An assessment is undertaken to determine ongoing needs such as returning to an unsafe situation, and specific health and psychological needs.

4.4 Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility

CLAN will work with partners to create environments where every person involved shares responsibility to implement strategies to prevent SEAH. Partners in CLAN's programs may include government personnel, businesses, non-government organisations, institutions, specialists, communities and individuals. CLAN's program beneficiaries may include children with NCD's and their families, health and medical staff, individuals and groups attending conferences and professional presentations or other CLAN activities.

4.5 Gender inequality and other power imbalances are addressed

Risk assessments undertaken by CLAN and its partners include reviews of potential power imbalances, particularly where families and children are involved in their programs. Inequalities may exist in status, roles, abilities or disabilities, ethnic and indigenous status, religion, gender identity and sexual orientation, age, health, poverty, class and economic status.

4.6 Stronger reporting will enhance accountability and transparency

Stronger reporting helps an increased focus on issues. To prevent SEAH, CLAN, partners and communities work together to improve culture, reporting processes and managing complaints to support victims/survivors by developing effective strategies relevant to specific communities for implementing safeguards.

(Source: DFAT, 2019, *Preventing Sexual Exploitation, abuse and Harassment Policy*, pp.6-7, adapted.)

5 Governance

CLAN is committed to improving practices and responses to provide safe environments for children, families and other participants in CLAN programs and activities. A safe environment includes safety from physical and psychological harm, including SEAH. Reviews of current practice will underpin training and/or management changes required, based on legislative requirements and best practice.

Committee Agendas will include relevant reports on Child Protection and SEAH.

Legislation (ACNC) requires that CLAN's Committee members must be 'Responsible Persons', hence each member must have a current 'Working with Children Check' (NSW Office of the Children's Guardian) or a Police Check.

Communicating the Policy

This Policy is to be communicated to staff including volunteers, partners, consultants, medical persons involved in CLAN activities, families and children involved in CLAN programs, and other persons or groups where relevant. Risk analysis will determine the type and level of training required for individuals or groups involved in programs. SEAH Policy updates and reports will be shared with CLAN's Committee and partners as relevant and/or annually.

Recruitment

Staff

A statement on CLAN's zero tolerance to SEAH is to be included on job advertisements, job descriptions and performance reviews. Interviews with applicants include questions about SEAH and child protection to ascertain an applicant's values, attitudes, beliefs and to vet former misconduct regarding vulnerable children, adolescents, women and vulnerable adults. Two (or more) verbal reference checks will be undertaken, plus a reference from a current or recent employer. A Police Check and/or a Working with Children Check is required prior to employment.

Employment contracts include a specific requirement to agree to and abide by CLAN's Child Protection and SEAH Policies, in addition to commitment to act in accordance with all of CLAN's Policies. Contracts include provision for disciplinary action or termination for breach of PSEAH and CLAN Polices.

Induction processes will include training for child protection and PSEAH to highlight the need to provide a safe and supportive environment for CLAN's programs and activities. Performance management processes include reviews of safe conduct practices.

Partners

CLAN's partners, prior to acceptance as a partner, are required to show evidence of their acceptance, understanding and commitment to CLAN's Policies, particularly those applying to children and vulnerable individuals and groups. Partners are assessed for their experience, capabilities and capacity for implementing CLAN's safeguarding and risk policies effectively.

This is required due to CLAN's work with partners to develop and administer programs to support vulnerable groups including families and their children with non-communicable diseases (NCD's). Reference checks of partners will be undertaken against prohibited entities listing.

Volunteers

Volunteers who may be, or are involved in CLAN's programs involving families and children, are required to hold and produce evidence of a current Work with Children Check or a Police Check. Inductions for volunteers includes information and the need for compliance with Child Protection and SEAH Policies. Risk assessments relevant to volunteers includes obtaining knowledge about their previous behaviours, current responsibilities and capacity to comply with relevant CLAN policies.

6 Working with Partners

CLAN's partners are diverse, including organisations, consultants, specialists, medical and health personnel, suppliers, and contractors. Prior to the formation of a partnership, assessment includes the potential partner's capabilities, capacity and current practices and commitment to providing safe and secure environments for delivery of programs. The ACFID Code of Conduct and CLAN's Policies are shared with relevant partner/s to inform and obtain agreement prior to a formal Agreement made. Safeguarding and prevention of SEAH is part of CLAN's partner's assessment tool to determine a level of risk of a potential partner prior to any Agreement or contract made with partner/s. Training will be provided as needed in order to ensure an adequate understanding of legal and policy requirements.

PSEAH requirements will be included in employment contracts, MOU's and other Agreements that are made by CLAN and partners. A check of partners will show if they have their own PSEAH policy and if aligns with CLAN's policies.

The PSEAH Policy covers all CLAN partners but application of this Policy will be defined by the risk analysis undertaken to determine the level of risk relevant to the type of program, project or activity undertaken with partner/s or by partner/s.

CLAN is committed to consulting and working collegially with partners to achieve outcomes, including risk assessments to determine a level of risk and actions for child safety and SEAH. Collaboration with partners includes setting goals and outcomes, identifying clear roles and responsibilities, responsibilities for managing financial and non-financial resources, and determining the type of support provided by each party. Decisions may also include reporting on programs, sharing data and information, identifying communication personnel and documenting processes.

CLAN will consult with communities where relevant, to obtain data, identify needs, and plan specific programs to meet the needs of vulnerable children and families.

Where partners are involved in the delivery of CLAN programs to children and their families, CLAN will work with partners to assess potential risks including child protection and SEAH risks prior to delivery of any program or activity. Consultative planning with partner/s will also include processes to monitor and manage the culture and environment during implementation of programs, how to make reports of alleged incidents and provide effective support for victims/survivors after the report is received. The level of risk will determine the strategies developed to prevent SEAH. Compliance with CLAN's PSEAH policy will be undertaken as part of a program's ongoing monitoring and evaluation processes to review goals and outcomes.

7 Risk Assessment/Safe Programming

CLAN and partners are responsible to control, monitor and manage identified risks effectively. Risk assessment processes are undertaken for each potential program. Assessment will indicate the level of risk (low, medium, high, very high) for providing a safe and supportive environment for participants, including child safety and PSEAH. The level of risk will determine actions to implement, which may include obtaining further data and information from participants involved in CLAN programs, and developing specific safeguards based on data and information received. Strategies aimed to prevent SEAH include relevant training about unacceptable behaviours, complaint and reporting procedures, and reassurance that a complaint or report will be managed with respect and confidentiality. CLAN will document SEAH information in records or Minutes of meetings undertaken with partners

CLAN adopts the following Minimum Standards to establish the risk of PSAEH

- 1 Have a PSEAH policy or other documented policies and procedures in place and clearly communicate expectations of this Policy.
- 2 Have reporting and investigation procedures in place
- 3 Have risk management processes include the risk of PSEAH
- 4 Effective PSEAH training program in place
- 5 Recruitment and screening processes and employment practices address and manage the risk of SEAH
- 6 Prohibit transactional sex for all personnel, while engaged in the direct delivery of CLAN Business
- 7 Prohibit fraternisation for non-national personnel while engaged in the direct delivery of CLAN business.

(Source: DFAT 2019, *Preventing Sexual Exploitation, abuse and Harassment Policy*, pp.11-12.)

8 Standards of Conduct

To prevent SEAH, the following PSEAH standards of conduct apply to CLAN's staff, partners, representatives and volunteers who are involved in CLAN's programs and activities.

- 1 Sexual exploitation and abuse by any CLAN personnel constitutes acts of gross misconduct and are grounds for termination of employment.
- 2 Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- 3 Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitive behaviour are prohibited. This includes exchange of assistance that is due to beneficiaries.
- 4 Sexual relationships between CLAN personnel/partners and beneficiaries is not permitted as this is contrary to CLAN's mission and values and undermines the credibility and integrity of CLAN's work.
- 5 Where a CLAN member or a partner develops concerns or suspicions regarding sexual exploitation, abuse or harassment by a fellow worker, he or he must report such concerns via CLAN's reporting mechanism
- 6 CLAN and partners are obliged to create and maintain an environment which prevents sexual exploitation, abuse and harassment, and promotes the implementation of their code of conduct.

(Source: adapted from IASC 2002, *IASC Six Core Principles Relating to Sexual Exploitation and Abuse*.)

