NO CHANGES SHOULD BE MADE TO THIS VERSION OF THE MANUAL.
ANY STAFF MEMBER CONTEMPLATING CHANGES TO POLICY SHOULD MAKE A COPY OF THIS DOCUMENT, AND DRAFT THEIR AMENDMENTS IN THAT. ONCE APPROVED, THIS MANUAL WILL BE UPDATED ACCORDINGLY.
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Annex 4 Disability Inclusion Policy (Jan 2017)
1 ABOUT THIS MANUAL

1.1 WEAL and Good Return
World Education Australia Limited (WEAL) is a public company limited by guarantee, and a registered charity. Good Return is the registered business name used for its operating activities. In the general text of this document, ‘Good Return’ refers interchangeably to WEAL and reference to one includes the other. World Education Inc. is a founding member and affiliate of WEAL.

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 WEAL 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 and technical assistance activities, plus consumer awareness and financial empowerment initiatives. The last two sections outline policies that govern our internal processes: Finance, Operations and People.
This Policy manual contains only high level policies. Annexes detail four important cross cutting policies: Gender Equality, Child Protection, Environmental Impact, and Disability Inclusion. It does not replicate all the rules in the five operating unit manuals:

- **Program Manual**: core program & project activities
- **Marketing & Fundraising Manual**: marketing, community engagement, and fundraising
- **Finance Manual**: financial management and control, accounting and audit procedures
- **Operations Manual**: office and people (includes Complaints & Whistleblowing Policy)
- **Staff and Volunteer Manuals** for staff and their relationship with the organisation

### 1.4 Maintenance

Management will periodically 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 people have access to resources and opportunities to improve their lives. To realise this, our mission is: **To enable those living in poverty to achieve economic empowerment through responsible financial inclusion and capability development.**

Core values underlying our work are:

- **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 actively promote gender equity in all activities.
- **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 the poorest and most vulnerable. Notwithstanding our non-discrimination values, these can seek to redress the disadvantages of groups such as women or ethnic minorities.
- **Recognition and respect for human rights**: We support the social, economic, civil, and political rights of all, and respect social, spiritual and cultural values.
- **Integrity**: We apply the highest levels of ethics, transparency and professional practices.
- **Learning and effectiveness**: We foster ongoing organisational learning to ensure high standards of effectiveness in current and future programs.
- **Partnership**: We work in 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.
- **Self reliance and sustainability**: Our programs are designed to build the capacity of partners and local communities to manage their own development and resources, including environmental resources, on a sustainable basis.

## 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.

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 2019 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 WEAORF
WEAL is the Trustee of controlled entity World Education Australia Overseas Relief Fund
('WEAORF'), which holds Deductible Gift Recipient status from the Australian Tax Office.
(relating to Overseas Aid Gift Deduction Status). In practice the Trust Fund is overseen by
Directors of WEAL acting as its Committee of Management; quarterly meetings of the Board
incorporate a meeting of WEAORF trustees.

3.4 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

Role of the 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.

3.5 Risk management
Good Return identifies five categories of high level or strategic risk:

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business</td>
<td>the risk that poor quality execution or delivery of core activities leads to loss of clients, reduced income, and consequent financial impacts.</td>
</tr>
<tr>
<td>Operational</td>
<td>the risk of loss that arises from inadequate or failed internal processes, systems or external events (this encompasses Key Person Risk).</td>
</tr>
<tr>
<td>Compliance &amp;</td>
<td>the risk of legal or regulatory sanction, financial or reputational loss arising from failure to apply regulatory standards applicable to Good Return as a</td>
</tr>
<tr>
<td>Reputation</td>
<td>charitable fundraiser and financial conduit business. The risk to earnings or external financial support arising from negative public opinion, loss of</td>
</tr>
<tr>
<td></td>
<td>reputation or support of key financial sponsors.</td>
</tr>
<tr>
<td>Financial</td>
<td>(or liquidity risk) the risk of not meeting payment obligations, caused by cash resources being temporarily inaccessible or depleted by operating losses.</td>
</tr>
<tr>
<td>Counterparty</td>
<td>the business disruption risk if program sponsors, suppliers or business partners fail to meet performance obligations. This includes credit risk, when a</td>
</tr>
<tr>
<td></td>
<td>counterparty fails to meet its financial obligations.</td>
</tr>
</tbody>
</table>

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

In addition to these standard controls, management uses a Risk Management matrix to identify and monitor 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.

3.6 Compliance
Good Return has a Compliance Advisor who, with support from external legal advisers and auditors, 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 and WEAORF fundraising activities**
- Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) legislation
- ACFID Code of Conduct compliance
- Public Benevolent institution (PBI) and overseas development agency status
- State & territory fundraising authority approvals and related compliance
- Compliance relating to the Good Return loan program, and its exemption from Australian Financial Services Licence and National Consumer Credit Code requirements
- Australian Aid accreditation and compliance

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. 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. All projects with budgeted spend over $10,000 have a Project Design document.
- 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 1.4 NGO demonstrates a strategic approach to program work, with consideration of geographic and sectoral priorities.
DFAT B 2 NGO operates in a manner consistent with sector good practice guidelines.

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 Conduct) and DFAT Australian Aid policies (ANCP Manual 2016 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. Annex A is Child Protection Policy.
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.

4.2.2 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. Annex B is Gender Equality Policy.
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.

4.2.3 Environmental Impact
Policy: Recognise and wherever appropriate implement relevant principles of ACFID Code of Conduct and DFAT guidelines with respect to environmental risk and protection. Apply sustainable practices to minimise the environmental footprint of our own operations. Annex C is Environmental Policy.
ACFID 3.3.1 Members demonstrate an organisational commitment to environmental sustainability and improved environmental outcomes in their development and humanitarian initiatives, and in their organisation’s internal operations.

4.2.4 Disability Inclusion
Policy: Strive to enable equal opportunity for people with disabilities (PWD) to participate in and benefit from our programs and the services of partners. Recognise and wherever appropriate implement the relevant principles of ACFID Code of Conduct and DFAT guidelines with respect to people with disabilities. Annex D is Disability Inclusion Policy.
ACFID 2.4.1 et seq Members demonstrate an organisational commitment to the inclusion of PWD; their planning process includes consultation with PWD and contextual analysis of the barriers to social
inclusion and participation. Members promote opportunities for PWD to participate in decision-making; and monitor and evaluate their progress in promoting the empowerment of PWD.

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 evident value to those facing economic and social vulnerability and disadvantage.

Procedure: As part of 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. This tool should be updated at least once every three years.

DFAT B 1.4 and 1.5 NGO demonstrates a strategic approach to programming, with consideration of geographic and sectoral priorities; and has developed country and sectoral strategies.

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

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: For each partnership or project, program staff conduct an annual partnership review, and at least annual project monitoring.

DFAT C 3 Partnerships reflect good development practice of equality, mutual respect and learning, self-reliance, accountability and transparency through appropriate documentation such as written agreements, documented records of meetings, correspondence etc.

ACFID 5.2.1 Members negotiate shared goals and respective contributions with partners and those they collaborate with. They support mutually identified capacity-strengthening strategies with their partners.

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 C 2 Assess the capacity of its partner organisations to deliver and develop projects or programs appropriate for that capacity.

ACFID 5.1.1 Members work intentionally with others in mutually respectful ways.

4.4.2 Partner due diligence

Policy: Good Return will assess potential partners’ capacity and commitment to implement agreed project activities. Prior to formalising any agreement, Good Return will conduct appropriate due diligence.

Procedure: A due diligence assessment is conducted for new partners. The scope of the assessment is determined based on the nature of the partnership and may include consideration of (among other aspects) the potential partner’s strategic management, transparency, understanding of client needs, social performance, human resources, portfolio and financial status, management capability, risk management controls, and its governance and compliance status.

