



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.
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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.

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:

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

CLAN has a 6th Pillar – Governance the activities of which are internally focussed to ensure effective governance of all administrative functions and legal compliance requirements.

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 web-site, Annual Reports and newsletters are key mechanisms that are used for disseminating reports on CLAN's work.

CLAN ADVOCACY GUIDELINES

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CLAN's Mission states that 'We are passionate about improving the quality of life for children living with chronic health conditions in resource-poor settings, so they may grow to enjoy healthy and happy lives.'

CLAN is committed to the principles of a rights based approach to community development and comprehensive primary health care. Principles guiding CLAN's work includes respect, protecting human rights for all regardless of race, religion, ethnicity, Indigeneity, disability, age, displacement, caste, gender identity, sexuality, sexual orientation, poverty, class, or socio-economic status.

Advocacy undertaken by CLAN does not do harm or increase the level of risk facing families and children involved in CLAN programs. Advocacy is based on research and evidence to ensure accuracy and to reflect the perspectives of those whom CLAN represents.

CLAN's Five Pillars will focus advocacy action on:

- 1) Affordable access to medication and medical equipment
- 2) Education (of individuals, families, communities, health professionals, policy makers and the international community). Research and 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.

CLAN's Advocacy actions may include the following groups, as relevant to each activity:

- 1) Individuals and families
- 2) Health professionals, other specialists
- 3) Philanthropy
- 4) Government and Health Systems such as WHO
- 5) Non-government organisations
- 6) Policy makers
- 7) Industry
- 8) Community groups
- 9) Engaging media interest.

CLAN's Advocacy Plans may include the following activities as relevant to each situation:

- 1) Define the situation: undertake research, identify needs resources, personnel, partners, risks
- 2) Establish goals, objectives and outcomes
- 3) Define target audiences and key messages
- 4) Implement programs, engage media interest
- 5) Monitor progress and evaluate outcomes
- 6) Manage learning and knowledge in advocacy
- 7) Report and share advocacy actions.

CLAN's Strategic Framework for Action is simple, and easily communicated to a wide range of stakeholders, thereby facilitating multisectoral involvement and a comprehensive approach to a complex problem. When communities of children (the support groups) are viewed as the central hub of all action by all stakeholders, genuine child and family centred and community development approaches are natural consequences. Local involvement, ownership and control is fostered, ensuring culturally appropriate action. Long-term, sustainable change is achieved through a development (rather than welfare) approach, and a focus on the broader social determinants of health rather than a narrow bio-medical approach.



CLAN's 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:

- 1) **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.
- 2) **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.
- 3) **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.
- 4) **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](#)

[CLAN Child Inclusive Policy](#)

[CLAN Child Protection and Safeguarding Policy](#)

[CLAN Code of Ethics and Professional Conduct Policy](#)

[CLAN Communications Policy & Ethical Decision Making Framework for Communications](#)

[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 Environmental Policy](#)

[CLAN Equal Employment Opportunity & Anti-Discrimination Policy](#)

[CLAN Financial Impropriety Risk Management Policy](#)

[CLAN Financial Management Policy](#)

[CLAN Foreign Exchange Policy](#)

[CLAN Fundraising Policy](#)

[CLAN Gender Equality Policy](#)

[CLAN Grievance & Dispute Resolution Policy](#)

[CLAN Human Resources Policy](#)

[CLAN Monitoring, Evaluation and Learning Commitment](#)

[CLAN Non-Aid and Development Activities Policy](#)

[CLAN Overseas Payment and Transfers Policy](#)

[CLAN Partnership Policy](#)

[CLAN Privacy and Disclosure Policy](#)

[CLAN Procurement Policy & Authorisations and Delegations](#)

[CLAN Project Design, Monitoring and Evaluation Policy](#)

[CLAN Protocol for Reporting Serious Incidents](#)

[CLAN Preventing Sexual Exploitation, Abuse and Harassment Policy \(PSEAH\)](#)

[CLAN Risk Management Policy](#)

[CLAN Safety and Security Policy](#)

[CLAN Staff Training & Development Policy](#)

[CLAN Transparency Policy](#)

[CLAN Whistleblower Policy](#)

[CLAN Work Health & Safety Policy](#)

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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.

2. 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, policymakers, 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.

3. 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.

4. 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.

5. Capacity building and Sustainable Development

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 is development that meets the needs of the present without compromising the ability of future generations to meet their own needs (WHO)

6. Building Capacity and Sustainability

CLAN recognises that sustainable development includes social, community, cultural and economic sustainability and that a 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.

7. 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.

8. 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:

- 1) Identification of the needs of children with NCD's and their families (and/or other focus need)
- 2) The need for, and role of partners and community resources for example, 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 and formal and informal training workshops for children, families and community.
- 3) 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
- 4) The need for development of community support through partnerships and strategies to support children and families in their local community
- 5) Nature of partnerships required, e.g. building partnerships with hospitals, pharmacy suppliers, and other NCD groups

- 6) 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.

9. Building Capacity

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:

- 1) 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
- 2) Education and training to children, families and professionals to provide knowledge, skills and confidence to manage child health challenges effectively
- 3) Empowering families, professionals and the community to 'own' processes to achieve outcomes both short-term and long-term
- 4) Seeking resources to provide resources to children, families and professional services where required or possible
- 5) Encouraging families in poverty to improve their financial situation through seeking and small business operations.

10. Sustainability

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, to participate in conferences at national and international levels and 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 to promote 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.

11. 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.

12. Policy review

This policy will be reviewed bi-annually.

13. Associated CLAN documents

- Disability Inclusive Policy
- Risk Management Policy
- Staff Safety and Security Policy

CLAN Child Inclusive Policy

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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 with chronic health conditions, including children and their families to improve the quality of life. This includes promoting gender equality and equity and non-discrimination in regard to gender identity and ensuring children's rights are adhered to and that they have a voice.

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 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 endeavours 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 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.

- 1) 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.
- 2) 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. Research is undertaken to identify the specific needs and rights of the children and young persons to be involved in the project.
- 3) 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.

CLAN's programs endeavour to build and continue relationships between families and their children with the local community and local medical resources in order to provide long-term benefits for children with NCDs.

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.

6. Policy review

This policy will be reviewed bi-annually.

7. Associated CLAN Documents

- Child Protection Policy
- Code of Ethics and Professional Conduct
- Disability Inclusiveness Policy
- Project Design Monitoring and Evaluation

CLAN Child Protection and Safeguarding Policy & Ethical Decision Making Framework in Communications

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1. Purpose

This Child Protection and Safeguarding Policy articulates CLAN's zero tolerance approach to child exploitation, abuse, harassment 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 through child protection and safeguarding measures. Children have a right to survival, development, protection and participation as stated in the United Nations Convention on the Rights of the Child. As indicated in the Declaration of the Rights of the Child, "the child, by reason of his physical and mental immaturity, needs special safeguards and care, including appropriate legal protection, before as well as after birth".

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 offences, sexual misconduct offenses, trafficking, child pornography and telecommunication offences 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 (NGOS), particularly regarding the requirements of child safeguarding. 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 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, visitors to projects, and any other individuals or groups that have a responsibility with respect to CLANs programs.

The Child Safeguarding Policy is disseminated to, and training undertaken for all relevant persons and groups prior to implementing programs or activities to ensure safe environments for children.

Application of the policy also requires that any use of images and personal information used for promotion, fundraising and development education will ensure the privacy and safeguarding of children.

4. Definitions

Child and young person	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.
Child protection	Describes the responsibilities and activities undertaken to prevent or stop children being abused or maltreated or exploited.
Child abuse	Child abuse includes physical, sexual, and emotional abuse, and neglect, harassment, 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.
Conduct	Inappropriate behavior is conduct contrary to CLAN's expectations. Professional misconduct includes conduct contrary to CLANs Child Protection and Safeguarding Policy, Prevention of Sexual Exploitation, Abuse and Harassment Policy, and Code of Ethics and Professional Conduct Policy.
Reportable conduct	Includes any sexual offence, sexual misconduct, assault, harassment, 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.
Physical abuse	This occurs when a person purposefully injures or threatens to injure a child or young person. This may take the form of slapping, punching, shaking, kicking, burning, shoving, or grabbing. The injury may take the form of bruises, cuts, burns, or fractures.
Emotional Abuse	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.
Neglect	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.
Safeguarding	Safeguarding is protecting adults or children living in vulnerable situations from abuse or neglect. It means making sure people are supported to get good access to health care and stay well. It is wrong if people living in vulnerable situations are not treated by professionals with the same respect as other patients.
Sexual abuse and sexual misconduct	This occurs when a child or young person is used by an older 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.
Child-sex tourism	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).
Bullying	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.
Exposure to domestic violence	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, children are extremely vulnerable when they become part of a displaced or traumatized population

5. Policy

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 Child Protection Policies and meet compliance and safeguarding standards. Any form of child abuse, sexual exploitation and harassment 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, safeguarded 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. Commitment to Child Safeguarding

CLAN is committed to:

- Effective leadership to enable the safeguarding of children
- Communication of the Child Protection and Safeguarding Policy and practices all governing body Members, staff, volunteers, and visitors to projects.
- Recruitment screening processes for all personnel in contact with children which include:
 - Criminal record checks before engagement; statutory declarations or local equivalent where criminal record checks are unavailable or unreliable.
 - Verbal referee checks
 - The following additional screening measure for all personnel working with children: behavioural-based interview questions.
- Processes for assessing risk and monitoring and evaluating risk and child safeguarding processes at all stages of the initiative.
- Use of images and personal information for promotion, fundraising and development education which ensures the privacy and safeguarding of children.
- If relevant, an overview of the processes to ensure child safeguarding in sponsorship/overseas volunteer programs and other high-risk activities that facilitate access to children and young people.
- Child safeguarding training for all personnel.
- Employment contracts which contain provisions for the prevention of a person from working with children if they present an unacceptable risk to children; dismissal, suspension, or transfer to other duties for any employee who breaches the child protection code of conduct.
- Regular reviews of the Child Protection and Safeguarding Policy.

Such commitments are detailed throughout this policy.

7. Procedures

The following procedures outline CLAN's approach to child safeguarding through providing a safe and secure environment for children involved in its programs undertaken by CLAN and its partners. CLAN personnel will act professionally and in a safe and responsible manner, specifically in child safeguarding behaviours, the prevention of sexual exploitation and abuse, transactional sex, anti-bullying and sexual harassment, neglect, and including obligations to report wrongdoing.

7.1 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. (Reference: Supporting Document 9.2: CLAN Employment of Staff and Volunteers)

7.2 Person responsible for Child Protection

The President of CLAN is responsible for the oversight of Child Protection and Safeguarding Policy, procedures and practices, management of investigations and reports, and training.

7.3 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 safeguarding and 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

7.4 Children in CLAN's 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 and procedures.

Partners are assessed for their experience, capabilities and capacity for implementing CLAN's safeguarding and risk policies effectively. 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.

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

- 1) Demonstrate commitment to CLAN's Policies related to Child Protection Policy and Codes of Conduct
- 2) Have a current Child Protection Policy and Prevention of Sexual Exploitation, Abuse and Harassment Policy onsite for CLAN programs
- 3) Undertake training in Child Protection when required
- 4) Have an onsite trained child protection officer or person delegated to manage child safety and to provide information, reports and complaints to CLAN
- 5) 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 program
- 6) 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 allegation
- 7) Review and assess child protection procedures implemented and outcomes for each project.

7.5 Risk Management for Child Protection

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

- 1) 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
- 2) Identify risks where programs are to be delivered, analyse and evaluate risks to determine actions to provide a safe environment
- 3) Develop controls to mitigate identified risks, including a written risk assessment
- 4) 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).

8. Reporting Child Abuse

8.1 Who should report?

All CLAN staff and others involved in CLAN programs, including partners, visitors, children and their families. Reports and complaints are to be managed in a professional and child friendly manner.

8.2 What should be reported?

- Any disclosure or allegation from a child/community member or staff regarding the safety, abuse, harassment, or exploitation of a child.
- 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.
- Inappropriate use of the organisation's photographic equipment or computers including evidence of child pornography.
- Staff engaging in suspicious behaviour that could be associated with sexual exploitation or trafficking

8.3 Who to report to

In 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)

Child abuse reports in **overseas** settings 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, harassed or exploited 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.

8.4 When to report

Child abuse concerns should be reported immediately.

8.5 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)

8.6 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. Complaints about child safeguarding, including neglect, sexual exploitations, abuse and harassment are to managed as stated in the Child Protection Policy and the Preventing of Sexual Exploitation, Abuse and Harassment Policy.

When an allegation is made there should be an immediate response that protects the child from further potential exploitation, 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. CLAN will assist the complainant with identifying the most appropriate reporting mechanism, or help refer their complaint, where possible (especially in any safeguarding-related complaints).

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 allegations.

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.

As complaints are classified as a risk to CLAN, the topics of Complaint Management and Safeguarding are standing agenda items.

8.7 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 and complete the Child Incident Report Form (Support Document 4)
2. Follow this process for making decision about child abuse report
 - a) 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)
 - b) Decision options are:
 - 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) (Telephone +61 2 6261 9048)

9. CLAN Child Protection and Safeguarding Policy Supporting Documents

9.1 State and Territory Child Protection Legislation

New South Wales	Child Protection (Working with Children) Act 2012.
Victoria	Working With Children Act 2005
Queensland	Commission for Children and Young People and Child Guardian Act 2000
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	Children and Young Persons Act 2008 Working with Vulnerable People (Background Checking) Act 2011
Northern Territory	Care and Protection of Children Act 2007

9.2 CLAN 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 all job advertisements.
- 2) Contracts will include statements of potential sanctions for breach of the Child Protection Policy and the Code of Conduct.
- 3) A copy of CLAN's Child Protection Policy will be available to all applicants, and they will be informed of the screening requirements when they are sent the application form. Applicants will need to sign that they have read and understood the Child Protection Policy and the 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 position. This form will ask for extensive information about the applicant's background such as dates and places of employment, education, and other activities.
- 5) All positions will be assessed for the level of risk in relation to contact with children. Positions working directly with children will require the highest level of screening and the applicant must possess relevant qualifications and experience in working with children.
- 6) Job descriptions are required for all positions (staff, volunteers, consultants –short long term etc), which describe key selection criteria and outline tasks and accountabilities.
- 7) Criminal record checks or statutory declarations, verbal referee checks and behavioural-based interview questions will be undertaken prior to any engagement.
- 8) Interviews will be conducted for all positions, ideally face-to-face, but skype/telephone interviews may be necessary in the international context.
- 9) Behavioural-based questions will be used to ask for examples of the candidate's past behaviour and experiences. In positions working directly working with children, the panel 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, teamwork and how they have responded to ethical dilemmas.
- 10) A minimum of two reference checks including verbal 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.

- 11) Written references may not be accepted. CLAN reserves the right to request additional references.
- 12) 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.
- 13) Where the candidate is working directly with children in Australia, they may require a Working with Children Check (depending on the jurisdiction) or a Police Check.
- 14) All staff will be required to provide proof of identify which may include a birth certificate, passport, drivers license and relevant qualifications. Original documents may be required.
- 15) All positions will be subject to a probationary period depending on the length of the contract.
- 16) Issues relating to child protection will be included in staff performance reviews.
- 17) Employment contracts will include provisions for the prevention of a person from working with children if they present an unacceptable risk to children, dismissal, suspension, or transfer to other duties for any breach of the child protection code of conduct.
- 18) All staff and relevant others will be required to read and sign the CLAN Child Protection Policy and the Code of Conduct.
- 19) CLAN may suspend, transfer to other duties any employee who breaches the Child 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.
- 20) CLAN reserves the right to refuse employment to or terminate any person's employment that may pose a risk to children.

9.3 CLAN Child Protection Risk Guidance 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. Projects where CLAN's work results in direct access to children, then a risk assessment/register is to be completed to determine the level of risk attached to the project in terms of child protection and safeguarding. The project lead is to regularly review the risk register to ensure risk levels are being mitigated or managed if the risk cannot be minimised. Items around risk to consider (not exhaustive and risk should always be considered in the context of the project and at each stage of the project eg planning, activities, monitoring and evaluation, future planning) are the level of contact and interaction with children, their vulnerability, their rights and the project teams level of skill working with children, risk controls in place, training required, the need for a Code of Conduct specific to the project, access to CLAN policies such as Prevention of Sexual Exploitation, Abuse and Harassment Policy, record keeping and the need for partner checks and so on.

Use the risk assessment/register template found in the CLAN Grant and Project Management Form.

9.4 CLAN Incident Report Form

Use this form when reporting an incident in relation to a breach of the Child Protection & Safeguarding Policy; any relevant law of Australia or the country in which the CLAN project is operating.

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 Gender Nationality Contact details	Given Name Date of birth
Details of Victim/s Age of child at time of alleged incident:	Family Name Gender Nationality Contact details	Given Name Date of birth
Family Details	Name Location Parent knowledge of report?	
Name of witness/s (complete separate incident report form)	Family Name Gender Nationality Contact details	Given Name Date of birth
Impact on child and details of any injuries observed or reported		
Network of support around the young person		

<p>Further details:</p> <p>Is the victim still in danger of abuse or neglect?</p> <p>Are local police or other local authority aware of the incident/allegation? What other authorities have been informed?</p> <p>If relevant, have Australian Federal Police in country been informed?</p>
Any other pertinent information
<p>Report check</p> <p>*protects all parties involved in the report</p> <p>*is confidential, truthful, fair and professional</p> <p>*is submitted expediently to focal person after notification of behavior/s</p>

9.5 CLAN Code of Conduct for Working with Children

Project Lead: _____

Project: _____

Signed: _____

Date: _____

CLAN Representative: _____

All people working on behalf or as a result of a CLAN grant or project are responsible for safeguarding and 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. Everyone should conduct themselves in a manner consistent with their role as a CLAN representative and a positive role model to children.

Safeguarding is protecting adults or children living in vulnerable situations from abuse or neglect. It means making sure people are supported to get good access to health care and stay well. It is wrong if people living in vulnerable situations are not treated by professionals with the same respect as other patients.

There is a need for **confidentiality** around the issues discussed and any material including photographs disseminated that are of a sensitive nature, particularly in relation to children, their rights and protection

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 (Please ☐):

I WILL

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

I WILL NOT

- ☐ 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
- ☐ I WILL NOT take children to their own home/hotel or sleep in the same room or bed as a child

- ☐ I WILL NOT smack, hit or physically assault children or use physical punishment on children
- ☐ I WILL NOT develop sexual relationships with children or relationships with children that may be deemed exploitative or abusive
- ☐ I WILL NOT behave provocatively or inappropriately with a child
- ☐ I will avoid physical contact with a child unless it is required in an emergency situation
- ☐ I WILL NOT condone or participate in, behaviour of children that is illegal, unsafe or abusive
- ☐ I WILL NOT act in a way that shows unfair and differential treatment of children
- ☐ I WILL NOT photograph or video a child without the consent of the child and his/her parents or guardians
- ☐ I WILL NOT hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way
- ☐ I WILL NOT seek to make contact and spend time with any child or young person outside the program times
- ☐ 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
- ☐ 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
- ☐ I WILL NOT give gifts to children.
- ☐ I will fulfill reporting responsibilities as required and also when unsure about a matter.

[END]

9.6 CLAN 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, harassment and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment
- 2) Sexual activity with children is prohibited regardless of the age of majority locally. Mistaken belief in 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 exploitative behaviour is prohibited. This includes exchange of assistance that is due beneficiaries
- 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.

9.7 CLAN 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.

9.8 CLAN 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

9.9 Associated CLAN documents

- 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
- Prevention of Sexual Exploitation, Abuse and Harassment Risk Management Policy
- Safety and Security Policy

- Staff Training and Development Policy

10. Policy review

This policy will be reviewed bi-annually.

CLAN Communications Policy & Ethical Decision Making Framework for Communications

Version No. & History	2.0 (9 December 2015, March 2017, May 2020 formerly Managing Social Media Policy)
Date approved	25 th of November 2021
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Review date	September 2023

1. Introduction

CLAN recognises the value in using various forms of communication including publications and 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 publications and 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.

CLAN uses an Ethical Decision Making Framework (EDMF) to help make ethical decisions when creating and publishing communications content, in particular, where it might not be immediately clear if an image or story should be published. CLAN uses the framework at important moments during the storytelling process, noting that it is harder to make shared decisions when different people, with different sets of values are involved.

2. Purpose

CLAN's Communication Policy has been developed to inform employees and volunteers of CLAN about the rules around publications and, in particular, social media. It has also been developed to encourage and empower staff so they feel confident to participate in the development of articles and when online whilst being mindful of their responsibilities and obligations under CLAN's Code of Ethics and Professional Conduct Policy.

In addition to this and other guiding policies, the EDMF outlines key issues to be considered such as when discussions should happen, who should be involved and what to do if a decision cannot be made. Importantly the EDMF ensures that the collection of information, images and stories does not harm people or the environment. The ACFID Fundraising Charter provides compliance requirements in this regard and should be referenced when planning a fundraising communication.

3. Scope

This Communications Policy applies to all communications forwarded both internally of CLAN and externally when conducting the business of CLAN. It relates to academic publications, annual reports, newsletters, emails, blogs, website, and all forms of social media.

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. Critically, social media is an area, due to its immediacy in nature, where stories and images can be uploaded without

due consideration to the potential harm, breach of privacy or lack of permission may not have been thoroughly given.

Examples of social media platforms include:

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

4. Definitions

TERM	DEFINITION
Communication	The imparting or exchanging of information by speaking, writing, or using some other medium, a means of sending or receiving information, such as phone lines or computers.
Social Media	Any conversation or activity that occurs online, where people can share information or data that might impact CLAN or the people who use our services.
Official use	When an employee, volunteer or supporter is using social media as a representative of CLAN with the relevant permission from CLAN Executive. Alternatively, 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	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.
Ethical	Relating to moral principles.
Ethical Decision Making Framework	Describes steps that can be used to guide an individual in the project management profession through a process to make a decision when confronted with an ethical dilemma.
Unconscious bias	Triggered when our brain automatically makes quick judgments and assessments, which are influenced by our background, personal experiences, societal stereotypes and cultural context.
Dynamic risk assessment	The continuous process of identifying hazards, assessing risk, taking action to eliminate or reduce risk, monitoring and reviewing, in rapidly changing circumstances.
Stories	Help us explain everything in our experience from science to relationships, from feelings to memories, and from questions to objections. And with every story we hear, read, or listen, our mind makes cognitive and emotional connections that shape our perspective of the world.
Informed consent	When a contributor grants permission to publish their story with full knowledge of the possible consequences, including possible risks and benefits. Informed consent must be granted without duress.

5. Managing risk in communications

Managing risk to the reputation of CLAN and maintain trust in the organisation must be considered therefore risk considerations must be made to ensure value based, ethical and lawful decisions are made around posting information. While the concept of a dynamic risk assessment is typically used in an operations context, it is relevant to the more immediate forms of communication such as social

media posting to ensure the risk to CLAN's reputation and status of trust is minimised as much as is reasonably practicable. If the situation is such that a decision cannot be satisfactorily made, use the below risk related questions as a guide, noting other risk issues may present, to tease out the issues and the Ethical Decision Making Framework (attached):

- 1) What consequences could individuals or groups face for contributing to CLAN's communication materials? Are the potential risks greater for certain groups or individuals that you work with? Do existing procedures help mitigate these risks?
- 2) Are there clear procedures in place for how content is collected, consented to an informed way and approved before publishing? Are existing procedures being followed consistently?
- 3) What risks do current processes for storing and filing images and information pose to CLAN or contributors, including children?
- 4) Are CLAN's policies and procedures well-understood and implemented by personnel involved at different stages of the communications process?
- 5) What role do partners or other third parties have in CLAN's communications process? Do they have the knowledge, capacity and experience to implement any relevant policies or procedures?
- 6) What areas of CLAN's operations are higher-risk and therefore likely to require additional checks and monitoring?
- 7) Are there risks to the well-being of staff or volunteers as a result collecting or being involved in communications work?
- 8) What risks could the sharing of material from third parties (e.g. news outlets) have for CLAN?
- 9) What are the potential reputational risks created by CLAN's communications materials?
- 10) Has CLAN had complaints or issues with its communications materials in the past that can be learnt from?