9 Response to incidents

9.1 Reporting

CLAN will treat all complaints seriously and ensure that all parties are treated fairly. All personnel and as defined under the Policy's Scope (section) and undertaking official duties or CLAN business must report any alleged or suspected incidents of SEAH or Policy non-compliance that they are aware of. Reports of abuse or exploitation of individuals under 18 years of age must follow CLAN's Child Protection Policy. All sexual activity with someone under the age of consent in the law of the host country or under Australian Capital Territory Law (16 years) whichever is greater, is considered sexual abuse.

CLAN and partners will provide information to participants in CLAN programs about need for mandatory reporting, and processes for reporting any alleged incident of sexual exploitation, abuse or harassment that occurs during CLAN/partners' programs. Also, that the safety and wellbeing of the victim, survivor or whistleblower is paramount and is to be treated confidentially.

When an alleged incident is reported, documentation undertaken throughout the duration of managing the complaint is kept with the report.

9.2 Reporting a complaint

All CLAN personnel are required to report immediately to the program's nominated SEAH/complaints person if they have any suspicion or knowledge of SEAH or policy non-compliance occurring. Verbal complaints must be documented by personnel and submitted in written form using the SEAH Incident Notification Form if the complainant is unwilling to submit a report personally.

Information about reporting and managing the complaint will be provided to the complainant as needed, including their ability to make a complaint for alleged breach of the ACFID Code to

ACFID Code of Conduct Committee, for a process to review and analyse complaint information with CLAN.

Documented Reports of alleged incidents of SEAH of policy non-compliance are to be reported within 24 hours to the President of CLAN or to the nominated PSEAH person. Reports of sexual exploitation, abuse or harassment of individuals should be made using the CLAN SEAH Incident Notification Form (see Attachment) and anonymously emailed to info@clanchildhealth.org. Reports to CLAN's Committee of allegations of SHEA will not include identification of the victim/survivor.

9.3 Managing Reports

Reports of SHEA will be dealt with in a timely manner, and where required CLAN will report to regulatory bodies. An investigation may be undertaken by a CLAN or outsourced to professional investigators.

Where safe to do so, and when in accordance with the wishes of victims, survivors and whistleblowers, all alleged SEAH incidents that involve a criminal aspect should be reported through the correct local law enforcement channels. Local reporting procedures will guide the process based on whether the allegation constitutes a criminal offence in the country, and if it is also a breach of other CLAN Policies. Evidence will determine whether it is a disciplinary matter, or if it should be managed by local child protection agencies, and if it is a matter that should be reported to Australian authorities.

Reported incidents and alleged incidents of SEAH are managed sensitively and confidentiality by CLAN, within the parameters of relevant legislation. Where allegations are made of sexual misconduct that occurred by a CLAN staff member or volunteer either in Australia or overseas, the matter will be reported to the Australian state police or the state child protection authorities. CLAN's Committee will review reported incidents and processes annually to determine effectiveness and improvements needed.

9.4 Victim/Survivor Support Guidelines

A survivor-centred approach is implemented in preventing and responding to SEAH complaints to CLAN. Responses are planned to balance requirements for due process with the survivor's wishes, rights and dignity, with safety and well being a priority in all SEAH matters and procedures.

An alleged victim/survivor should be assessed for immediate risks, to ensure the safety and security of those involved, and to ascertain support services required. Information about relevant support services available in the victim/survivor's country will be shared with the victim/survivor. A victim/survivor will be informed on the progress of managing the alleged complaint or report, and outcomes.

Compliance and Assurance

CLAN will monitor compliance preventing SEAH through program monitoring, performance assessments, reviews. Analysis of incidents and due diligence checks can provide data for improving procedures. Non-compliance may result in termination of an agreement with a partner.

10 Policy Management

This policy will be reviewed every two years or unless required earlier, either by legislation or from data obtained from monitoring SEAH activities. The Policy will be translated where required for relevant stakeholders.

Supporting Documents

Child Protection Policy
 Code of Ethics and Professional Conduct Policy
 Complaint Management Policy
 Disability Inclusiveness Policy
 Gender Equality Policy
 Human Resources Policy
 Risk Management Policy
 Staff Training and Development Policy
 Whistleblower Policy

APPENDIX

CLAN Incident Report Form: SHEA

Name of person receiving report:	
Position:	
Date when report received:	
Name/s of person reporting and contact details	
Name Position	Address: Phone: Email:
CLAN Program or Activity	Country and Location: Program
Name of Partner/s associated with CLAN program and Contact details	
Type of Allegation: circle Sexual Exploitation Sexual Abuse Sexual Harassment Sexual Fraternisation Transactional Sex	Details: Date, Place Other relevant details: (For example, vulnerability, or disability factors):
Details of Person/s subject to allegation. Circle descriptor CLAN employee CLAN contractor/subcontractor CLAN volunteer Australian citizen or resident	Family Name Given Name Gender Date of birth Nationality Contact details
Details of Victim/s Age of child or alleged victim at time of alleged incident:	Family Name Given Name Gender Date of birth Nationality Contact details
Name of witness/s (witness to complete separate incident report form)	Family Name Given Name Gender Date of birth Nationality Contact details
Impact on child or alleged victim and details of any injuries observed or reported	
Network of support around the child, young person or alleged victim	
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? If relevant, have Australian Federal Police in country been informed?	
Any other pertinent information	

Policy: **CLAN Privacy and Disclosure Policy**

Version No: 1.0

Date Approved: 3 December 2014

Date Updated: March 2017

Date Review Scheduled: 2020

1. Introduction

CLAN understands the importance of protecting personal information that may be provided in the course of our activities. It is recognised that any personal information that is collected will only be used for the stated purposes, or used as allowed under the law. It is important that CLAN staff, volunteers or others that CLAN is involved with, are confident that any personal information that is held will be treated confidentially to ensure protection of the information.

CLAN's commitment to confidentiality of personal information aligned to the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth), (the Act), and any other relevant legislation.

2. Purpose

This document sets out our privacy policy commitment in respect of personal information that is held and the use of that information.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN in whilst in the delivery of CLAN programs.

4. Definitions

<u>Term</u>	<u>Definition</u>
-------------	-------------------

Personal information	Information from which your identity is reasonably apparent.
----------------------	--

5. Policy

CLAN, in the course of our activities, will at times collect personal information. This may be for employment or volunteer screening, for research purposes or for other related purposes.

Where reasonable and practical, personal information will be collected directly from the person concerned. However, personal information may also be collected from third parties such as a partner or spouse who contacts CLAN on their behalf, or from publicly maintained records, or from other individuals such as accountants and lawyers, or from companies authorised by the person.

Where personal information is provided to CLAN by a third party, steps will be taken to ensure that there is an entitlement that CLAN may collect, use and disclose such information for the purposes described in this Privacy Policy.

Where CLAN has collected personal information, the person concerned has the right to request

access to that information and make a request for to add, delete or correct that information if needed. CLAN may refuse access to such personal information if the information is subject to legal enquiry or proceedings. Similarly, requests for access may be refused if the request is vexatious.

6. Collecting personal information

Personal information may be collected by us in a number of circumstances, including when an individual:

- i. makes an enquiry with us via email, telephone, or visits our offices
- ii. lodges an enquiry online through our website
- iii. interacts with us via social media including Facebook, Google+ and Twitter
- iv. downloads free offerings from our website
- v. applies to be a borrower or guarantor
- vi. attends an event hosted by us
- vii. registers to use a related product service offering
- viii. applies for employment with us.

CLAN may use cloud storage to store the personal information that is held. The cloud storage and the IT servers may be located outside Australia.

7. Use of personal information

CLAN may use personal information for the purpose for which it has been provided, for reasonably related secondary purposes, or for any other purpose consented to and any other purpose permitted under the Act. This may include using personal information for the following purposes:

- i. to provide products or services requested
- ii. to verify identity
- iii. to assess, process and manage applications for grants or to be a borrower or guarantor including to verify your details
- iv. to assess, process and manage applications for employment.

When assessing an application for grants or to be a borrower or guarantor, credit-related personal information may be used for purposes of assessing the application.

8. Disclosure of personal information

We may disclose your personal information:

- i. to prospective funders or other intermediaries in relation to finance requirements, for example grant applications
- ii. to other organisations that are involved in managing or administering finance such as third party suppliers, lenders (funders), printing and postal services, storage facilities, lenders insurers, title insurers and credit reporting bodies
- iii. to associated businesses that may want to market products
- iv. to companies that provide information and infrastructure systems to CLAN
- v. to authorise representatives, such as lawyers and accountants
- vi. to anyone, where consent has been provided
- vii. where CLAN is required to do so by law, such as under the Anti-Money Laundering and

Courter Terrorism Financing Act 2006 (Cth)

- viii. to investors, agents or advisers, or any entity that has an interest in our business, or
- ix. to your employer, referees or identity verification services.