DFAT E 2: Overseas partners and affiliates have the capacity and commitment to undertake activities in a professionally competent manner, especially 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.

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. The subsequent arrangement is recorded in a formal agreement.

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: Program Manual will specify 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 manual and program manual assessed annually by the Program Quality Lead.

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: PD will maintain and ensure compliance of all projects with a Monitoring, Evaluation, Accountability & Learning framework.
Control: Project designs will specify how each project addresses these requirements.

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 (see http://dfat.gov.au/about-us/corporate/Pages/branding-aid-projects-and-initiatives.aspx)
Control: CEO, Director M & F, Program Director, or their nominee, to approve all publicity materials prior to publication to check appropriate display of DFAT support.

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.

DFAT B4: The NGO can monitor, report and rate the effectiveness of its activities
DFAT D 1 NGOs and their partners acknowledge and attribute Australian government support. NGOs to demonstrate the commitment and capacity to comply with DFAT Visual Identity Guidelines.
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 (using the Financial Monitoring Tool) of all partners/projects at least annually.

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

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 (ref CFN 18447), and of similar approvals granted separately by other States.
- ACFID Code of Conduct
- FIA Code of ethics and professional conduct
- WEAORF Deed of Trust.
ACFID 7.2.1 Members are registered and meet their reporting and legal obligations to the 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: M&F team uses a peer review process for content approvals. A member of the team is notified, usually by email, when the content owner sends a piece of content for review.
Control: Content must be seen by at least one other member of the team before publishing.
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 the materials, 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.
DFAT D 2 Promotional material respects the dignity, values, history, religion and culture of the people with whom it works.
ACFID 6.2.2 Members have organisational requirements for the collection of information, images, and stories, and 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.

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.
Welfare Assistance to maintain individuals in a particular condition on a long term basis, as a gift or subsidy not designed to lead to independence; thus is not developmental in nature.
Evangelism Deliberate efforts to promote a particular faith or to proselytize.
Political activities Activities to direct people from one political persuasion to another OR that seek to build up training and/or organisational resources related to political structures. This excludes structures that provide relief and/or development assistance, or support such assistance.
Procedure We do not undertake non-development activities
Control In case of doubt, Board will determine acceptability of the activity in question.
ACFID B 1.5 Funds designated for the purpose 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 particular party.
ACFID 8.1.1 Members have organisational standards for the acceptance of donations
DFAT B 1.3 Staff differentiate between development and ‘non-development’ activities.

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.
ACFID 6.2.3 Members are respectful and considerate of the reputation of other ACFID Members.
DFAT D 3 NGO will have a strategy to maintain community support for its development activities.

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 in 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 an organisational commitment to operating transparently with all stakeholders.

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

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

### 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.

#### 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.

6.3 Annual Report
Policy: An Annual Report is to be prepared by end of November for each year. It will be posted on the website, or otherwise made available to members and the general public.
ACFID 8.3.1 Members publish an annual report.
ACFID 8.3.2 Members publish annual ACFID-Code- compliant financial statements in their Annual Reports.
ACFID 8.3.3 Members fully and accurately disclose administration costs and costs of any public fundraising.

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 of the bank accounts. In addition, a bank issued token provides another level of security for all transactions above $5,000 per day. These control measures apply to all bank accounts.

6.5 Solvency
Policy: Hold unrestricted cash to cover at least 3 months of fixed expenses, plus budgeted once off variable expenses.
Procedure: Good Return uses three methods to track solvency:
1. Hold unrestricted cash and near cash assets to cover at least 3 months of fixed expenses and budgeted, significant / material, one off variable expenses.
2. The sum of cash and near cash assets must exceed the sum of liquid liabilities. Calculate a working capital snapshot at the end of each reporting quarter. This formula will be based on balance sheet liquid assets, liquid liabilities, and the value of near cash assets.
3. Prepare and update at least twice annually a cash flow forecast for next 6 months. This will be reviewed by the CEO and Financial Controller, and also at regular Chair-CEO meetings. Any concerns will as appropriate be shared with the Chair.
Controls: Management will review these formulae in assessing spot and forward solvency, rather than rely solely on just one. A decision to escalate will be based on judgement of the underlying factors that determine each trigger.
This policy reflects AICD and AASB guidelines. The 3 month timeframe is considered a reasonable minimum period over which fixed expenses can be reduced should it become necessary. Fixed expenses comprise salaries, office rent, insurance, software & IT expenses.

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 s 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 their 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 customer due diligence and reporting (suspicious matters, threshold transactions and international funds transfers).

Procedure: With regard to potential partners, Good Return will undertake activities:
- to know which organisations and people that are being assisted, including any searches or checks considered necessary;
- 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 and the DFAT consolidated list of individuals and entities subject to targeted financial sanctions.

ACFID 7.2.1 Members are registered and meet their reporting and legal obligations to the 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 5% of outstanding Donated Loans advanced to MFIs under the program.

Procedure: This provision will be calculated at 5% of the outstanding balance of such Donated Loans. Charge or write back to profit as calculated to be passed at 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 person to contribute to the achievement of our goals.

Good Return practices equal opportunity employment and non-discrimination in all employment-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.

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.

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 in their work area.

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 to provide support and guidance to all staff, especially those based or travelling overseas. 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 others in the workplace.

### 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 their knowledge and skills to perform better in their current positions, and to 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 its capability to meet future requirements.

### 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 Good Return premises. Staff may accept personal gifts on behalf of Good Return.

**Control:** Any offer of 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 (given limited resources) enables us to undertake activities that we could not otherwise do.

**Procedure:** Good Return understands that to achieve its goals, it must attract, motivate and retain volunteers. To this end, management recognises 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 systems and devices is permissible. Internet is not be used for any illegal, immoral or socially unacceptable use. Any staff member who uses Good Return internet connections to access morally 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, which should never be shared and must be changed regularly (six monthly) to prevent misuse.
7.8 Conflict of Interest
Policy: Conflicts of interest will be managed to ensure operational 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 and 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 identify, 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 member removes themselves, or is removed from the matter.
- **Relinquish or Resign** Staff member relinquishes the private interest creating the conflict. Where this is not possible (e.g., 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 E3: Organisations are expected that they have an approved Conflict of Interest Policy. This policy should define the term ‘conflict of interest’ and describe how the organization will identify and manage any actual, potential or perceived conflicts of interest.

7.9 Remuneration philosophy
Approved by Board 22 February 2013

The Board’s remuneration philosophy is based on five principles and aimed to achieve optimal outcomes for employees. It provides the framework for managing remuneration and recruiting new employees, and guiding the Board Remuneration Committee.

1. **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 resources to compete solely on this basis.

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

3. **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 NFP). It is expected that five years’ good performance would see an employee in the top quartile.

4. **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.

5. **This remuneration philosophy should be transparent**
A summary of this remuneration philosophy should be made easily available to interested 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:** Detailed policy and procedures set out how complaints from staff or community members will be handled. They seek 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.
Child Protection Policy

Update history

<table>
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<th>Version</th>
<th>Who updated</th>
<th>When updated</th>
<th>Details</th>
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<tr>
<td>V3.7</td>
<td>Ian Jackson</td>
<td>23 Aug 2013</td>
<td>Amendments following DFAT review of V3.6</td>
</tr>
<tr>
<td>V3.8</td>
<td>Ian Jackson</td>
<td>22 Nov 2013</td>
<td>Final approved by WEAL Board &amp; DFAT</td>
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<tr>
<td>V3.9</td>
<td>Sandra Carvajal</td>
<td>16 Nov 2015</td>
<td>Update to specifically recognise projects with children</td>
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<tr>
<td>V3.10</td>
<td>Sandra Carvajal</td>
<td>20 Mar 2016</td>
<td>Update to comply with ACFID review</td>
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<td>Sandra Carvajal</td>
<td>20 Mar 2017</td>
<td>Update to comply with new DFAT guidelines</td>
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<td>V3.18</td>
<td>Shane Nichols</td>
<td>19 Jan 2018</td>
<td>Updated based on DFAT review and feedback</td>
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<td>NS</td>
<td>Nov 19</td>
<td></td>
<td>1 Add 'Promotion of safeguarding commitment'</td>
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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.

