



POLICY MANUAL

Update History

Version date	Who updated	Details
Feb 19	NS	Added 7.9 Remuneration Philosophy
Aug 19	Riva, NS	Amended references to ACFID Code
Nov 19	NS	Amended 2.1, 5.9, 6.7 per ACFID CSA feedback
May 20	NS	Amended 2.2 Core Values 5.7 Non development Activities per ACFID
Sep 20	Sophat	Amended references to ANCP manual
Feb 21	Eilis	Replaced annexes of secondary people policies with e-links. Added 4.2.2 PSEAH [Board Approved]
Oct 21	Eilis/ Sophat	Update ACFID and DFAT references
Nov 22	Norm/Eilis	Removed 3 references to WEAORF Annual review; Add Modern Slavery statement; Enhance Comms section
Nov 23	Eilis/Sophat	Updated Risk Management section, incorporating the Risk Management Framework; triennial Partner Capability Assessment; Solvency

Only members of the risk team are authorized to make changes to this manual. Other staff contemplating changes will make a copy and draft amendments in that. Once approved, the manual will be updated accordingly. Typically, changes are approved by the Board at its November meeting.

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1 ABOUT THIS MANUAL

1.1 About Good Return

Good Return Limited is a public company limited by guarantee, and a registered charity. It was registered in 2003 under the name World Education Australia Limited, and formally changed name to Good Return Limited in 2023.

1.2 Purpose

This manual consolidates the operating principles and policies that govern the way Good Return works. These rules direct Good Return’s approach to managing issues and making decisions inherent in its normal operations.

The policy principles in this manual are strategic in nature, and as such are approved by the Board. This recognises that clearly documented policies support improved understanding, greater transparency, and a stronger compliance and control environment. Such approval also recognises that effective risk management is integral to Good Return achieving its objectives.

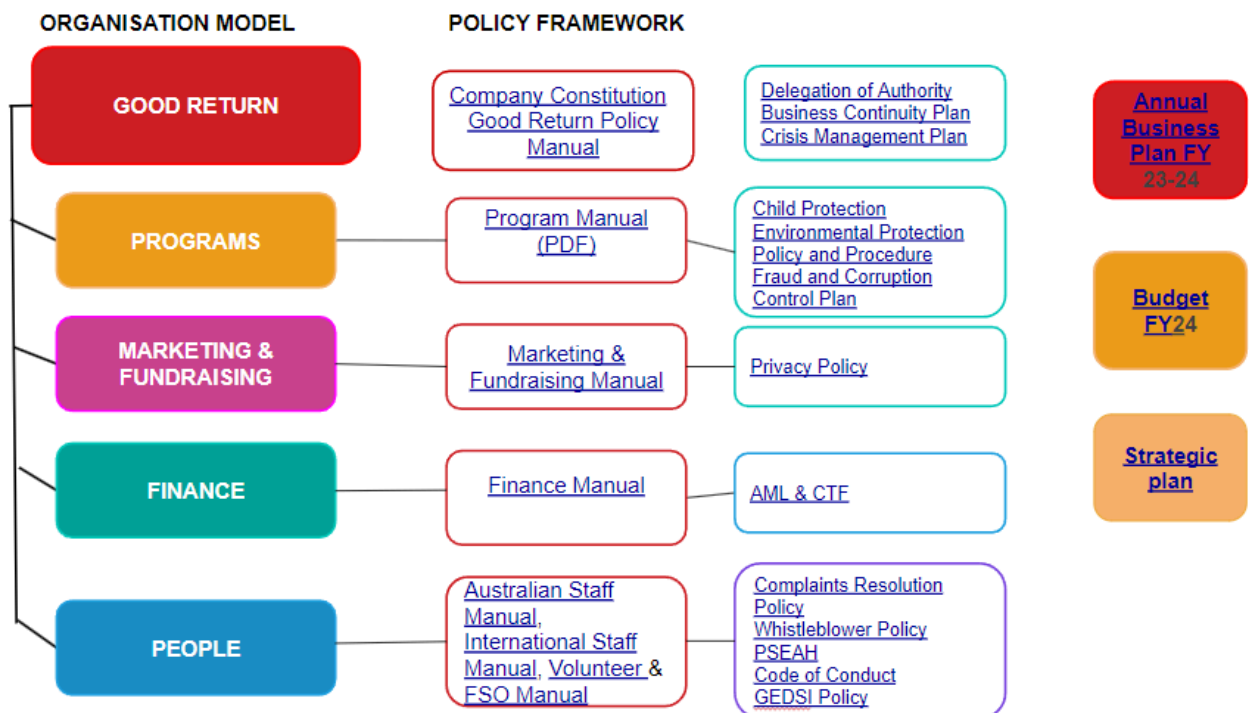
The contents of this manual are guided by the requirements of the Constitution, relevant resolutions of the Board, statutory obligations, and best practice industry standards. In line with acknowledged good governance, the Board delegates authority to the CEO to develop, implement and communicate these policies as required.

For clarity and consistency of policy guidance, relevant text is highlighted as follows:

- **Policy principles are in bold text**
- Procedures and controls are in dark blue text.
- **DFAT and ACFID principles are in brown text**

1.3 Structure

Good Return’s policy framework and structure of this manual reflect our organisation model.



This manual’s first sections establish the context: Vision & Values summarise our strategy and core methodologies. Governance & Compliance describes internal governance, compliance and risk

management principles. The next two sections address Good Return's core operating units: Programs, and Marketing & Fundraising (M&F). Programs encompass development, technical assistance and access to finance activities. The last two sections outline policies that govern our internal processes: Finance, Operations and People.

This Policy manual acts as an umbrella document, containing high level policy statements. In many cases, further detail is available in standalone policies and procedures. It does not replicate all the rules in the various operating unit manuals, including:

<i>Program Manual:</i>	core program & project activities
<i>Marketing & Fundraising</i>	marketing, community engagement, and fundraising
<i>Finance Manual:</i>	financial management and control, accounting and audit procedures
<i>Staff, FSOs & Volunteers</i>	for all staff and their relationship with the organisation

1.4 Maintenance

Management will periodically, at least annually, review this manual for currency and accuracy. All material changes in policy will be submitted for approval by the Board.

2 VISION AND VALUES

2.1 Vision and Mission

We believe no one deserves a life of poverty. Our vision is a world without poverty where all people have access to resources and opportunities to improve their lives. To realise this, our mission is: *To enable those who are marginalised and excluded to achieve economic empowerment through responsible financial inclusion and capability development.*

2.2 Our Core Values

Respect: We treat everyone with respect and dignity. We respect differences in cultural norms and rituals. We listen to and value each other and the different perspectives we bring. We seek to understand context before voicing opinions. We treat others as equals regardless of seniority, gender, sexual orientation, culture, ethnicity or religion. We celebrate diversity in all its forms.

Collaborate: We value the benefit of working as a team and do it where possible. We communicate openly and honestly. We involve people early on, determine input and availability. We strive to be aware of what others are doing. We share experiences and take time to connect. We celebrate success and effort.

Dream: We pause to think, listen and dream. We engage in big picture thinking and visioning. We create space to advocate for new ideas. We encourage and support each other to pursue our shared mission. We strive for excellence.

Support: We reach out and support each other. We give constructive and honest feedback. We recognise time pressures. We recognise personal boundaries. We strive to be a gender responsive organisation. We understand that to achieve well-being, balancing work, home and personal time requires flexibility.

Be accountable: We set and manage expectations. We do what we say we will do. Meetings have a clear purpose, firm starts and end times, and action items. All team projects have time expectations. We strive to be efficient with time and resources. We understand strong and accountable teams are built on trust.