Prior to disclosing any personal information to another person or organisation, CLAN will take all reasonable steps to satisfy ourselves that

- (a) the person or organisation has a commitment to protecting all personal information at least equal to our commitment, or
- (b) consent has been given by the relevant person to making the disclosure.

9. Direct marketing

From time to time we may use personal information to provide current information that may be of interest, changes to CLAN, or new products or services being offered by CLAN or any company we are associated with. By providing personal information it is taken as consent for CLAN to use personal information to contact people for this purpose.

Marketing information can be stopped by contacting CLAN through any of the mechanisms on our website. All reasonable steps to meet this request at the earliest possible opportunity.

10. Updating personal information

It is important that personal information held by CLAN is accurate and up to date. CLAN may ask for personal information to be checked and updated at various times. CLAN also relies on information owners to advise of any change.

CLAN may refuse access to such personal information if the information is subject to legal enquiry or proceedings. Similarly, requests for access may be refused if the request is vexatious. If CLAN refuses to correct personal information reasons for doing so will be provided.

11. Using government identifiers

If CLAN collects government identifiers, such as a personal tax file number, CLAN will not use this government identifier in order to identify a person.

12. Business without identification

In most circumstances it will be necessary for CLAN to identify a person in order to successfully do business. However, where it is lawful and practicable to do so, CLAN will offer the opportunity of doing business without the need to provide personal information, for example, if general inquiries are made about CLAN's activities. Enquirers can specifically ask for their personal information not to be collected at the time of contact.

13. Sensitive information

CLAN will only collect sensitive information with consent. Sensitive information is personal information that includes information relating to racial or ethnic origin, political persuasion, memberships in trade or professional association or trade unions, sexual preferences, criminal record, or health.

14. Personal information safety and security

CLAN will take reasonable steps to protect personal information by storing it in a secure environment. Personal information may be stored on paper and electronic form. CLAN will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

15. Complaints

If there is a dissatisfaction about the manner in which CLAN has managed personal information or concerns with respect to compliance with the Act a complaint can be made by using any of the contact mechanisms on the CLAN website. Complaints will be managed in accordance with the CLAN Complaint Management Policy.

16. Further information

You may request further information about the way we manage your personal information.

Associated Documents

Complaint Management Policy
Human Resources Policy

Legislation

Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)
Anti-Money Laundering and Courter Terrorism Financing Act 2006 (Cth)

Policy: CLAN Project Design, Monitoring and Evaluation Policy

Version No: 1.0

Date Approved: March 2017

Date Review Scheduled: 2020

1. Introduction

CLAN is a not for profit, non-government incorporated association and its vision, mission and goals are based on the health and well-being needs of children in resource-poor settings. CLAN believes that these children have a right to health and life, and to live the healthiest and most fulfilling life possible. CLAN is committed to building relationships and working with partners to promote sustainable health strategies and strengthen community involvement to support children with Non-Communicable Diseases (NCD's) and their families, who live in resource poor settings.

2. Purpose

The purpose of this policy is to outline CLAN's approach to the design and evaluation of the programs and projects developed to support children with NCD's, particularly in resource poor settings.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN in whilst in the delivery of CLAN programs.

4. Definitions

Term	Definition
Program	A program is a portfolio of multiple projects that are part of the strategic plans of CLAN. Program management is the coordinated management of projects and activities to achieve goals and outcomes.
Project	A project is the practical implementation of development activities of an overarching program. A project normally has a start and finish date and an identified budget.
Partner	A partner is an organisation which has formed an alliance with CLAN for implementing overseas or national projects based on CLAN's five pillars. These are not legal partnerships but alliances with CLAN to promote its vision and mission and to build capacity and develop sustainability for the benefit of children with non-communicable diseases (NCD's) and their families.
Beneficiary	A beneficiary refers to children with chronic health conditions and their families who are recipients in project activities and gain from their involvement. It may also include CLAN partners and/or medical personnel who are involved in CLAN projects and who may benefit from resources shared.

5. Project Design

Project design is undertaken in conjunction with CLAN's partner/s where this involves the need for personnel other than CLAN members to participate in a project. Where CLAN perceives a need in a resource poor setting, CLAN will work with relevant parties to identify specific needs and opportunities to develop a project to support a target group. In situations where CLAN receives an application for support, CLAN will work with the applicant to determine the feasibility and viability of a project aligned with CLAN's mission and resources.

Project design includes:

- 1 identification of needs of a specific group of children with NCD's in a community
- 2 designing the project to meet the needs of the target group of children with NCD's, and their families
- 3 developing a project plan and determining funding requirements and where necessary seeking necessary funding sources
- 4 implementing project activities with partners, and where relevant with beneficiaries
- 5 monitoring during the project implementation, managing risks, adjusting if needed to meet needs of the target group
- 6 evaluation of the project to determine efficiencies and effectiveness of the project for relevance to meet the needs of the target group, to build capacity and develop sustainability
- 7 review of effectiveness of the project for learning, application.

6. Planning for project design

The following processes and research provide the basis for developing a project:

- i. projects are designed in conjunction with partner who are involved in a part of the project, but who may or may not be part of the target community
- ii. projects are based on research to identify and document the specific needs of children with NCD's in a specific community
- iii. research and evidence for developing a project should include details, for example, evidence based on medical data for a targeted group of children and families, and community engagement and participation relevant to the needs of the targeted group
- iv. research should also include engagement with other relevant stakeholders in the community and the country to identify needs and opportunities
- v. projects need to include strategies to build capacity and sustainability relevant to the goals of the project
- vi. a risk analysis is included to provide a safe environment for project activities.

7. Project documentation (see checklist Attachment 1)

A project proposal should include the following information:

- i. title, location, authority, partner/s
- ii. alignment of project with CLAN's mission, vision and five pillars
- iii. duration of the project including any potential follow-up visit

- iv. identified needs and corresponding evidence as the basis for the project
- v. goals and expected outcomes for the project
- vi. project plan and activities, key personnel, resources required
- vii. beneficiaries, i.e. children, families, benefits, their participation in the project design and strategies for implementing the project
- viii. estimated budget for the project
- ix. risk identification and management of the project, including child protection, safety and security, building capacity and sustainability
- x. cross-cutting issues to be considered in the project e.g. child protection, safety and security
- xi. proposed monitoring and evaluation plan
- xii. other specific aspects, requirements

8. Project appraisal

Project appraisal applies to new project proposals, and any change to an existing project.

CLAN's criteria for assessing project proposals from partners includes the relevant areas listed above, and in particular:

- i. relevance of the proposal to CLAN's mission, vision and 5 pillars
- ii. evidence of partner capacity to support delivery of the project, including resources, knowledge and skills
- iii. evidence of the needs of the target group of children and families
- iv. potential of the project to build capacity and sustainability
- v. identified monitoring and evaluation plans
- vi. evidence of cross-cutting areas that need to be included in the proposal

9. Partnerships

CLAN recognises the importance of working with partners to achieve positive outcomes based on its five pillars. Partnerships may include planning for in-country projects to achieve desired outcomes for children with NCD's in those countries. CLAN's focus in these projects is to create communities where children with NCD's and their families can meet together with CLAN personnel and medical professionals to share and learn about effective management for their specific medical condition. Partnerships are effective when CLAN, with national medical personnel, services and families are all involved in working together to achieve outcomes. Other partnerships may involve working with international bodies or with medical services to achieve common goals. Partnerships may also involve working with companies to provide medicines, resources and/or other services to children and their families.

To assess capacities of partners, the following areas are addressed:

- i. governance processes, if relevant
- ii. alignment of partner's vision, mission and values with CLAN's strategic framework
- iii. knowledge, skills and competencies of partners to work effectively in the project
- iv. partner has required policies and procedures in place and implemented effectively including Child Protection, Counter-Terrorism, Non-aid activities, Disability inclusiveness, Gender equity, Human Rights
- v. partner is able to provide suitable resources for a project where required
- vi. financial management systems are in place, accepted by CLAN and partner/s

- vii. reference checks of partners against prohibited entities listings (e.g. counter-terrorism)

CLAN will identify any needs to improve the capacity of potential partner/s capacity involved in projects or activities. CLAN will work collegially with partners to achieve desired outcomes. This may involve providing training, education, building skills, providing practical experience, or planning other activities to add value to expected contributions.