1 Introduction
At Good Return we consider the safety and well-being of children to be a priority concern. Good Return adopts a zero tolerance approach to child abuse and exploitation and child pornography, including trafficking and other forms of exploitation, wherever and however they may occur in the context of Good Return activities. Good Return is committed to the safeguarding of children, and to promoting this to the public and other external stakeholders.

All children without exception will be treated with appropriate respect and with recognition of their fundamental right to grow up safely and to enjoy a childhood that is free from exploitation and abuse. In all of its work Good Return sustains a focus on the rights of children that is in line with the UNHCR’s Convention of the Rights of the Child, which in addition to the Child Protection Policy set forth by Department of Foreign Affairs and Trade (DFAT), serves to guide Good Return policy on child protection.

With a programmatic approach of working primarily with partner agencies and adult beneficiaries, staff of Good Return are not usually directly involved in dealing with children. However many of the people Good Return partners work with are poor women with children, and occasionally Good Return supports partners on specific projects that interact directly with children. It is therefore appropriate that all Good Return staff adhere to this policy. Such adherence is monitored through the range of procedures and controls outlined in this policy, and through formal acknowledgement via signature of the Child Protection Code of Conduct.

2 Purpose
The purpose of this policy is to **protect children from abuse and exploitation** of any kind in the delivery of Good Return programs and services.

3 Definitions
**Abuse** comprises:
- **physical**: the use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning
- **neglect**: failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing
- **emotional**: a parent or caregiver’s inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child’s self-esteem or social competence
- **sexual**: use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals; masturbation; oral sex; vaginal or anal penetration by a penis, finger or any other object; fondling breasts; voyeurism; exhibitionism; and exposing the child to, or involving the child in, pornography
- **ill-treatment**: disciplining or correcting a child in an unreasonable and seriously inappropriate or improper manner; making excessive and/or degrading demands of a child; hostile use of force towards a child; and/or a pattern of hostile or unreasonable and seriously inappropriate degrading comments or behaviour towards a child

*Note: the above includes a child or children being present (hearing or seeing) while a parent or sibling is subjected to any of the above.*

**Child/Children** means anyone under the age of 18 years.

**Guardian** means any adult person who is legally responsible for the care and protection of a child

**Child protection** is a broad term to describe philosophies, policies, standards, guidelines and procedures to protect children from both intentional and unintentional harm

**Child Abuse or “maltreatment”** constitutes “all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.”

**Contact with children** means working on an activity or in a position that involves or may involve contact with children, either under the position description, or due to the nature of the work environment.

**Emotional or psychological abuse** includes humiliating and degrading treatment such as bad name calling, intimidation, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

**Exploitation** refers to one or more of the following: committing or coercing another person to commit an act/s of abuse, grooming or online grooming against a child, possessing controlling, producing, distributing or obtaining child exploitation material, or using a child for profit, labour, gratification or some other personal or financial advantage resulting in unjust, cruel and harmful treatment of the child.

**Harm** is the result of the exploitation, violence, abuse and neglect of children and can take many forms, including impacts of children’s physical, emotional and behavioural development, their general health, their family and social relationships, their self esteem, their educational attainment and aspirations.

Good Return staff means any paid employee, in-country personnel, volunteer, contractor, Director or ambassador.

**Informed Consent** ensures the child and the parent or guardian understand the implications, purpose and potential uses of photographs or videos

**Neglect** means deliberately, or through carelessness or negligence, failing to provide for, or secure for a child, their rights to physical safety, food, shelter and development.

**Personnel** are either employed by an organisation, engaged by an organisation on a subcontract basis, or engaged by an organisation on a voluntary or unpaid basis. Personnel can include paid staff, volunteers, interns, trustees, board members

**Sexual abuse** includes all forms of sexual violence including incest, early and forced marriage, rape, involvement in pornography, sexual slavery, indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material.

**Unacceptable Risk** is the portion of identified risk that cannot be tolerated, and that must be either eliminated or controlled. For people deemed an unacceptable risk, control mechanisms are not considered appropriate.

**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 works.

4 **Guiding principles**

Good Return supports and is committed to abiding by the following principles:
Zero tolerance to child abuse and exploitation: Child abuse and exploitation is not tolerated by Good Return, nor is possession of or access to child pornography. Good Return will actively manage risks of child abuse and exploitation associated with delivering its activities and trains its staff on their obligations. Good Return will not knowingly engage, directly or indirectly, anyone who poses an unacceptable risk to children, nor fund any individual or organisation that does not meet the child protection standards outlined in this policy in their own operations and activities.

Recognition of children’s best interests: Australia is a signatory to the United Nations Convention on the Rights of the Child. Good Return is committed to upholding the rights and obligations of this convention. Good Return recognizes that some children, such as children with disabilities and children living in areas impacted by disasters (natural or conflict based), are particularly vulnerable.

Sharing responsibility for child protection: To effectively manage risks to children, Good Return requires the active support and cooperation of contractors and partner NGOs implementing activities funded or supported by Good Return, directly and indirectly. Good Return expects contractors and partners to meet relevant terms of this child protection policy and holds them accountable for complying with it through our MoU and regular field visits.

Use of children’s images: Use of photographs, videoing or other images of children will be done in a manner that is sensitive to local traditions, dignified and respectful, and that is an honest representation of the context and facts. Advance permission will be obtained to use any image, and the possible use of such image explained (a Photo Release Form used whenever possible); no identifying information will be made available about any child in sending or posting images electronically. Training to the staff of partner organisations will stress that photographs should not be solely of children (unless the project works directly with children), and that any location information must only be at the regional/state level, rather than at the village level.

Risk management approach: While it is not possible to eliminate all risk of child abuse and exploitation, we will adopt a risk management approach to reduce the incidence of child abuse and exploitation associated with the delivery of our services and activities through an approach which combines an initial risk assessment (when we commence dealings with a partner) followed by subsequent field visits.

Incorporating child protection strategies into risk management procedures: Child Protection risks must be considered for all projects that ‘work with’ and have ‘contact with’ children. In projects that work directly with children, risks to children are managed for the duration of the activity.

Procedural fairness: We will use fair and proper procedures when dealing with breaches of this Policy, recognising that our decisions could affect a person’s rights and interests. We will contractually require our partner organisations to adhere to this principle when dealing with concerns or allegations of child exploitation and abuse.

Labour exploitation of children- we endorse ILO Convention 182 Concerning Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour and expect partners to comply with labour laws regarding child labour.

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.

5 Compliance

STAFF
Policy: Good Return will ensure that criminal reference checks are obtained for all personnel engaging in work that is likely to involve contact with children. This will include all program staff, not only those working with children.

Procedure: Checks will be conducted for each country in which the individual lived for 12 months or longer over the last five years, and for each of the individual’s countries of citizenship.

In cases where a police check cannot be obtained, which can be the case in developing countries, a personal character reference check is obtained from at least one person, preferably with official status (in the community, company or government), plus a statutory declaration (or the equivalent legal statement) will be required in relation to child abuse and child pornography and exploitation. See Annex C.

Two verbal referee checks are conducted for all Good Return staff and the results recorded in their file. For program staff, referees are asked whether they are aware of any child protection related issues or risks.

Control A police check for all program staff who are Australian residents & citizens. For other program staff, a police check or statutory declaration. For all staff, two referee checks, with results kept on file. Compliance will be checked annually by the Compliance Adviser.