6. Guiding principles and conduct for social media

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:

- 1) Have approval from CLAN to use social media in an official capacity
- 2) Be presented in the approved style including colour, logo placement, font etc
- 3) Comply with the CLAN Code of Ethics and Professional Conduct Policy
- 4) Must not harm CLAN or any person or other organisation
- 5) Must not promote individual staff and/or volunteer businesses or money making ventures
- 6) Be cognisant of the influence of unconscious biases
- 7) Be subject to a dynamic risk assessment or if necessary a thorough risk assessment
- 8) Be cognisant of relevant legislation covering defamation, bullying and harassment.

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:

- 1) Not criticise beneficiaries, colleagues, other service providers or CLAN, or the Australian Council for International Development (ACFID) and not for profit organisations who are signatories to ACFID
- 2) Respond to others' opinions respectfully and professionally

- 3) Not do anything that breaches the terms of employment – whether paid or unpaid as a volunteer
- 4) Not harass, bully or intimidate
- 5) Acknowledge and correct mistakes promptly
- 6) Disclose conflicts of interest where able
- 7) Not knowingly post inaccurate information
- 8) Link to online references and original source materials directly
- 9) Be polite, considerate, kind and fair
- 10) Ensure the activity does no harm
- 11) 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:

- 1) Disclose that you are an employee or volunteer of CLAN and clearly state what you are representing
- 2) Ensure you adhere to the apolitical character of CLAN
- 3) 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:

- 1) Disclose only publically available information or other information that is authorised to be released
- 2) Offer only information, support or comment on topics that fall within an area of give responsibility
- 3) Provide a direct link to information where it is available
- 4) Ensure any content that is published is factually accurate and complies with privacy guidelines
- 5) 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
- 6) Be mindful of the diverse cultures in which CLAN operates.

8. 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.

9. Inappropriate Use

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

- 1) Conducting a private business on CLAN's social media presence
- 2) Using discriminatory, defamatory, abusive or otherwise objectionable language
- 3) Stalking, bullying, trolling or marginalising any individual or group
- 4) 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.
- 5) Accessing sites that promote hatred or extreme/fundamental beliefs and values
- 6) Direct political affiliation, unless an individual is running for election (but only on a personal account)
- 7) Excessive debate on public policy, religion or cultural issues
- 8) Uploading information of a confidential nature, especially in regards to CLAN services or beneficiaries
- 9) Criticising CLAN or other organisation and our/their employees, volunteers or supporters
- 10) Activity that interferes with work commitments
- 11) Paid or unpaid endorsement of any kind, including in kind services or gifts
- 12) 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.

10. 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.

11. 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.

12. Guiding principles and conduct for emails

Every employee has a responsibility to maintain CLANs image, to use electronic resources in a productive manner and to avoid placing CLAN at risk of legal liability based on email use. All messages

distributed via CLAN's email system, even personal emails, are CLAN's property. There must be no expectation of privacy in anything that is created, stored, sent or received on CLAN's email system.

Emails can be monitored without prior notification if this is deemed necessary such as if there is evidence that emails are not adhering to the guidelines set out in this policy. CLAN reserves the right to take disciplinary action, including termination and/or legal action. Email is one of CLAN's communication tools and users are obliged to use this tool in a responsible, effective and lawful manner. Although by its nature email seems to be less formal than other written communication, the same laws apply. Therefore, it is important that users are aware of the legal risks of email:

- An email message may go to persons other than the intended recipient. If it contains confidential or commercially sensitive this could be damaging to CLAN
- Letters, files and other documents attached to emails may belong to others. By forwarding this information, without permission from the sender, to another recipient you may be liable for copyright infringement
- Email is a fast form of communication. Often messages are written and sent simultaneously, without the opportunity to check for accuracy. If emails are sent with any libellous, defamatory, offensive, racist or obscene remarks, the sender and CLAN can be held liable
- An email message may legally bind CLAN contractually in certain instances without the proper authority being obtained internally
- Email messages can carry computer viruses. If an email is sent an attachment that contains a virus, the sender and CLAN can be held liable. By opening emails and attachments from an unknown sender you may introduce a virus into CLAN's computer operations generally
- All personal data contained in emails may be accessible under Data Protection legislation and, furthermore, a substantial portion of emails to Government and other public bodies may be accessible under the *Government Information (Public Access) Act 2009 (NSW)*. Emails should always be regarded as potentially public information, which carry a heightened risk of legal liability for the sender, the recipient and the organisations for which they work.

13. Rules for email use

CLAN considers email as an important means of communication and recognises the importance of proper email content and speedy replies in conveying a professional image and delivering good customer service. Users should take the same care in drafting an email as they would for any other communication. Therefore CLAN wishes users to adhere to the following rules:

- 1) CLAN's name is included in the heading carried with every message sent by a CLAN employee. Emails reflect on CLAN's image and reputation. Therefore, email messages must be appropriate and professional.
- 2) CLAN's email system is specifically for legitimate business purposes. However, it is appreciated that it may be necessary at times to forward and receive emails of a personal nature. This is acceptable provided the content respects the guidelines in this policy. The sending of chain letters, junk mail, and jokes is prohibited. All messages distributed via the company's email system are CLAN's property.
- 3) All emails will carry a disclaimer stating that the email is intended only for CLAN use and if used for any other purpose a named person should be contacted immediately within CLAN.
- 4) Particular care should be taken when sending confidential or commercially sensitive information. If in doubt, please consult a member of the Executive Committee for guidance and use the Ethical Decision Making Framework (attached) to assist in making the decision.
- 5) CLAN confidential messages should be distributed to personnel only. Forwarding to locations outside of CLAN in these cases is prohibited.

- 6) Great care must be taken when attaching documents or files to an email. Letters, files and other documents attached to emails may belong to others. By forwarding this information, without permission from the sender, to another recipient you may be liable for copyright infringement. Again, if in doubt, please consult a member of the Executive Committee for guidance and use the Ethical Decision Making Framework (attached) to assist in making the decision.
- 7) Only send emails of which the content could be displayed on a public notice board. If emails cannot be displayed publicly in their current state, consider rephrasing them, using other means of communication, or protecting information by using a password.
- 8) Subscription to electronic services or other contracts on behalf of CLAN is prohibited unless you have the express authority from the Executive Committee to do so.
- 9) If you receive any offensive, unpleasant, harassing or intimidating messages via email or intranet you are requested to inform a member of the Executive Committee immediately for a determination on how to respond/react.
- 10) A hard copy of any important or potentially contentious communication, which you have received via email should be printed and filed appropriately.
- 11) Where important to do so obtain confirmation that the recipient has received the email.
- 12) Documents prepared by CLAN for clients, partners or project leads etc may be attached via the email however take care to ensure that the recipients are correct and permitted to receive the email and attached documents.
- 13) Users must spell check all mails prior to transmission.
- 14) CLAN reserves and intends to exercise the right to review, audit, intercept, access and disclose all messages created, received or sent over the electronic mail system for any purpose. Notwithstanding the CLAN's right to retrieve and read any electronic mail messages, such messages should be treated as confidential by other employees and accessed only by the intended recipient.
- 15) Employees are not authorised to retrieve or read any email messages that are not sent to them. Any exception to this policy must receive prior approval from a member of the Executive Committee. However, the confidentiality of any message should not be assumed. Even when a message is erased it is still possible to retrieve and read that message.

14. Publications

This section of the policy refers to publications such as the CLAN annual report, CLAN newsletters, and academic or professional and peer reviewed publications.

CLAN's annual report is a document that is provided annually disseminated via the CLAN website and describes CLAN's operations and financial conditions. The front part of the report contains a combination of graphics, photos, and an accompanying narrative, all of which chronicle CLAN's activities over the past year and may also make forecasts about the future. The back part of the report contains detailed and audited financial information.

CLAN's annual reports have been delivered in a particular format that, while it has been used over time, is flexible to allow for improvement in the delivery of content and the style of presentation. Changes to the format and style are to be approved by the Executive Committee. Content for the annual report is collated across the reporting year.

CLAN's newsletter is generally provided on a quarterly basis and follows the same style guide as social media publications. The newsletter can be disseminated wholly via the CLAN website and email to CLAN members and Stakeholders and in part (short or abbreviated stories) through social

media outlets. Content for the newsletter is collated across each quarter and is approved by the Executive Committee.

Typically CLAN's annual report and newsletter content involves telling a story with images in support of the written content. In these cases use the Ethical Decision Making Framework (attached) to help make decisions about how to present the story and the images. This is particularly necessary if there is doubt about content or images specially when the story and images relate to children and young people.

CLAN occasionally leads or participates in writing an academic paper or the preparation of professionally and peer reviewed documents. An example of a document CLAN has led the development of are the Child Friendly Rights Flyers. These rights flyers can be translated into other languages. In these cases, CLAN follows strict processes to ensure accuracy including use of native speaking subject matter experts with approval of final versions by lead partners in country. Rights flyers have a proven style and this is to be adhered to unless changes are made by the Executive Committee.

15. Website

The CLAN website is a publicly accessible website providing information and news about CLAN's activities. It enables on-line access to a large amount of information that CLAN has made publicly available.

CLAN's identity is important and as a communication tool of CLAN as such the website needs to express our values clearly. The structure of the site and how the user navigates it is of paramount importance so the organisation of the site should be made easy for the user. Good design is also essential to ensure that the material contained on the website is accessible to all. The content must be kept up to date. Out of date information will be removed or updated by the System Administrators and the originating author will be informed.

Typically CLAN's annual report and newsletter content involves telling a story with images in support of the written content. In these cases use the Ethical Decision Making Framework (attached) to help make decisions about how to present the story and the images. This is particularly necessary if there is doubt about content or images specially when the story and images relate to children and young people.

CLAN's website is primarily a communication tool that will be viewed by its target audience. It is therefore essential that a professional image is portrayed. To ensure that the website maintains a consistent standard, content is approved by the Executive Committee prior to uploading. A master design has been created for the website and any change to this design standard must be approved by the Executive Committee. This master design includes CLAN's name, logo, colours and the menus and forms part of CLAN's corporate image.

System Administrator access is given to only those who have the authority and skill to add and delete and update the website and they are accountable to the Executive Committee. Day to day management of the website is under the direct supervision of the President and Vice President of CLAN. Google analytics is used to assess usage to adjust content and layout.

The following actions are not permitted on CLAN's website:

- Publishing of any information that identifies a child, young person or adult family member that will identify the child in any format unless express permission is given
- Publishing any information that results in harm to a child, young person or adult or to the environment
- Publishing any information that is defamatory in nature
- Publishing confidential or private information
- Publish any information that contains bad language, is offensive, vulgar, racist, sexist or libellous
- Linking pages to inappropriate internet sites. Links to internet pages from the intranet site should carry a warning that only those with internet access can get to the destination
- Publish any information that brings CLAN into disrepute
- Publish non-CLAN related material
- No other website is to established or maintain on a separate internet site purporting to represent CLAN.

16. Monitoring and Reporting

The Committee will monitor the risks and use of all forms of communication, in particular, 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.

17. Breach of Policy

Employees and volunteers who engage in communication deemed not be in the best interest of CLAN are in breach of CLAN's relevant policies and legislation are subject to determinations made by CLAN's Executive Committee.

18. Policy review

CLAN will undertake reviews of this policy and the Ethical Decision Making Framework bi-annually.

19. Associated CLAN documents

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

20. References

- NSW Law Society, Guidelines on Social Media Policies 2012
- Workplace Health and Safety Act 2011 (NSW)
- Workplace Health and Safety Regulation 2011 (NSW) Social Media.
- ACFID Ethical Decision Making Framework for Communications

CLAN Ethical Decision Making Framework in Communications (EDMF)

Version No. & History	1.0
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1. Introduction

At CLAN, we aim to empower the communities we work with through our storytelling and communications content. We strive to empower and protect the people who share their stories with us. We are committed to depicting people and contexts authentically and truthfully. We value the importance of self-determination and are committed to working with all stakeholders in a way that upholds their dignity and respects their values, history, religion, language and culture.

Our vision is to improve the quality of life of for children living with chronic health conditions in resource-poor settings so they may enjoy healthy and happy lives. We bring this vision to life by carefully protecting those who share their stories with us, and amplifying the benefits of sharing stories with our supporters and the general public.

CLAN is a not-for-profit entity that takes a rights based, grassroots community development model that provides a strategic framework for action based on our five Pillars. As part of our work, we share some important – yet difficult – stories. Sometimes our stories will show injustice and harsh realities. We, and the people we work with, know these are important stories for the world to hear. However, inherent in undertaking these activities is a level of risk in relation to sharing these stories.

CLAN acknowledges it can be difficult to put our values into practice when sharing stories – especially stories dealing with trauma and injustice. We can face conflicting demands when collecting and sharing stories, and we acknowledge it's sometimes challenging to know exactly what 'dignity' and 'empowerment' mean in different cultural contexts. We also acknowledge that unconscious bias plays a huge part in decision-making – however, by its very nature, it is difficult to address and mitigate the risks that it causes.

Misunderstanding cultural norms and mismanaging storytelling content can harm both the people we strive to support, as well as our organisation. For example, children may be targeted by people seeking to abuse them. The personal reputation and confidence of people who've shared their stories may be damaged if their stories are misused and they may face retribution from their community. CLAN may suffer damage to our brand and reputation if we publish insensitive materials. These are just a few of the potential risks.

This EDMF is one element in a suite of tools to reduce these risks, as far as possible. We seek to prevent harm from occurring and this EDMF is a proactive means of mitigating those risks and supporting ethical decisions about our communities.

2. Purpose

This EDMF aims to ensure our communications content is of the highest ethical standard. This means all stakeholders are respected and protected, and trust in our organisational is maintained. The EDMF aims to ensure our organisation is using best-practice communications methods that minimise the risks related to storytelling and publishing.

3. Scope

This EDMF must be followed by everyone who collects and publishes stories at CLAN, including all staff, volunteers, partners, staff and governing body members. It includes our offices in Australia and in other countries where we work. The EDMF applies to all visitors to our programs, and contractors and consultants such as freelance writers, designers, multimedia producers, fundraising consultants, partner organisations and other external parties using our stories, images, name or logo.

Images and messages developed for the purpose of fundraising must have free, prior and informed consent of the person/s portrayed including children, their parents or guardians.

4. Our values

Everything our organisation does is built on our values. For our foundations to remain strong and for our actions to be ethical, we must continue to look to our values in our everyday work.

Ethical principles relating to the treatment of human beings are codified in a number of widely-accepted documents, such as the *Nuremberg Code* (1947), the United Nations' *Declaration of Human Rights* (1948), the *Declaration of Helsinki* (1964), the *Belmont Report* (1979), and the United Nations' *Convention on the Elimination of All Forms of Discrimination Against Women* (1979), *Convention on the Rights of the Child* (1989), *Convention on the Rights of Persons with Disabilities* (2007) and *Declaration of the Rights of Indigenous People* (2007).

At their core, these policies include the fundamental rights of human dignity, autonomy, protection, safety, maximisation of benefits and minimisation of harms. While originally stemming from biomedical and human rights contexts, these principles have been adapted beyond these early contexts and rise above disciplines and methodologies. We accept them as basic to any endeavour relating to storytelling ethics and they are explored in our EDMF.

CLAN's values underpin our approach to storytelling and help us to be honest and respectful of people's dignity and right to privacy. Our values ensure our communications are empathetic to story subject matter and importantly in being truthful and respectful do not over emotionalise, extrapolate the facts: CLAN's values are:

- Honesty – CLAN acts honestly and truthfully so that public trust is protected and donors and beneficiaries are not misled
- Respect - CLAN acts with respect for the dignity of our organisation and with respect for the dignity of donors and beneficiaries
- Integrity – CLAN acts openly and with regard to our responsibility for public trust. We disclose all actual or potential conflicts of interest and avoid any appearance of ethical or professional misconduct
- Empathy – CLAN works in a way that promotes our purpose and encourages others to use the same professional standards and engagement. CLAN values individual privacy, freedom of choice and diversity in all its forms
- Transparency – CLAN reports transparently about the work we do the way donations are managed and disbursed and cost and expenses in an accurate and clear manner.

CLAN's values are aligned with the Australian Council for International Development's Code of Conduct of which we are a full signatory and our EDMF is connected to other CLAN policies contained within the On-line Handbook, including:

- Communications Policy & Ethical Decision Making Framework in Communications
- Child Protection and Safeguarding Policy
- Privacy Policy
- Risk Management Policy
- Disability Inclusiveness Policy
- Gender Equality Policy
- Code of Ethics and Professional Conduct.

5. Making ethical decisions

CLAN's EDMF for Communications explains how to make ethical decisions when creating and publishing communications content. It uses a framework of structured discussions at ethically important moments during the storytelling process, with the aim of creating focused discussions that improve practice. It also aims to reduce risks associated with storytelling and protect contributors.

Ethical decisions can be very complex. When a situation has no clear 'right and wrong' answer, decision making can be difficult. Even more difficult is making ethical decisions when affected by unconscious biases. And everyone holds unconscious biases.

More than one set of cultural norms and organisational values can equally apply to an issue, even if those norms and values are conflicting. This makes decisions difficult, as individuals and teams are forced to choose.

This EDMF sets out important questions and explains when these questions ought to be asked throughout the storytelling process. It also explains who is responsible for having these discussions and what to do if a decision can't be made.

Ambiguity and uncertainty are part of any ethical decision-making framework, and we encourage exploration of ethically grey areas. Indeed, this exploration is the most important part of the process. Our discussions help us to reach further outward, toward a fuller understanding of our contributors' lives and contexts – and also of our own unconscious biases, norms and ways of working.

6. Risk Assessment

In developing this EDMF, CLAN has considered the risks associated with all its communications activities and how they might impact. Using the below matrix identify the likelihood and consequence of any known or potential risk to the proposed communication to determine the risk rating to assist devising management action/mitigation strategies to be implemented to reduce the chance of the risk being realised.

Likelihood (eg. Possible) is the chance that something might happen and can be defined, determined, or measured objectively or subjectively and can be expressed either qualitatively or quantitatively. Consequence (eg. Minor) is the outcome of an event and has an effect on objectives. The risk rating or level of risk is the point on the matrix at which the likelihood and consequences meet (eg. Medium). Determine the rate/level of risk to the project outcomes for each of the identified risks occurring with the controls in place, then, determine whether the risk is acceptable in that it will not impact substantially on the communication going forward. Should the risk be unacceptable, reconsider mitigation strategies so that the risk is acceptable. If this is not possible then consider if the project can go forward or not carrying this risk. Complete the Risk Register below.

CLAN Communication Risk Management Register

Likelihood (L)	Insignificant Consequences (C)	Minor Consequences	Moderate Consequences	Major Consequences	Catastrophic Consequences
Almost Certain	Low	Medium	High	Extreme	Extreme
Likely	Low	Medium	High	High	Extreme
Possible	Low	Medium	Medium	High	Extreme
Unlikely	Low	Low	Medium	Medium	High
Rare	Low	Low	Medium	Medium	Medium

Key: L = Likelihood, C = Consequences, A = Acceptable, NA = Not acceptable

No	Risk	Impact	L	C	Rating	A or NA	Management Action/Mitigation Strategy	Person responsible
1	Community in which we work							
2	Contributors/donors							
3	Staff, volunteers, contractors across the organisation							
4	Governing body							

No	Risk	Impact	L	C	Rating	A or NA	Management Action/Mitigation Strategy	Person responsible
5	Partners							
6	Supporter and the general public							
7	CLAN's activities							
8	CLAN's reputation and the reputation of ACFID and other associated organisations							
9	Other							

Complete this risk assessment for each storytelling project.

This EDMF will be used to guide decision-making across the organisation to help mitigate some of the risks mentioned above. It will be shared with partners who are involved in sourcing content for our communications materials, and training will be supplied where appropriate.

See the CLAN Communications log which includes the level of risk log. The Log is updated and reported on as a standing agenda item of CLAN Association meetings.

7. Who is involved in the ethical decision making process

While all staff, volunteers and members are responsible for ensuring our communications are ethical, lawful and protect contributors and some staff members will need to be involved in specific conversations as part of our EDMF. The staff involved in EDMF discussions are:

- **Content gatherers** - President, Vice President, Committee Members, Partners, Community Development Officers, Community Leaders, Youth Advisors - Outreach, Projects and Governance, Communications Officer and Marketing Officer
- **Programs** - Project Leads, Community Development Officers, Community Leaders, Youth Advisor - Outreach
- **Child safeguarding** - All CLAN personnel.
- **Marketing** - President, Vice President, Committee members, Communications Officer and Marketing Officer.

8. Ethically Important Moments

While all ethical issues should be considered throughout the storytelling process, there are times when certain issues are more important. Below are seven 'ethically important' moments during the storytelling and publishing process, accompanied by key issues to discuss at those times and who's responsible for the discussions.

No	Ethically important moment	When to discuss	Issues to discuss	Who to discuss
1	When scoping a story	<ul style="list-style-type: none">• Developing a storytelling concept• Scoping story leads• Writing a Terms of Reference	<ul style="list-style-type: none">• Connection to values• Protection	<ul style="list-style-type: none">• Content gatherers• Programs• Child safeguarding• Marketing
2	When planning to gather content	<ul style="list-style-type: none">• Planning a content-gathering trip• Planning a phone/email/video interview• Sourcing content directly from program staff and contributors	<ul style="list-style-type: none">• Informed consent• Fuzzy boundaries (a context analysis is helpful at this point)• Protection• Privacy	<ul style="list-style-type: none">• Content gatherers• Programs• Child safeguarding
3	While gathering content	<ul style="list-style-type: none">• While on a content-gathering trip• While conducting an interview	<ul style="list-style-type: none">• Informed consent• Fuzzy boundaries• Protection• Connection to values• Privacy• Authorship and ownership	<ul style="list-style-type: none">• Content gatherers• Programs• Child safeguarding

4	Directly after gathering content	<ul style="list-style-type: none"> • Directly after gathering content from the field or via an interview 	<ul style="list-style-type: none"> • Informed consent • Fuzzy boundaries • Protection 	<ul style="list-style-type: none"> • Content gatherers • Programs • Child safeguarding
5	While creating the storytelling content	<ul style="list-style-type: none"> • While creating materials to publish, such as writing a story, editing videos/photos, and writing social media content 	<ul style="list-style-type: none"> • Connection to values • Authorship and ownership • Fuzzy boundaries • Privacy 	<ul style="list-style-type: none"> • Content gatherers • Programs • Marketing
6	When publishing a story	<ul style="list-style-type: none"> • When publishing content on social media and via the website, print (such as DMs) and the news media 	<ul style="list-style-type: none"> • Connection to values • Fuzzy boundaries (a context analysis is helpful at this point) • Informed consent • Protection • Privacy • Authorship and ownership 	<ul style="list-style-type: none"> • Marketing • Content gatherers • Child safeguarding
7	After publishing a story	<ul style="list-style-type: none"> • Once a story is in the public domain 	<ul style="list-style-type: none"> • Informed consent • Fuzzy boundaries • Authorship and ownership 	<ul style="list-style-type: none"> • Programs • Content gatherers • Marketing

9. Key ethical issues

There are six key ethical issues that are relevant for our storytelling and publishing process. A few golden rules to keep in mind are:

- If I share this story, will this person be safe?
- If I share this story, will this person be empowered?
- If I share this story, will this person feel respected – by themselves and others?

Below are some questions to help us reflect on the key ethical issues and discuss them as part of the decision-making process. Some of these questions may be easy to answer. Others might not have a clear answer and are best considered in conversations with others, as outlined above.

9.1 Connection to values

Everything CLAN does is built on our values. We must continue to look to our values in our everyday work so our foundations remain strong and our actions are ethical. Our discussions should ask:

Topic	Question	Y/N or N/A
Human rights	Have we put the best interests of the contributor first?	
	Have we treated the contributor with dignity and fairness?	
	Have we respected the personal freedom and privacy of the contributor?	