2.3 Our working priorities

Needs-based and responsive: We assess needs jointly with partners, clients and beneficiaries to ensure responsiveness to all stakeholders' requests for support.

Recognise and respect diversity without discrimination: We encourage participation of all, and do not discriminate by age, culture, gender, race, religion, social or political affiliation. We promote gender equity in all activities.

DFAT B3.1 ANGO has a gender equality policy and incorporates gender equality practices including contextual analysis of gender barriers, opportunities to enable inclusion, strategies to promote gender equality and targeted M&E.

ACFID 1.2.1 Members demonstrate organisational commitment to inclusion and representation of those vulnerable to and affected by the intersecting drivers of marginalisation and exclusion.

ACFID 1.2.2 Members' planning process includes consultation with those who are vulnerable and those who are affected by marginalisation and exclusion and analysis of their needs and rights and barriers to their inclusion in context-specific ways.

Prioritise the poorest and most vulnerable: We strive to support those who are affected by the intersecting drivers of marginalisation and exclusion. We support projects and programs that target people who are living in poverty. Notwithstanding our non-discrimination values, these can seek to redress the disadvantages of groups such as women or ethnic minorities.

ACFID 1.2.4 Members consider the potential impact of their development and humanitarian initiatives on those who are vulnerable and those who are affected by marginalisation and exclusion with a view to preventing unintended harm.

ACFID 1.2.3 Members monitor and evaluate their progress in addressing the needs, rights and inclusion of those who are vulnerable and those who are affected by marginalisation and exclusion..

Recognition and respect for human rights: We support the social, economic, civil, and political rights of all, and respect social, spiritual and cultural values.

ACFID 1.1.1 Members demonstrate an organisational commitment to human rights

Integrity: We apply the highest levels of ethics, transparency and professional practices.

ACFID 7.3.1 Members demonstrate a commitment to operate transparently with all stakeholders.

Learning and effectiveness: We foster ongoing organisational learning to ensure high standards of effectiveness in current and future programs.

Partnership with organisations overseas and in Australia. Our partnerships are flexible and able to evolve over time, based on mutual interest and trust.

Local ownership and empowerment: We promote the involvement and ownership of programs by local communities and partners.

DFAT B 2.3 ANGO undertakes contextual analysis including the perspectives of stakeholders, which informs planning and design.

ACFID 4.2.1 Members' planning and practice are informed by analysis of context, evidence and research, and inclusion of the perspectives and knowledge of primary stakeholders.

ACFID 2.2.1 Members have formal mechanisms for primary stakeholders to contribute their ideas, feedback and complaints so that they have a voice in and ownership of their own development and humanitarian initiatives.

ACFID 2.2.2 Members promote opportunities for primary stakeholders to participate in decision-making about the initiatives that affect them.

Self reliance and sustainability: Our programs are designed to build the capacity of partners to manage their development and resources, including environmental resources, on a sustainable basis.

DFAT B 3.5 ANGO can demonstrate approaches that will enhance sustainability

ACFID 3.1.1 Members design initiatives in response to the root causes of poverty and inequity.

ACFID 3.1.2 Members identify and influence local organisations and/or primary stakeholders to enhance and promote their own development.

ACFID 3.1.3 Members support local partners to develop capacity to influence their own development.

ACFID 3.2.1 Members build on and enhance the strengths and capacities of primary stakeholders.

3 GOVERNANCE & COMPLIANCE

3.1 Legal status

WEAL is a not-for-profit company limited by guarantee. The company and its constitution have been registered with the Australian Securities and Investment Commission (ASIC) in accordance with Australian law and the Corporations Act (2001).

WEAL has charitable status as a registered Public Benevolent Institution (PBI), is registered with the Australian Charities and Not-for-profits Commission (ACNC), and has the authority to fundraise in all States and Territories of Australia. It also holds an AFSL (Australian Financial Service licence) relating to its online loan program.

3.2 Governance

We strive to maintain the highest possible standards of governance. The company constitution is the guiding reference for the governance and management of the company. The Board is committed to adherence to the [ACFID Code of Conduct](#) as a minimum standard for integrity, governance and reporting.

All directors, paid staff and volunteers are expected to adhere to this Code of Conduct.

Any changes to the constitution can only be made at General Meetings, held at least annually. Members are admitted in accordance with the constitution, and they alone are able to change the constitution. Members at the Annual General Meeting consider the financial statements, and may also perform various other statutory obligations.

3.3 Roles of Board and management

Good Return is governed by a Board of Directors elected by members. It oversees management, delegating certain powers to the CEO, who is appointed by and is accountable to the Board. In general, the role of the Board centres on strategy, policy, audit, compliance, risk, funding and fundraising issues.

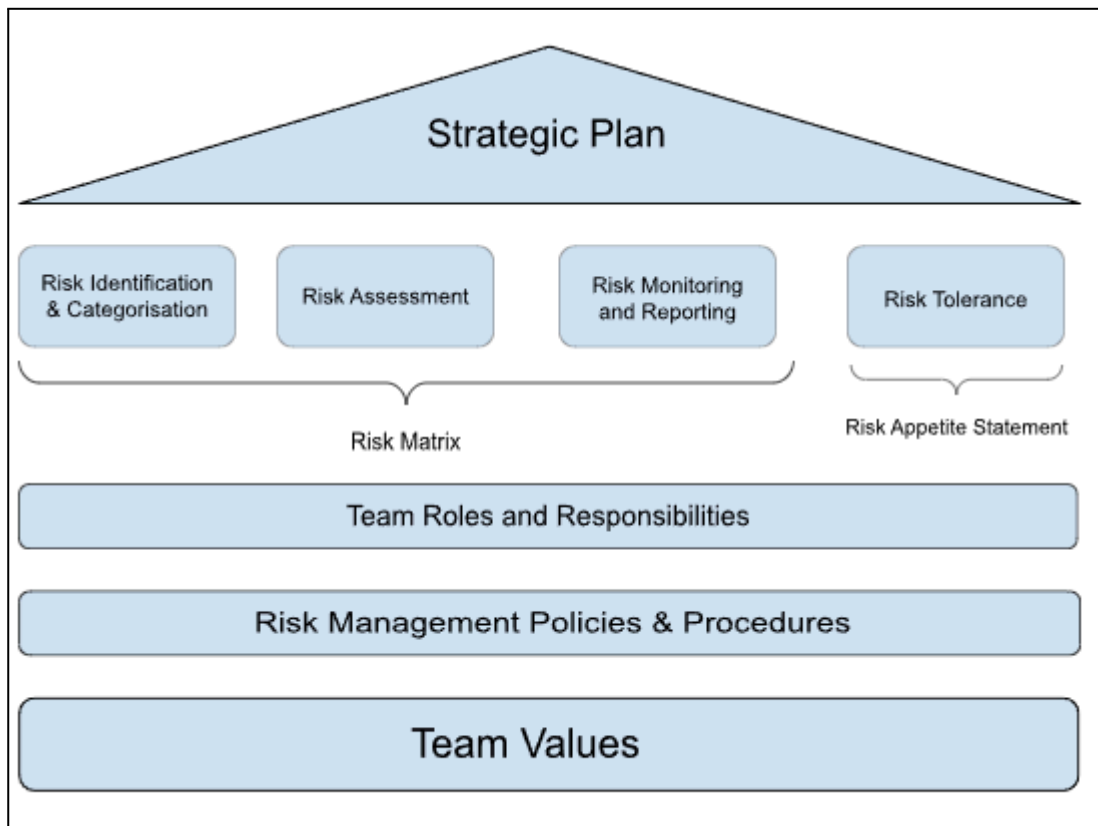
The Board reviews management’s 3 year Strategic and annual business plans. The Board is responsible for oversight of risk management as it:

- reviews and approves Good Return’s strategic plans, budgets and performance
- reviews and approves the policies that support these objectives
- oversees effective risk monitoring, in particular financial reporting and controls
- reviews significant issues raised by management or Compliance staff

The role of CEO and staff is to develop and implement strategy, and execute tactical and operational actions. They are responsible for operating within approved policies and procedures, and for identifying and managing risks that arise from our activities.