Policy: Targeted interview questioning on child protection will be carried out during recruitment process.
**Procedure:** Recruitment process will include a documented request for an applicant to disclose whether they have been charged with child exploitation offences, and include a provision for their response. Template questions are provided to all interviewers.

**Control** Recruitment process includes file note that relevant question has been asked & answered appropriately.

**Policy:** All Good Return staff will understand and comply with this Child Protection Policy (CPP), and with DFAT Child Protection policy.

**Procedure:** All prospective employees, volunteers, Directors, contractors and partner organisations will be informed of Good Return Child Protection Policy during the recruitment process. Employment contracts and letters of engagement contain a clause enabling Good Return to take appropriate action (up to and including dismissal) in respect of any breach of the Policy.

**Control** All staff to sign CPP CoC to confirm they understand and accept. Relevant clause in employment contract/ engagement letter.

**Policy:** All partners agree to adhere to relevant parts of this CPP (or equivalent) via MOU.

**Policy:** Staff will not use language or behaviour towards children that is inappropriate, harassing, abusive, exploitative, sexually provocative, demeaning or culturally inappropriate nor do we engage children in any form of sexual activity or acts.

**Procedure:** Good Return will not employ technology to exploit or harass children, to identify their locations, or access child pornography. Good Return will comply with all relevant Australian and local legislation, including child labour laws.

**Control** All staff to sign CPP CoC to confirm they understand and comply

**Policy:** All staff working on programs (overseas or in Australia) will be required to attend a training event (generally annually) to ensure understanding of this Child Protection Policy.

**Procedure:** CPP training will take place at induction, with (generally) annual refreshers. Material used in training is based on DFAT guidelines. Compliance Advisor will work with the CP Officer to ensure, as far as possible, that any legislative or other changes relevant to this Policy are promptly reflected in the document, and in related training and signed undertakings.

**Control** Register of staff completing training

**Owner** Program Director / CP Officer / Compliance Advisor

**PARTNERS**

**Policy:** Development partners are required to formally confirm the rejection of all forms of sexual and labour exploitation and abuse or exploitation of women and children, and to adhere to the Child Protection Code of Conduct.

**Procedure:** Ongoing partner awareness of this CPP will be done by reference in progress reporting and/or through site visits at least annually.

**Control** Relevant clause in MoU signed by partner, with follow-up monitored & reported in the progress reports

**Owner** Program Director & Program Managers

**VISITORS**

**Policy:** All visitors will understand and comply with this Child Protection Policy (CPP), and with DFAT Child Protection policy.

**Procedure:** All visitors will be informed of Good Return Child Protection Policy during the briefing process. All visitors to sign CPP CoC to confirm they understand and accept.

**Control** All visitors agree to adhere to relevant parts of this CPP

6 Complaints & Sanctions

**STAFF**

**Policy:** Good Return will not allow any person presenting an unacceptable risk to children’s safety or well-being to work with children.

**Procedure:** Should any Good Return staff become aware of (or have reported to them) a situation of child abuse or exploitation, or non compliance with the Child Protection Policy or Code of Conduct, they should report the incident to Good Return’s Program Director and Child Protection Officer. Partner agency staff should report any such incidents to their own organisation’s senior management and to the most senior Good Return counterpart known to them. This situation must be reported as soon as possible, and may initially be reported verbally, but must be followed up by a written statement by the person making the report. If the incident involves child abuse or exploitation involving a partner organisation then the organisation’s senior management must be informed and the incident reported by them to the relevant social services and police agencies. Where the affected child is not associated with a partner organisation or its staff, Good Return staff should report the incident to police and social services themselves. Parents or guardian(s) of the
child affected should be informed immediately, unless they are believed to be the perpetrator.

Control  All staff to sign CPP CoC (see Annex A) confirming they understand and will comply

Owner   CEO

Procedure: Where there is a complaint against a member of Good Return staff involving any breach or alleged breach of this policy, there may be three types of investigation:

- a criminal investigation
- a child protection investigation
- a disciplinary or misconduct investigation.

Wherever one of the above investigations is underway, Good Return CEO will make an immediate report to the Conduct and Ethics Unit at DFAT in the format required, and to the address shown in their current Child Protection Policy. Supplementary reports will be provided as the investigation proceeds, or as requested by DFAT.

Senior Good Return management will make an immediate decision about whether any individual accused of exploitation or abuse should be temporarily suspended or re-assigned pending further inquiries. Irrespective of the findings of the social services or police inquiries, the Good Return Board will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be done sensitively. Every effort will be made to ensure confidentiality is maintained for all concerned and that accepted standards of procedural fairness are followed. Information will be handled and disseminated on a need-to-know basis only.

Control  On a case by case basis

Owner   CEO and/or Chair

Sanctions

Policy: Should any staff member of Good Return breach this or the DFAT Child Protection Policy, then that staff member may be dismissed, suspended or transferred to other duties, as appropriate.

Control  On a case by case basis

Owner   CEO and/or Chair

PARTNERS

Policy: Good Return will not partner with any organisation presenting unacceptable risk to children.

Procedure: Should a staff member of a partner organisation present a risk to the safety and wellbeing of children, Good Return will re-assess the agreement between Good Return and the partner

Control  On a case by case basis

Owner   Program Director

Policy: All development partners are required to formally confirm the rejection of all forms of sexual and labour exploitation and abuse or exploitation of women and children, and to adhere to the Good Return Child Protection Code of Conduct.

Procedure: Ongoing partner awareness of this Child Protection Policy will be done via the partnership planning process and/or monitoring activities at least annually. Where requested, Good Return will support partners to develop appropriate child protection policies and will provide training to board, staff and clients.

Control  Relevant clause in MoU signed by partner, with follow-up monitored & reported in the partner progress report

Owner   Program Director & Program Managers

7 Project Design

Policy: Project appraisal and design procedures will incorporate appropriate consideration of child protection issues and risks

Procedure: For all projects designed by Good Return, a project design appraisal (see Project Design Appraisal Tool) checklist is completed to ensure that all internal and external issues that may affect the delivery of a project are considered at the activity design stage. The Project Design Appraisal Tool is used to ensure that a risk analysis has been completed including specific risks facing children being identified where appropriate, and that a risk management strategy identifying risks, classifying any high risk activities, mitigation strategies and actions to be taken in the event of the risk occurring (including immediate reporting to DFAT). As part of its project monitoring activities Good Return will undertake to review such risks on at least an annual basis.

Control  Completed and signed Project Design Appraisal Tool form for all projects

Owner   Program Director & Program Managers

8 Appropriate images & materials

Policy: Any use of images or written or other materials of children will be undertaken with the informed consent of the child and parent or guardian, will respect the right to privacy, dignity and
culture of partners and participants, and will not identify their location.

Procedure: Where such consent is obtained verbally, a note will be placed on file. In taking photographs and film footage of children, Good Return follows procedures to ensure that permission is requested prior to film or photos being taken by obtaining permission from the parents or guardians of all concerned children. Where such permission is obtained verbally, a file note will be made.

Control  Completed release form in place for all published photographs of children (see full policy here)

Owner  Relationship Leads / Field Support Officers

9 Policy review
Policy: Good Return will review its child protection policy on a regular basis, in line with Australian government (DFAT) guidelines.
Procedure: An internal review of compliance with this policy will be undertaken annually, and the policy itself will be reviewed at least once every 3 years or as required.