	Have we respected the personal freedom and privacy of the contributor?	
	Have we given the contributor control over how their identity and thoughts are portrayed in their story?	
	Have we ensured the content is accurate?	
Children's rights	Have we encouraged the contributor to freely express their thoughts and feelings?	
	Have we ensured the best interest of children have been put before the interests of adults and our organisation?	
	Have we adequately protected children?	
	Have we respected children's rights to dignity and fairness?	
	Have we attempted to reduce stereotyping of children?	
	Have we treated all children equally?	
Women's rights	Have we carefully considered how women are portrayed?	
	Have we considered how sex-role stereotyping is portrayed?	
	Have we given voice to women?	
	Are we empowering girls and women through this story?	
	Have we considered the unique protection needs of women in this story?	
Disability rights	Have we given people with disabilities the opportunity to contribute to this story?	
	Have we considered how ableism has affected this story?	
	Have we carefully considered how people with a disability are portrayed?	
	When published, will this story be accessible to people with disabilities?	
Indigenous rights	Have we respected Indigenous people's rights to dignity and fairness?	
	Have we given Indigenous people the ability to freely express themselves, through their own culture and language?	
	Have we considered how racism has affected this story?	
	Have we carefully considered how Indigenous people are portrayed?	
	Have we given Indigenous people control over how their identity and thoughts are portrayed in this story?	
Comments		

9.2 Protection

CLAN puts the wellbeing of its stakeholders first. We explain how we protect our stakeholders in our Child Protection and Safeguarding Policy, Communications Policy Image, Privacy Policy and Risk Management Policy. All staff and stakeholders must uphold these policies. There are no exceptions. However, there are also context-related issues that arise in relation to protection. Our discussions should ask:

Topic	Question	Y/N or N/A
Protection of life	Could the contributor's life be at risk by sharing their story?	
	Do we know enough about the contributor's history to make a confident assessment of their safety?	

Protection of health	Could the contributor's health be put at risk by sharing this story?	
	Could the contributor risk being cut off from important services by sharing this story?	
Protection of dignity	Could we be putting the contributor or their community at risk of vilification or retribution by sharing their story?	
	Have we considered how the contributor's family, friends and community might feel about the storytelling project?	
Comments		

9.3 Informed consent

CLAN's informed consent is clearly defined in the CLAN Communications Policy and the CLAN Privacy Policy. All staff and stakeholders must follow this process. There are no exceptions. However, there are also context-specific issues that arise in relation to informed consent. Our discussions should ask:

Topic	Question	Y/N or N/A
Correct information	Have we provided all of the necessary information to the contributor so they can decide whether to consent to participate?	
	Have we shown the contributor appropriate examples of how their story might be used (including where it may be published and who might see it)?	
	Have we explained different ways the contributor's identity can be revealed and concealed?	
	Have we consulted with the right people (including children's guardians and community elders)?	
Clear comprehension	Does the contributor fully understand the risks and opportunities associated with sharing and publishing their image and story with our organisation?	
	Have we given the contributor enough advance notice about the project so they have time to consider the risks and opportunities?	
	Have we explained the storytelling process in a way the contributor fully understands (including children), using the best-possible language?	
	Is there a single point of contact for the contributor to discuss the project and any consent issues? Is it easy for the contributor to discuss the project with us?	
Voluntary consent	Is there a power imbalance between the contributor and the CLAN?	
	If there is a power imbalance, can you describe it?	
	If there is a power imbalance, how can you reduce it?	
	Is there an element of duress in the contributor's consent?	
	If there is an element of duress, how can we address it?	
	How can we ensure the contributor can say 'no' to being involved in the storytelling project?	
	How can we ensure the contributor can withdraw their consent at any time?	
Comments		

9.4 Privacy

CLAN values and upholds the privacy of their contributors. All staff, governing body members, partners and volunteers must abide by our Privacy Policy. However, there are also context-related issues that arise in relation to privacy. Our discussions should ask:

Topic	Question	Y/N or N/A
Protection	Have we adequately protected the privacy of the contributor?	
	Have we discussed how the contributor's story may expose them to the public?	
	If appropriate, have we adequately concealed the name, location and visual identity of the contributor?	
Information storage	Have we safely and securely stored the contributor's personal information?	
	Does the contributor understand how their personal information is stored and used?	
Access to information	Who has access to the contributor's information and are they aware of who can access it?	
	Have we explained how the contributor can access their personal information, make amendments to their story and withdraw consent?	
Comments		

9.5 Authorship and ownership

CLAN respects the right of contributors to control their stories. We respect the right of contracted writers and photographers to moral ownership of their works. We acknowledge that ownership and 'control' of stories can raise difficult ethical questions. While we always abide by our [Privacy Policy], there are some discussions that can help us understand our responsibilities regarding authorship. Our discussions should ask:

Topic	Question	Y/N or N/A
Authorship	How will contributors and content creators be acknowledged when publishing their stories?	
	Does acknowledgement of authorship have implications for the privacy, anonymity or confidentiality assurances given to contributors?	
	What ethical obligations do contributors and content creators have to the truthful representation of stories and data?	
Copyright	Who owns the copyright of our storytelling?	
	Are there any conflicting copyright claims for storytelling materials we've published (or seek to publish)?	
	How do we ensure contributors and content creators understand their legal rights?	
Comments		

9.6 Fuzzy boundaries

CLAN understands the storytelling process is built on relationships, and sometimes the network of relationships is complex. We acknowledge that relational boundaries between contributors, content collectors, program staff and others can become blurred. In addition, the stories they create may be

used to serve multiple purposes, such as fundraising, advocacy, and community engagement. This blurring of roles and purposes is referred to as ‘fuzzy boundaries’.

CLAN acknowledges there is the potential for the content-collector role to become blurred in storytelling processes that involve building rapport with contributors. We also acknowledge that this potential is intensified in storytelling projects where content collectors spend significant periods of time engaged in fieldwork. Our discussions should ask:

Topic	Question	Y/N or N/A
Content creator responsibilities	How should we develop a relationship with the contributor?	
	Should we explore how our unconscious biases affects this projects? How might we change the storytelling process as a result of exploring our unconscious biases?	
	What are the moral responsibilities that fall directly on the content collector?	
Other people’s responsibilities	What are the different roles involved in the storytelling project?	
	Does everyone in the project understand their role and other’s expectations of them?	
	How do different people involved in the project see the purposes of the storytelling project? If there are different perspectives, how do we manage conflicts?	
Blurred boundaries	How do we respect the personal relationships (and possible friendships) developed during the project?	
	How do we respond to any blurred roles and relationships during the course of the project?	
	What impacts do blurred roles have on the ethical conduct of the project?	
	Can content collectors, contributor’s or others become personally over-invested?	
Comments		

10. Who to talk to if still unsure

Making decisions about some of these issues can be difficult. There may be times when you or your team are still unsure whether an image, story or information should be used even after discussing the key issues and reviewing other policies and guidelines. If you have discussed the questions outlined above and need more information to make a decision: Contact the CLAN’s President or Vice President, or Communications or Marketing Officers. The final decision on all communications materials lies with the President of CLAN.

11. Definitions

Content gatherer	Someone who documents a contributor’s story via photographs, videos, oral interviews and written testimony.
Content	What stories are made of. Content can include copy, images, sound, video and data.
Contributor	Someone who shares their storytelling content with an organisation that intends to publish their content. In the context of not-for-profit organisations, contributors are usually program participants, staff, volunteers and members.
Copy	Written words and numbers

Cultrural norms	Informal understandings of group conduct that govern the behaviour of members of a society.
Dignity	The feeling of having decision-making power, freedom and autonomy over life choices, together with the feeling of self-worth and self-confidence, and feeling that one has the respect of others.
Empowerment	Authority or power given to someone to do something.
Ethical decision-making framework	A structured series of questions and issues for consideration that help people make choices when they are faced with situations that require value judgements.
Ethical dilemma	A situation that has no clear right or wrong answer.
Images	Two-dimensional visual representations. Images include 'still' images such as photographs, artworks and illustrations, and 'moving' images such as videos, animations and GIFs.
Informed consent	When a contributor grants permission to publish their story with full knowledge of the possible consequences, including possible risks and benefits. Informed consent must be granted without duress.
Privacy	A person's right to control access to their information and identity.
Publisher	A person or organisation that publishes stories using methods such as print, websites, social media, press releases etc.
Respect	Due regard for the feelings, wishes or rights of others
Story	A story can include written, visual, verbal and data elements. These elements can exist alone or in a combination with other story elements.
Storytelling	The act of sharing stories.
Unconscious bias	A bias we are unaware of, and which happens outside of our control. It is a bias that happens automatically and is triggered by our brain making quick judgments and assessments of people and situations. It is influenced by our cultural environment and personal experiences.
Vicarious trauma	The inner transformation that occurs in the inner experience of the therapist [or other professional] that comes about as a result of empathic engagement with clients' trauma material. (Pearlman and Saakvitne, 1995)

CLAN Code of Ethics and Professional Conduct Policy

Version No. & History	2.0 (January 2011, March 2015)
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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

Ethics	The moral principles that govern a person's behaviour or the conducting of an activity.
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5. Policy

CLAN is committed to complying with the ACFID Code of Conduct (2019), 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, and management of incidents and complaints. 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 prevent and 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 fulfil its vision and mission. This is evidenced by compliance to the Code to:

- 1) Respect and protect human rights
- 2) Participate with communities to build capacity and sustain change
- 3) Undertake research to identify needs to plan projects
- 4) Effectively collaborate and coordinate projects with partners
- 5) Communicate truthfully and ethically
- 6) Be transparent and accountable
- 7) Acquire, manage and report on resources in an ethical and responsible way
- 8) Support and manage people fairly and effectively.

6. Guidelines/Procedures

6.1 The Committee shall:

- 1) 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
- 2) 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
- 3) 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
- 4) Ensure that no individual has unfettered powers of decision-making
- 5) Ensure that the independent views of Committee members are given due consideration and weight
- 6) Ensure that stakeholders are provided with an accurate and balanced view of the organisation's performance, including both financial and service provision
- 7) Regularly review its own performance as the basis for its own development and quality assurance

- 8) Carry out its meetings in such a manner as to ensure fair and full participation of all Committee members
- 9) Ensure that the organisation's assets are protected via a suitable risk management strategy
- 10) Ensure that personal and financial interests do not conflict with the duty to the organization
- 11) Determine what information is to be made to primary and secondary shareholders, what is to be made public and when
- 12) 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.

6.2 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.

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

- 1) Take a professional approach and act with integrity, courtesy and respect at all times
- 2) 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
- 3) Perform their duties as best they can, taking into account their skills, experience, qualifications and position
- 4) Act professionally in a safe and responsible manner, specifically in child safeguarding behaviours, the prevention of sexual exploitation and abuse, transactional sex, anti-bullying and sexual harassment, and including obligations to report wrongdoing
- 5) Exercise due diligence in the expenditure of CLAN funds
- 6) Be punctual and reliable in their attendance and adhere to their prescribed and authorised hours of duty
- 7) Comply with the prescribed terms and conditions of their employment/engagement
- 8) Record their attendance for duty in the manner prescribed
- 9) 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
- 10) 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
- 11) 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)
- 12) 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
- 13) Accurately and openly maintain records

- 14) Ensure that CLAN will market services with integrity and accuracy
- 15) 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
- 16) Not undertake personal or business activities for personal gain while on duty at the organisation or while conducting business of the organization
- 17) Not use CLAN resources without open and express permission of a higher authority
- 18) Work within the organisation's policies. Guidelines/procedures and principles
- 19) 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.

7. Management of Misconduct

Performance Management processes are based on legal requirements and CLAN's policies. It is expected that staff and volunteers adhere to CLAN's Code of Conduct and other relevant codes and standards relevant to their work for CLAN.

In situations where a breach of policy or misconduct occurs, relevant performance management processes will be implemented, documented, and may involve termination of employment, reporting misconduct to legal authorities where relevant.

8. Policy review

This policy will be reviewed bi-annually.

9. Associated CLAN documents

- Child Protection Policy
- Complaint Management Policy
- Disability Inclusiveness Policy
- Gender Equality and Equity Policy
- Grievance and Dispute Resolution Policy
- Human Resources Policy
- Prevention of Sexual Exploitation, Abuse and Harassment Policy
- Whistleblower Policy

CLAN Complaint Management Policy

Version No. & History	2.0 (January 2014; March 2015)
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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 accessible and appropriate complaints management framework for all Committee Members, Staff and, Volunteers, donors, Partner Organisations of CLAN and communities with whom we work, including children involved in CLAN activities and all visitors to project sites.

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

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
Complaint Inquiry	A request for information or an explanation, opinions, comments
Feedback	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 or organization

5. Commitment

CLAN is committed to managing complaints effectively. The Policy for managing complaints is made available publicly and when projects are implemented, people involved are directed to the Complaints Management Policy and are requested to become cognisant of the policy contents and specifically 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 topics of Complaint Management and Safeguarding are standing agenda items.

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.

CLAN is committed to providing appropriate assistance and referrals to complainants where possible, for example, medical, social, legal, or referrals to other services.

6. Procedures

To familiarise CLAN's Executive Committee members with the Complaint Management 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 Complaint Management Policy is distributed to all CLAN's paid staff, volunteers, partners, contracted service providers at induction sessions. Other personnel acting on our behalf are made aware of the Complaint Management Policy on the website and the overarching CLAN Policy

Handbook which is also available on the CLAN Website. 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 and a link to Complain Management Policy can be found on the Contact Us page. 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:

- 1) Complaints from donors and partners are logged are managed by members of the Committee. This may also include complaints from participants involved in CLAN programs or projects, including families and children.

- 2) Complaints from members of the public and supporters are logged and are managed by members of the Committee
- 3) All other external complaints are logged and are managed by a person designated by the Committee
- 4) 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).
- 5) Complaints about child safeguarding, including sexual exploitations, abuse and harassment are to be managed as stated in the Child Protection Policy and the Preventing of Sexual Exploitation, Abuse and Harassment Policy.

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

When a complaint is received and documented, CLAN will determine whether an internal investigation will be undertaken or whether an external investigator will be engaged to undertake the investigation. All misconduct complaints must be recorded but may de-identify the complainant at the request of the complainant or survivor.

Complaints made will be responded to quickly, kept confidential, treated with fairness and focused on the well-being of all concerned in a complaint. Any personnel or teams identified in a complaint will not be involved in the decision-making process of complaints handling.

A complaint about a matter outside the jurisdiction of CLAN, e.g. complaints about another organisation or individual not associated with CLAN will be referred to the relevant organisation or government department or other authority of the state or country for their assessment. CLAN will assist the complainant with identifying the most appropriate reporting mechanism, or help refer their complaint, where possible (especially in any safeguarding-related complaints). Such matters may include conduct matters, criminal offenses, assault, abuse including sexual abuse, theft, damage to property, other.

Where serious incidents involve child protection and sexual exploitation, abuse and harassment or other incidents, a complainant will be informed that such complaints will be managed as stated in CLAN's relevant policies.

A complaint about serious incidents including child protection and sexual exploitation, abuse and harassment will be managed as stated in CLAN's Child Protection Policy. If there is a complaint or a suspicion of child sexual abuse, exploitation, abuse or harassment made about a staff member of volunteer, the complaint may be made to the person in charge of a program who will then forward the complaint to the President of CLAN. Or a complaint may be made to the President of CLAN via CLAN's website. The President of CLAN will then report the matter to the relevant authorities which may include state police, the state child protection authorities, DFAT, the Australian Federal Police.

If a complaint is made concerning child sexual abuse in an overseas program involving other person's than a staff member, local reporting procedures will guide CLAN to determine whether it is a disciplinary matter, or managed by local authorities, and/or reported to Australian authorities. Should a complaint be reported in relation to sexual exploitation, sexual abuse or harassment, fraternisation or transactional sex where the victim is an adult, CLAN will take into account the wishes and the welfare of the survivor. Should the survivor wish not to report CLAN will take all reasonable action to support the person/s

All complaints about misconduct must be recorded, subject to the wishes and welfare of the complainant.

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

- 1) All complaints, including those forwarded anonymously, will be documented, assessed and responded to (where possible). Criteria for assessing a complaint may include severity, health and safety implications, financial implications, complexity, impact on the individual and others, potential to escalate and need for immediate action.
- 2) An entry is made in the CLAN Complaints Register.
- 3) 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.
- 4) 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.
- 5) 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.
- 6) In the event the CLAN Executive Committee determine to investigate the complaint, the investigation will be allocated for investigation. Planning for and implementing the investigation includes who will undertake the investigation, steps to be followed, and how the determination is reached.
- 7) Whether a complaint is investigated or declined the complainant will be advised within ten working days of the proposed action.
- 8) An entry is made in the CLAN Complaints Register.
- 9) 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). An investigation and determination should be made within 30 working days.
- 10) An appeals process should be managed within 30 working days.
- 11) At the conclusion of enquiries and findings the investigator prepares a report for consideration of the CLAN Executive Committee.
- 12) The CLAN Executive Committee will review the investigation outcome and make a determination as to what remedial action, if any, is to take place.
- 13) An entry is made in the CLAN Complaints Register.
- 14) 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.
- 15) In the event of that there is no further action the matter will be closed.

- 16) 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.
- 17) A final report will be made to CLAN's Committee including learnings from complaint made and the investigation undertaken.
- 18) CLAN is committed to providing assistance to complainants that might include medical, social, legal and financial assistance or referrals to such services.

12. Responsibilities for categories of complaints

Type or source of complaint	Person responsible to investigate and resolve
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 e.g, advertising or TV program	President and/or member of CLAN's Committee or staff member in charge
A particular program or project	Relevant Project Lead
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)

13. Reviewing and Reporting

. 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.

As part of the complaint management process, the Committee will review any complaints made at the following Committee meeting

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.

14. Associated Documents

- Child Protection Policy
- Human Resources Policy
- Preventing Sexual Exploitation, Abuse and Harassment Policy
- Workplace Health and Safety Policy

CLAN Conflict of Interest Policy

Version No. & History	2.0 (January 2011; March 2015)
Date approved	March 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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 whilst in the planning and delivery of CLAN programs.

4. Definitions

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. A conflict of interest may be real or actual apparent or perceived, potential of foreseeable.
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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 preventing a conflict of interest by:

- 1) Inclusion of a standing agenda item at governing body meetings
- 2) Documentation of any examples of conflict of interest in the minutes of governing body

- 3) Establishing a quorum for dealing with any conflict of interest matters which may arise among Executive Committee members from a single family
- 4) Monitoring compliance with this policy
- 5) 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, staff and partners to:

- 1) Avoid conflicts of interest where possible
- 2) Identify and disclose any real or perceived conflicts of interest
- 3) Carefully manage conflicts of interest as aligned to this Policy
- 4) Follow this policy and respond to any breaches.

7. Procedures

- 1) CLAN will strive to manage conflicts of interest by requiring Committee members to avoid conflicts of interest where possible and may request a written agreement from staff and volunteers to abide by the policy.
- 2) CLAN will endeavour to prevent possible conflict of interest through advising and discussing with staff and volunteers on how to avoid being placed in a situation of perceived obligation or indebtedness, and strategies to manage a conflict of interest situation.
- 3) 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.
- 4) 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.
- 5) In a CLAN committee meeting 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.
- 6) If a person declares themselves to have existing or potential conflict of interest confidentiality will be respected.
- 7) If a person does not agree with the perception that he/she is in a conflict of interest situation, dispute resolution procedures will be implemented.
- 8) If a conflict of interest is discovered 'after the fact', CLAN executive will review the outcome to determine the potential impact on the decision made and activities implemented by CLAN and implement procedures for dealing with any issues due to the conflict of interest.
- 9) 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.
- 10) 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.
- 11) CLAN may recruit a third party to assist where the effects of a conflict of interest could be or are more significant.

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.

9.1 Self-benefit may occur when

- 1) A Committee member or his/her immediate family or business interests stands to gain financially from any business dealings, programs or services of the organisation.
- 2) 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.
- 3) Use of CLAN property for personal advantage, such as equipment, personnel, supplies for private use.

9.2 Conflicting relationships

When a Committee member, personally, offers the services of a relative to the organisation.

- 1) 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.
- 2) 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.
- 3) 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.

9.3 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. 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.

9.4 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

9.5 Intellectual Property

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

9.6 False Information

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

9. Review

This policy will be reviewed bi-annually and when any conflict of interest occurs.

10. Attachments

- Conflict of Interest Guide
- Register of Conflict of Interests
- Conflict of Interest Disclosure Form

11. Associated Documents

- Code of Ethics and Professional Conduct Policy
- Financial Impropriety Risk Management Policy
- Financial Management Policy
- Grievance and Dispute Resolution Policy

CLAN CONFLICT OF INTEREST GUIDE

Version No. & History	2.0 (March 2018)
Date approved	March 2020
Date last updated/reviewed	March 2020
Review date	March 2022

1. 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.

2. Register of Conflict of interests and the Conflict of Interest Disclosure Form

The Register of Conflict of interests and the Conflict of Interest Disclosure Forms are to be completed by:

- 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 when in a consensual personal relationship
- 4) All employees, partners and volunteers involved in a CLAN project if engaged in any financial activity for example procurement, tendering, supply of goods or items, in particular, where family or personal relationships are involved.

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 on induction and at CLAN's Annual General Meeting
- 4) as determined by CLAN President and/or by CLAN's Association members.

3. Conflict of Interest Guide

A conflict of interest may be identified as:

Real conflict of interest	Where a direct conflict exists between current official duties and existing private interests
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
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.
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4. Examples of Conflict of Interest

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

5. 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.

6. Attachment: Register of Conflict of Interests

The register of conflicts of interest is maintained by the Executive Committee and contains these components. An example of the register is below:

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 DISCLOSURE FORM

NOTE: This is a confidential document and is to be managed in accordance with the CLAN Conflict of Interest Policy and the CLAN Privacy Policy and if necessary, the Complaint Management Policy.

Date:

Name of person reporting alleged conflict of interest:

Is the person self reporting of reporting an alleged conflict of interest of someone else?

- ☐ Self
- ☐ Someone else

Position/relationship with CLAN of the person reporting:

CLAN member/s assessing the alleged conflict of interest:

What is the alleged conflict of interest:

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

- ☐ A real conflict of interest
- ☐ An apparent conflict of interest
- ☐ A potential conflict of interest
- ☐ Pecuniary interest
- ☐ Non-pecuniary interest

OR

- ☐ There is no conflict of interest

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

Date management plan actions to be reviewed:

Action to be taken if not a self report:

Declaration by person reporting:

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 of person reporting

Name: (please print)

Date:

Signature of President

Date:

CLAN Copyright and Intellectual Property Policy

Version No. & History	2.0 (January 2011, March 2015)
Date approved	March 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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 whilst in the delivery of CLAN programs. Where a person or organisation wishes to use CLAN intellectual property for other reasons, an application must be made to CLAN for approval prior to the use of any CLAN materials. CLAN must be acknowledged any time in any manner where CLAN's copyright and intellectual property is used outside of CLAN's own work.

4. Definitions

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 property creations of the mind. 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

Copyright works created by CLAN may include:

- 1) Literary works such as books, reports, blogs, emails, newsletters, written material in paper or digital format, research material, data, translated documents, CLAN programs
- 2) Computer software e.g. disks or apps

- 3) Pictorial works such as images, photographs
- 4) Sound recordings.

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:

- 1) That all uses of copyright materials are recorded

- 2) All compensable uses of copyright material are appropriately processed
- 3) All materials produced by or on behalf of CLAN are copyright
- 4) Permission to reproduce such materials depends on the category into which they fall
- 5) All materials produced by or on behalf of CLAN will be classified.

8. Categories for classification

Categories for classification into one of the following classes:

- 1) 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.
- 2) Those materials that are copyright and that may nonetheless be circulated and/or reproduced as long as any reproduction features specified credits and disclaimers.
- 3) Those materials that are copyright and that may nonetheless be reproduced without conditions.
- 4) Those materials that are not copyright.

9. Policy review.

This policy will be reviewed bi-annually.

10. Legislation

- Copyright Act 1968
- Copyright Amendment Act 2006

CLAN Counter-Terrorism Policy

Version No. & History	2.0 (March 2017)
Date approved	September 2020
Date last updated/reviewed	August 2020
Review date	August 2022

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

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

6.1 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 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.

6.2 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.

6.3 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.

6.4 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.

6.5 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.

8. Policy review

This policy will be reviewed bi-annually.