3.4 Risk management

Good Return has a risk framework which considers risk through the lens of what can negatively impact of the achievement of its objectives.



Good Return identifies several categories of high level or strategic risk. These are monitored through a Strategic Risk Matrix, which is regularly reviewed by management and updated as needed.

RISK TYPE	RISK DETAIL
<p>1 CONTROL Management & financial discipline</p>	<p>Management systems and processes not operating effectively</p> <ul style="list-style-type: none"> - Systems not able to meet governance and regulatory requirements - Significant errors in financial reporting - Financial data not understood or accessible by responsible managers. - Reporting not able to provide timely early warning of financial issues.
<p>2 FINANCIAL CAPABILITY Ability to meet all financial obligations</p>	<p>Shortfall in funding</p> <ul style="list-style-type: none"> - M&F effort fails to engage wider Australian public. - International tenders not successful - Corporate support matures or tails off; no new HNW / PAF sponsorships - Donated Loans and regular giving programs fail to meet targets - Reduced income squeezes unrestricted funds & recovery of non-Program costs. - Lack of cash resources to meet known maturing expenses & liabilities. - Threatens going concern status and flow of operations. - Forced to reduce front line and support staff, and curtail operations.
<p>3 PEOPLE Key Person Risk</p>	<p>Key Person Risk <i>(eg departure of CEO, Program Dir, Group Acct, AFSL Responsible Mgr).</i></p> <ul style="list-style-type: none"> - Weakened execution across critical functions (Programs, M&F, Operations) - ASIC AFSL requirement to maintain 2 Responsible Managers - Negative perception by ASIC, DFAT, sponsors, Program partners.
<p>4 COMPLIANCE Reputation risk and compliance</p>	<p>Compliance, reputation or PR incidents</p> <ul style="list-style-type: none"> - System gaps cause problems with regulators (ASIC, AUSTRAC, DFAT, ACFID or AFCA) - Unable to adhere to major cross cutting policies of DFAT & ACFID - Complaint from a Loan Program public lender is escalated to ASIC or ACFID - For any reason, public perception of Good Return and its mission turns negative
<p>5 PROGRAMS Programs focus, quality, impact</p>	<p>Program effectiveness issues</p> <ul style="list-style-type: none"> - CAFE not able to scale up - RIF Academy unable to demonstrate impact - Impact Investment slow to establish country and partner network - Difficulty to measure and show how we improve lives. - MFI initiatives separate from Loan Program, reduce synergies. - Climate change, impacting Pacific region in particular. - Indigenous program not successful
<p>6 PROGRAMS Loan Program fails to deliver</p>	<p>Loan Program fails to achieve scale</p> <ul style="list-style-type: none"> - Struggle to recover past level of support from Australian public. - Volumes stagnate, meaning lower flow of loans to MFI partners. - Low volumes diminish corporate support, and attraction to MFI partners - Require compliance with ASIC AFSL
<p>7 PEOPLE Unacceptable staff behaviour</p>	<p>Failure in people culture and process</p> <ul style="list-style-type: none"> - Incident of sexual harassment, bullying or discrimination in the workplace or field operations. - Child protection risks in field delivery of programs

<p>8 IT SYSTEMS Failure in IT systems or security</p>	<p>IT systems fail to meet organisational needs</p> <ul style="list-style-type: none"> - Internal IT processes and databases fail to deliver expected service - External IT providers fail to deliver quality service - Multiple software solutions difficult to manage & reconcile - Cyber attack renders data inaccessible; release of confidential data
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The Risk Management Matrix records and monitors specific risks, and track procedures to mitigate them. This tool:

- identifies key operational risks, and ranks them by their basic or inherent (ie before management controls) likelihood, impact and consequences.
- identifies preventive and detective control actions to manage or mitigate each risk, the control owner, and frequency. It judges the perceived effectiveness of these controls.
- ranks the likelihood and impact of residual (ie after control measures) risks.

Good Return adheres to proven risk management processes. Typically these include clear, robust, documented policies and procedures; people who are properly informed about these policies, and adhere to them.

- Accurate, timely management information systems and reports.
- Preventive and detective controls to minimise and/or mitigate risk incidents. Review of such incidents or near misses to prevent future occurrence.
- Delegated levels of authority (to incur expense or enter into contracts).
- Segregation of duties in approval and disbursement of funds, and sign-off of key reports
- Frequent reconciliation of banking and financial accounts.
- Robust password, IT and data security protocols.
- Internal compliance and risk management capability

DFAT B 2.5 NGO assesses and manages activity risk

ACFID 4.2.2 Members assess and manage risk in their development and humanitarian initiatives.

ACFID 1.2.4 Members consider the impact of their development and humanitarian initiatives on those who are vulnerable and those who are affected by marginalisation and exclusion with a view to preventing unintended harm.

ACFID 8.2.1 Members can control and manage their financial resources and risks.

ANCP 5.1 NGOs must employ a whole-of-organisation level risk management approach, and apply appropriate risk management measures.

3.5 Compliance

Good Return has a Compliance Advisor who, with support from external advisers, provides advice on legal and regulatory requirements and initiates appropriate steps to comply with these obligations.

Good Return maintains a Compliance Calendar. This summarises the nature of the requirement, due date, action required and person responsible to ensure Good Return meets its obligations pursuant to Corporations and Trusts law within required timeframes.

The Compliance function reviews reporting requirements for:

WEAL as a public company/charity:

- Financial reporting to ACNC under the Australian Charities and Not-for-profits Commission Act 2012 (Cth) (the ACNC Act). The ACNC Act includes governance & corporate reporting requirements: updating Director details, public officer appointments, maintaining board minutes and other regulatory requirements
- Good Return fundraising activities
- Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) legislation
- ACFID Code of Conduct compliance
- Public Benevolent institution (PBI) status
- State & territory fundraising authority approvals and related compliance
- Compliance of the Good Return loan program with ASIC Australian Financial Services Licence, and National Consumer Credit Code requirements

- Accreditation and compliance with DFAT Australian NGO Cooperation Program (ANCP)

The Risk and Compliance team meet regularly with the CEO to bring to his attention issues arising from ongoing review of risk management practice. Compliance and Risk advisers provide periodic reports to the Board on the adequacy of compliance and control procedures.

4 PROGRAMS

Programs represent the application of Good Return's core mission. In planning its capacity building and client support activities, good management requires that we comply with those external and internal policies that govern these programs. In addition, each project plan identifies risks that can arise during its life, and processes to monitor and control them.

4.1 Program strategy

Policy: The Strategic Plan defines our approach to programming, the geographic and sector focus, priorities in resourcing and strategic interventions in a multi-year timeframe. This approach considers (in the context of our work) how targeted results and sustainable change can be best achieved.

Procedures

- A detailed strategy is developed for every program, in the form of a Program Design Document (PDD). This identifies development needs and issues in the area, and outlines the strategic interventions to be implemented.
- A summary of each program is in the Strategic Plan and budgeted in Annual Business Plans.
- Projects are designed to be sustainable. This generally means they are designed to develop or improve ongoing service delivery, typically by a partner organisation. Where appropriate they include a suitable exit strategy for Good Return.

DFAT B 2.7 ANGO can demonstrate a strategic approach to programming and has country, regional and/or sectoral strategies relevant to the size and complexity of its programming.

ACFID 4.1.2 Members' initiatives are clearly linked to their organisational vision, mission and values.