A partnership Agreement or an MOU is signed by the partner and CLAN for each project. Partnership agreements will include evidence of compliance to CLAN's requirements, mutually agreed strategies for reporting, sharing and communicating. An agreed dispute resolution process will be included or referenced, including management of complaints that may be made during the implementation of projects and activities.

10. Assessing Projects: Monitoring and Evaluation

Monitoring and evaluating a project or activities involves CLAN personnel, partners and those who may be involved in projects including the children and families. Other medical personnel and community members may also be included in reviews.

Monitoring involves observing and reviewing the progress of a project during the term of the project. This provides opportunities to assess the program and its effectiveness and/or the need for flexibility to modify the activities to achieve desired outcomes. Monitoring includes reviewing the progress of a project, the expenditure, risks, timeframes, outcomes being achieved, and managing any changes required during the project.

Evaluation involves assessment based on data, records and documentation, usually at the end of the project, to determine if the initial outcomes were achieved effectively and efficiently. Evaluation of specific areas may be included as part of monitoring during the project cycle to inform program management, particularly in long-term programs. Evaluations can inform learnings and may contribute to planning policies and strategies for future projects.

11. CLAN's Projects

CLAN is involved in a diverse range of projects which can vary in purpose, require different management strategies and have quite different outcomes.

However, where CLAN is involved a partnership for delivery of longer-term project/s, follow up monitoring and supporting visits may be planned to provide continuing support for sustainability of the initial project. Each project is monitored by observation throughout its delivery and activities, and if required, any change is formally recorded. A final evaluation is based on the initial project plan, activities and outcomes. The Evaluation Report of the project provides information to the Committee for feedback and future planning (see Attachment below).

Where CLAN has a long-term goal, planning for a program or project requires flexibility, and may include research to seek opportunities for working with international health organisations and/or responding to emerging situations where CLAN can be involved and participate with new partners to achieve common goals. Achievement of a long-term goal or goals may be the basis for developing a new program or project.

12 Reporting

Reports will be made to the Committee to review. Relevant reports will be shared with partners and where relevant, to other significant persons involved in a project or activity. Reports will be reviewed for the quality of outcomes achieved, sustainability (where relevant), management of

risks, and lessons learned. Documentation will be undertaken to record feedback from the Committee and partners, and where relevant, will identify significant determinations which may impact on future planning and activities.

The Committee and/or the President of CLAN have the responsibility to determine information to be shared publically, which may include information on CLAN's website, journal articles, scholarly reports, advertising material, news reports.

Attachments

- 1 Project Assessment Checklist
- 2 Project Design Template
- 3 Project Monitoring Report
- 4 Project Evaluation Report
- 5 Proposed Project Budget
- 6 Funding Application to CLAN for support for International NCD Child Health Projects
- 7 Application Form for Funding and/or Other Support
- 8 ACFID Code of Conduct

Other Relevant Documents

Building Capacity and Sustainability Policy
Child Protection Policy
Counter-Terrorism Policy
Disability Inclusiveness Policy
Drug Donations to Developing Countries Policy
Non-Development Policy
Safety and Security Policy

Reference

Core Humanitarian Standard on Quality and Accountability 2014.

Attachment 1: Project Assessment Checklist

Project Title	
Country	
Date of application (if received by CLAN)	
Date accepted by Committee	
Agreement/MOU (if relevant)	

Project appraisal criteria

	Criteria	Submitted	Approved	Comments
1	Title and Governing body	Yes/No	Yes/No	
2	Project manager/s	Yes/No	Yes/No	
3	Partner's capacity	Yes/No	Yes/No	
4	Purpose of project , goals and outcomes	Yes/No	Yes/No	
5	Planned steps/timeline, monitoring, evaluation	Yes/No	Yes/No	
6	Beneficiaries	Yes/No	Yes/No	
7	Community consultation Target group, community	Yes/No	Yes/No	
8	Budget: income, expenditure, resources	Yes/No	Yes/No	
9	Risk Management analysis	Yes/No	Yes/No	
10	In-country resources and approvals	Yes/No	Yes/No	
11	Acceptance of CLAN policies	Yes/No	Yes/No	
12	Partner's Child Protection Policy	Yes/No	Yes/No	
13	Partner agreement to CLAN requirements	Yes/No	Yes/No	

This is a complete and accurate Report.

Name..... Signature..... Date.....

Attachment 2: Project Design Template

Project Title	Information	Comments
Country		
Project Manager/s		
Date Accepted by Committee		

	Project Design	Evident	Comments
1	Project developed in partnership with a target community	Yes/No	
2	Research, identification and assessment of needs recorded	Yes/No	
3	Statement of specific needs of the group of children with a NCD	Yes/No	
4	Beneficiaries - details of the group of children and their families - Other beneficiaries and details	Yes/No	
5	Project goals and outcomes based on needs of the identified community	Yes/No	
6	Project timeframes and implementation for project activities	Yes/No	
7	Project personnel required: CLAN, partners, medical services, other	Yes/No	
8	Partner capacities identified, needs incorporated into project planning	Yes/No	
9	Resources required (local, in-country)	Yes/No	
10	Project Budget: resources available, estimated expenditure	Yes/No	
11	Management strategies for the project	Yes/No	
12	Risk assessment and risk management strategies identified	Yes/No	
13	Monitoring and evaluation plan	Yes/No	
14	Capacity building strategies and Sustainability strategies	Yes/No	
15	Policies, cross-cutting issues identified, addressed for compliance	Yes/No	
16	Notes		

This is a complete and accurate Report.

Name..... Signature..... Date.....

Attachment 3: Project Monitoring Template

Project Title	Information	Comments
Country, date if visited		
Project manager/s		
Date of monitoring the project		
Date Accepted by Committee		

	Project Activities	Notes on project progress at date of monitoring
1	Project Budget expenditure	
2	Project implementation aligned to agreed goals, outcomes and timeframes	
3	Compliance to required Policies: Child Protection, Counter-Terrorism, Non-aid activities, Disability inclusiveness, Gender equity, Human Rights	
4	Risks, challenges, difficulties	
5	Project amendments	
6	Successes	
7	Progress towards building capacity	
8	Feedback from partners	
9	Lessons learned to date	
10	Recommendations for Project	
11	Comments	

This is an accurate Report.

Name..... Signature..... Date.....

Attachment 4: Project Evaluation Report

Project Title		Comments
Country		
Report prepared by		
Date Accepted by Committee		

	Project Report	Outcomes/Results	Comments
1	Project purpose and goals		
2	Project activities		
3	Partnership activities and project		
4	Beneficiaries - Number of children - Number of families - Other		
5	Community involvement including evidence of gender-equality and equity		
6	Budget		
7	Risks encountered		
8	Challenges		
9	Management of project		
10	Assessment of Capacity building		
11	Assessment of Sustainability strategies		
12	Feedback from partners		
13	Learnings from the project		
14	Recommendations from project		

This is a complete and accurate Report.

Name..... Signature..... Date.....

Attachment 5: Proposed Budget for a Project

The following template may be used for planning CLAN’s programs and projects, and/or for assessing a partner’s proposal for support for a project.

PROJECT NAME:

Potential Program costs	Budget (currency)	Budget (currency)	Notes
Initial costs			
Personnel costs			
Travel costs			
Resources and equipment			
Fund raising costs			
Overhead costs			
Other			
Estimated Total			

Resources available?	Budget (currency)	Budget (currency)	Comments
Donations			
Partnership contributions			
Other resources			

This Report has been reviewed by the following person/s:

Name..... Signature..... Date.....

Name..... Signature..... Date.....

Attachment 6

Funding Proposal from Applicant for support for International NCD Health Program Review criteria for final decision.

Conditions of funding

- 1 Applications must comply with CLAN's mission and 5 pillars.
- 2 Applicants must comply with Australian legislation, and CLAN's Policies where relevant.
- 3 Plans or project applications should demonstrate capacity to implement and build capacity and strategies for sustainability.
- 4 Application must contain a budget.

Considerations

The applicant should have made previous contact with CLAN to discuss a potential project.

The completed Application Forms have been reviewed prior to submission to the Committee.

The Application Form and any relevant documents from the applicant should include the following information for a project proposal or other support.

- 1 Agreement with and commitment to comply with CLANs Mission and Policies. (These are available on the CLAN website at www.clanchildhealth.org/)
- 2 An overview of the support requested to meet the needs of a target group.
- 3 Details of the target group and identified specific needs.
- 4 Details of the type of support requested, e.g. a partnership, consultation, training and education, resources, advocacy.
- 5 Other information relevant to the request, such as conditions, as resources available, legislation, risks, constraints, timeframes.