9. Associated CLAN documents

- Project Design, Monitoring and Evaluation Policy
- Risk Management Policy

10. Legislation

- Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)
- Criminal Code Act 1995

CLAN Disability Inclusiveness Policy

Version No. & History	2.0 (March 2017)
Date approved	March 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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

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 disease (NCD)	NCDs do not result 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	A child is born with the condition eg Down Syndrome; Hypothyroidism
Acquired	A child develops the condition at some time after birth e.g. Type 1 Diabetes; Epilepsy

Preventable	A child could possibly not have acquired the disease if a specific action had been taken to stop it eg Human Immunodeficiency Virus (HIV); traumatic injuries
Non-Preventable	There is nothing that could have been done that we yet know of to stop the child from having the condition eg Autism; Congenital Adrenal Hyperplasia (CAH)
Communicable	The chronic disease is somehow infectious eg HIV, Tuberculosis (TB)
Non-Communicable	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 NCDs. CLAN is involved in activities to support children with NCDs such as, but not limited to, Autism, Congenital Adrenal Hyperplasia (CAH), Diabetes, Duchenne Muscular Dystrophy (DMD), Nephrotic Syndrome (NS), Osteogenesis Imperfecta (OI), Rheumatic Heart Disease (RHD), and others, such as Asthma, Child Cancer, Polio, Laron Syndrome, Nodding Syndrome and Epilepsy.

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:

- 1) Cultivating a culture of inclusiveness and acceptance in projects/programs for children with NCD's

- 2) Working with disabled children and their families with dignity and respect
Respecting the cultures, customs, beliefs of the country where it is involved in undertaking projects
- 3) Promoting partnerships through collaboration and discussion with partners, community, families and children involved in projects/programs
- 4) 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:

- 1) Multi-sectoral partnerships and projects to work directly with children and their families
- 2) partnerships with in-country medical professionals
- 3) Partnerships and advocacy, at community, national, and international levels
- 4) Involvement with NCD Child
- 5) Advocacy activities to increase knowledge and awareness of the needs of children with NCD's
- 6) 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.

8. Policy review

This policy will be reviewed bi-annually.

9. Associated CLAN 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

CLAN Drug Donations to Developing Countries Policy

Version No. & History	1.0
Date approved	March 2017
Date last updated/reviewed	March 2020
Review date	March 2022

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

Drug donation	The act of presenting drugs as a gift, grant, or contribution.
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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), WHO Guidelines for Medicine Donations (2010) 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. CLAN may source supplies for drugs to meet identified needs for those involved in CLAN programs, or CLAN may respond to requests from individuals or groups for particular drugs needed for a specific purpose in work currently being undertaken in that country that aligns with CLAN's mission.

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.

6.1 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. Drugs will not be sent until approvals and relevant clearances have been finalised by both the recipient and CLAN.

6.2 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. If relevant, written permission to export certain drugs must be obtained from the Australian Government of Health and Ageing prior to sending drugs overseas.

6.3 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). Administration of the drugs is to be recorded, including administrators, dates, recipients of each drug given, and any usual effects of the drug on the recipient.

6.4 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. Details including e.g packaging, labelling, quantities, dates, consignments, should be clearly understood by both the donor and recipient/s.

6.5 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.

A record of the drug donations will be maintained by the Executive Committee.

6.6 Review of donations

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.

7. Policy review

This policy will be reviewed bi-annually.

8. References

- Australian Pharmaceutical Advisory Council (APAC),
- Australian guidelines for drug donations to developing countries 2000.
- WHO Guidelines for Drug Donations 1999
- WHO Guidelines for Medicine Donations 2010

10. Attachments

CLAN record of drug donation/s report to the Committee

CLAN RECORD OF DRUG DONATION/S REPORT TO THE COMMITTEE

The coordinator of the drug donation is to use this form when a drug donation/s has been made and submit it to the next CLAN Association meeting for information and recording with the minutes.

Project details or independent request	
Country and location eg hospital	
Title and name of recipient	
Contact details - email, phone, address	
Drug donor eg pharmaceutical company	
Governing authority approval if required	
Drug name and dosage	
Non communicable disease	
Estimated number of children in need of the drug	
Community Support Group if applicable	
Other Partners involved in the program/project if relevant	
Risks and how mitigated	
Timeframes involved in organising	
Cost	
Recognition of CLAN and donor's contributions	
Date for presentation to CLAN Executive Committee	
Donation Coordinator name	
Signature of President	

CLAN Environmental Policy

Version No. & History	1.0
Date approved	September 2020
Date last updated/reviewed	September 2020
Review date	September 2022

1. Introduction

CLAN is committed to providing a quality programs to benefit children living with Non-communicable diseases (NCD's) in resource poor countries around the world. CLAN's activities include providing a safe and healthy workplace and minimising its potential impact on the environment.

2. Purpose

The purpose of this policy is to:

- Consider environmental concerns and potential impacts into decision making about CLAN programs
- Conserve natural resources, minimise waste, re-use or recycle where possible
- Train and inform employees, volunteers, relevant partners and program participants about environmental issues where relevant to a specific program or activity
- Encourage and support program participants to work in an environmentally responsible manner.

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

Environmental sustainability	Is responsible interaction with the environment to avoid depletion of degradation of natural resources and allow for long-term environmental quality.
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5. Policy

CLAN is committed to promoting environmental sustainability and improved environmental outcomes in their work around the word and also in their internal operations.

6. Procedures

CLAN's governing body has the responsibility to maintain and implement environmental sustainability procedures relevant to CLAN's activities.

CLAN will consult with partners prior to the implementation of CLAN programs to review and manage any potential environmental concerns.

CLAN will endeavour to apply knowledge and experience to contribute to environmentally safe programs involving partners, families and children with Non-communicable diseases (NCD's) around the world.

CLAN will act responsibly to manage incidents that may endanger health, safety or the environment and will report any matters to authorities as required by legislation.

CLAN will provide training and position-specific professional development where the Committee decides that it is necessary for an individual or group to acquire particular skills, knowledge or training in environmental management and sustainability.

CLAN will endeavour to minimise materials, reuse and recycle materials, and dispose of waste safely.

CLAN will endeavour to conserve energy, prevent air, water and other pollution.

CLAN will use reasonable endeavours to ensure that every employee, volunteer, stakeholders and the public are informed of and expected to follow this policy and to report any environmental, health or safety concern to CLAN for prompt action.

CLAN's Committee will review the effectiveness of environmental sustainability strategies undertaken for CLAN's activities and outcomes.

7. Policy review

This policy will be reviewed bi-annually.

8. Associated CLAN documents

- Code of Ethics
- Human Resources Policy
- Project Design, Monitoring and Evaluation Policy
- Workplace Health and Safety Policy

CLAN Equal Employment Opportunity and Anti-Discrimination Policy

Version No. & History	2.0 (28 January 2011, March 2015)
Date approved	March 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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 employees and volunteers who work for CLAN. CLAN also endeavours to provide equal opportunities for participation in programs for adults and children that CLAN works with, as CLAN's mission is to support children with chronic health conditions and their families. 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, evidence of social justice and a 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 where an individual demonstrates competency to undertake a given volunteer role.

4. Definitions

Equal Employment Opportunity (EEO)	<p>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
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	<ul style="list-style-type: none"> • 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, and the workplace is efficient and free of harassment and discrimination.
Anti-discrimination legislation	The law on the right of people to be treated equally. Under the Anti-Discrimination Act 1977 (NSW), it is unlawful for any employer, to discriminate against an employee or role applicant because of characteristics such as sex, marital status, pregnancy, race, age, religion, family responsibilities, physical and or intellectual disability, political beliefs, homosexuality
Discrimination	<p>a. 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. Characteristics which Federal and NSW state legislation prohibit discrimination and harassment on include:</p> <ul style="list-style-type: none"> • Age • Breastfeeding • Disability • Family or carer's responsibilities • Marital or relationship status • Political conviction • Pregnancy or potential pregnancy; • Race, colour, descent, nationality, ethnic, ethno-religious or national origin; • Religion; • Sex; • Sexual orientation or preference; • Transgender status <p>and any actual or imputed characteristics of any of the attributes listed above; and association with a person identified by reference to any of the attributes listed above.</p>
Victimisation	Refers to less favourable treatment of a person or persons for their participation in making, supporting or resolving a complaint of discrimination, harassment or vilification covered under the NSW Anti-Discrimination Act 1977, whether that participation was actual, intended or presumed. This includes a person or persons who have agreed to be witnesses in relation to a complaint. 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
Villification	Refers to a public act that could incite others to hate, have serious contempt for, or severely ridicule a person or a group of people because on the basis of certain characteristics as determined by legislation

Adverse action	Includes but is not limited to discrimination on the basis on certain characteristics as defined under legislation
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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
- sexual harassment
- pregnancy
- potential pregnancy
- marital/domestic status
- disability
- race, colour, national extraction, social origin, descent, and ethnic, ethno-religious, or national origin
- age, compulsory retirement
- family responsibilities, family status, status as a parent or carer
- racial vilification
- homosexual vilification
- physical or mental disability
- displacement
- HIV/AIDS vilification
- religious belief or activity
- political belief or activity
- physical features
- industrial activity
- employer association activity
- trade union activity
- breastfeeding
- sexuality
- trans-sexuality
- transgender
- profession, trade, occupation, or calling
- 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

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. Employees who believe they being treated unfairly as a result of discrimination should notify their manager or the CLAN Executive Committee. Any matter which does not comply with the principles of equal employment opportunity must be addressed as promptly and sensitively as possible. 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:

- 1) 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;
- 2) 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
- 3) An environment is provided which encourages EEO and set an example by their own behaviour
- 4) All staff are aware of the EEO and Anti-discrimination policy
- 5) All employees, contractors and volunteers must treat all colleagues and customers with respect and professionalism without regard to non-relevant criteria or distinctions.

8. Complaints

Any complaints about a breach of this Policy shall be dealt with CLAN's Complaint Management Policy. Complaints may also be made to the NSW Anti-Discrimination Board or to the Federal Fair Work Ombudsman.

9. 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.

10. Policy review

This policy will be reviewed bi-annually.

11. Legislation

11.1 Federal Legislation

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)
- Fair Work Act 2009
- Human Rights and Equal Opportunity Act 1986
- Racial Discrimination Act 1975 (Cth)
- Sex Discrimination Act 1984. (Cth)
- Workplace Gender Equality Act 2012

11.2 New South Wales

- Anti-Discrimination Act 1977

12. Associated CLAN documents

Code of Ethics and Professional Conduct Policy
Complaint Management Policy
Disability Inclusiveness Policy
Gender Equality Policy
Grievance and Dispute Resolution Policy
Human Resources Policy
Prevention of Sexual Exploitation, Abuse and Harassment
Safety and Security Policy
Staff Training and Development Policy
Whistle Blowers Policy

CLAN Financial Impropriety Risk Management Policy

Version No. & History	2.0 (January 2011, October 2019)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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:

- Ensure that all parties are aware of their responsibilities for identifying exposures to financial impropriety, including but not limited to fraud, bribery, corruption, counterterrorism, 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.
- Provide guidance to staff as to action which should be taken where they suspect any financial impropriety
- Provide a clear statement to staff forbidding any illegal activity including financial impropriety for the benefit of the organization
- 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

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).

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. 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.
Fraud and financial Impropriety	<p>Fraud and financial impropriety shall include, but is not limited to the following:</p> <ul style="list-style-type: none"> • Forgery or unauthorized alteration of any document or account • Forgery or unauthorized alteration of a cheque, bank draft, or any other 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.
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.

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:

- Assess the risk of financial impropriety
- Educate employees about prevention and detection of financial impropriety
- 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

Financial impropriety prevention accounting procedures shall be incorporated in the organisation's policies related to Cash Management, Credit Card Use, Commercial Transactions, and Investment.

Authority to issue and sign cheques on behalf of CLAN is limited to the following rules:

- 1) All cheques must contain two eligible signatures.
- 2) Eligible signatories are Committee members or staff members who have been previously nominated and endorsed by the Committee.
- 3) Any two of the above have the authority to sign cheques.
- 4) Signatories cannot sign a cheque made payable to themselves.
- 5) A list of all cheques issued each month will be provided to the Treasurer
- 6) Family members may not sign the same cheques.

Company credit card and Internet banking transactions must be for business-related goods and services.

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.

No one transaction must exceed the purchase or payment limit set.

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.

Recruitment strategies shall incorporate prevention to financial impropriety risks:

- 1) Applicants may be required to undergo police checks where required by the duties of the position
- 2) Previous employers and referees shall be contacted
- 3) Requests may be made of potential applicants for validation of transcripts, qualifications, publications and other certification or documentation.

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.

Financial Management reports will be regularly tabled for examination during Committee meetings.

Vendors and contractors shall be asked to agree in writing to abide by these policies and procedures.

7. Reporting and Investigation

It is the responsibility of all CLAN personnel to report all suspected, attempted or actual fraud or corruption incidents. 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

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. Investigations will not be disclosed to, or discussed with anyone other than those who need to know.

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. Immediate action will be taken to protect records from theft, alteration or destruction.

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.

In cases involving monetary loss, CLAN may seek to recover lost or misappropriated funds.

Matters involving financial impropriety will be reported to CLAN's governing body and reviewed.

8. Sanctions

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

9. Policy review

This policy will be reviewed bi-annually.

10. Legislation

- Anti-Money Laundering and Counter-Terrorism Financing Act 2006
- Australian Charities and Not for profits Commission Amendment (2018 Measures No.2) Regulations 2018

11. References

- ACNC External Conduct Standards
- Australian Auditing Standards
- Australian Accounting Standards (Cth)
- Criminal Code Act 1995

12. Associated CLAN documents

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

CLAN Financial Management Policy

Version No. & History	2.0 (March 2017)
Date approved	March 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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

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.
Financial management	The planning, organising, directing, controlling and monitoring the financial activities and applying management and principles to financial resources to achieve Clan's mission.
Revenue	Revenue is the total income that CLAN receives.
Operating expenditure	The money used to run CLAN and implement its activities.

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 fulfil 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 unsustainable programs or projects.

7. Delegations of Authority

The Committee is delegated to:

- 1) Exercise budgetary control including certification of accounts and acquittals
- 2) Write off debts
- 3) Approve project expenses, including overseas transfers and payments, and travel
- 4) Approve credit cards
- 5) Control physical assets
- 6) 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:

- 1) Monthly financial statements
- 2) Any risks as identified under the Risk Management Policy
- 3) Recommendations on policies including financial policies
- 4) Annual financial statements
- 5) Internal and external audits
- 6) Any recommendations requiring the Committee's approval.

9. Audit

The Committee will conduct an annual audit of its financial situation and make any adjustments to financial management as necessary.

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:

- 1) Ensure that CLAN is solvent
- 2) Determine a budget that is sustainable and approved
- 3) Ensure financial statements are accurate and audited
- 4) Ensure that controls are in place to prevent fraud and mismanagement
- 5) Manage financial risk, and handle errors
- 6) Ensure safety and security of financial records
- 7) Segregate duties of Committee members for different financial responsibilities
- 8) Determine value of funds provided for CLAN's mission and vision
- 9) Review program and project costs to determine viability of implementing the proposal
- 10) Analyses annual financial 'health' as part of strategic planning for future activities
- 11) Assesses a partner's capacity to manage and control funds effectively for CLAN activities or grants provided for services as part of CLAN's mission.

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. Policy review

This policy will be reviewed bi-annually.

13. Associated CLAN documents

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

14. References

- Australian Auditing Standards
- Australian Accounting Standards
- CPA Financial management for not-for-profit organisations 2012

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1. Purpose

The purpose of this policy is to engage in proper financial management practices regarding foreign exchange, the impact of foreign exchange movements, and the effect of foreign exchange upon CLAN's mission, projects, grants, and personnel. Implementing this policy will support financial management practices by anticipating and mitigating cash flow deviations as a result of foreign exchange movements. The overarching objectives of this policy are to protect the budgeting processes of CLAN, maintain and manage donation value and maximisation through active foreign exchange management, protect cash flow volatility, and to protect assets and liabilities. As CLAN continues to deliver local currency to field accounts and partners in the developing world, this policy is of utmost importance to CLAN's aid and development objectives. (Zanders Advisory, 2021).

2. Definitions

Exchange rate	The amount of money needed in one currency to purchase another. This process is frequently called "currency conversion". (US Aid, 2018).
Foreign currencies	The lawful money of another country other than Australia, in the context of CLANs base in New South Wales.
Purchasing Power	The value of a sum of one currency in relation to alternative currencies.
Transaction exposure	The risk of value changes of a transaction executed in foreign currency measured in the functional currency as a result of foreign exchange fluctuations. (Zanders Advisory, 2021).
Translation exposure	Arises when an organisation has 'subsidiaries' with a functional currency other than the reporting currency of the main organisation. Translation exposures are often split into profit translation exposures and (net) asset translation exposures. (Zanders Advisory, 2021).

Procurement	The act of obtaining goods or service, usually for business purposes.
Value/ settlement date	The date when the value of an asset or currency is determined.
Volatility	The likelihood of fluctuations in the exchange rate of currencies. It is a probability measure of the threat than an exchange rate movement poses to an investor's portfolio in a foreign currency.

3. Responsibilities

A centralised approach to risk, programme budgets, and project delivery, is vital to ensure the movement of CLANs funds is managed effectively. Through this approach, a timely settlement of funds, and appropriate transfer of funds is encouraged through open dialogue.

Foreign exchange risk is dynamic and may have implications for CLAN's work overseas. Monitoring the actualised outcomes against the planned outcomes is vital for effective financial management of foreign exchange risk. Speculation should be avoided.

4. Procedures

4.1 Budgeting

When preparing budgets for international projects or activities, it is important that the budget is completed in the relevant currency. Proposals must be submitted outlining the cost of conversion and differences in purchasing power. Proposals must directly reference relevant costs and expenditure, including differences in the price of objects in Australia against the location of the activity/s referenced in the proposal. Budgets must also account for exchange rate fluctuation.

4.2 Grants

Grants must be signed in the currency of CLAN's base in Australia. Subgrants must be signed in the local currency of application.

4.3 Providers

When acquiring new providers, it is important to engage with a range of considerations. The following should be considered:

1. What correspondent bank network and which banks are used to deliver the specific currencies?
2. Does the proposed provider have in-depth knowledge of the market to which the funds are being sent?
3. Is the financial viability of the provider acceptable?
4. Is CLAN able to secure an all-inclusive rate upfront?
5. Is the delivery amount guaranteed?
6. How does the provider weigh up against comparison rates?

It is important to ensure a large proportion of control over funds is acquired. Transparency, efficiency and security of funds should be ensured when engaging with any provider (Humentum, 2020).

5. Risk Management

Risk Management regarding Foreign Exchange is invaluable, and involves a range of overarching objectives, including: understanding the nature of the foreign exchange risk in terms of size, duration, and currencies involved, understanding sensitivity to movements in foreign exchange rates, developing an approach to managing risk, and regularly reviewing assumptions behind the approach in light of changes to the markets CLAN is exposed to. CLAN's should have the optimum amount of funding locally to invest in effective charitable work.

In alignment with the Framework for Non-Public Debt Foreign Exchange Risk Management, both the Better Practice Principles, and the Commonwealth approach, the following strategies must be implemented.

- Exposures should be identified and quantified over an appropriate timeframe.
- Appropriate objectives to optimise risk and return trade-offs should be engaged.
- Limits are to be set on the maximum allowable exposure.
- Responsibility for exposure management decisions should be clearly identified.
- Systems must exist to report exposures and the results of actions taken to manage risk.
- Provision of risk management advice and dealing activities should be engaged from CLAN personnel.

In circumstances where Risk Management is required, the following generic process should be followed (Commonwealth Foreign Exchange Risk Management Procedures, 2000):

1. Establish the context
2. Identify the risks
3. Analyse, assess and prioritise the risks
4. Treat the risks

Some questions to be asked when assessing the level of risk to CLAN include:

- What proportion of donations or grants does CLAN need to exchange into another currency?
- Where, when and in what currencies does CLAN need to disburse donations?
- Where, when and in what currencies does CLAN need to raise donations?
- For how long does CLAN have an exposure to foreign exchange risk?
- Is the level of risk acceptable?
- Is CLAN able to deliver on commitments if the exchange rate moves heavily against CLAN?
- Is this risk a one-off or an ongoing lengthy commitment?
- What can CLAN do to mitigate the risk posed?
- Does CLAN have the expertise to monitor and manage the risk at hand?

7. Training Requirements

CLAN must regularly assess the levels of fluctuation in exchange rates and disseminate this information periodically.

8. Associated Policies

Overseas Transactions and Transfers Policy
Procurement Policy
Financial Impropriety Risk Management Policy
Financial Management Policy
Project Design, Monitoring and Evaluation Policy

Staff Training and Development Policy
Risk Management Policy

9. Sources

Commonwealth Foreign Exchange Risk Management Procedures, 2000 -

https://www.anao.gov.au/sites/default/files/anao_report_1999-00_45.pdf?acsf_files_redirect

Humentum, 2020 - <https://humentum.org/tips-for-ngos-to-meet-their-foreign-exchange-goals/>

US Aid, 2018 -

<https://www.ngoconnect.net/sites/default/files/resources/Financial%20Management%20-%20Understanding%20Fluctuating%20Exchange%20Rates.pdf>

Zanders Advisory, 2021 - <https://zandersadvisory.com/service/foreign-exchange-risk-for-ngo/>

CLAN Fundraising Policy

Version No. & History	2.0 (January 2011, March 2015)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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

Fundraising	The seeking of financial support for a charity, cause, or enterprise.
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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 and based on the purpose for the donation.

CLAN may choose to accept a donation for a specific achievable activity directly related to CLAN's mission. CLAN may decide not to accept a donation where the activities of the donor are incompatible with CLAN's mission, where the cost of accepting the donation will be greater than the value of the donation or where the acceptance of a donation may give rise to litigation.

Fundraising techniques are to be undertaken in a transparent and ethical manner, designed to avoid any offense. CLAN will collaborate with stakeholders when planning, delivering and reviewing fundraising activities.

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:

- 1) Fundraising activities carried out and materials used by CLAN will comply with all relevant legislation
- 2) Any communications to the public made in the course of carrying out a fundraising activity shall be truthful and non-deceptive
- 3) 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
- 4) 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
- 5) 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
- 6) Advertising materials will include CLAN's identity, address, ABN and purpose for each donation
- 7) Privacy of donors will be consistent with the Privacy Act, and where allowed, donors will be acknowledged as appropriate with regard to the situation and beneficiaries
- 8) Where images and stories are used for fundraising purposes, free, informed consent is to be obtained prior to use
- 9) Images and messages for fundraising will not:
 - a. Be untruthful, exaggerated or misleading (e.g. not doctored, created as fiction or misrepresenting the country)
 - 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
- 10) Record keeping of fundraising donations, costs and use of donations will comply with relevant legislation
- 11) For any outsourced fundraising activity, CLAN will ensure that legal contracts will contain specific expectations, responsibilities and obligations of each party and that CLAN is identified as the beneficiary of donations.

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:

- 1) Contracts are in place which meet all the relevant legislative and regulatory requirements
- 2) Specific expectations, responsibilities and obligations of each party are clear and in writing
- 3) CLAN is identified as the beneficiary of the funds
- 4) Contractors are clearly identified
- 5) CLAN retains the responsibility for approval of public use of images and messages.

9. Fundraising Risks

- 1) Fundraising activities should not be undertaken if they will expose the organisation to significant financial risk.
- 2) Fundraising activities should not be undertaken if they may be detrimental to the good name or community standing of CLAN.
- 3) 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.

11. Policy review

This policy will be reviewed bi-annually.

12. Associated CLAN document

- Counter Terrorism Policy
- Financial Impropriety Risk Management Policy
- Financial Management Policy

13. References

- ACFID Code of Conduct 2017 Quality Assurance Framework
- ACFID Fundraising Charter
- Fair Trading NSW, Charitable Fundraising
- 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
- OAGDS Overseas Aid Deduction Scheme
- Privacy Act 1988 (Cth) (amended 2014)

CLAN Gender Equality Policy

Version No. & History	3.0 (28 January 2011 March 2015, 30 June 2017)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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 settings', challenges the organisation to work towards the eradication of discrimination in all its forms, in particular that of gender discrimination. CLAN is committed to promoting gender equality and equity and to non-discrimination in regard to gender identity for all participants involved in CLAN programs. 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 families and 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:

- 1) 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, girls and boys and others.
- 2) 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 fulfillment 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

Equality	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.
Equity	"Health equity means social justice in health (i.e., no one is denied the possibility to be healthy for belonging to a group that has historically been economically/socially disadvantaged)." ... and ... "In operational terms, and for the purposes of measurement, equity in health can be defined as the absence of disparities in health (and in its key social determinants) that are systematically associated with social advantage/disadvantage." (Paula Braveman.ssir.org)
Social equality and equity	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.