4.2 Adherence to overarching policies

Policy: Good Return executes its programs in compliance with relevant principles of the ACFID Code of Conduct; and DFAT Australian Aid policy guidelines .

Procedure: All program staff are required to be familiar with ACFID standards ([ACFID Code of Conduct](#)) and DFAT Australian Aid policies ([ANCP Manual](#) and [NGO Accreditation Guidance Manual](#)). All new staff are orientated on ACFID standards and DFAT Australian Aid policies. Updates to ACFID and DFAT Australian Aid policies are shared with all program staff.

4.2.1 Child Protection

Policy: Good Return does not currently run activities involving children; but considers the safety and well-being of children to be a priority concern. It adopts a zero tolerance approach to child abuse and child pornography. *Child Protection Policy can be accessed at the Good Return [website](#) for external readers and in Good Return [Hub](#) for internal staff.*

DFAT A 3 NGO has effective child safeguards

ACFID 1.4.1 Members demonstrate their organisational commitment to the safeguarding of children.

ACFID 1.4.2 Members have a code of conduct that advances child safeguarding behaviours and applies to all personnel, partners and project visitors.

ACFID 1.4.3 Members have a documented child safeguarding incident reporting procedure and complaints handling procedure that aligns with principles of privacy and promotes safety and dignity.

ANCP 5.6 DFAT Child Protection Policy is principles-based, articulates DFAT's zero tolerance of child exploitation and abuse, and includes expectations of DFAT staff and DFAT funded partners in the management of child protection risks.

ACFID 7.4.4 Members governing body is informed of and responds to serious incidents in accordance with their mandate and responsibilities

4.2.2 Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH)

Policy: Good Return operates with zero tolerance in relation to any known or suspected SEAH incident. PSEAH is a core responsibility. We are not only accountable to our funders but also to the communities for whose benefit our work is intended. *PSEAH policy can be accessed at the Good Return [website](#) for external readers and in Good Return [Hub](#) for internal staff.*

DFAT A2.3 NGO has a safeguarding policy and practices in place to manage risks associated with sexual exploitation, abuse, harassment and misconduct, including processes for investigating, reporting and action (where appropriate).

ACFID 1.5.1 Members demonstrate their commitment to the prevention of sexual exploitation and abuse.

ANCP 5.9 DFAT does not tolerate inaction to sexual exploitation, abuse or harassment of any kind.

ACFID 7.4.4 Members governing body is informed of and responds to serious incidents in accordance with their mandate and responsibilities

4.2.3 Gender Equality

Policy: Good Return programs endorse non-discrimination on gender grounds and promote gender equality within communities.

Good Return recognises that advancing gender equity is a powerful tool for reducing poverty, and is a development goal in its own right. Recognising the constraints faced by women in achieving equal status and opportunity, we focus on overcoming barriers to their full participation in society. We oppose any and all types of domestic violence. *Gender Equality Policy, part of a broader Gender Equality, Disability and Social Inclusion (GEDSI) policy, can be accessed at the Good Return [website](#) for external readers and in Good Return [Hub](#) for internal staff.*

DFAT B 3.1 NGO has a gender equality policy and incorporates gender equality practices including contextual analysis of gender barriers, opportunities to enable inclusion, strategies to promote gender equality and targeted M&E.

ACFID 2.3.2 Members' planning process includes consultation with those marginalised due to their gender, in particular women and girls, contextual analysis of barriers to their inclusion and identification of opportunities for their participation.

ANCP 6.2 Gender equality is about equal opportunities for women and men, girls and boys.

4.2.4 Environmental Impact

Policy: Good Return recognises and wherever appropriate implements relevant principles of ACFID Code of Conduct and DFAT guidelines with respect to environmental risk and protection. We apply sustainable practices to minimise the environmental footprint of our own operations. *Environmental Impact Policy can be accessed at the Good Return [website](#) for external readers and in Good Return [Hub](#) for internal staff.*

DFAT B 3.8 ANGO has an Environmental Management Policy and undertakes periodic assessments of its own and its implementing partners' environmental management practice

ACFID 3.3.1 Members demonstrate a commitment to environmental sustainability and improved environmental outcomes in their development and humanitarian initiatives, and in their internal operations.

ANCP 5.3 DFAT's Environmental & Social Safeguard Policy sets out the requirement to identify, assess and manage (including monitor and report) safeguard risks in Australia's development program.

4.2.5 Disability Inclusion

Policy: Good Return works to enable equal opportunity for people with disabilities (PWD) to participate in and benefit from our programs and the services of partners. We recognise and wherever appropriate implement the relevant principles of ACFID Code of Conduct and DFAT guidelines with respect to people with disabilities. *Disability Inclusion Policy, part of a broader GEDSI policy, can be accessed at the Good Return [website](#) for external readers and in Good Return [Hub](#) for internal staff.*

DFAT B 3.7 ANGO has a Disability Inclusion Policy and undertakes periodic assessments of its own and its implementing partners' disability inclusion practice

ACFID 2.4.1 Members demonstrate an organisational commitment to the inclusion of PWD; their planning process includes consultation with PWD and analysis of the barriers to social inclusion and participation.

ACFID 2.4.2 Members promote opportunities for PWD to participate in decision-making; and monitor and evaluate their progress in promoting the empowerment of PWD.

ACFID 2.4.3 Members promote opportunities for people with disabilities and/or their representative organisations to participate in decision-making

ACFID 2.4.4 Members monitor and evaluate progress in promoting empowerment of people with disabilities

ANCP 6.3 Australian Government aims to ensure that people with disabilities are included in and benefit equally from Australia's aid program, consistent with obligations under UN CRPD.

4.2.6 Modern Slavery and Human Trafficking

Policy: Good Return does not and will not tolerate human trafficking or modern slavery in any aspect of our work. We will support our supply chain and partners to be aware of the risks of human trafficking and modern slavery and to act appropriately when any such risk is detected.

Procedure: Our standard Memorandum of Understanding (MOU) contains a clause relating to human trafficking and Modern Slavery. This will be progressively added to the various MOUs already in place. Field visits to programs will be alert to any potential for modern slavery or human trafficking.

4.3 Geographic coverage

Policy: Good Return programs operate in countries in the Asia Pacific region where levels of poverty create the need, and the opportunity for us to assist. In Australia, we will only consider programs where our capacity and skills set can deliver demonstrable value to those facing economic and social vulnerability and disadvantage.

Procedure: In its strategic and annual planning process, Good Return determines the geographies in which it chooses to operate. Staff use the Country Risk Assessment Tool to assess the risks and opportunities of working in a country or region.

DFAT B 2.7 ANGO demonstrates a strategic approach to programming, and has country, regional and sectoral strategies relevant to the size and complexity of its programming.

4.4 Effective partnerships

Policy: Program staff conduct an open and structured dialogue with partners, and maintain records to monitor and assess the effectiveness of the partnership. Our strategic approach is to help them to build their capacity.

Procedure: An annual partnership survey is conducted among partners Good Return has an MoU with. Individual program staff conduct an annual partnership review.

DFAT C 1 ANGO has documented arrangements with partner organisations in countries where it works. NGO has documented contractual frameworks in place to manage partnerships and initiatives.

ACFID 5.2.1 Members negotiate shared goals and respective contributions with partners and collaborators.

ACFID 5.3.1 Members support mutually identified capacity- strengthening strategies with their partners.

ACFID 5.3.2 Members assess their collaborations and partnerships

4.4.1 Partner selection

Policy: Good Return identifies potential partners based on common vision and goals, or shared targeted communities. Our work should add demonstrable value to any partner.

Procedure: Potential partners are identified based on strategic and annual business plans.

Control: Program Director is responsible for approving all new partnerships.