Control  Board minute approving CPP

Owner  Compliance Officer (per compliance plan & calendar)

10 Reporting Process flowchart
1A Child Protection Code of Conduct : Staff Declaration

As a staff member, volunteer, contractor or visitor engaged by Good Return, I acknowledge that I have read and understood Good Return’s Child Protection Policy and agree that while implementing activities on behalf of, or in support of, Good Return, I will at all times:

- treat all children with respect, regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status
- not use language or behaviour towards children that is inappropriate, harassing, exploitative, abusive, sexually provocative, demeaning or culturally inappropriate
- not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
- wherever possible, ensure that another adult is present when working in the proximity of children
- not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor’s permission, and ensure that another adult is present if possible
- never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium (see also ‘Use of children’s images for work related purposes’)
- not upload photographs depicting children associated to work activities on personal or other social media channels and/or disclose their locations using GPS or identifying descriptors
- not use physical punishment on children
- not hire children for domestic or other labour which is inappropriate given their age or development stage, which interferes with their time available for educational and recreational activities, or which places them at significant risk of injury
- comply with all relevant Australian and local legislation, including laws in relation to child labour
- immediately report concerns or allegations of child exploitation or abuse or breaches of this policy to my supervisor and the CEO or Program Director
- immediately disclose all charges convictions and other outcomes of an offence that relates to child exploitation or abuse, including those under traditional law, which occurred before or occurs during association with Good Return
- Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse.

These behaviours are not intended to interfere with normal family interactions.

Use of children’s images for work related purposes

When photographing or filming a child for work related purposes, I will:

- take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
- before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child in conformity with Article 16 of the UNCRC – right to privacy. As part of this I must explain how the photograph or film will be used
- ensure photographs, films, videos and DVD’s present a child in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- ensure images are honest representations of the context and the facts
- ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

I understand that the onus is on me, as a person engaged by Good Return, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse when implementing activities on behalf of, or in support, of Good Return.

Name (print): ___________________________ Country of citizenship: ___________________________

Signed: ___________________________ Date: ___________________________
1B Child Protection Code of Conduct: Partner Declaration

As a partner of Good Return, I __________________, on behalf of ______________, acknowledge that I have read and understood Good Return’s Child Protection Policy and agree that while implementing activities in partnership with Good Return, ____________ staff will at all times:

- treat all children with respect, regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status
- not use language or behaviour towards children that is inappropriate, harassing, exploitative, abusive, sexually provocative, demeaning or culturally inappropriate
- not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
- wherever possible, ensure that another adult is present when working in the proximity of children
- not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor’s permission, and ensure that another adult is present if possible
- never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium (see also ‘Use of children’s images for work related purposes’)
- not upload photographs depicting children associated to work activities on personal or other social media channels and/or disclose their locations using GPS or identifying descriptors
- not use physical punishment on children
- not hire children for domestic or other labour which is inappropriate given their age or development stage, which interferes with their time available for educational and recreational activities, or which places them at significant risk of injury
- comply with all relevant Australian and local legislation, including laws in relation to child labour
- immediately report concerns or allegations of child exploitation or abuse or breaches of this policy to my supervisor and the CEO or Program Director
- immediately disclose all charges convictions and other outcomes of an offence that relates to child exploitation or abuse, including those under traditional law, which occurred before or occurs during association with Good Return
- Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse.

These behaviours are not intended to interfere with normal family interactions.

Use of children’s images for work related purposes

When photographing or filming a child for work related purposes, I will:

- take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
- before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child in conformity with Article 16 of the UNCRC – right to privacy. As part of this I must explain how the photograph or film will be used
- ensure photographs, films, videos and DVD’s present a child in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- ensure images are honest representations of the context and the facts
- ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

I will ensure that _________ staff understand that the onus is on them, as staff members of ______________, who is a partner with Good Return, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse when implementing activities on behalf of and in partnership with Good Return.

On behalf of: (name)

Signed: __________________________ Date: ____________
1C Standard Appearance Release

Policy: Marketing materials (print or online) will not feature children. Where children are visible, we will provide no specifics as to their location.

ACFID C 1.3 Signatories will ensure that images and messages portraying women and men, boys and girls in their communications respect the dignity, values, history, religion and culture of the people portrayed.

DFAT D2 Materials respect the dignity, values, history, religion and culture of those with whom we work.

- Images and messages of women and men, boys and girls will present them in a dignified, respectful manner, portraying them as equal partners in the development process.
- Images and messages will honestly portray the diversity of local people including age, disability and other marginalised groups.
- Images and messages will honestly convey the context and complexity of the situations in which local people live.
- Figures in images will be informed of what the image is used for and if possible, permission obtained.
- Origins of any images will be known and necessary permissions, including copyright releases, be held.
- Care will be taken to ensure that the identification of or use of images of local people will not endanger the people they portray.

Procedures:

When taking photos on behalf of Good Return, have available Appearance Release forms so subjects can sign them after their photo is taken. Explain the purpose of the photo and its potential uses: this represents their informed consent to the use of their image.

When English is not understood, use a translator for gaining informed consent. When it is not feasible to gain written consent, still seek verbal agreement to take and use their photo: this is informed verbal consent.

This gives Good Return the legal ability to use the photos for promotional purposes.

Standard Appearance Release

Person Appearing: ______________________
Project: ____________________________
Date: _____________________________
Location: __________________________

I authorize Good Return to use, in whole or in part, my name, likeness, image, biography, interview and performance, in all manner and media, as Good Return shall determine in its sole discretion. Good Return and its successors and assignees, shall own all right, title and interest, including the copyrights, in and to the Project, to be used and disposed of throughout the world in perpetuity without limitation as Good Return shall determine in its sole discretion. Good Return is not liable for unintentional misrepresentation of information including facts, opinions, and quotes derived from this photography and/or video and/or interview other data-collection process.

Name: _____________________________
Signature: _________________________
Address __________________________
Date: ____________________________
Annex 2   Gender Equality Policy (Jan 2017)

1. Purpose
This Gender Equality Policy will support and guide our work in advancing gender equality, women’s empowerment and non-discrimination of women and men within the organisation and supported programs.

Good Return understands that gender equality and women’s empowerment have a crucial impact upon its ability to achieve its mission. As outlined in the Beijing Declaration and Platform for Action: “Eradication of poverty based on sustained economic growth, social development, environmental protection and social justice requires the involvement of women in economic and social development, equal opportunities and the full and equal participation of women and men as agents and beneficiaries of people-centred sustainable development.”

To understand and address gender is to understand and address women’s and men’s needs and interests separately. Women’s greater experience of disadvantage and discrimination means that women specifically require special attention and interventions, and men’s involvement and support is necessary and valuable. Promoting gender equality and women’s empowerment in Good Return work is a vital part of achieving its mission.

Good Return recognises the need for a Gender Policy that will underpin its approach and strategic direction in relation to gender equality. This Gender Policy outlines the context and key issues of gender equality and non-discrimination & safety. It presents definitions, guiding principles, and primary approaches taken by the organisation.

2. Background
Good Return is committed to promoting gender equality for women and men, both as an internationally recognised human right, as well as a powerful means of reducing poverty worldwide. Despite decades of international efforts attempting to address issues of gender inequality, globally, women continue to experience greater disadvantage than men in accessing opportunities which is in direct violation of their human rights. Women face a greater level of extreme poverty, discrimination and marginalisation and it is within this context that Good Return’s Gender Policy promotes a particular focus on women’s empowerment and women’s access to opportunities to mitigate the continued gender discrimination across the globe.

Good Return acknowledges the context of disadvantage and discrimination experienced by women occurs in all spheres of life. In our Asia Pacific region, patriarchal cultures are dominant, resulting in greater inequality afforded to women and girls compared to men and boys. Compared to men, women have fewer educational opportunities and experience economic disadvantage, unfavourable laws in relation to property and inheritance, and a limited political voice. The Asia and Pacific region is losing US$42-$47 billion annually because of women’s limited access to employment opportunities, and another US$16 billion to US$30 billion annually as a result of gender gaps in education.