5. Policy

To fulfil its vision and mission, CLAN will ensure that its work is based upon, and promotes gender equality, equity and justice towards all groups of children and participants in programs. 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 equality and 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 usually 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 equality and equity will be promoted through programming systems and structures where:

- 1) Program planning will include research and consultation to identify any barriers to inclusion and to plan strategies to provide opportunities for participation by those who may be marginalised.
- 2) 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.
- 3) 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.
- 4) 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.
- 5) CLAN will monitor and evaluate projects to measure the relative impact on all participants women and men, and on the relationships between them.

7. Organisational Culture

CLAN recognises that gender equality and 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 equality and 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.

- 1) 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.
- 2) 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.

8. Policy review

This policy will be reviewed bi-annually.

9. Associated CLAN documents

- Child Protection Policy
- Code of Ethics and Professional Conduct Policy Disability Inclusiveness Policy
- Human Resources Policy

CLAN Grievance and Dispute Resolution Policy

Version No. & History	2.0 (January 2011, March 2015)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

1. Introduction

CLAN is committed to provide a positive environment where all participants are able to constructively work together to achieve outcomes to improve the health and well-being of children with non-communicable diseases. Risk assessments for CLAN activities will assess any potential causes of conflict and plan how these may be prevented.

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 grievances or disputes 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

Grievance	A real or imagined cause for complaint, especially unfair treatment.
Dispute resolution	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:

- 1) Identify, prevent and address potential problems before they become formal grievances
- 2) Be aware of, and commit to the principles of communicating and information sharing with their employees and volunteers
- 3) Give consideration to the ramifications for the individual, as well as the organisation in general in all decisions relating to employment practices
- 4) Handle any grievance or dispute in the most appropriate manner at the earliest opportunity
- 5) Ensure all employees and volunteers are treated fairly and without fear of intimidation.
- 6) Ensure all managers, supervisors, employees, volunteers and others are aware of their obligations and responsibilities in relation to communication and information sharing
- 7) Provide ongoing support and guidance to all staff, volunteers and others in relation to employment and communication issues
- 8) Ensure all managers, supervisors, employees, volunteers and others are aware of their obligations and responsibilities in relation to handling grievances
- 9) 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. A written statement of the grievance or dispute may be requested prior to implementing resolution procedures.

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:

- 1) If more than one person is present, establish the role of each person
- 2) Outline the process that is to be followed
- 3) Inform the parties that any information obtained in the conduct of the review is confidential
- 4) Listen to the aggrieved person and endeavour to diagnose the problem
- 5) Take accurate and detailed notes of all conversations (including dates, people involved) and attach any supporting documentation.

- 6) 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. Minutes of the discussion, response to the person with the grievance/dispute, and outcome/s are to be documented.

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.

In a situation where a grievance/dispute is not resolved, a person requesting a formal resolution must do so in writing. CLAN may appoint an external investigator to undertake a formal investigation and resolution process. Where a dispute occurs, an arbitrator may determine decisions and consequences for each party. Where the possibility of one party being in danger to themselves, external professional assistance will be sought.

CLAN will review procedures undertaken for each grievance and outcomes for managing any further grievances or disputes.

9. Policy review

This policy will be reviewed bi-annually.

10. References

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

11. Associated CLAN documents

- Code of Ethics and Professional Conduct Policy
- Complaint Management Policy
- Human Resources Policy
- Work Health & Safety Policy

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1. Introduction

CLAN is a not for profit, non-government Incorporated Association. CLAN is committed to applying employment terms and conditions of employment principles and practices as required by Fair work Australia. CLAN is also committed to caring for people involved in CLAN activities and to ensure a positive and supportive work environment. CLAN's mission and its activities determine personnel that will be needed for current and future activities. The composition of CLAN's governing body, the Executive Committee, is responsible for managing employment processes. CLAN's projects/programs and activities will determine the various and changing needs for professionals and volunteers engaged in the implementation of its programs and projects.

2. Purpose

The purpose of this policy is to provide an overview for the management of personnel associated with CLAN. This includes association members, employees, contractors, volunteers and any other person or party who may be involved in CLAN activities.

3. Scope

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

4. Definition

Human resource management	Includes the management of personnel in an organisation to provide quality in planning, implementation of projects and activities, and wise management of resources to achieve desired outcomes.
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5. Policy

The purpose of this policy is designed to provide guidance to the activities and outcomes of CLAN to ensure the health, safety and welfare of persons involved in delivery with CLAN and its activities. CLAN is required to comply with Australian legislation when involved in employment procedures and is also committed to providing terms and conditions for employees, contractors and volunteers that are fair and equitable.

6. Employment Processes Overview

CLAN works with partners, consultants, contractors, and volunteers to achieve outcomes. CLAN may occasionally employ a person for a temporary position to fulfil a specific need. CLAN is committed to

implementing equal opportunities, equity and acceptance of diversity for those involved in CLAN activities.

In situations where personnel are involved with children, the following screening processes include criminal record checks or statutory declarations where criminal checks are not available or suitable, prior to engagement. Verbal referee checks will be undertaken and during an interview behavioural-based interview questions will be asked to assess understanding of, and compliance to child safety requirements. Reference checking and vetting will be undertaken for all staff and volunteers prior to engagement. Employment contracts will contain consequences such as dismissal, suspension or transfer of duties for breach of child protection policies and codes of conduct requirements.

Employment matters such as remuneration and benefits, family and leave provisions are managed according to the terms of employment or involvement, as under an Award, a contract, or as a volunteer. Job descriptions or terms of reference will be provided for staff and key volunteers who fill formal roles in CLAN. Basic training will be provided to all those including volunteers who are involved in CLAN activities and will include topics including child protection, preventing sexual exploitation, abuse and harassment and relevant codes and standards. Relevant training will also include information about requirements for conduct, confidentiality, integrity, conflict of interest, safety and security, workplace health and safety and obligations to report wrongdoing. Topics will also include performance management, misconduct, and grounds for termination. Information will also include procedures for managing a grievance of dispute and whistleblowing protection. Pre-deployment training will be provided where relevant. Specific staff learning and development planning is relevant to the needs of each group and will be based on risk assessments for activities pertinent to each program or activity. Refresher training will be provided in key areas such as codes of conduct, child protection, complaints and whistle-blowing situations.

Induction training is planned based on relevance to each CLAN position of involvement. Basic inductions relevant to all positions will include requirements for compliance to the ACFID Code of Conduct, CLAN Code of Ethics and Behavioural Conduct Policy, and other key policies including Child Protection, Preventing Sexual Exploitation, Abuse and Harassment Policies and the obligation for staff and volunteers to report wrongdoing. The induction will also include any other codes and standards relevant to their role in CLAN. Training will also include topics covering travel, safety and security, and specific codes and standards where relevant to their roles.

Performance or conduct management procedures for staff and volunteers will be implemented for underperformance and serious misconduct. Management of underperformance includes discussing concerns, addressing issues, a performance improvement plan, regular performance reviews, building cooperative relationships and reviews. Where required, warning/s in writing are given prior to dismissal. Serious misconduct such as theft, fraud, assault, being under the influence of illegal drugs or alcohol on CLAN business, abuse of prescription drugs, and refusing to carry out duties may result in instant dismissal.

In situations where a serious incident is reported, the incident is to be documented, dated, signed, reviewed and reported to CLAN's nominated person. Serious incident reports are to be presented to CLAN's Association meetings.

CLAN is committed to providing appropriate assistance to employees and volunteers where involvement in CLAN activities has impacted on health and wellbeing. This may include medical, social, legal and financial assistance or referrals to these services.

6. Procedures

Association members and any other person employed or voluntarily involved with CLAN's activities will be provided with the relevant CLAN policies, including Health and Safety policies and Anti-discrimination policies. CLAN will ensure that inductions will be given for each new group or person involved in delivery of CLAN activities. Groups of 'staff' listed below have different requirements that the Committee will address when involved in staffing matters.

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:

- 1) Appointment of association members and acceptance of volunteers
- 2) The provision of information, guidelines and legal requirements to committee members contractors and volunteers where relevant
- 3) Induction of association members, employees, contractors, volunteers and visiting personnel
- 4) Delegation and clarification of role descriptions, responsibilities, and/or accountabilities
- 5) Developing plans to manage and support designated professional personnel involved in CLAN projects, both in Australia and overseas
- 6) Identification of safety and security strategies needed for CLAN projects/programs
- 7) Management of training and education where required
- 8) Undertaking risk management analysis and strategies relevant to programs and projects
- 9) Implementing procedures for managing any personnel issues
- 10) Providing professional development sessions to association members and relevant staff and volunteers to improve professional practices and contributions
- 11) Reviewing compliance and performance matters on a regular basis.

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, particularly in child protection areas. 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 and contractors

Consultants and contractors 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 drawn up to detail the shared contributions and responsibilities.

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 Volunteer Involvement 2015 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:

- 1) 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. Relevant similar screening will be undertaken for volunteers in other countries.
- 2) 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.
- 3) 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.
- 4) An induction will be provided to volunteer/s, and include topics such as, but not limited to:
 - a. Volunteer rights including safety, insurance, reimbursement of expenses, working hours,
 - b. Access to CLAN policies, confidentiality of personal information,
 - c. Training and access to resources required to fulfil their role, and specifically if working with children
 - d. Procedures for managing certain situations, for example, accidents, dismissal, complaints and grievances
 - e. Supervision procedures relevant to position undertaken by the volunteer
 - f. Managing change to a volunteer's role
 - g. Workplace health and safety requirements and processes to protect safety of volunteers
- 5) Recognition of volunteer contributions. CLAN's association will recognise volunteer efforts either informally or publically where relevant. Volunteer involvement records will be kept for reference.

12. Policy review

This policy will be reviewed bi-annually.

13. Reference Documents

- Fair Work Ombudsman, National Employment Standards
- NSW Office of Communities, Risk Management Resource Volunteer
- Volunteering Australia,
- National Standards for Volunteer Involvement 2015

14. Associated CLAN documents

Code of Ethics and Professional Conduct Policy
Complaint Management Policy
Conflict of Interest Policy
Copyright and Intellectual Property Policy
Equal Employment Opportunity and Anti-Discrimination Policy
Disability Inclusiveness Policy
Gender Equality Policy
Grievance and Dispute Resolution Policy
Prevention of Sexual Exploitation, Abuse and Harassment Policy
Privacy Policy
Risk Management Policy
Safety and Security Policy
Staff Training and Development Policy
Workplace Health and Safety Policy
Whistle Blowers Policy

CLAN Monitoring, Evaluation and Learning Commitment

Version No. & History	1.0 (January 2017)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

1. Purpose

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 Policy. 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 conditions 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 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 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.

2. Definitions

Equality	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.
Equity	"Health equity means social justice in health (i.e., no one is denied the possibility to be healthy for belonging to a group that has historically been economically/socially disadvantaged)." ... and ... "In operational terms, and for the purposes of measurement, equity in health can be defined as the absence of disparities in health (and in its key social determinants) that are systematically associated with social advantage/disadvantage." (Paula Braveman.ssir.org)

3. CLAN's approach

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 NCDs. To achieve these goals, CLAN endeavours to facilitate multi-sectoral involvement for a comprehensive approach to a complex problem 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.

A) Project Design

CLAN's policies for planning programs, projects and other activities include the following processes included in the Project Design, Monitoring and Evaluation Policy:

- 1) Identification of needs of a specific group of children in a community
- 2) Designing the project to meet the needs of the target group of children with NCD's their families
- 3) Appraising the project proposal e.g. for quality assurance, budgets, partner capacity
- 4) Implementing activities with partners
- 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.

B) Key Principles

1) Equality and Equity

1.1) 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.

1.2) 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 needs of a group or individuals so that all participants can achieve outcomes successfully. For example, a child with a chronic health condition 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:

- Rights of the child
- Vulnerability of children and families with needs and/or at risk
- Consideration and management of potential or identified gender inequalities and inequity
- Level of disabilities experienced by children living with NCDs and impact on their families and communities

- Positive and effective communication strategies required, particularly for working with groups in another language
- Collaborative and effective management of complaints

2) Quality and Effectiveness

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:

- Research to analyse needs and the contexts for implementing activities
- Strategic goals and outcomes to achieve objectives
- Analysis of potential risks and mitigation strategies
- Reviews and assessments during and at the conclusion of planned activities
- Reflections and analysis of results, learning, and application to future planning where relevant.

3) 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.

Procedures include:

- Collaborations on analysis of contexts and barriers to achieve improved health outcomes
- Purpose of the program or project
- Goals, objectives and outcomes, indicators
- Human and non-human resources available
- Roles and responsibilities for all participants
- Indicators for accountability
- Documented reviews and evaluations of the program or project, based on criteria
- Relevant to outcomes
- Appraisals of outcomes related to goals, objectives and outcomes and evidence of building capacity and sustainability.

4) 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.

4. Policy review

This commitment will be reviewed bi-annually.

5. Associated CLAN documents

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

CLAN Non-Aid and Development Activities Policy

Version No. & History	2.0 (April 2015)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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.

4. Definitions

Aid	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.
Aid and development	Refers to activities undertaken to reduce poverty and address global justice issues. In the non-government organisation 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

5. 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 choice between development and non-aid development activities for donors and partners involved in a project. Donors would be informed that donations to non-development activities are not tax deductible.

CLAN is resolute in ensuring that 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 resource poor settings that are designed to:

- 1) Work collaboratively with local communities or agencies based on the needs of those communities in terms of non-communicable diseases
- 2) Promote continuous improvement of the health and wellbeing of children and their families in those communities.

6. 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 agreements will include reference to the requirements for definitions and separation of non-development activities. Partner assessment prior to formalising an agreement 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.

7. Compliance

- 1) CLAN will provide training for its governing body, employees and volunteers, partners and any representatives to distinguish between development and non-development activities
- 2) CLAN will take immediate action where required to ensure compliance with separation of development and non-development activities

- 3) In situations where a partner may engage in non-development activities, these are not to be included in any CLAN program or activity undertaken with a partner. Any non-development activities must be reported separately as evidence that they are not included in any CLAN programs or activities
- 4) CLAN's fundraising materials and activities are for non-aid development purposes only and where required, CLAN will provide training on the need for separation of non-development activities.
- 5) Expenditure reporting will clearly show funds are used for development purposes only.

8. Policy review

This policy will be reviewed bi-annually.

9. Associated CLAN documents

- Counter-Terrorism Policy
- Fundraising Policy
- Financial Impropriety Risk Management Policy
- Financial Management Policy
- Project Design, Monitoring and Evaluation Policy
- Risk Management Policy

10. Reference

- ACFID Code of Conduct

CLAN Overseas Transactions and Transfers Policy

Version No. & History	1.0 (January 2022)
Date approved	February 2022
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Review date	January 2024

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1. Purpose

The purpose of this policy is to ensure proper financial management in relation to overseas transactions and transfers. This policy seeks to prevent CLAN's participation in illegal and negligent activities resulting from financial mismanagement. In supporting associated charities and NGOs overseas, CLAN must be aware of all risks, costs and consequences associated with overseas transactions and transfers. This policy seeks to protect CLAN's financial position, ensure CLAN meets its procedural and reporting requirements, ensure individuals involved in conducting overseas transactions and transfers are aware of and understand their obligations and to further protect the organisations at the receiving end of the transactions and transfers.

2. Definitions

Money laundering	The concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses.
Terrorism financing	The provision of funds or providing financial support to individual terrorists or non-state actors.
Terrorist organisation	An organisation that is directly or indirectly engaged in preparing, planning, assisting or fostering the doing of a terrorist act.

3. Legislation

ss 45 and 46 [Anti-Money Laundering and Counter-Terrorism Financing Act 2006](#) (Cth)

Chapter 16 (items 1 and 2 in s 46) [Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 \(No. 1\)](#) (Cth) – for reportable details for international funds transfer instructions

Chapter 17 (items 3 and 4 in s 46) [Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 \(No. 1\)](#) (Cth) – for reportable details for international funds transfer instructions under a designated remittance arrangement

4. Responsibilities

Comprehensive and effective guidelines for overseas transactions and transfers is vital. CLAN must, to the best of its ability, ensure any and all overseas transactions and transfers are transferred for a legitimate purpose, are receipted by a legitimate organisation not involved in money-laundering or terrorist activities and ensure the best financial outcome is achieved for both the sending and receiving parties. CLAN must furthermore comply with all legal obligations, namely reporting requirements, and strive to maintain a transparent and efficient process.

4.1 Compliance with the External Conduct Standards

Charities that operate outside Australia are required to comply with the Australian Charities and Not-for-profits Commission's (ACNC's) External Conduct Standards (ECS). A charity does not have to be conducting major programs or projects to be considered operating outside of Australia.

There are four ECSs:

1. Activities and control of resources (including funds);
2. Annual review of overseas activities and record-keeping;
3. Anti-fraud and anti-corruption; and
4. Protection of vulnerable individuals.

4.1.1 Activities and control of resources

This ECS requires a charity to:

- take reasonable steps to ensure its activities outside Australia are consistent with its purpose and character as a not-for-profit;
- maintain reasonable internal control procedures to ensure that funds, equipment, supplies and other resources are used outside Australia in a way that is consistent with the charity's not-for-profit purpose and character; and
- take reasonable steps to ensure that funds, equipment, supplies and other resources provided to third parties outside Australia (or within Australia for use outside Australia) are applied:
 - in accordance with the charity's not-for-profit purpose and character, and
 - with reasonable controls and risk management processes in place.

Furthermore, this ECS requires charities to comply with Australian laws in the following areas while operating overseas:

- money laundering
- financing of terrorism
- sexual offences against children
- slavery and slavery-like conditions
- trafficking in individuals and debt bondage
- people smuggling
- international sanctions
- taxation, and
- bribery.

CLAN is required to maintain reasonable internal control procedures to ensure compliance with these laws.

4.1.2 Annual review of overseas activities and record-keeping

This ECS requires a charity to obtain and keep records for its operations outside Australia. These records must include information necessary for a charity to be able to prepare a summary for its activities and related expenditure outside Australia on a country-by-country basis.

The records must be kept for each financial year in which a charity:

- operates outside of Australia; or
- gives funds or other resources to third parties for use outside Australia.

4.1.3 Anti-fraud and anti-corruption

This ECS requires a charity to take reasonable steps to:

- minimise any risk of corruption, fraud, bribery or other financial impropriety by its Responsible Persons, employees, volunteers and third parties outside Australia; and
- identify and document any perceived or actual material conflicts of interest for its employees, volunteers, third parties and Responsible Persons outside Australia.

4.1.4 Protection of vulnerable individuals

This ECS requires charities to take reasonable steps to ensure the safety of vulnerable individuals overseas. ECS 4 applies where individuals are:

- being provided with services or accessing benefits under programs provided by the charity (whether directly or through collaboration with a third party); or
- engaged by the charity, or a third party in collaboration with the charity, to provide services or benefits on behalf of the charity or third party.

“Vulnerable individuals” are defined as people under the age of 18, or those who may be either unable to take care of themselves – due to their age, an illness, trauma, disability, or some other disadvantage – or unable to protect themselves against harm or exploitation.

4.2 Compliance with the Australian Council for International Development Code of Conduct

Members of the Australian Council for International Development Code of Conduct (**ACFID**) must comply with the ACFID Code of Conduct. As CLAN is such a member, it must comply with these standards.

The ACFID Code of Conduct is informed by the following principles:

- proportionality – recognising the diversity of ACFID's members and their approach to development;
- certainty – complementing other regulatory regimes and providing consistency and transparency in implementation;
- flexibility – recognising diverse and innovative approaches to implanting Code principles and obligations
- responsiveness – changing in response to emerging good practice and changes in the sector
- transparency and accountability – working in collaboration to develop and change the Code and ensuring governing groups are accountable to ACFID's members
- capable regulators – ensuring effective people and systems to operate an effective and efficient regulatory regime; and
- continuous improvement – improving processes in response to clear evidence and lessons learned and encouraging innovation.

5. Procedures

5.1 Sending Foreign Money

Before sending money in a foreign currency, it is important to undertake the procedures and analyses stipulated in the Foreign Exchange Policy, particularly with regards to selecting a provider for the transfer or transaction.

6. Risk Management

Overseas transactions and transfers will always present some level of risk, particularly as the not-for-profit sector has been identified as vulnerable to the risk of misuse for the purpose of terrorism financing. To mitigate these risks, CLAN must, in addition to exercising due diligence and good governance:

- ensure the organisation on the receiving end of the transaction or transfer is not connected to illicit activity; and
- verify details using trusted contact details.

The ACNC recommends that for charities sending money overseas, the charity must take reasonable steps to ensure that:

- their activities outside Australia are carried out in a way that is consistent with their purpose and character as a charity; and
- the resources (including funds) given to third parties outside Australia are applied in accordance with their purpose and character as a charity and with proper controls and risk management processes in place.

In circumstances where Risk Management is required, the following generic process should be followed (Commonwealth Foreign Exchange Risk Management Procedures, 2000):

1. Establish the context
2. Identify the risks
3. Analyse, assess and prioritise the risks
4. Treat the risks

Further risk management strategies in relation to the transfer of money can be found in the Foreign Exchange Policy.

7. Reporting

7.1 ACNC Reporting Obligations

Under the *Australian Charities and Not-for-profits Act 2012* (Cth), CLAN is obligated to report in its Annual Information Statement basic financial details, relevantly the total funds spent on grants and donations made for use in and outside Australia. As CLAN is a small charity for the purposes of charity legislation, an annual financial report containing further detail on any grants or donations is not required to be submitted to the ACNC.

8. Training Requirements

Individuals involved in overseas transactions and transfers for CLAN must be aware of all risk management activities, the standards, codes and legislation that must be complied with and the reporting requirements to all relevant agencies.

9. Associated Policies

Foreign Exchange Policy
Procurement Policy

Financial Impropriety Risk Management Policy
Financial Management Policy
Project Design, Monitoring and Evaluation Policy
Staff Training and Development Policy
Risk Management Policy

10. Sources

Australian Transaction Reports and Analysis Centre, 2021 –

ACNC – <https://www.acnc.gov.au/tools/factsheets/overseas-aid-and-development-charities>

Australian Competition and Consumer Commission – <https://www.accc.gov.au/consumers/health-home-travel/buying-sending-foreign-money>

Australian Council for International Development – <https://acfid.asn.au/content/about-code>

CLAN Partnership Policy

Version No. & History	1.0
Date approved	August 2021
Date last updated/reviewed	July 2021
Review date	July 2023

1. Introduction

CLAN's strategy includes working in partnerships at a local, national, and international level to assist children living with Non-Communicable Diseases (NCDs) globally. CLAN recognises the role of partnerships in the implementation of their strategic framework to provide community support and development, and to achieve positive outcomes based on its five pillars. CLAN engages in a broad scope of partnerships, including but not limited to, multi-sectoral partnerships and subsequent collaborative initiatives to work directly with children and their families, partnerships with in-country medical professionals, or partnerships to engage in advocacy.

2. Purpose

The purpose of this policy is to consolidate the requirements of partners and CLAN's commitments regarding partnerships. The policy has been developed to make accessible the procedures and requirements of partners when working in conjunction with CLAN, to assure mutual understanding and accountability.

3. Scope

This Policy applies to all relevant personnel working with CLAN and its partner, including the staff, volunteers, and contractors of the partner through the duration of said partnership.

4. Definitions

Aid & Development	Refers to activities undertaken to reduce poverty and address global justice issues. In the non-government organisation 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
Collaboration	The process of two or more people, entities or organizations working together to complete a task or achieve a goal
Coordination	The organisation of the different elements of a complex body or activity so as to enable them to work together effectively
Dispute	Dispute can occur when one or more people disagree about a matter which is not resolved
Non-Aid	Refers to limitations on the use of funds by NGOs. 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
Partner	A person or commercial entity which has alliance with another person or commercial entity

Partnership	An arrangement where parties agree to cooperate to advance their mutual interests
Sustainability	The ability to be maintained effectively in the long term.

5. Commitments

CLAN will decide what projects and activities are necessary, appropriate, and able to be supported by partnerships.

CLAN is committed to building partnerships to work collaboratively through the frequent coordination of development and humanitarian initiatives to achieve an improved quality of life for children living with NCDs.