DFAT C2.2 ANGO regularly assesses the capacity of its implementing partners including financial management, safeguarding practices and operational performance.

ACFID 5.1.2 Members undertake due diligence and capacity assessments of organisations with whom they work in formal partnerships.

ACFID 5.3.1 Members support mutually identified capacity-strengthening strategies with their partners

ACFID 5.3.2 Members assess their collaborations and partnerships.

4.4.2 Partner Assessment

Policy: Good Return will assess potential partners' capacity and commitment to implement agreed project activities. Prior to formalising any agreement, Good Return will conduct an appropriate capacity partner assessment. This is repeated triennially.

Procedure: A capacity partner assessment is conducted for new partners, and subject to a three yearly review. The scope of the assessment is based on the nature of the partnership (e.g. financial or non-financial) and may include consideration of (among other aspects) the potential partner's strategic management, transparency, understanding of client needs, social performance, social inclusion, safeguarding, human resources, portfolio and financial status, management capability, risk management controls, and governance and compliance status.

DFAT C2 NGO undertakes due diligence and assesses the capacity of its partner organisations.

DFAT E2 NGO assesses, monitors and strengthens the financial management capacity of its implementing partners and affiliates to ensure they have the capacity and commitment to undertake activities in a professionally competent manner with regard to financial operations.

ACFID 5.1.2 Members undertake due diligence and capacity assessments of organisations with whom they work in formal partnerships.

ACFID 5.3.2 Members assess their collaborations and partnerships.

4.4.3 Fraud and corruption control

Policy: Good Return is committed to the highest standards of financial propriety and has a zero tolerance approach to corruption, fraud, or other financial impropriety by its staff or partners. Good Return will specifically assess partners' commitment to financial propriety.

Procedures: Fraud and corruption control is based on:

- thorough assessment of risks particular to our operating environments
- development and implementation of processes and systems to effectively prevent, detect and investigate fraud and corruption

- application of appropriate prosecutorial, administrative or disciplinary action - remedy any harm arising from fraud
- recovery of proceeds of any fraudulent activity
- training of all employees and relevant contractors in fraud awareness and specialised training of employees involved in fraud and corruption control activities
- periodic review of control activities in order to ensure they represent best practice.

DFAT E3.7 ANGO has policies, systems and practices in place to facilitate the prevention, detection and investigation of fraud and the prevention of corruption.

ACFID 8.2.1 Members control and manage their financial resources and risks.

ANCP 5.4 NGO must report within five business days to DFAT, any suspected or detected fraudulent activity involving the project or staff.

4.4.4 Documenting the partnership

Policy: To assure a high standard of transparency and clarity, all substantive activities with partners will be formally documented.

Procedure: Initially a Memorandum of Understanding (MoU) is executed by Good Return and the partner agency, to provide a framework for the partnership. Any subsequent arrangement is recorded in a formal agreement.

DFAT C1.2 ANGO has documented arrangements with partners.

DFAT C1.4 ANGO can demonstrate its partnership agreements are understood and accepted by its partners.

ACFID 5.2.1 Members negotiate shared goals and respective contributions with partners.

4.5 Project Cycle Management

Policy: All projects will be managed throughout the project cycle, demonstrating influence and control to add value to the development process and to manage risk.

Procedure: The Program Manual specifies the processes by which staff manage projects through the project cycle, consistent with the broader organisational policies. The manual is owned by the Program Director. All program staff are required to be familiar with the manual and abide by its stated processes.

Control: Project compliance with policy and program manuals is assessed annually by the Program Quality & Compliance Specialist.

DFAT B2.2 NGO has a documented approach to managing its initiatives/programs e.g. project cycle or equivalent, relevant to its types of initiatives or models of delivery.

ACFID 3.1.1 Members design initiatives in response to the root causes of poverty and inequity.

ACFID 3.1.2 Members identify and influence local organisations and/or primary stakeholders to enhance and promote their own development.

ACFID 3.1.3 Members support local partners to develop their capacity to influence their own development.

ACFID 4.1.2 Members' initiatives are clearly linked to their organisational vision, mission and values.

ACFID 4.3.1 Members assess the quality of their strategies, designs and plans.

ANCP 9.1 NGOs deliver programs according to an Australian financial year, from 1 July to 30 June. The annual cycle of the ANCP is designed according to the Australian financial year cycle.

4.6 Project Evaluation, Accountability & Learning

Policy: All projects will be comprehensively monitored and evaluated, with lessons captured and disseminated to inform ongoing improvements. We will ensure accountability to stakeholders including beneficiaries, partners and supporters.

Procedure: Program Director will maintain and ensure compliance of all projects with a Monitoring, Evaluation, Accountability & Learning framework.

Control: Program and Project designs specify how each initiative addresses these requirements.

DFAT B 4.1 ANGO undertakes regular monitoring of initiatives/programs, analysing information to assess progress and constraints.

DFAT B 4.3 ANGO conducts activity evaluations commensurate with scale assessing results and effectiveness.

ACFID 4.3.2 Members monitor, evaluate and learn from their work.

ACFID 4.4.2 Members reflect on results and lessons in order to inform and improve practice.

4.7 DFAT Identity guidelines

Policy: Projects funded by DFAT Australian Aid will promote the Australian identity through appropriate information management and publicity materials.

Procedure: Australian Aid funded projects, in particular projects funded under the Australian NGO Cooperation Program (ANCP), will be in line with Australian Aid program's [Visual Identity Guidelines](#).

Control: CEO, Marketing & Fundraising Director, Program Director, or their nominee, to approve all publicity materials prior to publication to check appropriate display of DFAT support.

DFAT D1.1: ANGO acknowledges and attributes the Australian identity and the support of the Australian Government, both in Australia and overseas

DFAT D1.2: ANGO has documented procedures that address the acknowledgement and attribution of the Australian identity and support of the Australian Government.

ANCP 8.1 NGOs must acknowledge the support of the Australian Government through their ANCP funding.

4.8 Partner financial controls

Policy: Good Return is committed to the highest standards of financial propriety and has a zero tolerance approach to corruption, fraud, bribery or other impropriety by any stakeholder. For partners. Good Return will assess their capacity and commitment to financial propriety and to managing disbursed funds as agreed.

Procedure: Agreements with implementing partners should include a commitment to manage funds in an appropriate manner, commit to annual audits, and spend funds as agreed. Program staff must conduct financial monitoring of all partners/projects as appropriate, if possible annually

ACFID 8.2.5 Members undertake due diligence assessments of partners who manage the member's funds.

5 MARKETING & FUNDRAISING

These policies address compliance and legal obligations when communicating with or soliciting donations from private sponsors and the public.

DFAT D2.4: ANGO has established systems to ensure public materials are quality assured against guidelines.

ACFID 6.1.2 Members have organisational protocols for the approval of public materials.

ACFID 6.2.1 Members' communications are accurate, respectful, and protect privacy and dignity.

5.1 Regulatory compliance

Policy: Donations will be raised in compliance with the fundraising licences granted by State authorities, and with industry best practice standards.

Procedure: All fundraising methods will comply with:

- Charitable Fundraising Act (NSW 1991), and the terms and conditions of NSW Office of Charities and of similar approvals granted separately by other States.
- ACFID Code of Conduct
- FIA Code of ethics and professional conduct

DFAT C1.1 ANGO and its implementing partners have authority to work in the countries where they work (through agreements with Government, partnerships with local partners, or licence to operate etc.)

ACFID 7.2.1 Members are registered and meet reporting and legal obligations to relevant authorities

5.2 Appropriate materials

Policy: All fundraising will be based on accurate and complete information. All solicitations will be truthful, accurately describe our mission and purpose, and only make realistic claims. There will be no material omissions or exaggerations of fact, no use of misleading photographs, nor wording that could create a false impression or misunderstanding.