As primary caregivers, women are more likely to experience the challenges of poverty and carry the burden of their families’ wellbeing. However, women are often denied their human right of equal access to economic resources and opportunities, contributing to household poverty and disadvantage for many communities. According to the World Bank, women living on less than US$2/day are 28% less likely than men to have an account at a formal financial institution. Moreover, women often experience economic violence, such as in Cambodia, where 53.2% of men reported committing at least one act of economic violence against their partner (most commonly, “withheld earnings from partner”).

Women are vulnerable to poor health outcomes due to restrictive factors limiting their access to adequate health care and education. Women and girls also face increased risks of domestic and sexual violence and trafficking compared to men. According to a 2013 UN study which interviewed 10,000 men across the Asia Pacific region, overall, nearly half of those men interviewed reported using physical and/or sexual violence against a female partner, ranging from 26% to 80% across the sites. In the workplace, advancing gender equality has enormous positive socioeconomic outcomes, stimulating productivity and growth. The Australian Workplace Gender Equality Agency outlines the following benefits of gender equality in the workplace: reduces expenses, improves company performance, increases national productivity and competitiveness, and reduces resource wastage.

Good Return recognises the importance of promoting gender equality and equal opportunity within its own organisation, reflected in the results of the 2015 Gender Self-Assessment. Good Return is
committed to improving its policy and practice through the regular implementation of gender auditing and action planning.

3. Our Gender Equality Vision & Mission

Our vision is a world without poverty where people have access to resources and opportunities to improve their lives. Our mission is to enable those living in poverty to achieve economic empowerment through responsible financial inclusion and capability development.

As an important aspect of achieving Good Return’s vision, Good Return’s Gender Equality Vision is a world where all people, regardless of gender, are able to enjoy equal human rights and associated opportunities to achieve their goals in life free from discrimination and violence.

Good Return’s Gender Equality Mission is to work internally as an organisation and with our partners to address gender inequality and empower women as a means of overcoming poverty.

Good Return recognises these conventions:
- The Beijing+20 Review Declaration
- UN Sustainable Development Goal 5: Achieve gender equality and empower all women and girls
- WEAL is a signatory to the ACFID Code of Conduct.

We also recognise DFAT’s strategic priorities in relation to gender equality and women’s empowerment:
- Enhancing women’s voice in decision-making, leadership and peacebuilding
- Promoting women’s economic empowerment
- Ending violence against women and girls

4. Our Principles

In line with the above international conventions and DFAT’s strategic priorities, Good Return supports and is committed to abiding by these principles:

Promote ownership of gender equality amongst staff internally and with Good Return partners. Good Return will promote gender equality amongst Good Return staff in all locations and actively engage and support partners on gender issues as deemed appropriate to the local context.

Actively work to reduce discrimination against women. Good Return will identify barriers for women’s participation and areas of discrimination in its organisation and programs and actively work towards addressing these by institutionalising gender equality in the development, monitoring and evaluation of all policies, processes, programs.

Promote equal representation of women and men in leadership and decision-making. Good Return will seek opportunities to promote gender equality in leadership and decision making. This will include ensuring a balanced representation of women and men on the Board and senior leadership positions.

Improve women’s and men’s access to education. Good Return has a special focus on education and skill building as a means of addressing poverty. It seeks to reduce the gap in women’s access to education and therefore primarily targets women as clients of its training programs.

Support efforts towards achieving equal access to economic resources and community services. Good Return works exclusively through local partners, and seeks opportunities to promote women’s roles in decision-making at all levels of the organisation and in the implementation of community activities.

Empower women to share equally in the benefits of economic and social life. Good Return microfinance and livelihood development programs are focused on empowering women through access to these critical services.

Support men and women to challenge existing gender roles and relations, minimise harm, and promote women and men’s human rights. Good Return is committed to incorporating gender and responding to social justice and human rights concerns in its operations. Good Return will actively engage men and boys as gender allies to help champion the cause of gender equality.

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5. Our Commitment
Good Return will take a proactive and immediate response to addressing discrimination and safety issues relating to gender. Specifically, Good Return commits to:

- Treat all staff, partner staff, program beneficiaries and supporters with respect and courtesy regardless of gender, sexual orientation, ethnicity, religion, etc.
- Ensure all staff have equal access to Good Return resources and opportunities, and address any disadvantages where they exist.
- Acknowledge the different working styles and various strengths of staff, and encourage equitable participation by women and men in all decision-making processes.
- Not use discriminatory or stereotyping language (written or verbal), which may diminish or cause offence to others, applying to both internal and external communication.
- Not permit any form of verbal, emotional, psychological, physical or sexual harassment by Good Return or partner staff.
- Provide a confidential, sensitive and fair mechanism for staff to report incidences of gender based discrimination and/or harassment.
- Ensure any breaches of conduct with respect to gender safety and non-discrimination are handled fairly and efficiently, with a view to improving understanding and conduct. Any cases of gender based or sexual harassment will be addressed in accordance with Good Return grievance policy, and if appropriate, relevant State and Federal legislation.

6. Our Programs
Good Return must often work within patriarchal cultures where access to and control of economic resources within households and communities is commonly held by men. Interventions that engage men to support women’s economic empowerment can reduce unintended negative impacts of financial inclusion programs.

Good Return seeks to deliver high quality gender responsive programs through gender mainstreaming, the use of a gender-focused monitoring and evaluation framework and certain research initiatives. To achieve this goal, Good Return will seek to understand the local context, educate ourselves and our partners, and capture data to inform our research, design and delivery of activities. It is recognised that gender issues exist within a broader framework of inclusion (e.g. disability, age, sexual orientation, ethnicity).

Good Return aims to expand its gender KPIs at the Organisational, Marketing & Fundraising and Program levels through its Annual Business Planning process. The KPIs will be informed by the Gender Strategy & Action Plan, which will be reviewed and updated on an annual basis.

7. Accountability
Implementing the Gender Policy is a shared responsibility by all levels of the organisation, per below:

<table>
<thead>
<tr>
<th>Action</th>
<th>Control / Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>All (Board and/or staff):</td>
<td></td>
</tr>
<tr>
<td>Adhere to the Gender Policy, including reporting any gender safety and/or discrimination issues</td>
<td>Register of staff sign-on to Gender Policy / Program Director</td>
</tr>
<tr>
<td>Undertake basic gender awareness training (in-person or via Learning Management System)</td>
<td>Register of staff completing training / Program Director</td>
</tr>
<tr>
<td>Staff performance reviews to include discussion item on individuals’ progress towards mainstreaming gender into their work (e.g. internal/external communications, project design, organisational planning, recruitment, staff development, gender advocacy, etc.)</td>
<td>Annual staff performance reviews / Operations Director</td>
</tr>
<tr>
<td>Board:</td>
<td></td>
</tr>
<tr>
<td>Achieve 50:50 gender parity on the Board by 2018</td>
<td>Annual report / Chair</td>
</tr>
<tr>
<td>Commission an organisational gender self-assessment on a 3 yearly basis to track progress over time</td>
<td>Gender Self-Assessment Report / Chair</td>
</tr>
<tr>
<td>CEO:</td>
<td></td>
</tr>
<tr>
<td>Promote gender balance as a way of achieving quality staffing at all levels of the organisation</td>
<td>Annual Report / CEO</td>
</tr>
<tr>
<td>Include gender targets into Good Return Annual Business Plan (in consultation with Senior Management)</td>
<td>Annual Business Plan / CEO</td>
</tr>
<tr>
<td>Senior Management (Operations, Program and Marketing &amp; Fundraising Directors):</td>
<td></td>
</tr>
</tbody>
</table>
### Address and remedy Gender Policy transgressions
Case by case basis / HR and/or Senior Management

### Formulate strategies (incl. resourcing) to achieve gender targets outlined in Strategic and Annual Business Plans
Strategic & Annual Business Plan KPIs / Senior Management