	Application Decision	Notes
1	Date of receipt of application	
2	Date/s submitted to CLAN Committee	
3	CLAN Decision and Date	
4	Authorisation: Name, Position	
5	Decision and reasons	

Attachment 7

CLAN: APPLICATION FORM FOR FUNDING and/or OTHER SUPPORT

Plan or Project Details

Applicant to complete all sections of this document.

Country and location	
Governing authority approval	
Administrator of plan/project Name, title, Contact details	
Plan or project title	
Purpose of the Project	
Details of the plan/project (information for this section may be provided separately)	
Statement of needs	
Personnel involved	
Estimated number of beneficiaries and details * ages of children and NCD *families *communities	
Community involvement (where applicable)	
Goals and stated outcomes	
Sustainability Plan	
Monitoring and reporting on program implementation	
Other Partners involved in the program/project (if relevant)	
Estimated risks	
Support requested	
Estimated timeframe	
I have read and agree to comply to CLAN's Manual (please sign your response for each policy)	Counter-Terrorism Child Protection Gender Equality Code of Ethics & Professional Conduct Disability Inclusiveness

CLAN: APPLICATION FORM FOR FUNDING and/or OTHER SUPPORT (continued)

Plan or Project Details

Applicant to complete all sections of this document.

Estimated budget (provide details if used for different project activities or if sub-partners are involved)		
Funding Specific amount requested		
Bank details (if relevant)	Account Name	Bank Name
	Bank Address	BSB
	Account Number	Swift Code or IBAN
Management of funding (if relevant)	Initial and interim, during the plan/project	
	Total, estimated date for receipt of funding	
	Other option	
Recognition of CLAN	How you intend to acknowledge publicly CLAN funding support	
Reporting to CLAN and estimated dates	Monitoring and evaluation throughout the plan/project	
	Final report	

I have read and understand the requirements attached to this Funding/Support Application and will make every reasonable effort to comply with legislation and conditions attached to receipt of funding from CLAN.

Name Position..... Date

Authority..... Position..... Date

Attachment 8

ACFID Code of Conduct: Quality Principles and Commitments

Quality Principles	Commitment
<p>1. RIGHTS, PROTECTION & INCLUSION Development and humanitarian responses respect and protect human rights and advance inclusion.</p>	<ol style="list-style-type: none"> 1. We respect and protect human rights. 2. We respect and respond to the needs, rights and inclusion of those who are vulnerable and those who are affected by marginalisation and exclusion. 3. We support people affected by crisis. 4. We advance the safeguarding of children.
<p>2. PARTICIPATION, EMPOWERMENT & LOCAL OWNERSHIP Development and humanitarian responses enable sustainable change through the empowerment of local actors and systems.</p>	<ol style="list-style-type: none"> 1. We promote the participation of primary stakeholders. 2. We promote the empowerment of primary stakeholders. 3. We promote gender equality and equity. 4. We promote the empowerment of people with disabilities. 5. We promote the participation of children
<p>3. SUSTAINABLE CHANGE Development and humanitarian responses contribute to the realisation of sustainable development.</p>	<ol style="list-style-type: none"> 1. We seek durable and lasting improvements in the circumstances and capacities of primary stakeholders. 2. We contribute to systemic change. 3. We promote environmental stewardship and sustainability
<p>4. QUALITY AND EFFECTIVENESS Development and humanitarian organisations and responses are informed by evidence, planning, assessment and learning.</p>	<ol style="list-style-type: none"> 1. We articulate clear strategic goals for our work. 2. We analyse and understand the contexts in which we work. 3. We invest in quality assessment of our work. 4. We reflect on, share and apply results and lessons with stakeholders.
<p>5. COLLABORATION Development and humanitarian responses are optimised through effective coordination, collaboration and partnership .</p>	<ol style="list-style-type: none"> 1. We respect and understand those with whom we collaborate. 2. We have a shared understanding of respective contributions, expectations, responsibilities and accountabilities of all parties. 3. We invest in the effectiveness of our collaborations and partnerships
<p>6. COMMUNICATION Development and humanitarian organisations communicate truthfully and ethically.</p>	<ol style="list-style-type: none"> 1. We are truthful in our communications. 2. We collect and use information ethically.
<p>7. GOVERNANCE Development and humanitarian organisations are governed in an accountable, transparent and responsible way.</p>	<ol style="list-style-type: none"> 1. We are not-for-profit and formed for a defined public benefit. 2. We meet our legal and compliance obligations. 3. We are accountable to our stakeholders. 4. We have responsible and independent governance mechanisms
<p>8. RESOURCE MANAGEMENT Development and humanitarian organisations acquire, manage and report on resources ethically and responsibly.</p>	<ol style="list-style-type: none"> 1. We source our resources ethically. 2. We ensure that funds and resources entrusted to us are properly controlled and managed. 3. We report on the acquisition and use of our resources.
<p>9. PEOPLE AND CULTURE Development and humanitarian organisations manage and support their people fairly and effectively.</p>	<ol style="list-style-type: none"> 1. We have the human resource capacity and capability to deliver our work. 2. We protect, value and support our people. 3. We manage our people effectively and fairly. 4. We enable our people to conduct themselves professionally and according to our stated values.

CLAN: PMEL Portfolio

Documents for PMEL relevant to CLAN's programs and projects include the following:

- * CLAN's Planning, Monitoring, Evaluating, and Learning Commitment
- * CLAN's Project Design, Monitoring and Evaluation Guidance Statement
- * CLAN's Monitoring, Evaluating and Learning Template

CLAN: Planning, Monitoring, Evaluation and Learning Commitment

Purpose of this Document

This Commitment outlines CLAN's framework to be used as a guide to identify key principles and practices to underpin planning and implementation of CLAN's programs, projects and activities. The Framework is to be used as an accessory to CLAN's Project Design, Monitoring and Evaluation Guidance Document and Template. The key principles outlined below are to be implemented in CLAN's work and also in other policies where relevant (see Appendix).

CLAN was created to work for children living with chronic health diseases in resource-poor settings around the world. CLAN's Vision and Mission, as stated below, identify CLAN's purpose and focus to work towards achieving equity and equality for children living with non-communicable diseases (NCDs) and their families who live in resource-poor settings.

CLAN's Vision: Our vision is that all children living with chronic health conditions in resource-poor settings of the world will enjoy a quality of life equivalent to that of their neighbours' children in higher-income countries.

CLAN's Mission: To maximise the quality of life for children and their families who are living with chronic health conditions in resource-poor settings of the world.

Definitions: (Oxford Dictionary)

Equity The quality of being fair and impartial.

Equality The state of being equal, especially in status, rights or opportunities.

CLAN is committed to providing services and opportunities with the support of stakeholders and formal partners to improve the health and conditions of children living with Non Communicable Diseases (NCD's). To achieve these goals, CLAN endeavours to facilitate multi-sectoral involvement for a comprehensive approach which may involve governments and health systems, industry, policy makers, health professionals, specialists, businesses and most importantly, the children living with NCDs and their families in resource poor settings.

The following outlines CLAN's approaches to working with children living with NCDs and their families, partners and stakeholders.

1 Programs, Projects, Activities

Key components of planning for quality and effectiveness involves careful planning for each program, project or activity. In consultation with stakeholders, CLAN, where relevant, implements strategies to:

- i analyse the needs of children with NCD's based on research or other evidence
- ii research or obtain evidence to determine the context/s for implementing activities
- ii determine strategic goals and outcomes to achieve goals and objectives
- iii assess human and non-human resources, plan budget/s, identify potential risks and mitigation strategies, develop time frames, identify specific factors that may affect the activity
- iv determine review and assessment periods for monitoring the program or project
- v ensure times are implemented for reflection and analysis of results, and learning during and at the conclusion of a program or project
- vi apply knowledge gained to future programs and activities where relevant.

2 Key Principles

2.1 Equality and Equity

i. Equality

CLAN works collegially with partners to plan and implement programs and projects that demonstrate equality and equal opportunity. CLAN's approach to working with stakeholders including professionals, families and children, is to treat others with respect, fairness and impartiality. Activities are implemented fairly and impartially, and with honesty and transparency.

ii. Equity

Careful planning based on research includes the need to plan each activity carefully in order to provide outcomes that demonstrate equity, that is, to meet the specific and different care needs of a group or individuals so that all participants can achieve outcomes successfully. For example, a child with a non-communicable disease may also experience other health issues that need to be taken into account in planning activities so that the child can achieve the same or similar outcome/s.