Procedure: Marketing & Fundraising team uses a peer review process for content approvals, ensuring the subject matter expert (in-country or program manager) is the first reviewer, followed by a member of our marketing team. The CEO or Marketing & Fundraising Director are involved in major communications or anything that may be deemed sensitive. A glossary is used to check terminology and partner acknowledgements and an Ethical Decision Making Framework is used when having to make significant or potentially sensitive communications decisions.

Control: Content is always reviewed by the subject matter expert and a member of the marketing team before being published. The Programs Glossary must be followed to ensure correct terminology and acknowledgement of partners; and the Ethical Decision Making Framework must be used when making significant or potentially sensitive communications decisions.

DFAT D2.2: There is consistency between ANGO's activities and its promotional material

DFAT D2.3: ANGO's promotional material respects the dignity, values, history, religion and culture of the people with whom it works.

ACFID 6.1.1 Members' public materials accurately describe the organisation and its work.

ACFID 6.1.2 Members have organisational protocols for the approval of public materials.

ACFID 6.2.1 Members' communications are accurate, respectful, and protect privacy and dignity.

5.3 Consent to appear in fundraising materials

Policy: Good Return must inform persons featured in promotional materials that they will appear in them, and will obtain their permission ("informed consent") to do so. Even when such consent has been obtained, the use of such materials will respect the right to privacy, and the dignity and culture of those depicted.

Procedure: All Good Return staff are trained how to use our photo and video consent forms. These are signed

by the subject (preferably) or the photographer and stored with the images.

Control: Marketing team provides regular training sessions and reminders on gaining consent, and checks compliance prior to using images.

DFAT D2.3: ANGO's promotional material respects the dignity, values, history, religion and culture of the people with whom it works.

ACFID 6.2.1 Members' communications are accurate, respectful, and protect privacy and dignity.

ACFID 6.2.2 Members have organisational requirements for the collection of information, images, and stories.

ACFID 7.2.2 Members have organisation-wide requirements for the protection of privacy.

5.4 Appropriate funding sources

Policy: Good Return will not accept funding (monetary or in kind) from any donor if such acceptance could impair our independence, or endanger our reputation.

Procedure: We receive funding from foundations, corporations, governments & individuals. While acceptance does not imply endorsement of the donor, any donation should be able to withstand public scrutiny.

Control: Board to approve any party seeking to donate \$100,000+ in a single financial year.

ACFID 8.1.1 Members have organisational standards for the acceptance of donations

ACFID 8.1.3 Members have organisational standards for the procurement of goods and services.

5.5 Appropriate fundraising agents

Policy: When Good Return utilises third parties to raise funds from the public, or pays commissions to these agents, due diligence will be conducted to assess and approve use of such services.

Procedure: Staff will conduct due diligence to affirm that their methods are consistent with our values as an organisation, before recommending use of any such external fundraiser.

Control: CEO to approve use of any external fundraising service provider.

ACFID 8.1.2 Members report their compliance with the ACFID Fundraising Charter annually.

5.6 Protection for donors

Policy: Good Return is committed to the highest standards of best practice, transparency and integrity in its dealings with donors.

Procedures: We will ensure that:

- a donor is not subject to undue influence or coercion
- a donor is counselled to seek advice if there is any reason to believe the donation may affect their financial position, or relationship with family members.
- any request to limit or cease communication by email or any other channel is respected.

5.7 Non development activities

Policy: Good Return does not undertake welfare, evangelistic, or partisan political activities; nor use DFAT grant funds to support such activities.

<i>Welfare</i>	<i>Assistance to maintain individuals in a particular condition on a long term basis, as a gift or subsidy not leading to independence; thus not developmental in nature.</i>
<i>Evangelism</i>	<i>Deliberate efforts to promote a particular faith or to proselytise.</i>
<i>Political activities</i>	<i>Activities to direct people from one political persuasion to another OR that seek to build training or organisational resources related to political structures. This excludes structures that provide relief or development assistance, or support such.</i>

Procedure: We do not undertake non-development activities .All agreements with our implementing partners contain a clause that equally requires that they do not use DFAT grant funds for such purposes.

Control: In case of doubt, the Board will determine acceptability of the activity in question. The Program team regularly reviews the operation of each of the Partners and, inter alia, considers if there is any indication of non-development activity.

ACFID 7.3.2 Member development initiatives consistently demonstrate the separation of development and non-development activities

DFAT B 1.3 Staff differentiate between development and 'non-development' activities.

ANCP 4.02 It is vital to ensure ANCP projects are not for the purposes of religious, welfare or partisan political objectives. Development assistance must be provided on a non-discriminatory basis.

5.8 Appropriate communications

Policy: All communication materials representing the organisation will be respectful of other NGOs, and not

make inaccurate or misleading statements about other agencies. Our sustainability and legitimacy as a community organisation depends on the ongoing support from the Australian public.

Control: Formal communication with public print or broadcast media on behalf of Good Return must be approved by the Chair, CEO, or Marketing & Fundraising Director. The Ethical Decision Making Framework must be followed.

ACFID 6.2.3 Members are respectful and considerate of the reputation of other ACFID Members.

DFAT D 2.3 NGO's promotional material respects the dignity, values, history, religion and culture of the people with whom it works.

5.9 Transparency

Policy: Good Return will conduct itself in an open and transparent manner. We welcome inputs from all stakeholders, and are committed (within the bounds of reasonableness, and subject to limits of privacy and confidentiality) to providing feedback to them, and any further information they seek.

This policy recognises all applicable laws, and the need to balance frank and open discussion at Board level, with duties of privacy, confidentiality, and agreed undertakings. Transparency means we share how we formulate our policies, processes, and decisions. It gives all stakeholders (directors, members, staff, funders and partners) access to relevant information, so they understand the processes we use, the criteria we apply to decisions, and why we execute programs the way we do.

Procedure: General information on the organisation is published on our website. The Annual Report outlines our key policies, programs and projects, significant institutional achievements, and summarises our financial statements and governance arrangements. Full audited financial statements and annual reports for every year since we were established are also available on the website.

ACFID 7.3.1 Members demonstrate organisational commitment to operating transparently with stakeholders.

ACFID 7.3.4 Members make information about their organisation and its work available to all stakeholders.

ACFID 8.3.1 Members publish an annual report.

DFAT D 2.1 NGO and its partners share accurate, timely and accessible information with its stakeholders, including primary stakeholders.

5.10 Public fundraising appeals

Policy: Specific fundraising appeals to the public require to be approved by the CEO, and to be tracked and reported separately.

Procedure: These are fundraising activities for specific purposes. Donations and expenditures are tracked to ensure funds are used for the purpose. A separate bank account may be established for such funds, and any interest earned will be applied to the purpose.

Control: Such specific fundraising appeals must be approved by the CEO.

5.11 Communicating with the media

Policy: Formal communication on behalf of Good Return with public print and broadcast media should only be by a Board member, the CEO, or a person approved by the CEO. The Ethical Decision Making Framework must be followed.

5.12 Privacy

Policy: Good Return has a commitment to the protection of personal information in accordance with the Privacy Act 1988. Good Return will collect only personal information that is related to and necessary for its dealings with individual supporters, unless they consent (express or implied) to its use for other purposes; or its use is required or permitted by law.

Procedure: Donor privacy is addressed by Good Return's Privacy Policy, which policy is posted on the Good Return website for public information. A member of the public can at any time request to have their name and details removed from Good Return's database.

ACFID 6.2.2 Members have internal processes for collection of information, images, and stories.

ACFID 7.2.2 Members have organisation-wide requirements for the protection of privacy.