CLAN strives to complement the valuable work of others, specifically supporting local partners to develop their capacity and influence their development.

CLAN will support mutually identified capacity-strengthening strategies with their partners.

CLAN will ensure the accurate dissemination of information to all primary stakeholders, particularly those within a partnership, guaranteeing frequent communication. Key information will be evidenced and accessible via CLAN's website.

CLAN is committed to promoting partnerships through collaboration and discussion with partners, community, families, and children involved in projects/programs.

CLAN is committed to implementing equal opportunities, equity, and acceptance of diversity for those involved in CLAN activities and partnerships.

CLAN and partners will clearly identify the separation between aid and development, and non-aid and development objectives and activities.

CLAN will disseminate relevant information about its partners, programs, outcomes and lessons to partners, volunteers, donors, and the public as relevant.

6. Standard of Conduct

CLAN's partnerships are built upon integrity, accountability, and transparency.

CLAN's members will work intentionally with others in mutually respectful ways.

CLAN's Code of Conduct for Working with Children (contained within the Child Protection Policy) is relevant to all individuals within CLAN's activities, including partners and associated members.

CLAN is accountable to government agencies, donors, supporters, and partners.

CLAN will encourage and support program participants and partners to work in an environmentally responsible manner.

CLAN will ensure that staff, volunteers, contractors, and partners are informed prior to engagement that they have a responsibility to disclose to CLAN information about any possible wrongdoing that occurs in a CLAN activity.

CLAN is committed to implementing equal opportunities, equity, and acceptance of diversity for those involved in CLAN activities and partnerships.

Principles of humanity, impartiality, independence, and neutrality provide direction and guidance to CLAN's programs.

CLAN's programs require documentation, agreed terms and conditions, and honest reporting for all its activities including its work with partners, donors, volunteers, and relevant professionals involved in particular activities.

7. Guidelines & Policy for the Acceptance of Partnerships

Prior to the formation of all formal partnerships, CLAN will undertake the following procedures sequentially:

- 1) The Australian Council for International Development (ACFID) Code of Conduct and CLAN's Policies will be shared with relevant partner/s to inform and obtain agreement prior to a formal agreement being made.
- 2) CLAN will undertake diligence and capacity assessments of organisations with whom they work in formal partnerships, as per the Partnership Assessment.
- 3) CLAN will ensure that the Child Protection Policy is disseminated to, and training undertaken for all relevant persons and groups prior to implementing programs or activities to ensure safe environments for children.
- 4) CLAN will ensure that, within the Child Protection Policy, relevant documents are disseminated and agreed to by the partner. This includes the Sponsorship Guidelines, Code of Conduct for Use of Children's Images, and Code of Conduct for Working with Children. Each are available within the Child Protection Policy.
- 5) CLAN's Code of Conduct for Working with Children (contained within the Child Protection Policy) will be disseminated all relevant persons involved in CLAN's partnerships and associated programs and activities.
- 6) Australian Partners will be assessed on their ability to ensure child safety, as per the Partnership & Child Safeguarding Requirements detailed in the Partnership Agreement.
- 7) CLAN will consider the knowledge and perspectives of a potential partner and analysis of power dynamics and issues of gender equality and equity.
- 8) CLAN will carry out a formal assessment of the capacity of partners, as per the Partnership Assessment. This ensures that partners will prioritise and protect the safety of all those involved in CLAN's collaborative initiatives, specifically children and vulnerable groups.

Under circumstances where partners may manage funds on behalf of CLAN, due diligence assessments of such partners will be undertaken, as per the Partnership Assessment. CLAN mandates that partners involved in fund management do NOT apply funds or resources to those under the prohibited entities listing. CLAN ensures that members involved in fund management are accredited to do so and adhere to legislated financial requirements, such as accounting and auditing standards. These assurances are made accessible to the partner, who will become signatory to such standards.

8. Guidelines & Policy for the Formation of Partnerships

CLAN's criteria for assessing project proposals from partners includes a range of relevant areas, outlined in the Partnership Assessment.

The formation of a partnership is signified through the signing of the Partnership Agreement. Termination guidelines of partnerships will be collaboratively determined through the Partnership Agreement.

CLAN is committed to complying with the ACFID Code of Conduct (2019). As such, CLAN will share and discuss a range of relevant policies with all partners and persons supporting CLAN and its activities, including but not limited to the Child Protection Policy, Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, Protocols for Reporting Serious Incidents, Counter-Terrorism Policy, Financial Impropriety Risk Management Policy and Non-Aid and Development Activities Policy. This is done so through the Partnership Agreement. CLAN will need evidence from partners that they comply with these policies.

CLAN will ensure that inductions will be given for each new group or person involved in delivery of CLAN activities. 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.

9. Guidelines & Policy for the Duration of Partnerships

9.1 Risk Assessment

CLAN will undertake a risk assessment of each individual project within a partnership, including areas of potential discrimination. Partners will be involved in developing the risk management plan for that project. 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. Partners will also be required to show evidence of compliance with CLAN's policies that are relevant to each specific project.

9.2 Project/Initiative Implementation

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

9.3 Complaint Disclosure and Dispute Resolution

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. Complaints from donors and partners are logged and managed by members of the Committee.

Processes implemented to resolve the dispute and to avoid the costs for resolving a claim externally or through litigation. This can occur through:

- 1) A negotiated outcomes where CLAN and a partner or party concerned agrees on a final outcome or decision.
- 2) A mediated outcome where CLAN and a partner or party concerns use the services of an independent mediator to support them to arrive at a final outcome or decision.

- 3) An arbitrated or adjudicated outcome where an independent arbitrator or court determines how the dispute is to be resolved and makes a binding decision in order to effect the resolution.

CLAN will endeavour to implement dispute resolution (See CLAN Grievance and Dispute Resolution Policy) processes that includes:

- 1) Procedures that are simple and understood by all parties.
- 2) Approaches that are fair, handled sensitively, confidential, and transparent.
- 3) An outline of potential steps to follow e.g., research about the dispute, causes, factors underpinning the dispute, meetings and dates, timeframe.
- 4) Protecting the well-being of those involved in the dispute.
- 5) Where a dispute is not resolved within a given time and is to be resolved by an external party, work with the partner or party concerned to agree to a process to be followed by the external investigator/arbitrator.
- 6) Working to ensure minimal impact on CLAN's reputation and activities.

9.4 Policy Adherence

Building Capacity and Sustainability Policy - CLAN is committed to building capacity of local partners, and will undertake regular assessment of the following:

- Where involvement of local partners is deemed necessary.
- Issues that must be counteracted through the integration of local partners.
- Potential/actual local partners and their required involvement.
- Purpose of such partnerships.
- Strategies to influence them.

Counter-Terrorism Policy - 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.

Drug Donations to Developing Countries Policy - CLAN will work with all partners to determine quantities, dates, and persons responsible in sending and receiving and distributing donated drugs. CLAN will work closely with the donor/s of drug donations at all stages of planning and sending the drugs to developing countries.

Environmental Policy - CLAN will train and inform employees, volunteers, relevant partners, and program participants about environmental issues where relevant to a specific program or activity. CLAN will consult with partners prior to the implementation of CLAN programs to review and manage any potential environmental concerns.

Financial Management Policy - The role of CLAN's Committee is to ensure sound financial management for CLAN programs, projects, activities, and partnership agreements. As part of managing budgets for projects and activities, the Committee will assess a partner's capacity to support a CLAN project or activity as per the Partnership Assessment. Where partners are involved in programs or projects, they will be invited to collaborate with CLAN for planning fundraising.

Financial Impropriety Risk Management Policy - If associates of the partner have committed fraud or financial impropriety, the Committee shall take or recommend appropriate disciplinary action up to and including termination of engagement or commence legal proceedings.

Preventing Sexual Exploitation, Abuse and Harassment Policy - CLAN understands the responsibilities of partners to assess risk, ensure accountability and maintain a safe and supportive environment. 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. 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 sexual exploitation, abuse, or harassment 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.

Staff Training and Development Policy - CLAN's strategic plan includes assessment of the need and/or opportunities for training and development for personnel involved with CLAN, including partners and participants. Where CLAN is involved in programs and activities with partners, CLAN will work with partners to identify needs and opportunities for training, development and sharing information that will provide benefits to all those involved in programs, including participants such as children and their parents, presenters, partners, and CLAN personnel.

9.11 Partnership Review

Project planning within partnerships is undertaken in conjunction with CLAN's partners. CLAN will ensure that documented evidence of periodic and joint review of collaborations and partnerships are undertaken quarterly, as per the Periodic Partnership Assessment. Long-term relationships with partners will involve follow up programs that review the quality of ongoing outcomes achieved, and the level of sustainability being achieved. CLAN will review at association meetings the role of personnel involved in programs and projects and results. CLAN will ensure mutual learning is undertaken through adherence to procedures outlined in both the 'Project Design, Monitoring and Evaluation Policy' and the 'Monitoring, Evaluation and Learning Commitment Policy'.

10. Policy review

This policy will be reviewed bi-annually.

11. Associated CLAN documents

- Building Capacity and Sustainability and Policy
- Child Inclusive Policy
- Child Protection Policy
- Code of Ethics and Professional Conduct Policy
- Complaint Management Policy
- Conflict of Interest Policy
- Copyright and Intellectual Property Policy
- Counter-Terrorism Policy
- Disability Inclusive Policy
- Drug Donations to Developing Countries Policy
- Environmental Policy
- Equal Employment Opportunity and Anti-Discrimination Policy

- Financial Impropriety Risk Management Policy
- Financial Management Policy
- Fundraising Policy
- Gender Equality Policy
- Grievance and Dispute Resolution Policy
- Human Resources Policy
- Monitoring, Evaluation and Learning Commitment Policy
- Non-Aid and Development Activities Policy
- Privacy and Disclosure Policy
- Project Design, Monitoring and Evaluation Policy
- Protocols for Reporting Serious Incidents
- Preventing Sexual Exploitation, Abuse and Harassment Policy (PSEAH)
- Risk Management Policy
- Safety and Security Policy
- Staff Training and Development Policy
- Whistleblower Policy
- Work Health and Safety Policy
- Transparency Policy

12. References

- ACFID Code of Conduct 2019
- Australian Auditing Standards
- Australian Accounting Standards
- ACFID Code of Conduct 2017 Quality Assurance Framework
- ACFID Fundraising Charter
- Fair Trading NSW, Charitable Fundraising
- Fundraising Institute Australia (FIA), FIA Principles and Standards of Fundraising Practice
- FIA Code of Ethics and Professional Conduct
- FIA Code of Acceptance and Refusal of Donations
- OAGDS Overseas Aid Deduction Scheme

13. Relevant Legislation

- Criminal Code Act 2017
- Criminal Code Act 1995
- Work Health and Safety Act 2011 No.10 (NSW)
- Workplace Health and Safety Regulation 2011 (NSW)

14. Appendices

- 1) Partnership Agreement
- 2) Partnership Assessment
- 3) Periodic Partnership Assessment

CLAN Partnership Agreement

<u>General</u>	
Partner Organisation:	
Contact Details:	
Contact Person(s):	
<u>Intention of partnership</u>	
Purpose of the partnership:	
Name of program/initiative:	
Location of program/initiative:	
Commitments, contributions, and responsibilities of partner:	
Commitments, contributions, and responsibilities of CLAN:	
<u>Statement of shared goal:</u>	
<u>Background of partner organisation</u>	
Establishment date:	
Vision statement:	
Mission statement/focus:	
Where does the partner organisation work?	
Brief overview on program/initiative partners are working on:	
<u>Partnership principles</u> - List agreed principles below (e.g., mutual respect, equity, transparency). <ul style="list-style-type: none">•••••	
<u>Duration</u> - This agreement will take effect from the date of its signature by the above parties and will be deemed to have commenced from that date and will expire by <i>[insert date]</i> .	
<u>Partnership Roles</u> - each partner agrees to contribute through financial and non-financial contributions.	

Governance of the partnership		
Dispute resolution process	<i>If the parties in this agreement are in dispute, they shall...</i>	
The partner organisation must have read and understood the following of CLANs Policies, specific codes of conduct and documentation.		
<i>Document</i>	<i>Signature</i>	<i>Date</i>
Child Protection Policy	_____	_____
Code of Ethics and Professional Conduct Policy	_____	_____
Counter-Terrorism Policy	_____	_____
Drug Donations to Developing Countries Policy	_____	_____
Financial Impropriety Risk Management Policy	_____	_____
Grievance and Dispute Resolution Policy	_____	_____
Monitoring, Evaluation and Learning Commitment	_____	_____
Non-Aid and Development Activities Policy	_____	_____

Project Design, Monitoring and Evaluation Policy	_____	_____
Protocols for Reporting Serious Incidents	_____	_____
Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy	_____	_____
Transparency Policy	_____	_____
<u>Obligations and accountabilities</u>		
Complaints handling		
Whistleblowing		
Ethical Procurement		
Conflict of Interest		
Regular communication		
Sharing information		
Agreed use of funds		
Financial record keeping and reporting		
Privacy		
Confidentiality		
Incident reporting		

Progress reporting	
Other	
<u>Partnership review</u> The parties to this Agreement agree to review the partnership every [<i>state period</i>]; to make available all information relevant to the party as necessary, to make adjustments to the partnership should either a review or an audit indicate that this is necessary for the partnership to achieve its objectives.	
<u>Termination</u> Either party may terminate this Agreement by giving [<i>nominate period</i>], when written notice to the other part.	
<u>Annexes</u> Details about the goal, objectives deliverable for each partner, expected outcomes of that project/program.	
<u>Partnership Requirements</u> Mutual Accountabilities: CLAN and its partners share mutual accountabilities for reporting, sharing information and communication. CLAN and its partners are mutually responsible for the protection of children and vulnerable persons and communities. CLAN and its partners are required to take all measures to prevent sexual exploitation, abuse and harassment. CLAN and its partners will work intentionally, and in mutually respectful ways. CLAN and partners will clearly identify the separation between aid and development, and non-aid and development objectives and activities. CLAN requires the definition and separation of non-development activities, and for these to be understood by all participants in collaborative projects. Requirements of the partner: The partner of CLAN will allow access to all documentation needed to reasonably undertake due diligence and capacity assessments prior to the formation of the partnership. Such information will be requested and disclosed in good faith and confidentiality, with strict adherence to CLAN's Privacy and Disclosure statement. The partner of CLAN will understand the importance of, and complete, the partnership agreement. As such, members will negotiate shared goals and respective contributions to collaboration. CLAN expects all relevant information and learning acquired by the partner to be disseminated to both CLAN and all relevant stakeholders in a timely fashion. Where partners or their staff become aware of any wrongdoing, it is their responsibility to disclose	

such information to the CLAN president or a member of the Executive Committee.

CLAN will require evidence that partners adhere to the policies they are signatory to, as per the Partnership Agreement.

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

Police checks and reference checks may be requested where relevant.

Child Safeguarding Requirements

As a partner of CLAN, I understand the entirety of my organisation is subjected to the following requirements as of the date of partnership formation:

- 8.** Demonstrate commitment to CLAN's Policies related to Child Protection Policy and Codes of Conduct
- 9.** Have a current Child Protection Policy and Prevention of Sexual Exploitation, Abuse and Harassment Policy onsite for CLAN programs
- 10.** Undertake training in Child Protection when required
- 11.** Have an onsite trained child protection officer or person delegated to manage child safety and to provide information, reports and complaints to CLAN
- 12.** Work collaboratively with CLAN to identify and manage the potential levels of risks to ensure the safety and welfare of staff, visitors, children and families involved in CLAN programs.
- 13.** Notify CLAN personnel immediately of any serious allegations and/or breaches
- 14.** Demonstrate processes for providing information to those involved in projects about reporting child protection complaints and allegations
- 15.** Review and assess child protection procedures implemented and outcomes for each project.

Partner's signature:

CLAN's signature:

Name:

Name:

Date:

Date:

CLAN Partnership Assessment

<u>Initial Proposal Assessment</u>	
Relevance of the proposal to CLAN's mission and vision.	
Evidence of partner capacity to support delivery of the project, including resources, knowledge, and skills	
Evidence of the needs of the target group of children and families	
Potential of the project to build capacity and sustainability	
Identified monitoring and evaluation plans	
Evidence of cross-cutting areas that need to be included in the proposal	
<u>Capacity Assessment</u>	
Alignment of the partner's vision & mission statement with that of CLAN.	
Alignment of the partner's espoused values with that of CLAN.	
Governance of partner organisation.	
Governance of partnership.	
Financial system of partner organisation.	
Are there any external sponsors to the partnership?	
Record of access to the financial management policies of the partner, with clear reference to financial impropriety risk management and adherence to financial requirements such as accounting and auditing standards.	
Reference check of partner against prohibited entities listing.	
Capacity assessment for implementation of key safeguarding and risk policies.	

Record of access to current risk management policy.	
Record of access to current child safeguarding policy.	
Record of access to current prevention of sexual exploitation, abuse, and harassment policy.	
Record of access to current complaint management policies that are child friendly.	
Record of access to previous complaints within the partner's complaints register.	
<u>Financial Assessment</u>	
Funds Assessment	
Assessment of Personnel Involved	
Resources Assessment	
Time Availability	
Is the organisation seeking sponsorship from another entity	
Any other factor relevant to a specific project or activity	
<u>Risk Assessment for financial costs</u>	
Prohibited listing of partner	
Experience of partner	
Capacity of partner	
Potential for a partner's involvement in sustainable programs of projects.	
<u>Fund Management Partnership Assessment</u> – <i>must be completed if the Partner will be managing funds on behalf of CLAN.</i> Please circle one of the following: Applicable/Not Applicable	
Evidenced adherence to CLAN's Financial Management Policy.	

Evidenced adherence to CLAN's Financial Impropriety Risk Management Policy.	
Process for record of fund/resource application to ensure alignment with CLAN's strategy.	
Evidence that the partner is not on the prohibited entities listing.	
Previous experience in similar roles	
Evidence of access to the partner's updated complaints register, and a current Complaint Management Policy.	

CLAN Periodic Partnership Assessment

Has there been any breach of the partnership agreement or requirements by CLAN?	Yes/No If yes, please specify below:
Has there been any breach of the partnership agreement or requirements by the partner?	Yes/No If yes, please specify below:
<u>Outcomes</u>	
Progress made from initiative/program	
Outcomes from initiative/program	
Alignment of such outcomes with the purpose of the partnership	
<u>Notable Feedback</u> - consultation should be undertaken with the beneficiaries of the collaborative project, as well as all members of the partnership where available.	
From the partner regarding CLAN	
From CLAN regarding the partner	
From alternative stakeholders regarding the partnership or subsequent initiatives/programs	
<u>Partnership Evaluation</u>	
Record of adherence to 'Monitoring, Evaluation and Learning Commitment' procedures with regard to collaborative efforts	
Value derived from the partnership	
Timeline for outcomes moving forward	
Necessity of the partnership moving forward	

CLAN Privacy and Disclosure Policy

Version No. & History	2.0 (December 2014, March 2017)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

7. 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, supporters, volunteers, and partner organizations and children and communities of CLAN in whilst in the delivery of CLAN programs.

4. Definitions

Privacy	Personal information from which your identity is reasonably apparent
Informed consent	When a contributor grants permission to publish their story with full knowledge of the possible consequences, including possible risks and benefits. Informed consent must be granted without duress.

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 with their informed consent. 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:

- 1) Makes an enquiry with us via email, telephone, or visits our offices
- 2) Lodges an enquiry online through our website
- 3) Interacts with us via social media including Facebook, Google+ and Twitter
- 4) Downloads free offerings from our website
- 5) Applies to be a borrower or guarantor
- 6) Attends an event hosted by us
- 7) Registers to use a related product service offering
- 8) Applies for employment with us
- 9) Makes a donation to CLAN.

When CLAN collects personal information about an individual, CLAN, where reasonable, will notify the individual or ensure that the individual is aware of the collection, disclosure and use of personal information.

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. Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)

This may include using personal information for the following purposes:

- 1) Provide products or services requested
- 2) Verify identity and associated details
- 3) Assess, process and manage applications for grants or to be a borrower or guarantor
- 4) 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 to:

- 1) Prospective funders or other intermediaries in relation to finance requirements, for example grant applications 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

- 2) Associated businesses that may want to market products
- 3) Companies that provide information and infrastructure systems to CLAN
- 4) Authorise representatives, such as lawyers and accountants
- 5) Anyone, where consent has been provided
- 6) Investors, agents or advisers, or any entity that has an interest in our business, or
- 7) Employers, referees or identity verification services
- 8) Where CLAN is required to do so by law, such as under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)

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

- 1) The person or organisation has a commitment to protecting all personal information at least equal to our commitment, or
- 2) Consent has been given by the relevant person to making the disclosure.

Where CLAN discloses any personal information to an overseas recipient, CLAN will take steps as are reasonable to ensure that the overseas recipient does not breach the Australian Privacy Principles, apart from Privacy Principle 1.

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 will be taken 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. Policy review

This policy will be reviewed bi-annually.

17. Associated CLAN documents

- Complaint Management Policy
- Human Resources Policy

18. Legislation

- Privacy Act 1988
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)
- Anti-Money Laundering and Courter Terrorism Financing Act 2006 (Cth)

129. Resources

- The Australian Privacy Principles 2014

CLAN Procurement Policy & Authorisations and Delegations

Version No. & History	1.0 (January 2022)
Date approved	February 2022
Date last updated/reviewed	January 2022
Review date	January 2024

Sections

1. Purpose
2. Definitions
3. Applications
4. Responsibilities
5. Procedures
6. Contracting External Workers
7. Reporting
8. Supporting Documents (*with addendum of delegations and authorities*)
9. Related Policies

1. Purpose

The purpose of this Policy is to:

- provide policy and guidance to CLAN Incorporated with regards to procurement;
- ensure consistency and accountability in procurement activities; and
- increase the probability of obtaining the most favourable goods, services and overall outcomes when purchasing goods and services.

2. Definitions

Procurement	The process of acquiring goods and services. This includes all stages of the process from initial concept through to the disposal of an asset or end of a contract of service.
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).
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. 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, organisation or cell.

Fraud and financial impropriety	<p>Fraud and financial impropriety shall include, but is not limited to the following:</p> <ul style="list-style-type: none"> ● forgery or unauthorised alteration of any document or account; ● forgery or unauthorised alteration of a cheque, bank draft, or any other 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; and ● violation of sanctions imposed by the Australian Government.
Risk management	<p>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.</p>
Commercial goods and services	<p>Commercial goods and services are of a type that are offered for sale to, and routinely purchased by, non-government buyers for non-government purposes, including any modifications common in the commercial marketplace and any minor modifications not common in the commercial marketplace.</p>
Contract	<p>An arrangement for the procurement of goods and/or services under which relevant money is payable or may become payable.</p>
Multi-stage procurement	<p>Involves an initial approach to market followed by one or more subsequent approaches to market.</p>
Direct procurement	<p>Acquisition of goods, materials, and/or services manufacturing purposes.</p>
Indirect procurement	<p>Sourcing and purchasing materials, goods, or services for internal use.</p>

Services procurement	Procuring and managing contingent workforces and consulting services.
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3. Applications

This policy applies to any and all procurement activities conducted by CLAN.

4. Responsibilities

CLAN has a number of responsibilities to be considered when conducting procurement activities.

4.1 Value for money

CLAN's engagement in procurement must be done so to achieve value for money, promoting financial wellbeing and strategic objectives. Value for money can be defined by the principles consolidated by the Department of Foreign Affairs and Trade (**DFAT**), and broken into four broad categories containing sub-categories.

- Economy – cost consciousness, and encouraging competition.
- Efficiency – evidence based decision making, and proportionality.
- Effectiveness – performance and risk management, results focused, experimentation and innovation.
- Ethics – accountability and transparency.

These sub-categories are supported by associated CLAN documents and policies.

4.1.1 Economy

Economical considerations relate to minimising costs of procurement, with emphasis placed on avoiding the waste of economic resources and on appropriately allocating these resources.

4.1.2 Efficiency

Procurement activities undertaken by CLAN must be done with the aim of achieving the maximum value of resources used. This involves careful consideration of the appropriateness of procurement methods and resources to be procured.

4.1.3 Effectiveness

Effective procurement is concerned with the extent to which intended outcomes or results are achieved.