To achieve equality and equity CLAN the following key aspects are taken into account when planning programs and projects:

- a rights of the child
- b vulnerability of children and families with needs and/or at risk
- c consideration and management of potential or identified gender inequalities and inequities
- d level of disabilities experienced by children living with NCDs and impact on their families and communities
- e positive and effective communication strategies required, particularly for working with groups in another language
- f collaborative and effective management of complaints

Key components of planning for quality and effectiveness involves careful planning for each program, project or activity. In consultation with stakeholders, CLAN identifies and plans for:

- i research to analyse needs and the contexts for implementing activities
- ii strategic goals and outcomes to achieve goals, objectives and sustainability
- iii risk analysis of potential risks and mitigation strategies
- iv reviews and assessments during and at the conclusion of planned activities

v reflections and analysis of results, learning, and application to future planning where relevant

vi analysis to predict sustainability of outcomes

2.2 Stakeholders and partners

CLAN works collegially with partners and/or relevant stakeholders at all stages of a program, project or activity undertaken to achieve strategic goals. Coordinated programs or projects are developed and implemented with input from partners, and where relevant to a program, will include input and/or feedback from participants such as presenters, health officials, children living with NCDs and their families.

2.3 Evaluation and learning

Evaluation and learning is integral to all aspects of a planned program, including the initial concept, implementation, final outcomes. Relevant documentation will be used as part of the formal report to be presented to CLAN's Committee for the purposes of reviewing, evaluating and analysing the program's purposes, achievements, and factors that may have affected or impacted on the program's implementation and outcomes. When the final report is accepted by the Committee, it will be shared with relevant partners, stakeholders for review, and used where relevant to inform future strategies and practice.

Appendix: Associated Policies

The Commitment Statement above is, where relevant, applicable to the implementation of CLAN's Policies below:

Building Capacity and Sustainability Policy	Fundraising Policy
Child Inclusive Policy	Gender Equality Policy
Child Protection Policy	Grievance & Dispute Resolution Policy
Code of Ethics and Professional Conduct Policy	Human Resources Policy
Complaint Management Policy	Managing Social Media Policy
Copyright and Intellectual Property Policy	Non-Aid and Development Activities Policy
Conflict of Interest Policy	Privacy Policy
Counter Terrorism Policy	Project design, Monitoring and Evaluation Policy
Disability Inclusiveness Policy	Risk Management Policy
Drug Donations to Developing Countries Policy	Safety and Security Policy
Equal Employment Opportunity & Anti-Discrimination Policy	Staff Training & Development Policy
Financial Impropriety Risk Management Policy	Whistleblower Policy
Financial Management Policy	Work Health & Safety Policy

Policy: **CLAN Risk Management Policy**

Version No: 1.0

Date Approved: March 2017

Date Review Scheduled: March 2020

1. Introduction

CLAN is a not for profit, non-government incorporated association (NGO) and its vision, mission and goals are based on the health and well-being needs of children in resource-poor countries. CLAN recognises that risks may originate from organisational decisions and/or the external environment, including both local and international situations.

2. Purpose

This policy provides a framework for structures and processes required to manage risks. CLAN recognises that it essential to identify and manage potential risks in order for CLAN to achieve its vision and mission effectively.

Risk assessment and management is essential as it provides support for CLAN to:

- i. be compliant with legislation, regulations and contracts
- ii. improve planning and efficiencies for projects and activities
- iii. improve safety and security for employees
- iv. add value to its reputation as a NGO.

3. Scope

This policy applies to all staff and other key groups. 'Staff' refers to: full time, part time, international and national and also those engaged on short term contracts such as: consultancies, researchers, photographers etc. 'Others' refers to: visitors, volunteers, board members, trustees, staff/volunteers in partnership agencies, and any other individuals or groups that have a responsibility with respect to CLANs programs.

4. Definitions

Term	Definition
Risk	A potential threat of damage, injury, liability, loss or other negative effect due to internal or external factors, and that could be avoided through effective risk management strategies. Risks may include threats to project outcomes, safety and security of personnel, child protection, finance, resources, compliance, trust and integrity.
Risk Management	Risk management involves coordinated activities to direct and control an organisation, with regard to risk. It is 'the systematic application of management policies, procedures and practices to the activities of communicating, consulting, establishing the context, and identifying, analysing, evaluating, treating, monitoring and reviewing risk.' (AS/NZS 31000:2009)

5. Policy

CLAN is committed to implementation of the AS/NZ 3100:2009 Standard and the Principles for managing risk. This policy outlines CLAN's processes to manage risks through the Risk Management Framework. Where CLAN works with partners on a program or project, partners

will be involved in developing the Risk Management Plan for that project. Partners will also be required to show evidence for compliance with CLAN's Policies that are relevant to each specific project. Risk management is an integral part of all project design, proposals and reports to the Committee.

The Committee will review each Risk Management Plan prior to acceptance of a proposal for a program, project, other activity, or an Agreement or MOU with a proposed partner. The evaluation for each activity will be reported to the Committee including outcomes of the risk management process implemented. An annual Risk Management Report will be reviewed by the Committee, and any adjustments required to the Risk Management processes will be determined by the Committee for continual improvement.

6. Risk Management Framework

Risk management is about avoiding risks, minimising risks, and managing risks in CLAN activities to achieve CLAN's objectives.

- i. CLAN undertakes the following approach to risk assessment for its activities:
 - 1 risk identification and causes
 - 2 risk assessment - the likelihood of risks occurring and potential consequences, and risk rating
 - 3 risk mitigation – strategies and controls to manage or mitigate identified risks
 - 4 apply learnings for continuous improvement for project planning and implementation
- ii. CLAN will document and report to the Executive on risk management undertakings.

7. Risk Management Tables and definitions

Likelihood	Description
Almost certain	Will probably occur, could occur several times per year
Likely	High probability, likely to arise once per year
Possible	May arise over a five year period
Unlikely	Could occur over a five to ten year period
Rare	Very unlikely but possible over a ten year period

Loss or damage impact scale	Description	Risk Level
Extreme	Most objectives may not be achieved, or severely affected	Low to Extreme
Major	Most objectives threatened or one severely affected	Low to Extreme
Moderate	Some objectives affected, considerable effort to rectify	Low to Extreme
Minor	effort objectives can be achieved	Low to Extreme
Negligible	very small impact, rectified by normal processes	Low to Extreme
<p>Note: Risk level may be Low, Medium, High, or Extreme, whether the risk occurs rarely or if it is almost certain to occur. Each case must identify, review, assess, and control risks. The final decision on risk level should not be limited by stated guidelines or templates.</p>		

8. Risk Category Management Matrix

1 External Risk examples

No	Category	Source, possible outcome	Likelihood	Impact	Control of Risk Level	Control Strategies	Responsible
1.1	Legal	Unfavourable Australian Legislation changes. Impact on fundraising.	Possible	Major	Low	Committee monitors govt. legislation	President Officers
1.2	Finance	Unfavourable Exchange rate. Impact on budget	Possible	Moderate	Moderate	Funding Policy	President
1.3	Civil factors	Political decisions, unrest. Impact on projects, safety and security	Possible	Major	Medium	Knowledge of country situation. Partnership Agreement, MOU. Policies	President Partner/s

2 Internal Risks examples

No	Category	Source, possible outcome	Likelihood	Impact	Control of Risk Level	Control Strategies	Responsible
2.1	Governance	Breach of compliance. Potential deregistration, fines, charges	Unlikely	Major	Low	Constitution Directors updated on legislation	President Officers
2.2	Finance	Counter-terrorism. Breach of legislation. Potential deregistration, Loss of trust.	Unlikely	Major	Low	Counter-terrorism Policy. Approval policy for projects.	President Treasurer
2.3	Finance	Misuse, fraud. Impact on loss, audits, trust, reputation	Unlikely	Major	Low	Constitution Financial Policies and Procedures, Monitoring, audits	President Treasurer Officers
2.4	Finance	Unfavourable audit. Loss of trust, reputation	Unlikely	Major	Low	Financial Policies and Procedures. Fundraising	President Treasurer Officers
2.5	Conflict of interest	Breach of policy. Loss of trust.	Unlikely	Major	Low	Conflict of interest policy	President Officers