6 FINANCE

6.1 Delegated expense authority

Policy: The CEO shall not approve financial actions or decisions that may cause financial harm, or material deviation of expenditures from Board-approved purposes.

Procedure: CEO shall not, without approval of the Board approve any single payment that would cause an overrun to total budgeted expenditure approved in the annual business plan

- Make any single budgeted withdrawal, transfer or payment above \$50,000.
- Make any single unbudgeted expenditure or capital purchase above \$10,000.
- Commit to any contractual or other obligation liability that exceeds \$100,000 and is outside the Board-approved annual business plan.

Control: In need, the Chair has the discretion to approve any contract that exceeds \$100,000, or to decide whether prior approval by the Board is necessary.

ACFID 8.2.1 Members can control and manage their financial risks

ACFID 8.2.2 Members are effective in their use of resources in the planning and implementation of activities

6.2 Finance & Accounting

Policy: All finance and accounting procedures, and all financial statements arising from the accounts, will meet applicable statutes and compliance standards.

Procedure & Control: Compliance, interpretation and applicability of accounting standards (including the ACFID Code) and of relevant statutory regulations will be guided by advice from the external Auditor.

ACFID 8.2.4 Members produce and publish annual audited financial statements.

6.3 Annual Report

Policy: An Annual Report is to be prepared by the end of November for each year. It will be posted on the website, or otherwise made available to members and the general public.

ACFID 7.3.4 Members make information about its organisation and work available to all stakeholders.

ACFID 8.3.1 Members publish an annual report.

ACFID 8.3.2 Members publish Code-compliant financial statements in their Annual Reports.

ACFID 8.3.3 Members fully and accurately disclose costs of administration and public fundraising.

DFAT D 2.1 NGO and its partners share accurate, timely and accessible information with its stakeholders, including primary stakeholders.

6.4 Banking

Policy: Where practicable, Good Return's banking is performed online using electronic funds transfers.

Procedure: Finance Officer checks bank activity weekly to ensure all transactions are correctly recorded in the accounts. Within 10 days of the end of each month a reconciliation is conducted of QuickBooks data and each bank account. This reconciliation is approved by the Financial Controller and filed.

Control: Two signatories are required to transact any Westpac account. A bank SMS code provides another level of security. These control measures apply to all Westpac bank accounts.

6.5 Solvency

Policy: Hold cash (restricted and unrestricted) to meet specific solvency metrics

Procedure: Good Return uses a number of methods to track and manage solvency:

1. Restricted + Unrestricted funds > 6 months expenses, based on a three month rolling average
2. Unrestricted funds > 3 months expenses, based on a three month rolling average
3. The sum of cash and near cash assets must exceed the sum of liquid liabilities.
4. Prepare and update at least twice annually a cash flow forecast for next 6 months. This will be reviewed by the CEO and the Board Finance & Audit Committee.

Controls: Management will review these formulae in assessing spot and forward solvency, rather than rely solely on just one method. A decision to escalate will be based on the underlying factors that determine each trigger. Escalation may involve the triggering of a Cash Preservation Contingency Plan.

This policy reflects AICD and AASB guidelines. The target timeframes are considered a reasonable minimum period over which fixed expenses can be reduced should it become necessary.

6.6 Managing Reserves

Policy: To maintain adequate reserves is a key part of financial management. It provides assurance that we can withstand periods of financial difficulty (adequate solvency & liquidity: see 6.5 above), and invest with confidence for the future (adequate net worth, or 'reserves'). Annual business plans and budgets will aim to achieve a modest but reliable operating surplus that sustains net worth. Management will disburse reserves donated for specific, restricted uses to only those designated purposes.

Procedure: Management will prepare annual business plans and budgets that aim to achieve a surplus of between 1% - 2% of annual expenditure.

In line with our agreements with providers of grant and donated funds, Good Return will comply with conditions that restrict application of such funds to specified purposes.

Control: Annual business plans and budgets require to be approved by the Board. Management will track application of restricted funds to assure compliance with terms of use.

6.7 AML and CTF Compliance

Policy: AML / CTF Act imposes obligations on WEAL as a reporting entity. These include:

- customer identification and verification of identity, and record-keeping.

- **establishing and maintaining an AML/CTF program.**
- **ongoing due diligence and reporting (suspicious matters, threshold transactions and funds transfers).**

Procedure: With regard to potential partners, Good Return will undertake activities:

- to know which organisations and people are being assisted, including necessary searches or checks.
- to ensure that directly funded organisations are aware of and obliged to comply with these laws, and in turn are obliged to make sure their distribution of funds is on the same basis.
- to check individuals and organisations receiving funds against the Criminal Code list of terrorist organisations, the DFAT consolidated list of individuals and entities subject to targeted financial sanctions and the World Bank listing of Ineligible Firms and Individuals.
- With regard to its internal operations, Good Return will not deal in cash or crypto-currencies, but uses the regulated banking sector for all transactions. It makes an annual report to AUSTRAC.

DFAT C1.1 ANGO and its implementing partners have authority to work in the countries where they work (through agreements with Government, partnerships with local partners, or licence to operate etc.)

ACFID 5.1.2 Members undertake due diligence and capacity assessments of organisations with whom they work in formal partnerships.

ACFID 7.2.1 Members are registered and meet reporting and legal obligations to relevant authorities.

6.8 Credit provision for Donated Loans

Policy: Good Return will not in normal circumstances advance its own funds (excluding Donated loans) to MFIs under the loan program. A collective loan loss provision will be maintained at an agreed percentage of outstanding Donated Loans advanced to MFIs under the program.

Procedure: This provision will be calculated at an agreed percentage of the outstanding balance of such Donated Loans. Charge or write back to profit will be passed at the end of each financial year.

7 OPERATIONS & PEOPLE

7.1 Workplace Culture

Policy: Good Return is committed to providing a workplace that is inclusive of difference, encouraging and enabling each staff member to reach their potential.

Procedure: Good Return recognises the diversity of its workforce, and aims to provide an environment that recognises and values individuals, and enables each to contribute to achievement of our goals. We practise equal opportunity employment and non-discrimination in all staff-related activities. Good Return applies ethical, transparent recruitment, selection and promotion processes by:

- use of competitive merit selection processes which are non-discriminatory - recognising and valuing workplace diversity
- retention and improvement of the skills and knowledge of employees
- use of competencies as a basis for training, development and career progression.

DFAT A2.2 ANGO has systems to ensure the integrity of staff including integrity screening checks, HR policies, Code of Conduct.

ACFID 9.3.1 Members are fair, transparent and non-discriminatory in managing staff and volunteers.

ACFID 9.3.2 Members comply with human resource regulatory requirements and legislation.

ACFID 9.4.1 Members specify the expectation of professional conduct of all staff and volunteers.

ACFID 9.2.1 Members provide professional development opportunities for staff and key volunteers.

7.2 Discrimination, Bullying and Harassment

Policy: Staff must not harass, bully or discriminate against their colleagues or members of the public on any grounds, such as gender, marital status, ethnic or national origin, religious or political conviction, age, disability, sexuality, or carer's responsibilities. Harassment or discrimination may constitute an offence under the [Anti-Discrimination Act 1977](#) and [Sex Discrimination and Fair Work Amendment Act 2021](#).

Procedure: Supervisors must make sure the workplace is free from all forms of harassment, bullying and discrimination. They should understand and apply the principles of equal employment opportunity and ensure their staff are informed of these principles.

Supervisors should also take all necessary steps, such as training and other active measures, to prevent and deal with harassment, bullying and discrimination. Good Return has a PSEAH policy in place.

DFAT A 2.3 NGO has safeguarding policy and practices in place to manage risks associated with sexual exploitation, abuse, harassment and misconduct, including processes for investigating, reporting and action.