### Report progress on gender targets to the Board on a quarterly basis
Quarterly Board reports / Senior Management

### Ensure all manuals (e.g. Program Manual), handbooks and other relevant documents have clear expectations and guidance on how gender considerations are to be addressed in all organisational processes, projects/programs, campaigns, communications, etc.
Relevant documents / Senior Management

### Operations, Marketing & Fundraising and Program staff teams:

<table>
<thead>
<tr>
<th>Task</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure gender considerations (i.e. gender analysis and feasible gender sensitive indicators) are built into project design, implementation, evaluation and organisational processes, to drive meaningful gender-disaggregated data collection and analysis</td>
<td>Relevant documents / Senior Management</td>
</tr>
<tr>
<td>Ensure reporting on gender targets as required (e.g. provide data, case studies, etc.)</td>
<td>Relevant documents / Senior Management</td>
</tr>
<tr>
<td>Program staff to conduct gender awareness workshops with partner leadership and staff (as required)</td>
<td>Register of staff completing training / Program Director</td>
</tr>
<tr>
<td>Coordinate implementation of and track &amp; report progress against Good Return Gender Strategy &amp; Action Plan.</td>
<td>Gender Strategy &amp; Action Plan progress report / Gender Focal Point</td>
</tr>
<tr>
<td>Develop training and deliver to staff to address gender considerations in their work (e.g. rapid gender assessments, gender analysis, gender sensitive monitoring &amp; evaluation, etc.)</td>
<td>Learning Management System / Gender Focal Point</td>
</tr>
<tr>
<td>Provide technical support to staff, including planning advice, tool use and development, evaluation &amp; reporting, etc.</td>
<td>Relevant documents / Gender Focal Point</td>
</tr>
<tr>
<td>Conduct periodic organisational Gender Self-Assessments to track progress over time</td>
<td>Gender Self-Assessment Report / Gender Focal Point</td>
</tr>
</tbody>
</table>

### Partners:

- Sign on and adhere to the Gender Policy, or develop own policy (as appropriate)
  Register of partners’ sign-on to Gender Policy / Program Director

- Enhance staff awareness of and capacity to address gender equality and women’s empowerment issues as part of their work
  Register of staff completing training / Relationship Lead

- Relevant Good Return staff to assist partners in their collection of gender disaggregated data to enhance their ability to address gender equality and contribute to the achievement of their organisational missions.
  Relevant documents / Relationship Lead

### 8. Procedures

Good Return documents include specific procedures for ongoing implementation of the Gender Policy:

<table>
<thead>
<tr>
<th>Document</th>
<th>Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Business Plan</td>
<td>Gender targets/KPIs to be tracked and reported against throughout the year</td>
</tr>
<tr>
<td>Annual Report</td>
<td>Reports adherence to the Gender Policy and progress against the Gender Strategy &amp; Action Plan</td>
</tr>
<tr>
<td>Employment Manual</td>
<td>Expectations for staff in terms of their responsibilities in alignment with the Gender Policy and Gender Strategy &amp; Action Plan.</td>
</tr>
<tr>
<td>Volunteer Manual</td>
<td></td>
</tr>
<tr>
<td>FSO Handbook</td>
<td></td>
</tr>
<tr>
<td>Operations Manual</td>
<td>Expectations and processes around ensuring gender balance in staffing and governance structures</td>
</tr>
<tr>
<td>Program Manual</td>
<td>Expectations and guidance on how gender considerations are to be addressed at all stages on the project/program lifecycle</td>
</tr>
<tr>
<td>Marketing Strategy and/or guidance document/s</td>
<td>Expectations and guidance on how gender consideration are to be addressed in marketing &amp; fundraising activities</td>
</tr>
</tbody>
</table>

Gender Focal Point and Gender Advisor will stay abreast of any changes related to gender equality by relevant government and sector organisations (e.g. DFAT, ACFID) and propose amendments to the Gender Policy accordingly.
Purpose:
Good Return seeks to be an environmentally aware organisation that practices what it preaches. It will actively promote the importance of conservation of the natural environment, and of the fight against climate change. The purpose of this policy is to guide staff in pursuing their responsibility to protect the environment in all activities carried out by the organisation.

Policy: It is Good Return policy to recognise and as appropriate implement ACFID Code of Conduct and DFAT Australian Aid guidelines with respect to environmental risk and protection.

Good Return recognises these principles:
- Consideration of environmental impacts inherent in our activities
- Reduction or mitigation of all negative environmental impacts (direct or indirect)
- Monitoring and enhancement of all positive environmental impacts (direct or indirect)
- Continuous improvement of our practices
- Involvement of partners in reflection and actions

Procedure:
We are committed to improving our environmental performance and reducing our organisational contribution to climate change and environmental degradation. Our educational programs, particularly those involving the rural poor, will:
- Primarily ensure all environmental impacts of our programs (direct or indirect, positive or negative) are managed to minimise negative and promote positive impacts on the environment.
- Ensure that environmental requirements specified by DFAT Australian Aid, and by relevant environmental regulations of the partner country, are implemented and monitored.
- Report to DFAT Australian Aid any potential or actual environmental impacts of our projects/programs.

ACFID B.1.6 The aid and development activity of signatory organisations will aim to be informed by and implemented with an understanding of the environmental impact, if any, of their activities.

DFAT Environmental Principles
DFAT seeks to work with partners, including from the private sector, that demonstrate and promote environmental sustainability. DFAT delivers the aid program through a range of partners, and recognises that these partners have their own environmental responsibilities and obligations. DFAT needs to know what those responsibilities are, and their application to Australian-funded activities.

Projects supported by DFAT will recognise the following principles.

Principle 1: Do no harm
- Protect and maintain the health, diversity and productivity of natural habitats.
- Protect the health, welfare, and livelihoods of people including women and vulnerable groups, including children and people with a disability.
- Apply pollution prevention and control technologies and practices consistent with international good practice. Avoid use of hazardous materials subject to international bans and phase outs.
- Provide safe and healthy working conditions that prevent accidents, injuries and disease to workers and local communities.
- Protect and conserve natural and cultural heritage.

Principle 2: Manage environmental risk and impact
- Conduct an assessment of each proposed activity to identify potential direct and indirect impacts on the environment and the potential significance of any identified impacts. Undertake due diligence reviews of associated facilities where appropriate.
- Ensure environmental risks are identified early and presented in relevant risk and decision-making processes and documents.
- Avoid, or where avoidance is not possible, minimise, mitigate, or as a last resort, offset negative environmental impacts.
- Monitor and report on environmental management during design and implementation.
- Conduct strategic environmental assessment of DFAT’s policies, programs, and plans when appropriate.
- Seek advice from the Department of the Environment, in accordance with the approach agreed between DFAT and Department of the Environment, for referral of any activities which are assessed as having, or likely to have a significant environmental impact.

**Principle 3: Disclose information transparently**
- Apply international and any relevant Australian Government transparency principles to all information on environmental considerations and provide access to this information in an accessible form and language.

**Principle 4: Consult stakeholders**
- Conduct meaningful consultation with affected parties, including women and vulnerable groups. Consultations shall be free from external manipulation, interference, coercion or intimidation and provide information that is understandable and accessible to affected people in a timely manner.
- Establish a grievance redress mechanism to receive affected parties’ concerns and grievances on environmental performance and facilitate resolution.

**Principle 5: Work with partners**
- Comply with partner government environmental laws, standards and policies as well as MEAs to which they are a signatory, and support partners to observe them.
- Build capacity of partners to develop and implement environmental governance frameworks.
- Harmonise with international development partner environmental safeguard policy principles.