3 Project Risks examples

No	Category	Source, possible outcome	Likelihood	Impact	Control of Risk Level	Control Strategies	Responsible
3.1	Project: In-country with partners	Breach of MOU, partner Agreement. Impact on project and outcomes, loss of trust & confidence	Unlikely	Major	Low	Initial research. Partner agreements, MOU's. Partner application policies and assessment.	President Officers
3.2	Project: Child Protection	Breach of Child Protection Policies. Impact on child & family reputation, projects.	Unlikely	Major	Low	Child Protection Policies and Procedures. Monitoring. Project design. Training.	President Officers Partners Project personnel
3.3	Project: Safety and Security	Civil unrest Breach of policy. Impact on personnel, costs, delays, fundraising	Unlikely	Major	Low	Knowledge of country involved. Safety and security policy. Training.	President Officers Partners
3.4	Project: Human Resources	Lack suitable Personnel. Impact on programs and projects	Unlikely	Major	Low	Project design, monitoring & evaluation policy	President Officers
3.5	Project: Financial	Budget inadequate. Impact on projects, resources	Possible	Major	Medium	Project Design Policy Fundraising	President Officers
3.6	Project: Resources	Fundraising inadequate. Project lack.	Likely	Major	Medium	Fundraising Policy & Procedures	President Officers
3.7	Project: development	Project not based on needs. Outcomes not achieved.	Unlikely	Moderate	Low	Research. Project Design Policy work with Partners	President Officer/s Partner/s

Policy:

CLAN Safety and Security Policy

Version No: 1.0
Date Approved: March 2017
Date Review Scheduled: 2020

1. Introduction

CLAN is a not for profit, non-government organization whose mission is to maximise the life for children and their families who are living with chronic health conditions in resource-poor settings of the world. CLAN's mission includes advocacy roles at national and international levels and participation in conferences and meetings around the world.

2. Purpose

This policy outline the responsibilities and procedures to be implemented by CLAN to maintain the safety and security of CLAN personnel, volunteers and visitors involved in CLAN projects, and CLAN personnel involved in conferences and meetings with partners around the world.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN whilst in the delivery of CLAN programs and other activities.

4. Definitions

Term	Definition
Safety and security	“Human security can be said to have two main aspects. It means, first, safety from such chronic threats as hunger, disease and repression. And second, it means protection from sudden and hurtful disruptions in the patterns of daily life – whether in homes, in jobs or in communities. Such threats can exist at all levels of national income and development.” (UNDP 2001)

5. Policy and Guidelines/Procedures

Security for a project is achieved when delivery and implementation is successful, and CLAN's reputation is maintained with integrity.

Security risk management is an integral part of CLAN activities, particularly projects undertaken in resource poor settings. CLAN must decide what projects and activities are necessary, appropriate and able to be supported by partnerships. For each project, CLAN's risk management assessment for each project will incorporate risks to safety and security to identify and manage such risks.

6. Framework to review risks

The following risks are to be assessed for a CLAN project. However, as each project is unique, research will need to identify and assess other risks associated with each project.

Minimum areas to be assessed for risks to safety and security include:

- i. country and timeframe and how this may affect safety and security
- ii. goals and outcomes aligned to CLAN's strategy and relation to cultural practices
- iii. assessment of resources required, including capacity of personnel if resources are limited
- iv. assessment of safety risks to personnel for implementation of a project
- v. evaluation of safety and security risks on potential results of a project

- vi. final decision for strategies to manage risk or to make decision to not accept a project

7. Management of risks to safety and security

Management strategies to manage risks may include, but are not limited to:

- i. forward planning to mitigate risk including procedures to respond to potential scenarios
- ii. training of project and in-country personnel about their responsibilities for providing a safe and secure environment and to conduct themselves accordingly
- iii. research, training and information about the resource poor country for personnel involved in a project in that country including the culture of the country.

8. Management of personnel

Before travelling overseas, CLAN staff should:

- i. access 'smart traveller' on the dfat.gov.au site for advice on country specific safety and security
- ii. register travel plans on the DFAT website and 'Register your travel plans'
- iii. have appropriate travel insurance, passport and visas (where required)
- iv. ensure all documents are copies and held securely in Australia
- v. have information about the relevant in-country Australian embassy or consulate
- vi. ensure all necessary vaccinations have been obtained.

9. Partner roles

CLAN expects and will require evidence that its partners will provide safe and secure accommodation and provide advice and assistance with implementing a CLAN project.

10. Review

CLAN will undertake reviews on the safety and security provisions and outcomes for personnel at the conclusion of each project or activity. Outcomes may underpin and guide further planning for more effective strategies to cover safety and security of personnel involved in CLAN's projects or activities.

Associated Documents

Child Protection Policy
Project Design, Monitoring and Evaluation Policy
Risk Management Policy
Code of Ethics and Professional Conduct Policy

Policy: CLAN Staff Training and Development Policy

Version No: 2.0
Date Approved: 28 January 2011
Date Updated: March 2015
Date Review Scheduled: 2020

BACKGROUND

1. Introduction

CLAN acknowledges that professional development is integral to personal job satisfaction, workplace productivity, reward and recognition and is critical to the achievement of the organisation's mission and continuous improvement in the quality of its programs and services.

CLAN is committed to providing a supportive and rewarding environment for employees and recognises that the quality, responsiveness, and professionalism of its workforce are linked to the further development of their skills and competencies.

2. Purpose

The purpose of this policy is:

- i. to encourage and support employees in their professional and career development as part of their involvement with the organisation
- ii. to provide administrative guidelines to facilitate fairness and equity in the application of these general principles.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organisations of CLAN in whilst in the delivery of CLAN programs.

4. Definitions

<u>Term</u>	<u>Definition</u>
Professional development	Refers to the acquisition of skills and knowledge, both for personal development and for career advancement.

5. Policy

CLAN, as far as is feasible within its available resources, is committed to providing CLAN personnel with:

- i. the opportunity to plan and develop skills, knowledge and attributes that complement organisational and work unit goals
- ii. the opportunity to participate in career development activities that extend and enhance their capabilities and capacity for advancement within the organisation

iii. equity of access to professional development opportunities.

CLAN will provide position-specific professional development where the Committee decides that it is necessary for an individual or group to acquire particular skills, to gain specific knowledge, or to acquire specific qualifications in order to carry out the duties attached to an existing position. CLAN shall be fully responsible for all costs for professional development. Where an employee is engaged in professional development program/s, the employee shall, where necessary, be given permission to attend any such course within working hours.

CLAN may encourage employees to explore professional development as part of a performance review process. Education or training requirements involving reimbursement of fees or provision of paid study leave may also be negotiated as part of the contract of employment between the employee and CLAN.

6. Procedures

Professional development programs may be planned by CLAN for employees and other personnel involved with CLAN. This may include orientation, induction and on-the-job training, career development and transition programs, internal or external courses, support for undertaking research or project work, support for participation in internal or external governance processes, attendance at conferences or seminars, networking, coaching and mentoring programs.

Employees shall be encouraged as part of the performance review process to take an active role in their own ongoing professional and career development and to apply their learning to add value to their work or contributions. Any proposal by an employee for a change to their existing conditions of employment (hours of work, taking of leave, use of equipment, etc) to facilitate their professional development shall be considered by the Committee subject to:

- i. the overall training needs and priorities of CLAN
- ii. the business of CLAN can be carried on satisfactorily in those circumstances
- iii. equity in the provision of such facilitation between employees.

Any such agreement shall be fully documented in that person's personnel file.

The Committee will review the effectiveness of the professional development undertaken and the value added to CLAN's activities.

Associated Documents

Human Resources Policy

Project Design, Monitoring and Evaluation

Policy: **CLAN Whistleblower Policy**

Version No: 1.0

Date Approved: 6 July 2018

Date Review Scheduled: 2023

1. Introduction

CLAN is a non-government organization whose mission is ‘To maximize the quality of life for children and their families who are living with chronic health conditions in resource-poor settings of the world.’ This involves CLAN working with partners and communities to achieve outcomes to build capacity and sustainability for their projects and activities. CLAN is committed to managing any complaints promptly in a fair and ethical manner.

2. Purpose

This policy aims to provide support for an individual who approaches CLAN to provide information about potential breach of the *Corporations Act 2001* by person/s within CLAN and to manage such disclosures effectively.

3. Scope

This Policy is intended to apply to any report or information about misconduct within CLAN, including our paid staff, our volunteers, our partners, our contracted service providers or anyone else acting on behalf of CLAN. CLAN will give serious consideration to the matters they raise.