4.1.4 Ethics

CLAN members undertaking procurement must act ethically throughout procurement. Ethical behaviour includes:

- effectively recognising and managing actual ,potential and perceived conflicts of interest;
- dealing with potential suppliers, tendered and suppliers equitably;
- carefully considering the use of public resources; and
- complying with all applicable laws and rules.

4.2 Accountability and transparency

CLAN's procurement activities must be conducted in a way that facilitates accountability and transparency. Accountability requires those involved in the procurement process to be responsible

for their actions and decisions and the resulting outcomes. Transparency involves facilitating appropriate scrutiny of procurement activities.

Mechanisms facilitating accountability and transparency include reporting requirements, outlined below.

4.3 Communication

CLAN is committed to open communication with all parties involved in the procurement process. Good communication facilitates a transparent and efficient process which allows the use of allocated resources effectively.

5. Procedures

5.1 Needs Recognition

The good or service which CLAN intends to procure must first be recognised. The specific need, along with the particular good or service which can satisfy this need, must be identified.

5.2 Assessment of suitability

Upon deciding whether procurement should occur, the following considerations must be assessed:

- Cost consciousness
 - Is this a reasonable opportunity?
 - What measures can be engaged to reduce costs at every level of operations?
 - Can cost be reduced without impacting efficiency and effectiveness?
- Encouraging competition
 - Are there other ideas and alternative solutions to be considered?
 - Are our partners and contractors competitive?
 - Are our partners and contractors aware of competitive forces?
- Evidence based decision making
 - What informs this decision?
 - Does this contribute to organisational learning?
 - Does this promote continuous improvement?
- Proportionality
 - Are organisational systems in place to support the operations of CLAN?
 - Are proposed outcomes proportional to the operations of CLAN?
- Performance and Risk Management
 - How will efficiency and effectiveness of the program be ensured?
- Results Focus
 - Is the program designed to focus upon the desired results?
 - Are objectives and performance targets clearly identified?
- Experimentation and innovation
 - How might outcomes be trialled to enhance outcomes?
 - Where does our risk tolerance lie?
- Accountability and Transparency

When considering cost, decision-making should be made after careful scrutiny of programming costs throughout the investment lifecycle, ensuring the most cost-effective options are pursued, as per DFAT's 'Value for Money Principles'. It should be noted that the lowest cost option, the priority of the task, ways to achieve the task and the costs of benefits are vital approaches.

DFAT stipulates that evidence-based decision making requires 'systematic, structured and rational approaches to decision making, framed around logical arguments informed by accurate analysis'. Both qualitative and quantitative research and results should inform decision making. Relationships with partners and contractors are crucial in ensuring effective procurement, and evaluation of outcomes from this investment.

Proportional procurement must be supported by a continuous commitment to development and evaluation of business processes to achieve coherent and clearly defined outcomes efficiently. All involved in the systems and operations of CLAN must be aware of transaction costs against benefits, processes, policies, and relevant systems. Assessments must be proportional to the weight of investment and procurement.

To mitigate risk, contracts, partnerships and investments subsequent to procurement must be consistently developed and evaluated. Fraud and corruption must be carefully considered at all stages of procurement. Innovation and adaptability are crucial to achieving results, and maintaining a flexible attitude.

5.3 Contract

5.3.1 Essential items

Procurement contracts must include provisions which outline the parties to the contract, the good or service to be procured, the purchase price and, particularly where a service is being procured, the duration of the contract. Relatedly, provisions relating to mutual or unilateral termination of the contract should be included.

5.3.2 Negotiation and post-negotiation

Negotiation is about reaching agreement on the essential terms of the contract and the deliverables under the contract. For collaborative relationships the focus will be on gaining a win-win solution; for tactical relationships the approach will be competitive.

Following negotiations, it is essential to record the exact terms of the negotiated agreement and reflect these in the contract.

5.4 Management

Management of the procurement, whether it be a good or service, is an ongoing process. The procurement must be carefully monitored throughout each stage of the acquisition process so any issues, or potential issues, may be effectively addressed and rectified. These issues may include changes in the availability, quality, effectiveness or necessity of the good or service subject to procurement.

5.5 Approval

Approval for procurement of the good or service must be obtained from the CLAN Committee and, in exigent circumstances, the CLAN Chair. Any alterations made to the procurement process or contract must be similarly approved.

5.6 Record-Keeping

Detailed records should be kept throughout the procurement process. Such records provide CLAN with an important reference point should any issues arise. Particular care should be taken when recording communications between CLAN and the other party, including all contract and finance discussions. The level of detail required of these documents must be commensurate with the nature and complexity of the transaction.

6. Contracting External Workers

Procurement includes the contracting of external workers to perform services for and on behalf of CLAN. Such a person or organisation may be engaged when it is not feasible or preferable for CLAN's members to perform the service themselves.

Careful consideration must be given to the appropriateness of procurement through the contracting of external workers. In particular, it must be evaluated whether the services which would be procured from an external worker could be provided by an individual within CLAN.

7. Reporting

Procurements must be reported to the ACNC in line with CLAN's annual reporting obligations as a registered charity.

8. Supporting Documents (*with addendum of delegations and authorities*)

9. Related Policies

Overseas Transactions and Transfers Policy
Foreign Exchange Policy

CLAN Project Design, Monitoring and Evaluation Policy

Version No. & History	2.0 (July 2019)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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 countries and who require support due to poverty and inequity. CLAN is committed to building relationships and working with partners within the resource poor country in order to promote sustainable health strategies and strengthen community involvement to support children with Non-Communicable Disorders (NCD's) and their families. Principles of humanity, impartiality, independence and neutrality provide direction and guidance to CLAN's programs.

2. Purpose

The purpose of this policy is to outline CLAN's approach to the planning, monitoring, evaluation and learning relevant to programs and projects it delivers or supports in resource poor countries.

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

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 individual, a group or 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 disorders (NCD's) and their families.
Beneficiary	A beneficiary refers to children with chronic health conditions and their families who participate in project activities and gain benefits from their involvement. It may also include CLAN partners and/or medical personnel who are involved in CLAN projects.

5. Partnerships

CLAN recognises the importance of working with partners to achieve positive outcomes based on its five pillars. Prior to establishing a partnership, CLAN will consider the knowledge and perspectives of a potential partner's and analysis of power dynamics and any issues of gender equality and equity. CLAN will work with partners in areas where they are involved in the project for example, in funding, and/or in planning, monitoring, evaluating and sharing learning.

Partnerships may also include planning based on existing in-country projects to achieve further outcomes for children with NCD's in those countries. For example, additional activities may provide sustainability through the development of communities where children with NCD's and their families can meet together with CLAN personnel and/or medical professionals to share and learn about effective management for their specific medical condition.

Partnerships are also effective when CLAN works with national medical personnel to provide services where children and their families are all involved in working together as partners to achieve outcomes. Partnerships may involve advocacy or working with international bodies or with medical services to achieve common goals and may also involve working with companies to provide medicines, resources and/or other services to children and their families.

In a situation where CLAN's programs require advocacy on behalf of a specific group of population, evidence is based on research, risk assessments and the rights and perspectives of the primary stakeholders to provide accurate information.

To assess capacities of partners, the following areas to be addressed include, but are not limited to:

- 1) Governance processes, if relevant
- 2) Alignment of partner's vision, mission and values with CLAN's strategic framework
- 3) Knowledge, skills and competencies of partners to work effectively in the project
- 4) Partner has required Policies and Procedures in place and implemented effectively
- 5) Partner is able to provide suitable resources for a project where required
- 6) Financial management systems are in place, accepted by CLAN and partner/s

A partnership agreement or an MOU is signed by the partner and CLAN for each project.

CLAN's activities include a diverse range of projects which can vary in purpose, require different management strategies and have quite different outcomes. The majority of CLAN projects are short-term. However, where CLAN is involved in a partnership for delivery of a project, follow up visits may occur in order to provide continuing support for the sustainability of the initial project.

6. Project Planning,

Project planning is undertaken in conjunction with CLAN's partner/s where this involves personnel other than CLAN members in a project. This may also include information from potential families with children who have a non-communicable disease (NCD). Where CLAN perceives a need in a resource poor country, CLAN will work with relevant parties to identify specific needs and opportunities to develop a project to support a target group. Relevant parties may include parents, children, community members, relevant professionals and agencies. In situations where CLAN receives an application for support, CLAN will work with the applicant to determine the viability of a project aligned with CLAN's mission based on its five pillars.

Project planning requires a comprehensive approach to acquire quality information in order to develop outcomes and strategies based on CLAN's 5 Pillars. The following activities aim to provide

information needed to develop quality projects to achieve benefits for children with NCD's and their families:

- 1) Decide if the potential project can be aligned to an existing program
- 2) Undertake research and evidence based on medical data for a targeted group of children and families, including evidence from primary stakeholders, community engagement and participation relevant to the needs of the targeted group
- 3) Identify rights and barriers to inclusion for a specific community of children with a disability due to a non-communicable disease
- 4) Assess factors that may cause barriers to inclusion, such as poverty, power dynamics and inequality
- 5) Analyse specific needs of the group of children related to health and wellbeing, gender equality and equity, gender identity, disabilities, power dynamics.
- 6) Design the project to meet the needs of the target group of children with NCD's, and their families, including the assessment of the risk of harm and unintended harm, and mitigation of risk of harm
- 7) Develop relevant strategies to protect primary stakeholders from discrimination, violence, abuse, exploitation or neglect where relevant, based on risk analysis.
- 8) Identify potential partners in the target community who potentially could be involved in a part of the project, for example, local schools
- 9) Develop strategies for quality management of budgets, to build partner capacity and leadership in local personnel for future sustainability relevant to the goals of the project
- 10) Undertake analysis of risks environmental factors relevant to the project, including risks to the safety and rights of children and their families involved in a project
- 11) Undertake analysis of potential environmental factors such as human and non-human resources that could contribute to the sustainability of the project.

7. Monitoring the project

CLAN will ensure systematic monitoring during the project based on stated criteria in order to provide evidence of progress towards achieving outcomes and to manage any required change or risks. Monitoring is undertaken in collaborations with partners and other relevant stakeholders. It may include consultations with partners and families and their children, to assess their participation and the effectiveness of activities undertaken to promote empowerment, equality and equity.

Monitoring also involves gathering and assessing data, anecdotal records, observations and reviews in order to assess the progress of a project during the term of the project. Data and information include reviewing the expenditure, risks, progress to achieving outcomes, and documentation of any changes required during the project. This provides evidence to identify any areas or activities that need to be modified to achieve the desired outcomes and planning strategies to manage change.

8. Project appraisal as part of monitoring

Project appraisal applies to new project proposals, and to any change to an existing project. CLAN's criteria for assessing project proposals from partners includes the relevant areas listed above, and in particular:

- 1) Relevance of the proposal to CLAN's mission and vision

- 2) Evidence of partner capacity to support delivery of the project, including resources, knowledge and skills
- 3) Evidence of the needs of the target group of children and families
- 4) Potential of the project to build capacity and sustainability
- 5) Identified monitoring and evaluation plans
- 6) Evidence of cross-cutting areas that need to be included in the proposal.

9. Evaluation of the project

Evaluation approaches are unique to each program. Evaluation is undertaken cooperatively with partners and stakeholders to assess outcomes in relation to determine the efficiencies, effectiveness and relevance of the project activities in meeting the needs of the target group and sustainability of outcomes achieved. Evaluation may take place during the project cycle as part of monitoring in order to inform program management. Evaluation may include assessment based on data, observations, records, information and responses from stakeholders and participants to determine if the initial outcomes were achieved effectively and efficiently. Evaluation results may identify factors impacting positively or negatively on the project and also show areas for improvement. Assessments may include documented evidence and feedback from partners and families and children involved in the project. Evaluation findings can demonstrate positive and negative factors impacting on the outcomes and areas for improvement and provide a basis for learning for future planning.

Evaluation strategies are planned for each of CLAN's diverse range of projects which can vary in purpose and require different management strategies to achieve quite different outcomes. The majority of CLAN projects are short-term. However, where CLAN is involved in a partnership for delivery of a project, evaluation may require follow up visits may occur in order to provide continuing support for the sustainability of the initial project. The Evaluation Report for a project or program 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 responding to emerging situations where CLAN can be involved and participate with new partners to achieve common goals (as in the creation of NCD Child and NCD Indigenous NGO organisations). Achievement of a long-term goal may underpin planning for a new program or project.

10. Learning

Information and data collated throughout a project enables CLAN to assess outcomes achieved. Documentation may include unexpected or other factors impacting positively or negatively on the project and success or failure of strategies undertaken to achieve outcomes. Analysis of such information is shared with partners and relevant stakeholders and used where relevant to inform future planning and delivery of projects. On completion of a project, a final report is presented to CLAN's Committee for review and planning future activities.

11. Project documentation

A project proposal should include the following information:

- 1) Title, location, authority, partner/s
- 2) Alignment of project with CLAN's mission, vision and five pillars
- 3) Duration of the project including any potential follow-up visits
- 4) Identified needs and corresponding evidence as the basis for the project
- 5) Goals and expected outcomes for the project
- 6) Project plan and activities, key personnel, resources required
- 7) Beneficiaries, i.e. children, families, benefits, their participation in the project design
- 8) Estimated budget for the project
- 9) Risk identification and management of the project, including child protection, safety and security, building capacity and sustainability
- 10) Cross-cutting issues to be considered in the project e.g. child protection, safety and security
- 11) Proposed monitoring and evaluation plan
- 12) Any other specific aspects, requirements

12. Policy review

This policy will be reviewed bi-annually.

13. Attachments

- 1) Project Assessment Checklist and Project Appraisal Criteria
- 2) Project Design Analysis
- 3) Project Monitoring Report
- 4) Project Evaluation Report
- 5) Proposed Project Budget
- 6) Funding Application for International Health Projects

14. Associated CLAN documents

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

CLAN Project Assessment Checklist and Project Appraisal Criteria

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

	Criteria	Submitted	Approved	Comments
1	Governing body, legal registration	Yes/No	Yes/No	
2	Project manager/s	Yes/No	Yes/No	
3	Partner's capacity including PSEAH Policy	Yes/No	Yes/No	
4	Purpose of project and shared goals, outcomes	Yes/No	Yes/No	
5	Planned steps/timeline	Yes/No	Yes/No	
6	Beneficiaries	Yes/No	Yes/No	
7	Community consultation Target group, community	Yes/No	Yes/No	
8	Project budget – income, expenditure	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 policiesPSEAH Policy	Yes/No	Yes/No	
12	Partner's Child Protection Policy, Reference checks	Yes/No	Yes/No	
13	PSEAH Policy & incident reporting compliance	Yes/No	Yes/No	
14	Partner agreement to CLAN requirements	Yes/No	Yes/No	

CLAN Project Design Analysis

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

No	Project Design	Evidence	Comments
1	Project developed with partners and 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: <ul style="list-style-type: none"> 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) including financial and non-financial resources	Yes/No	
10	Project Budget: resources available, estimated expenditure, management	Yes/No	
11	Management strategies for the project & grievance, dispute resolution processes	Yes/No Yes/No	
12	Risk assessment and risk management strategies identified	Yes/No	
13	Monitoring and evaluation plan based on shared goals, roles & responsibilities	Yes/No	
14	Capacity building strategies and sustainability strategies	Yes/No	
15	Policies, cross-cutting issues identified, addressed for compliance	Yes/No	

CLAN Project Monitoring Report

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

No	Project activities	Notes on project progress at date of monitoring
1	Project Budget expenditure	
2	Project implementation aligned to agreed goals, outcomes and timeframes, sharing information, communication	
3	Compliance to required Policies: Child Protection, Counter-Terrorism, Non-aid activities, Disability inclusiveness, Gender equity, Human Rights	
4	Risks, challenges, difficulties identified	
5	Project amendments	
6	Successes	
7	Progress towards building capacity in partners and participants	
8	Feedback from partners and any participants including children	
9	Lessons learned to date	
10	Recommendations for Project	
11	Comments	

Name..... Signature.....

Date.....

CLAN 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 <ul style="list-style-type: none"> • Number of children • Number of families • Other 		
5	Community involvement		
6	Budget		
7	Risks encountered		
8	Challenges		
9	Management of project		
10	Capacity building assessment		
11	Sustainability strategies		
12	Feedback from partners and participants		
13	Learnings from the project		
14	Recommendations from project		

Name..... Signature.....

Date.....

CLAN Proposed Project Budget

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

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			

Name..... Signature.....

Date.....

CLAN FUNDING APPLICATION FOR INTERNATIONAL HEALTH PROGRAMS

This application form is based on CLAN's Mission and Philosophy to improve the life of children living with chronic health conditions in resource-poor settings. To achieve positive outcomes, CLAN endeavours to collaborate with partners to implement a rights based approach and a community development model based on CLAN's 5 Pillars contained within the Strategic Framework for Action. CLAN's vision, mission and Strategic Framework for Action can be found on the CLAN website at www.clanchildhealth.org. CLAN policies can also be found on the website in the On-line Handbook located on the Contacts page.

Applications will be submitted to the governing body of CLAN for a decision whereafter applicants will be notified as soon as reasonably practicable of the outcome.

Please email the completed application to CLAN at info@clanchildghealth.org

The following information is required to support a grant application for funding based on CLAN's mission and 5 Pillars.

1. Applicant details

Name of applicant/s. e.g. Organisation, group, individual
Country and Address
Contact information e.g. individual to contact, telephone, email
Information about you or your organisation's role or in health activities
Staff or personnel to be involved in the project e.g. roles, number, potential personnel
Experience in working in health services and/or with partners in health activities

2. Project information

Project title Location, including address/building/other Estimated Project dates Grant amount requested (maximum \$5,000)
Project summary (100-200 words) including size of target group/s e.g. children, parents, community
Identify and outline needs of the target group e.g. children, adolescents, parents, community
Outline potential situations that may impact on the project e.g. constraints, positive/beneficial factors
Outline project activities to be implemented for target group

Beneficiaries of the project and outcomes
Objectives of the project e.g. specific, measurable, indicators, schedule/s
Monitoring the project e.g. what will be monitored, who will monitor progress
Sustainability of the project (or continuing benefits of the program)
Resources required for the project
Conflict of interest (if relevant, please outline if, or how this may impact on the project)

3. Program plan

Expected results	Planned Project Activities	Implementation Period (Months)	Responsible person/s party

4. Budget

List items as relevant, e.g. resources, personnel, travel, facilities

Activity	Estimated cost/s

5. Bank details

Bank name	
Bank Swift Code (Bank Identifier Code)	
Bank address	
Account Holder (MUST NOT BE A PERSONAL ACCOUNT)	
Account Number	
International Bank Account Number (IBAN)	

6. Additional documents

Please provide the following documents where relevant:

- 1) Copy of Registration of your organisation

- 2) Audited financial statement (last fiscal year)
- 3) CV of person managing or implementing the project

7. Terms and conditions

The following terms and conditions attached to grants provided by CLAN are based on CLAN's 5 Pillars and aim to protect both CLAN and its partners from fraudulent use of funds:

- 1) CLAN and its partners agree to work together collaboratively and to share information freely to achieve desired outcomes.
- 2) CLAN has right to monitor and evaluate the implementation of a program and to withhold any ongoing funding to partners where necessary.
- 3) The recipient of a funding grant agrees to share information with CLAN about the implementation of the project when requested.
- 4) A final project report will be submitted to CLAN as required, including feedback from participants, at least one high quality digital photograph, and financial data to validate money received.

8. Certification

I have read CLAN's vision, mission, philosophy and Strategic Framework for Action including the 5 Pillars and confirm that the project is designed to improve the health and well-being of children with non-communicable diseases in resource poor countries.

The responses in this application are accurate and true to the best of my knowledge.

I understand that CLAN has the right to use information about the project and its outcomes as they see fit both during and at the completion of the project if approved.

I understand that this application will be assessed against CLAN's criteria and that it may not be funded, or may not be funded for the amount requested.

Signature of applicant:

Date

Signature of CLAN's officer:

Date

Application received:

Date

Response to applicant:

Date

CLAN Protocol for Reporting Serious Incidents

Version No. & History	1.0
Date approved	September 2020
Date last updated/reviewed	September 2020
Review date	September 2022

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 responsibilities and procedures involve the need to maintain the safety and security of CLAN personnel, volunteers and visitors involved in CLAN projects, conferences and meetings with partners around the world.

2. Purpose

This document outlines the responsibilities and procedures for reporting serious incidents.

3. Scope

This process for reporting serious incidents applies to all Committee members, staff, volunteers and partner organizations of CLAN whilst in the delivery of CLAN programs and other activities.

4. Definitions

Serious incident	An event or circumstance that occurs during a program or activity and which has had or has the potential to have a significant impact on participants, delivery of a program or activity, or reputation
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5. Serious Incidents to Report

A serious incident to report includes the following situations:

- 1) Complaints or evidence of serious harm, physical, psychological, sexual assault or misconduct to any person or child involved in CLAN programs
- 2) Fundraising issues, theft, fraud, money-laundering
- 3) Incidents involving partners, e.g. terrorism, ceased to deliver a CLAN program
- 4) Staff computer has images of child pornography, beneficiary or individual connected with CLAN has died or seriously harmed due to failure to implement relevant policy
- 5) Theft, fraud, cyber-crime, money laundering, links to terrorism.

6. Reporting a serious incident

CLAN's procedures for each program or activity includes training for participants on codes of behaviour and procedures for making complaints and reporting serious incidents.

If, during a CLAN program or activity, a serious incident occurs it must be reported immediately or as soon as becoming aware of the incident to the nominated person in charge of the CLAN program or

activity who will then notify the nominated CLAN executive. Contact details are also provided on the CLAN website for situations where the serious incident is reported after the CLAN program or activity has concluded.

7. Serious incident management process

In the event of a serious incident the following management procedure is to be followed:

- 1) Immediate action to be taken to mitigate risks
- 2) Incident is assessed as a serious incident and reported
- 3) Serious incident is documented and report forwarded to nominated CLAN personnel
- 4) Review or investigation is undertaken of serious incident
- 5) Strategies implemented to review safety and prevent any further serious incident
- 6) Documented serious incident/s presented to CLAN's governing body
- 7) CLAN to report serious incident/s as required to legislated bodies e.g. police, child protection agency, Department of Foreign Affairs and Trade (DFAT)
- 8) CLAN to review and monitor reported incidents to inform risk management strategies to provide a safe and secure environment for CLAN programs and activities.

8. Protocol review

This protocol will be reviewed biannually.

9. Attachments

- 1) CLAN Incident Report Form

CLAN Incident Report Form

Person/s reporting incident	
Person/s receiving incident report	
Person/s affected by serious incident	
Date and time of incident	
Location of incident	
Description of incident (provide a map/sketch/diagram if necessary)	
Management of serious incident when notified: • Support to person/s affected by serious incident	
Management of serious incident when notified: • Action to prevent further harm or damage • Report to local authorities?	
Any other information e.g. follow up activities, support required, impact on CLAN program, observations, recommendations, reactions to incident e.g. participants, media, community?	
Name, signature, date report sent	
Name, signature, date report received	

CLAN Preventing Sexual Exploitation, Abuse and Harassment Policy (PSEAH)

Version No. & History	1.0
Date approved	September 2020
Date last updated/reviewed	September 2020
Review date	September 2022

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.

8. Purpose

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.

9. Scope

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

- 1) CLAN's Committee members, staff, contractors, representatives, volunteers, interns, project team members
- 2) CLAN partners who have agreements in place with CLAN. This may include grant recipients, consultants, medical and health professionals, sponsorship partners, other non-government organisations, other partners
- 3) 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.

4. 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.
Fraternisation	Fraternisation 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.
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 prohibited in CLAN activities. 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.

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.

5.1 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.

5.2 Recruitment

5.2.1 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 Policies.

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.

5.2.2 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.

5.2.3 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 between CLAN and partners. A check of partners will show if they have their own PSEAH policy and if it aligns with CLAN's policy.

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.

The Policy will be translated where required for relevant partners and stakeholders.

7. Risk assessment and child 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 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 PSEAH:

- 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
- a. risk of SEAH
- 6) Prohibit transactional sex for all personnel, while engaged in the direct delivery of CLAN business
- a. business
- 7) Prohibit fraternisation for non-national personnel while engaged in the direct delivery of CLAN business.

9. 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.

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 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 attached) and anonymously emailed to info@clanchildhealth.org.