**Principle 6: Promote improved environmental outcomes**
- Where appropriate, improve DFAT’s aid activities by integrating environmental considerations into social and economic development sectors to reduce pollution and improve the sustainable use of resources including energy, forestry and water resources.
- Promote the principles of ecologically sustainable development as outlined in the EPBC Act by ensuring aid activities address these principles.

**Procedures and Controls**
These procedures will apply where our work is in an environmentally sensitive area, or where our partners’ activities have environmental implications.

**Responsibility:** Designate officers as focal points for policy ownership and management: Agribusiness Lead for policy regarding Program areas. Corporate Partnerships Manager for policy regarding internal environmental footprint.

**Review:** Develop a process for assessing our activities’ impacts on the environment. Review this policy in light of DFAT Australian Aid guidelines every two years.

**Communications:** Include environmental issues in communications, website and annual report.

**Program design:** Prior to designing a program, complete basic Environmental Impact Assessment (EIA) to assess and manage potential environmental impacts. Where impacts are identified, develop an Environmental Management Plan (EMP) (appropriate to scale of the impacts) to direct actions.

**Reporting** Report in interim and final project reports on
- EIA findings
- how these findings were incorporated in the EMP
- environmental management activities, and required actions carried out
- environmental management outcomes.

**Partners:** Seek partners with commitment to environmental protection (as minimum, a ‘do-no-harm’ approach). Encourage them to adopt a triple bottom line approach (financial + social + environmental) to management, governance, and reporting.
Managing internal environmental impact

Policy: Good Return is committed to minimising the environmental footprint of its operations, by introducing environmentally sustainable practices into our own business activities.

Example: from 2014 ANNUAL REPORT

Extract from DFAT paper (2016): ANCP - Environment

The Environment Protection Policy for DFAT’s Aid Program outlines DFAT’s legal obligations to protect the environment when delivering aid. The Policy applies to all aid investments across economic growth and human development sectors such as infrastructure, agriculture, forestry, tourism, mining, fisheries and infrastructure works in health, water & sanitation and education programs.

The Policy outlines DFAT’s obligation under the Environment Protection and Biodiversity Conservation Act (Cth) 1999 (‘the EPBC Act’) to ensure that through our overseas work we are considering whether we are causing, or are likely to cause, a significant impact on the environment and taking steps to reduce any such negative impacts. Under the provisions of the EPBC Act, such potential significant impacts on the environment from the implementation of the Australian aid program must be diligently assessed and managed as prescribed under the EPBC Act.

All investments, regardless of the monetary value or delivery approach, must be assessed for potential environmental impacts in accordance with the Policy. NGOs, like other DFAT aid delivery partners, must specifically consider environmental issues in each proposal for funding. Projects/programs identified as having potential adverse environmental impacts or located in an environmentally sensitive location or sector will require an initial environmental assessment. A guide to assessing environmental risk is included in the Environment Protection Policy Good Practice Notes. The Good Practice Notes set out how to apply best practice in environmental management to Australian aid program activities.
**Annex 4 Disability Inclusion Policy (Jan 2017)**

<table>
<thead>
<tr>
<th>V2.1</th>
<th>Shane Nichols</th>
<th>17 March 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Feb 16</td>
<td>Rob Haggett</td>
<td>Feb 16</td>
</tr>
<tr>
<td>v 1-17</td>
<td>Janet Oxley</td>
<td>Jan 17</td>
</tr>
</tbody>
</table>

**Purpose**

The purpose of this policy is to promote disability inclusion and non-discrimination of persons with disabilities (PWD) within Good Return organisational and programmatic areas. Disability inclusion is a powerful tool for reducing poverty, increasing the effectiveness of aid, and is a development goal in its own right. The policy outlines how Good Return aims to achieve this, organisationally and programmatically.

The term ‘people with disabilities’ includes those who have episodic or long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder their full participation in society on an equal basis. In line with language used by the Convention on the Rights of Persons with Disabilities (CRPD), to which Australia is a signatory, Good Return encourages ‘person-first thinking’, and respect for the contribution, skills and capacity of individuals who have a disability.

Disability is an international development issue because approx 80% of those with disabilities globally live in developing countries, where they constitute over 20% of the poorest of the poor.

In relation to microfinance, it is estimated that persons with disabilities represent only 0.5% of current MFI clients despite the fact that the vast majority of these (80-85%) have the capacity to use and benefit from financial services. The Pacific and Asia are home to two thirds of this population.

The circumstances of people with disability also impact on their families and communities. One third of people with disability are children, two thirds of whom have preventable impairments. Women and children with disability often face the greatest barriers. It is believed that at least half the causes of disability can be prevented.

Persons with disabilities are often excluded from their communities due to:
- Incorrect assumptions that people with disabilities do not require or are not capable of engaging in society, education, employment and basic services
- Lack of skill and understanding amongst community members and workers regarding how to engage with and assist people with disabilities
- Social and development activities and services often being inaccessible to people with disabilities. For example, those with mobility impairments may not be able to travel far, and communication may not include those with sensory or intellectual impairments.

Disability and poverty reinforce and perpetuate one another. People with a disability are among the poorest of the poor, while people living in poverty are more at risk than others of acquiring a disability. The problem is aggravated by gender inequality. 75% of women worldwide are unable to be granted bank loans due to unfair property ownership laws, or unpaid or insecure jobs. In light of this, disability barriers can further burden already vulnerable members of the community.

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1. UNDP, Gender & Poverty Reduction
Policy: It is Good Return policy to recognise and wherever appropriate implement the relevant principles of the ACFID Code of Conduct and DFAT Australian Aid guidelines with respect to inclusion of people with disabilities.

ACFID B 3.3 and D 54 Australian Aid Guidelines

Procedures

Internal:
- Confirm Janet Oxley as focal person for disability inclusion and related issues.
- Review our current approach to disability inclusion, and develop a plan as to how we might improve and extend its reach in this area.
- Communicate to raise internal awareness (including Board members) about disability related issues. As part of staff induction, incorporate training around disability inclusion.
- Share resources on disability inclusion with staff via Learning Management System (LMS).

External / Program
- Establish links with Australian Disability & Development Consortium (ADDC) and ACFID working groups
- Engage with local Disabled People’s Organisations (DPOs) who are best placed to represent persons with disabilities in the community where our programs operate
- Share resources with our partners to facilitate access to local experts in disability inclusion.
  Conduct awareness raising sessions with partners, and include DPOs in the discussion.
- Include disability inclusion strategy in standard program design template

Key Success Factors (from ACCION Smart Campaign paper)
- Secure senior management buy-in. This must include having statement of commitment from the MFI and a champion within the organization who is vocal about commitment to this initiative.
- Have the right project manager on board from the very beginning – and make sure the manager has enough time to dedicate to disability inclusion.
- Find experienced and respected disability organization partners who are willing to invest significant time and energy to make this work. Industry peers and government agencies can play a role too.
- Make sure all internal and external stakeholders are on the same page regarding resource requirements, scope, and timeframes. This will require a detailed project plan and regular progress updates.
- Bring in specialized consulting resources when the required expertise is not in-house.
- Get PWD directly involved in the project – and look to your current PWD clients and staff first.
- Do not try to do too much at once and celebrate every small step. Be totally honest when things are not going according to plan, and focus on fixing any problem not assigning blame.
- Make sure the changes you enact are sustainable and scalable, not quick fixes that will not stand the test of time.

DFAT Australian Aid policy


Disability-inclusive development is a priority for Australia’s international engagement. This strategy responds to the agenda set out in DFAT’s development policy, and aims to promote improved quality of life of people with disabilities in developing countries. The Australian Government aims to ensure that people with disability are included in and benefit equally from Australia’s aid program, consistent with our obligations under the UN Convention on the Rights of Persons with Disabilities. The strategy aims to improve the quality of life of people with disabilities in developing countries, through enhancing participation and empowerment, reducing poverty, and improving equality for people with disabilities in all areas of life.