ACFID 1.5.1 Members demonstrate their organisational commitment to the prevention of sexual exploitation and abuse through a survivor-centred approach

ACFID 4.2.2 Members assess and manage risk in their development and humanitarian initiatives.

ACFID 7.3.3. Members enable stakeholders to make complaints in a safe and confidential manner.

ACFID 9.4.2 Members' staff and volunteers work in accordance with agreed standards of practice.

ANCP 5.8 Prevention of Sexual Exploitation, Abuse or Harassment DFAT does not tolerate inaction towards sexual exploitation, abuse or harassment of any kind.

ACFID 7.4.4 Members governing body is informed of and responds to serious incidents in accordance with their mandate and responsibilities

7.3 Work Health & Safety

Policy: The health, safety and welfare of all staff is important to Good Return. Good Return accordingly aims to maintain a safe and healthy work environment complying with all relevant legislation.

Procedure: Good Return has developed Work Health & Safety Policy Guidelines which are available in all staff manuals, to provide support and guidance to all staff. While Good Return is responsible for maintenance of workplace health and safety, it is important that each person contributes to the responsibility for the health and well-being of themselves and others in the workplace.

ACFID 9.2.3 Members protect the safety, security and well-being of staff and volunteers.

DFAT A 2.5 NGO has systems to assess and manage staff safety and security risk.

7.4 Professional Development

Policy: Good Return recognises that its staff are its most valuable resource and the key to an innovative, professional service.

Procedure: Good Return is committed to staff development on an equitable basis to ensure:

- staff increase knowledge and skills to perform better in their current role, and enhance their potential
- engagement is increased, and staff are encouraged to participate in the continuing improvement of their own and Good Return's performance
- Good Return improves organisational effectiveness and increases capability for the future.

ACFID 9.2.1 Members provide professional development opportunities for staff and key volunteers.

7.5 Ethical Conduct

Policy: Good Return has a commitment to fostering ethical awareness, conduct and decision making. Staff need to be mindful that their actions and decisions are legal, consistent with Good Return policies and do not involve any conflict of interest.

Procedure: Aside from employees' agreed remuneration, staff may not make a financial gain as a result of working with Good Return. Staff must not grant favourable treatment to contractors or suppliers, or operate another business from our premises. Staff may accept small personal gifts on behalf of Good Return.

Control: Any offer of a gift or in-kind donation with a value greater than \$200 must be disclosed and discussed with their supervisor. If approved and accepted, the details should be recorded. All gifts of money must be entered as a donation to Good Return .

ACFID 9.4.1 Members specify the expectation of professional conduct of all staff and volunteers.

ACFID 9.4.2 Members' staff and volunteers work in accordance with agreed standards of practice.

7.6 Volunteers

Policy: Good Return recognises the critical importance of volunteer input at all levels. Volunteer support is a key part of the organisation's total capability, and enables us to undertake activities that we could not otherwise do.

Procedure: We understand that to achieve our goals, we must attract and retain volunteers. It is recognised that a volunteer workforce will be different from paid staff, and that this requires a more tailored approach to recognition and reward. This will include negotiating meaningful work to match their skills, timely support, and access to appropriate development opportunities.

7.7 IT Usage and Security

Policy: Staff are expected to use Good Return IT and communication systems responsibly. Data is to be regularly backed up and stored securely.

Procedure: Reasonable, responsible and limited personal use of Good Return's communication assets is permissible. The Internet is not to be used for any illegal, immoral or socially unacceptable use. Any staff member who uses Good Return internet connections to access inappropriate sites whether during business hours or their own time will face disciplinary action.

Electronic data will be backed up at least weekly and stored offsite, and firewalls and encryptions maintained to minimise risk of breach.

Control: Access to Good Return IT systems is controlled by complex passwords. The user is responsible at all times for the proper use of passwords and for all access under the password.

7.8 Conflict of Interest

Policy: Conflicts of interest will be managed to ensure transparency for all stakeholders.

Definition: A conflict of interest exists when there is a connection, association or involvement with others, past

or present, which may inhibit necessary objectivity.

Actual Conflict involves a direct conflict between a person's current duties or responsibilities and existing private interests.

Perceived Conflict exists where it appears that private interests could improperly influence the performance of duties whether or not this is in fact the case.

Potential Conflict arises where private interests could conflict with official duties.

Procedure: All staff, volunteers and directors have a duty to disclose any actual or perceived conflicts of interest. They must avoid wherever possible, or declare and manage conflict of interest in accordance with this policy. When a conflict of interest exists or is perceived, following actions are to be taken:

- *Restrict:* Restrictions are placed on the staff or volunteer's involvement in the matter.
- *Recruit:* Involve a third party to oversee the process that deals with the matter.
- *Remove:* Staff members remove themselves, or are removed from the matter.
- *Relinquish or Resign:* Staff member relinquishes the private interest creating the conflict. Where this is not possible (eg. family relationship) and the conflict cannot be managed using another option, the ultimate choice is for the staff member to consider resigning.

Control: Staff and volunteer appointment agreements will include a Conflict of Interest declaration. All meetings of the Board will include such a declaration.

DFAT A1.2 NGO has a Conflict of Interest policy and clear mechanisms to address conflict of interest.

ACFID 7.4.3 Members manage conflicts of interest with responsible persons, staff and volunteers relating to all activities undertaken by the organisation.

7.9 Remuneration philosophy

Our remuneration philosophy is based on five principles that aim to achieve best outcomes for employees.

We will hire and retain the most talented employees available: Good Return strives to get results by executing strategies that create a culture where everyone feels empowered to achieve their full potential. We recognize that remuneration alone cannot build such a culture; nor are we likely to have the financial resources to compete solely on this basis.

Total remuneration will be based on affordability: We do this by judging how best to allocate funds between investing in programs and institutional development; in our staff, and holding reserves for the future.

We will pay fair and competitive salaries, benchmarked against our peers: The base salary for any position is targeted at the median of our peers (similar sized NFPs). It is expected that five years' good performance would see an employee in the top quartile.

Performance is reviewed against a balanced scorecard of financial and non-financial measures, and increases paid within fixed percentage bands: Not all employees will be star performers and thus not all will rise to the top quartile. We do not favour financial incentive schemes, which could harm our culture.

This remuneration philosophy should be transparent: A summary of this remuneration philosophy should be made easily available to stakeholders.

7.10 Complaints & Whistleblower protection

Policy: Any complaint will be received in a constructive and open manner, and resolved in a timely, effective way. Any complaint or dispute about our operations or employment practices will be dealt with in confidence, effectively and with appropriate urgency.

Procedure: The Complaints [policy](#) sets out how complaints are handled.

There is a separate [Whistleblower policy](#) which seeks to protect staff and volunteers who alert responsible officers to concerns of internal maladministration ("whistleblower protection"). Any such complaints or concerns accordingly may be made in confidence to a member of the management team or Board.

ACFID 9.2.2 Members enable staff and volunteers to make complaints and report wrongdoing through fair, transparent and accessible procedures.

ACFID 9.2.3 Members protect the safety, security and well-being of staff and volunteers.

ACFID 9.3.2 Members comply with human resource regulatory requirements and legislation.

ACFID 9.3.3 Members manage the performance and grievances of their staff and volunteers in a fair and transparent manner.

DFAT A2.4 NGO has established public-facing complaints handling, whistle blowing, and incident management systems that are accessible to all stakeholders

DFAT C3.3 NGO enables partners to provide feedback, raise complaints and receive a response through an effective, accessible and safe process.

ACFID 7.3.3. Members enable stakeholders to make complaints in a safe and confidential manner.

ACFID 7.3.5 Members seek input and feedback from all stakeholders.