Reports to CLAN's Committee of allegations of SEAH will not include identification of the victim/survivor.

9.3 Managing reports

Reports of SEAH 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 allegedly involve a criminal aspect will 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 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 not dealt with criminally or in the local or Australian child protection framework, any available evidence will determine whether it should be dealt with as a disciplinary matter and managed in accordance with CLAN policies.

Reported incidents and alleged incidents of SEAH are managed sensitively and confidentiality by CLAN, within the parameters of relevant legislation and child protection frameworks. 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 de-identified reported incidents and processes at the time of an incident and annually to determine effectiveness of CLAN policies, requirements and reporting tools.

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. Victim/survivors will be advised progressively during the management and of the complaint.

9.5 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 review

This policy will be reviewed every two years or unless required earlier, as a result of legislative change, Australian Government policy change or from data obtained from monitoring or as a result of managing reported SEAH activities.

11. Associated CLAN 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.

12. References

- DFAT, 2019, Preventing Sexual Exploitation, Abuse and Harassment Policy
- IASC 2002, IASC Six Core Principles Relating to Sexual Exploitation and Abuse.

13. Attachments

- CLAN SEAH Incident Report Form

CLAN Sexual Exploitation and Harassment Incident Report Form

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:
Name of Partner/s associated with CLAN program and Contact details	
Type of Allegation: <input type="checkbox"/> Sexual Exploitation <input type="checkbox"/> Sexual Abuse <input type="checkbox"/> Sexual Harassment <input type="checkbox"/> Sexual Fraternisation <input type="checkbox"/> Transactional Sex	Details: Date, Place Other relevant details: (For example, vulnerability, or disability factors):
Details of Person/s subject to allegation: <input type="checkbox"/> CLAN employee <input type="checkbox"/> CLAN contractor/subcontractor <input type="checkbox"/> CLAN volunteer <input type="checkbox"/> 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	

CLAN Risk Management Policy

Version No. & History	3.0 (March 2017, March 202)
Date approved	20 July 2023 (TBC)
Date last updated/reviewed	March 2020
Review date	September 2025

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 management is essential as it provides support for CLAN to:

- 1) Be compliant with legislation, regulations and contracts
- 2) Improve planning and efficiencies for projects and activities
- 3) Improve safety and security for employees
- 4) Add value to its reputation as an NGO.

CLAN's Risk & Audit Sub Committee exists to provide governance advice and oversight to ensure efficient, effective and ethical financial management and financial and related risk management for CLAN in its work overall and in for specific projects as required. Also, to ensure effective due diligence in relation to partnerships and other arrangements involving external parties.

2. 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, committee members, trustees, staff/volunteers in partnership agencies, and any other individuals or groups that have a responsibility with respect to CLANs programs.

10. Definitions

Risk	The effect of uncertainty of objectives. 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)
Dynamic risk assessment	The continuous process of identifying hazards, assessing risk, taking action to eliminate or reduce risk, monitoring and reviewing, in rapidly changing circumstances
Risk register	A document that records all of the organisation's or specific project's identified risks, the likelihood and consequences of a risk occurring, the actions you are taking to reduce those risks and who is responsible for managing them.
Likelihood	The chance that something might happen. Likelihood can be defined, determined or measured qualitatively or quantitatively (using mathematics)
Consequences	Is the outcome of an event and has an effect on objectives
Level or risk rating	Using a risk matrix, the level or rating of a risk is determined from where determined likelihood and determined consequences intersect
Risk mitigation or control measures	Control measures include actions that can be taken to reduce the potential of exposure to the hazard, or the control measure could be to remove the hazard or to reduce the likelihood of the risk of the exposure to that hazard being realised.
Hierarchy of controls	Is a system for controlling risks in the workplace. The hierarchy of control is a step-by-step approach to eliminating or reducing risks and it ranks risk controls from the highest level of protection and reliability through to the lowest and least reliable protection. The hierarchy of controls is: <ul style="list-style-type: none"> 1) Elimination 2) Substitution 3) Isolation 4) Engineering controls 5) Administrative controls 6) Personal Protective Equipment (PPE)

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 and register 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.

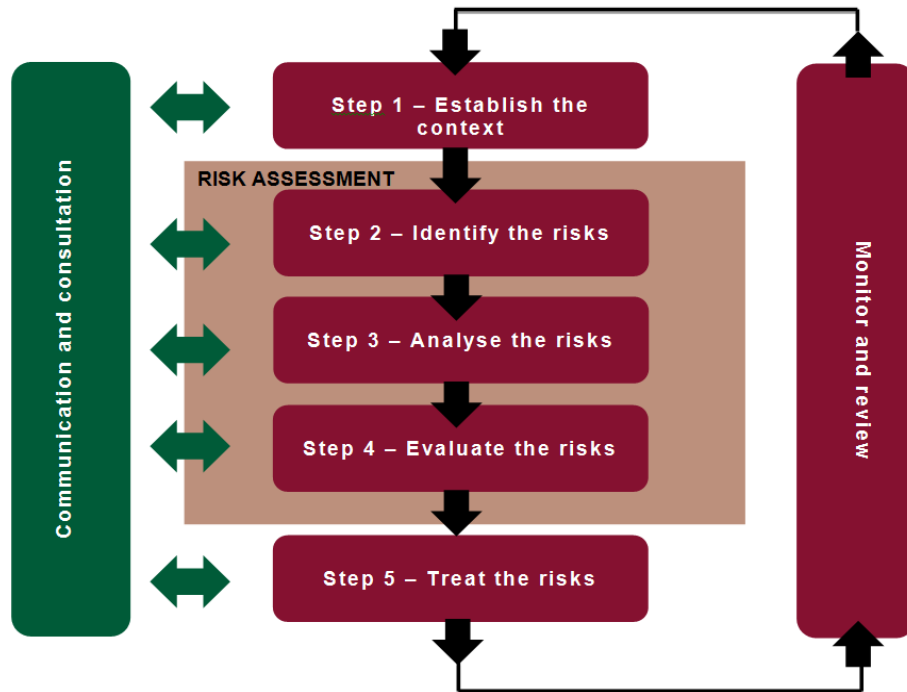
The Committee will review each risk management plan and register prior to acceptance of a proposal for a program, project, other activity, or an Agreement or MOU with a proposed partner. The evaluation for each activity will be reported to the Committee including outcomes of the risk management process 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.

5. Risk management framework

Risk management is about avoiding known risks, minimising risks, and managing risks in CLAN activities to achieve CLAN's objectives. Risk management also includes addressing potential risks in

order to protect and safeguard people, resources and activities. CLAN refers to the Hierarchy of Controls when managing identified risks.

CLAN undertakes the following approach to risk assessment for its activities:



CLAN will document and report to the Committee on risk management undertakings and reports. Should a situation occur where risks have been realised and resulted in harm or other damage, a report will be given to CLAN executive for management purposes.

6. Risk management matrix

Use the risk matrix to determine the level or rating from where determined likelihood and determined consequences intersect.

6.1 Likelihood

Likelihood	Descriptor
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

6.2 Consequences

Consequences	Descriptor
Catastrophic	Most if not all objectives may not be achieved, or extremely severely affected
Major	Most objectives threatened or one severely or extremely affected
Moderate	Some objectives affected, considerable effort to rectify
Minor	Effort to rectify objectives can be achieved
Insignificant	Very small, negligent impact, rectified by normal processes

6.3 Risk matrix

Likelihood	Insignificant consequences	Minor consequences	Moderate consequences	Major consequences	Catastrophic consequences
Almost certain	Medium	High	High	Extreme	Extreme
Likely	Medium	Medium	High	Extreme	Extreme
possible	Low	Medium	Medium	High	Extreme
Unlikely	Low	Low	Medium	High	High
rare	Low	Low	Low	Medium	High

7. Policy review

This policy will be reviewed bi-annually.

8. References

Government of E=Western Australia, Clinical Risk Management, 2019
(https://ww2.health.wa.gov.au/Articles/A_E/Clinical-risk-management)

9. Associated CLAN documents

Safety & Security Policy Work Health & Safety Policy CLAN Risk Management Plan CLAN Risk Register

10. Attachments

CLAN Risk Incident/Near Miss Report

CLAN Risk Incident/Near Miss Report

This form is to be submitted to the CLAN Committee when a report is made of an incident causing harm to person/s, facilities, property, resources, or the environment.

The form is to be completed then scanned and filed with the Risk & Audit Committee for consideration and action as required.

No.	Item	Details
1	CLAN Program/ project/ activity	
2	Name/s if person/s affected	
3	Incident/near miss (short title)	
4	Location	
5	Date, time	
6	Details of the incident	
7	Person/s notified and when	
8	Cause/s of the incident/near miss	
9	Result of the incident/near miss	
10	Other objects affected by a risk being realised or potentially realised	
11	Actions taken/to be taken	
12	Report submitted by, date	
13	Report received by, date	
14	Decisions, who, date	
15	Person responsible for actions arising	

CLAN Safety and Security Policy

Version No. & History	1.0 (March 2017)
Date approved	March 2020
Date last updated/reviewed	May 2020
Review date	March 2022

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 outlines 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. This policy is to read and applied in conjunction with CLAN's Work Health and Safety Policy, Child Protection Policy and the Preventing Sexual Exploitation, Abuse and Harassment Policy.

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

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)
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5. Policy and 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 in order to provide a safe, secure and supportive environment for all those involved in CLAN programs.

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:

- 1) Country and timeframe and how this may affect safety and security for CLAN personnel and programs and participants
- 2) Goals and outcomes aligned to CLAN's strategy and relation to cultural practices and potential impact on CLAN's program and activities
- 3) Assessment of human and non-human resources required, including capacity of personnel if resources are limited
- 4) Assessment of safety risks to personnel prior to, during and following implementation of a CLAN project
- 5) Evaluation of safety and security risks on potential results of a project
- 6) 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:

- 1) Forward planning to mitigate risk including procedures to respond to potential scenarios and changes
- 2) Training for project and in-country personnel about their responsibilities for providing a safe and secure environment and to conduct themselves accordingly
- 3) Research, training and information about the resource poor country for personnel involved in a project in that country including the culture of the country
- 4) Training for managing change and potential unsafe situations.

8. Management of personnel

Before travelling overseas, CLAN staff should:

- 1) Access 'smart traveller' on the dfat.gov.au site for advice on country specific safety and security
- 2) Register travel plans on the DFAT website and 'Register your travel plans'
- 3) Have appropriate travel insurance, passport and visas (where required)
- 4) Ensure all documents are copies and held securely in Australia
- 5) Have information about the relevant in-country Australian embassy or consulate
- 6) 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 will 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.

6. Policy review

This policy will be reviewed bi-annually.

7. Associated CLAN documents

- Child Protection Policy
- Code of Ethics and Professional Conduct Policy
- Preventing Sexual Exploitation, Abuse and Harassment Policy
- Project Design, Monitoring and Evaluation Policy
- Risk Management Policy
- Work Health and Safety Policy

8. Legislation

- Work Health and Safety Act 2011 No 10 (NSW)
- Workplace Health and Safety Regulation 2011 (NSW)

CLAN Staff Training and Development Policy

Version No. & History	2.0 (January 2011, March 2015)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

1. Introduction

CLAN acknowledges that training and 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 to:

- 1) Encourage and support employees in their professional and career development as part of their involvement with the organisation
- 2) Provide administrative guidelines to facilitate fairness and equity in the application of these general principles.
- 3) Add value to CLAN activities and strategic outcomes through identifying specific needs and providing opportunities for training and development

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

Professional development	The acquisition of skills and knowledge, both for personal development and for career advancement
Training	The teaching and learning activities implemented to help the acquisition of knowledge, skills, abilities and attitudes required for particular CLAN programs and activities

5. Policy

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

- 1) The opportunity to plan and develop skills, knowledge and attributes that complement organisational and work unit goals
- 2) The opportunity to participate in career development activities that extend and enhance their capabilities and capacity for advancement within the organisation
- 3) Equity of access to professional development opportunities.

6. Procedures

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 training and professional development organised and required by CLAN. 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. CLAN may also agree in certain situations to allocate resources or funding to support professional development for a specific activity related to CLAN's strategic framework. 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. Participation in professional development and training attendance will be recorded.

CLAN's strategic plan includes assessment of the need and/or opportunities for training and development for personnel involved with CLAN, including partners and participants. Training and development needs will be considered prior to the employment of personnel or the recruitment of volunteers and will determine the focus for orientations in order to achieve outcomes effectively. CLAN will also include learning opportunities in planning, implementing and evaluating programs based on data and risk assessments. This may include coaching and sharing opportunities between professionals, staff and volunteers, and training and development for the governing body of CLAN.

Where CLAN is involved in programs and activities with partners, CLAN will work with partners to identify needs and opportunities for training, development and sharing information that will provide benefits to all those involved in programs, including participants such as children and their parents, presenters, partners and CLAN personnel.

As part of CLAN's planning, appraisal, monitoring and evaluation processes, the Committee will review the effectiveness of the professional training development undertaken and the value added to CLAN's activities and achievement of strategic outcomes.

8. Policy review

This policy will be reviewed bi-annually.

9. Associated Documents

- Human Resources Policy
- Project Design, Monitoring and Evaluation Policy
- Workplace Health and Safety Policy

CLAN Transparency Policy

Version No. & History	1.0
Date approved	June 2021
Date last updated/reviewed	June 2021
Review date	June 2023

1. Introduction

CLAN is a not for profit, non-government organisation operating in Australia and overseas. CLAN values its relationships with its partners, stakeholders, donors and volunteers who support its plans and activities to achieve its purpose and goals. CLAN is committed to disclosing information in an accessible format that is accurate, relevant and as required.

2. Purpose

This policy outlines CLAN's commitment to transparency and accountability in planning, actions implementation and review of its programs and activities.

3. Scope

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

4. Definition

Transparency	The basis for trust between CLAN and all those involved in its activities which may include CLAN projects, financial management, legal requirements, reporting, presentations to health bodies, and any other business or activities. Transparency involves being honest and open when communicating with stakeholders about matters related to CLAN.
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5. Policy

The purpose of this policy is to recognize the importance of transparency and accountability to build trust to promote positive relationships to achieve identified goals and outcomes.

6. Procedures

Procedures to recognise the importance of, and to implement transparency and accountability in CLAN's activities are outlined below.

6.1 Governance

CLAN shares information regarding its governance structure, legal status, its purpose and activities. CLAN's Constitution lists its legal requirements for its status as a not-for-profit, non-governmental charity registered as an incorporated association in NSW. CLAN is also a member of the Australian

Council for International Development (ACFID), and is accountable for meeting their requirements and Code of Conduct.

CLAN's Board activities are governed by its Constitution, as required for Incorporated Associations registered under the *Associations Incorporation Act 2009 (NSW)* and the *Associations Incorporation Regulations (2016) NSW*.

6.2 Financial Management

CLAN is committed to transparency and integrity in managing its finances. CLAN's finances are managed by a registered company auditor, reviewed by CLAN's Board and reported as required.

6.3. Programs and activities

CLAN will disseminate relevant information about its partners, programs, outcomes and lessons to partners, volunteers, donors, and the public as relevant.

6.4. Policies

CLAN regularly updates its policies and these are shared on CLAN's website. CLAN's policies are also provided to partners as they are required to commit to implementing relevant CLAN policies when involved in CLAN's programs.

6.5 Risk Assessment

CLAN undertakes regular reviews of its policies and procedures and updates these as required in response to legal requirements, change requiring updated or new policies, lessons learnt, or identified needs.

6.6. Contracts, MOUs, Agreements

CLAN's programs require documentation, agreed terms and conditions, and honest reporting for all its activities including its work with partners, donors, volunteers, and relevant professionals involved in particular activities.

7 Requesting Information

7.1 How to make a request for information

Visit CLAN's website for a Contact Form at info@clanchildhealth.org.au or CLAN (Caring and Living as Neighbours) Inc, PO Box 996, Toronto NSW 2283

7.2 How to respond to requests for information

- 1) When request is received acknowledge the sender's request for information, e.g. by email, mail or phone.
- 2) Check and confirm if the information requested is approved for sharing or distribution e.g. either private to that person/organisation, and/or how broadly it may be shared.

- 3) Send information to person or organization requesting the information and require that they send a response acknowledging receipt of the information.

8. Policy review

This policy will be reviewed bi-annually.

CLAN Whistleblower Policy

Version No. & History	1.0 (July 2018)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

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 fostering a culture where representatives are encouraged to raise concerns about unethical and unacceptable conduct and managing arising issues or complaints promptly in a fair and ethical manner and in a safe environment.

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

Whistleblower	An insider within an organisation, who reports misconduct or dishonest or illegal activity that has occurred within that same organization. It may include former officers, employees, contractors, suppliers and family members
Whistleblowing	A deliberate, voluntary disclosure of individual or organisational wrongdoing by a person who has access to data, events of information about an actual, suspected or anticipated wrongdoing within the organization
Wrongful Act	Includes, but not limited to breach of legal obligations, criminal offences, mismanagement of funds, actual or suspected fraud, abuse of authority, disclosures related to miscarriages of justice, health and safety risks including risks to the public as well as to CLAN staff, damage to the environment, unauthorized use of organizational funds, corruption, sexual or physical abuse of clients or CLAN staff, unethical conduct, or the concealment of above
Protected disclosure	A report or complaint about disclosable conduct. A person who makes a protected disclosure is referred to as the 'discloser'. Often, the discloser may also be referred to as a 'whistleblower'.

Policy

CLAN will ensure that staff, volunteers contractors and partners are informed prior to engagement that they have a responsibility to disclose to CLAN information about any possible or real wrongdoing that occurs in a CLAN activity. CLAN is committed to managing information effectively that is disclosed by a whistleblower. CLAN seeks to ensure all actions are implemented to investigate such information ethically and with integrity.

6. CLAN's role

6.1 Criteria to determine a whistleblower:

A whistleblower must be a current officer of CLAN, a current employee, contractor or volunteer. 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;

The person presenting the information is required to give their name to the person they are making the disclosure to;

There must be evidence to demonstrate reasonable grounds that the information disclosed may have breached the *Corporations Act 2001*; is a 'wrongful act', as defined above

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:

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, or the whistleblower consents to the disclosure or the disclosure is necessary to further the investigation. At some stage it might be necessary to disclose the fact and substance of the report to the person subject of the report.

A whistleblower may submit reports without the need to declare their identity or prove that the disclosure is being made in 'good faith'.

A whistleblower is protected against civil or criminal litigations (including a breach of contract) for protected disclosures. Legal protections for whistleblowers may include: compensation for those who suffer reprisal or retaliation following a disclosure. If the whistleblower is the subject of an action for disclosing protected information they may rely on this protection in their defense. 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.

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.

A whistleblower who is implicated in a wrongful act will not be subjected to any actual or threatened retaliatory action or victimization for making a report under this policy. However, this will not necessarily shield the whistleblower from the consequences of that person's involvement in the wrongful act.

6.3 Management of a disclosure

- 1) 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. A report may also be made on CLAN's website at clanchildhealth.org on the Contact CLAN page using the Contact Form or email to info@clanchildhealth.org, or post to CLAN PO Box 996
- 2) CLAN will review the information disclosed and assess the matter to determine if a formal investigation is required or not, and then consider if other procedures may be effective to remedy the situation such as disciplinary action or a more informal approach to deal with the matter.

- 3) 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. The person subject of the allegation will be informed of the allegation, given the opportunity to answer allegations and have their defence set out fairly in any report.
- 4) If the whistleblower is not satisfied with the response they received they have the option to raise the matter directly with the Chair of CLAN's governing body.
- 5) 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.
- 6) In a case where an allegation is found to be unsubstantiated, CLAN will endeavor to address any negative effect on the reputation of CLAN and/or personnel involved.

5. Policy review

This policy will be reviewed bi-annually.

6. References

- ASIC 'Whistleblowing protections for not-for-profit organisations'. asic.gov.au
- Corporations Act 2001
- Treasury Laws Amendment (Enhancing Whistleblower Protections) Bill 2018
- Australian Council For International Development (ACFID)

7. Associated CLAN documents

- CLAN Complaint Management Policy
- Privacy Policy

8. Attachments

- CLAN Whistleblower Report

Clan Whistleblower Report

Use the following form of questions to assist in gathering information on a report of whistleblowing:

No.	Information required	Details
1	Full name of person reporting	
2	Position, title, location	
3	Contact details	
4	Manager's name (if required)	
5	Details of protected disclosure	
6	How was the matter discovered	
7	Over what period of time has the suspected activity occurred	
8	Why is this considered a wrongful act	
9	Names of the people involved	
10	Name of witnesses (if any)	
11	Nature of supporting evidence	
12	Location of evidence	
13	Risk of loss or destruction of evidence	
14	How can the evidence be accessed	
15	Is the person reporting the person who witness or discovered the wrongful act	
16	Have other people been advised, if so who and what, if anything have they done with the information	
17	Is there a risk of reprisal or recriminatory action against the person reporting	
18	Does the person reporting have an interest in the matter	
19	Is there a need for the person reporting to prepare a written report	
20	Is there a need to report this information to an appropriate body	
21	Detail future actions and who will be responsible for them	

Version No. & History	2.0 (February 2016, June 2018)
Date approved	May 2020
Date last updated/reviewed	March 2020
Review date	March 2022

1. Introduction

CLAN is committed to providing a safe and secure work environment that is consistent with NSW Work Health and Safety legislation. CLAN endeavours 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 are 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 whilst in the delivery of CLAN programs.

4. Definitions

Person conducting a business or undertaking (PCBU)	<p>(1) For the purposes of this Act, a person conducts a business or undertaking:</p> <ul 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. <p>(2) A business or undertaking conducted by a person includes a business or undertaking conducted by a partnership or an unincorporated association.</p> <p>(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.</p> <p>(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.</p> <p>(5) An elected member of a local authority does not in that capacity conduct a business or undertaking.</p>
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	<p>(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.</p> <p>(7) A volunteer association does not conduct a business or undertaking for the purposes of this Act.</p> <p>(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.</p>
Reasonably practicable	<p>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:</p> <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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	<p>(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:</p> <ul style="list-style-type: none"> (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. <p>(2) For the purposes of this Act, a police officer is:</p> <ul style="list-style-type: none"> (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. <p>(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.</p>

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

6.1 CLAN Committee will provide and maintain as far as possible:

- 1) A safe working environment
- 2) Safe systems of work based on risk assessments and reviews
- 3) Plant and substances in safe condition
- 4) Facilities for the welfare of workers
- 5) Information, instruction, training and supervision that is reasonably necessary to ensure that each worker is safe from injury and risks to health
- 6) Commitment to consult and co-operate with workers in all matters relating to health and safety in the workplace
- 7) Commitment to continually improve our performance through effective safety management, monitoring and evaluations
- 8) Comply with legislation where this applies to a worker.

6.2 CLAN workers will:

- 1) Comply with safe work practices, with the intent of avoiding injury to themselves and others and damage to plant and equipment
- 2) Take reasonable care of the health and safety of themselves and others
- 3) Wear personal protective equipment and clothing where necessary
- 4) Comply with any direction given by management for health and safety
- 5) Not misuse or interfere with anything provided for health and safety
- 6) Report all accidents and incidents on the job immediately, no matter how trivial
- 7) Report all known or observed hazards to their supervisor or manager.
- 8) Comply with CLAN policies relevant to each situation.

6.3 Focus for specific WHS situations

- 1) Inductions for volunteers will focus on their responsibilities, rights and coverage under the Act
- 2) Inductions for personnel involved in overseas programs will include but not limited to risk assessments including health risks, security arrangements, insurance arrangement, local care services, accident and incident and emergency protocols, travel and accommodation protocols,
- 3) Evacuation procedures for overseas programs/activities, staff will need to receive a health clearance and will be offered support both during and at the end of their contributions.

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.

8. Policy review

This policy will be reviewed bi-annually.

9. Associated Policies

- Risk Management Policy
- Safety and Security Policy
- Staff Training and Development Policy

10. Legislation

- Work Health and Safety Act 2011 (NSW)
- Work Health and Safety Regulation 2011 (NSW)
- Work Health and Safety Act 2011 (Commonwealth)
- Work Health and Safety Regulation 2011 (Commonwealth)

11. References

- BNG Workplace health and safety: Checklist (www.ngoservicesonline.com.au)
- Volunteers. The Essential Guide to Work Health and Safety for Volunteers, Safe Work Australia

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