4. Definitions

<u>Term</u>	<u>Definition</u>
Whistleblower	A whistleblower is an insider within an organization, who reports misconduct or dishonest or illegal activity that has occurred within that same organisation.

5. Commitment

CLAN is committed to managing information effectively that is disclosed by a whistleblower. CLAN seeks to ensure all actions to investigate such information ethically and with integrity.

6. CLAN’s role

6.1 Criteria to determine a whistleblower

- (i) a whistleblower must be a current officer of CLAN, a current employee, contractor or volunteer.
- (ii) the disclosure must be made to the CLAN’s President or Vice-President, CLAN’s auditor, or a person authorized by CLAN to receive whistleblower disclosures;
- (iii) the person presenting the information is required to give their name to the person they are making the disclosure to;
- (iv) there must be evidence to demonstrate reasonable grounds that the information disclosed may have breached the *Corporations Act 2001*;
- (v) the disclosure must be made in good faith, that is, it is honest and genuine to disclose misconduct, and not for any other unrelated reason.

6.2 Protection for the whistleblower

The *Corporations Act 2001* contains protections for whistleblowers who meet the criteria in s.4 and s.6.

- (i) Information provided by whistleblowers is classified as a 'protected disclosure', which must be kept confidential. CLAN must not disclose either the information or identity of the whistleblower unless that disclosure is specifically required by law.
- (ii) A whistleblower is protected against civil or criminal litigations (including a breach of contract) for protected disclosures. If the whistleblower is the subject of an action for disclosing protected information they, may rely on this protection in their defence. If an employer terminates a whistleblower's employment as a result of a protected disclosure, the whistleblower may ask the court for an order to reinstate them either in their original position or in another position at a comparable level.
- (iii) It is a criminal offence to victimize a whistleblower because of a protected disclosure. If a whistleblower suffers damage, the whistleblower can claim compensation for that damage from the offender.

6.3 Management of a disclosure

- (i) When an individual indicates that they wish to report misconduct or dishonest or illegal activity that has occurred, the disclosure will be made to one of CLAN's nominated persons. The protections for whistleblowers will be shared with the whistleblower.
- (ii) CLAN will review the information disclosed and assess the matter to determine if a formal investigation is required or if other procedures may be effective to remedy the situation. The focus of a formal investigation will determine the nature and seriousness of the misconduct, conduct of the person after the alleged misconduct, the strength of the case, potential impact of the remedy and any other mitigating factors.
- (iii) In cases where there is evidence of misconduct, dishonest or illegal activity, remedies may include court action, punitive action for misconduct, protective action to protect CLAN, corrective action for misleading information given about CLAN, or a negotiated resolution to improve compliance.

Policy: **CLAN Work Health and Safety Policy**

Version No: 2.0

Date Approved: 17 February 2016

Date Updated:

Date Review Scheduled: 30 June 2018

1. Introduction

CLAN is committed to providing a safe and secure work environment that is consistent with NSW Work Health and Safety legislation. CLAN endeavors to ensure a safe and healthy workplace by removing or reducing the risks, as far as reasonably practicable, to the health, safety and welfare of all volunteers, contractors and visitors, and any other personnel apart from employees, associated with CLAN's operations.

CLAN acknowledges that where a person is employed this changes the status of CLAN to Person Conducting a Business or Undertaking and that the provisions of the *Work Health & Safety Act 2011* (NSW) apply.

2. Purpose

The purpose of this policy is to ensure that all personnel associated with CLAN's activities or business operations as aware of both CLAN's and their responsibilities for compliance with work health and safety requirements.

3. Scope

This policy applies to all Committee members, staff, volunteers and partner organizations of CLAN in whilst in the delivery of CLAN programs.

4. Definitions

<u>Term</u>	<u>Definition</u>
Person conducting a business or undertaking (PCBU)	<ol style="list-style-type: none">(1) For the purposes of this Act, a person conducts a business or undertaking:<ol style="list-style-type: none">(a) whether the person conducts the business or undertaking alone or with others, and(b) whether or not the business or undertaking is conducted for profit or gain.(2) A business or undertaking conducted by a person includes a business or undertaking conducted by a partnership or an unincorporated association.(3) If a business or undertaking is conducted by a partnership (other than an incorporated partnership), a reference in this Act to a person conducting the business or undertaking is to be read as a reference to each partner in the partnership.(4) A person does not conduct a business or undertaking to the extent

that the person is engaged solely as a worker in, or as an officer of, that business or undertaking.

- (5) An elected member of a local authority does not in that capacity conduct a business or undertaking.
- (6) The regulations may specify the circumstances in which a person may be taken not to be a person who conducts a business or undertaking for the purposes of this Act or any provision of this Act.
- (7) A volunteer association does not conduct a business or undertaking for the purposes of this Act.
- (8) In this section, volunteer association means a group of volunteers working together for one or more community purposes where none of the volunteers, whether alone or jointly with any other volunteers, employs any person to carry out work for the volunteer association.

Reasonably practicable

In this Act, reasonably practicable, in relation to a duty to ensure health and safety, means that which is, or was at a particular time, reasonably able to be done in relation to ensuring health and safety, taking into account and weighing up all relevant matters including:

- (a) the likelihood of the hazard or the risk concerned occurring, and
- (b) the degree of harm that might result from the hazard or the risk, and
- (c) what the person concerned knows, or ought reasonably to know, about:
 - (i) the hazard or the risk, and
 - (ii) ways of eliminating or minimising the risk, and
- (d) the availability and suitability of ways to eliminate or minimise the risk, and
- (e) after assessing the extent of the risk and the available ways of eliminating or minimising the risk, the cost associated with available ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.

Worker

- (1) A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as:
 - (a) an employee, or
 - (b) a contractor or subcontractor, or
 - (c) an employee of a contractor or subcontractor, or
 - (d) an employee of a labour hire company who has been assigned to work in the person's business or undertaking, or
 - (e) an outworker, or
 - (f) an apprentice or trainee, or
 - (g) a student gaining work experience, or
 - (h) a volunteer, or
 - (i) a person of a prescribed class.
- (2) For the purposes of this Act, a police officer is:
 - (a) a worker, and
 - (b) at work throughout the time when the officer is on duty or lawfully performing the functions of a police officer, but not otherwise.

- (3) The person conducting the business or undertaking is also a worker if the person is an individual who carries out work in that business or undertaking.

5. Policy

CLAN is committed to providing an environment where all work can be carried out, as far as reasonably practicably, safely and with all possible measures taken to remove, or at least reduce the risks to the health, safety and welfare of workers , including volunteers, contractors, authorised visitors, and anyone else who may be involved in CLAN's operations.

When operating overseas, CLAN will continue to apply the guidance provided by the Work Health and Safety legislation to provide for the safety of workers.

Where a person is employed by CLAN, the provisions of the Workplace Health and Safety Act and Regulations (NSW) apply.

6. Procedures

CLAN Executive will provide and maintain as far as possible:

- i. a safe working environment
- ii. safe systems of work
- iii. plant and substances in safe condition
- iv. facilities for the welfare of workers
- v. information, instruction, training and supervision that is reasonably necessary to ensure that each worker is safe from injury and risks to health
- vi. a commitment to consult and co-operate with workers in all matters relating to health and safety in the workplace
- vii. a commitment to continually improve our performance through effective safety management
- viii. comply with legislation where this applies to a worker.

CLAN workers will:

- i. comply with safe work practices, with the intent of avoiding injury to themselves and others and damage to plant and equipment
- ii. take reasonable care of the health and safety of themselves and others
- iii. wear personal protective equipment and clothing where necessary
- iv. comply with any direction given by management for health and safety
- v. not misuse or interfere with anything provided for health and safety
- vi. report all accidents and incidents on the job immediately, no matter how trivial
- vii. report all known or observed hazards to their supervisor or manage.

7. Management and review

CLAN will undertake a risk management process to identify potential or real risks that may be associated with each program, project, activity or fundraising event undertaken.

CLAN will record all incidents, report to authorities where required and comply with legislation involving any return to work cases.

A regular review will be undertaken on the safety and security of personnel involved in every CLAN activity. Reports will be given regularly to the Committee on the safety of each project and activity undertaken.

Associated Documents

Risk Management Policy

Safety and Security Policy

Staff Training and Development Policy

Legislation

Work Health and Safety Act 2011 (NSW)

Work Health and Safety Regulation 2011 (NSW)

Reference

BNG Workplace health and safety: Checklist (www.ngoservicesonline.com.au)

