



Abbeyfield Australia Ltd

Abbeyfield Australia policy and procedure manual

April 2016

Abbeyfield Australia Limited
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1. Policy endorsement and review schedule

Policy	Date Adopted	Reviewed & Endorsed	By	Reviewed & Endorsed	By	Next Review Due
Human Resources						
Staff Recruitment	4 July 2014					Feb 2016
Conditions of Employment - general	4 July 2014					April 2016
Education, Training and Staff Development	4 July 2014					July 2016
Work Health and Safety Policy	4 July 2014					Sept 2016
Anti-discrimination	4 July 2014					Nov 2016
Sexual Harassment and Victimisation	4 July 2014					Feb 2017
Workplace Bullying	4 July 2014					April 2017
Grievance Resolution	4 July 2014					July 2017
Information and Communication Technology Policy	4 July 2014					Sept 2017
Social Media Policy	4 July 2014					Nov 2017
Operational Policies						
Reducing the Risk of Fraud and Corruption Policy	13 Feb 2010	22 Feb 2015	AAL Board			Feb 2018
Notifiable Incidents Policy	18 Nov 2012	19 Sept 2015				Nov 2018
Whistle-blower Policy	18 March 2010	19 Sept 2015	AAL Board			July 2018
Gifts Policy	13 Feb 2010	19 Sept 2015	AAL Board			May 2018
Donations Policy	13 Feb 2010	19 Sept 2015	AAL Board			May 2018
Investment Fund Policy	18 Nov 2012					Sept 2015
Leadership & Improvement						
Board Roles & Responsibilities	4 July 2014	16 April 2016	AAL Board			April 2019

Policy	Date Adopted	Reviewed & Endorsed	By	Reviewed & Endorsed	By	Next Review Due
Meetings & Decision Making	4 July 2014	16 April 2016				April 2019
Membership	4 July 2014					July 2016
Code of Ethical Conduct	4 July 2014					Sept 2016
Conflict of Interest	4 July 2014					Nov 2016
Planning & Evaluation	4 July 2014					Feb 2017
House Governance	4 July 2014					April 2017
Environmental Sustainability & Compliance	4 July 2014					July 2017
Risk Management	4 July 2014					Sept 2017
Publicity & Media Contact	4 July 2014	19 Nov 2014	AAL Board			Nov 2017

At the 2 May 2015 Abbeyfield Australia Board meeting, the Board resolved that the Governance Committee is responsible for reviewing all policies and will, if necessary, seek the opinion of other committees where relevant.

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Human resources policies

2. Staff recruitment

Introduction

The success of Abbeyfield Australia (Abbeyfield) relies on its ability to attract the best staff and volunteers available. Recruitment methods must be fair, efficient, and effective.

Purpose

The Staff Recruitment Policy has been established to ensure Abbeyfield has the opportunity to attract the best available staff and volunteers for all vacant positions.

Policy

Abbeyfield is committed to providing high quality supported housing in our community. To support the achievement of this objective, we recognise the importance of employing the most suitable applicant for all vacant positions.

Abbeyfield will ensure it has the best opportunity to attract the best available staff by broadly advertising all vacant remunerated positions and volunteer vacancies.

Abbeyfield will take all appropriate precautions to ensure that applicants may be safely entrusted with the duties of their position.

Abbeyfield will internally advertise all vacant positions to current staff and volunteers to encourage career advancement and increase participation.

Abbeyfield is an equal opportunity employer, and is committed to providing a work environment that is free from harassment and discrimination.

All recruitment and selection procedures and decisions will reflect Abbeyfield's commitment to providing equal opportunity by assessing all potential candidates according to their skills, knowledge, qualifications and capabilities. No regard will be given to factors such as age, gender, marital status, race, religion, physical impairment or political opinions.

Procedures

It shall be the responsibility of the CEO to implement this policy and to monitor its performance.

It is the responsibility of Committees of Management to ensure that:

- They are familiar with the recruitment policies and procedures, and that they follow them accordingly;
- All roles have current position descriptions that specify role requirements and selection criteria.

It is the responsibility of the Abbeyfield Australia to ensure that:

- Committees of Management are aware of their responsibilities in the recruitment and selection process;
- Committees of Management are given continuous support and guidance in regards to recruitment and selection issues.

Recruitment of CEO

The Board of Abbeyfield Australia is responsible for the employment and monitoring of the organisation's Chief Executive Officer (CEO), who is the highest-level staff member of the organisation.

Abbeyfield will employ the best available person for the job of CEO, will utilise an open and transparent appointment process, and will be a good employer, providing fair and appropriate terms and conditions of employment.

When a new CEO is to be appointed, the position will be advertised in order to attract the widest possible range of potential applicants.

The responsibility for appointing, monitoring and terminating the employment of Abbeyfield's CEO lies with the Board.

The process of advertising, interviewing and short-listing for the position of CEO is the responsibility of a committee that shall be set up by the Board for this purpose, with a membership selected by the Board. Alternatively, external recruitment consultants may be used. After due deliberation, this committee will make a recommendation to the Board.

The final decision for the appointment of the CEO is to be made by the full Board.

The position statement for the CEO will be that approved by the Board. The CEO's terms and conditions of employment are contained in the Contract negotiated and signed by the Chair (or a person delegated to this role by the full Board) and the CEO. Procedures for the termination of the CEO's contract are to be contained in that Contract.

The CEO's performance, remuneration and conditions of employment are to be reviewed annually by the Board, or a committee delegated to this role. Any variations to the Contract shall be negotiated by the Chair (or delegate) and ratified by the Board.

The CEO and the Chair (or designated committee) will meet annually to carry out a formal appraisal of the CEO's performance based on criteria agreed to and set at the beginning of the monitoring period. The format and process for this meeting will be negotiated and agreed upon between the CEO and the Chair/committee.

Remuneration will be negotiated and agreed upon by the CEO, Chair/Committee and Treasurer. Remuneration will be determined by benchmarking Abbeyfield's size, the number of employees and complexity against other NFP organisations, and the ability of Abbeyfield to pay.

It remains Abbeyfield's responsibility to ensure that the recruitment consultant adheres to Abbeyfield's recruitment and selection policies.

If a recruitment consultant has been engaged to recruit for a position, they will be responsible for screening the applicants.

Resumes must be screened against the position description so that assessments can be made of their suitability for the specific role. Applicants who are assessed as suitable will then be selected for interview.

Where appropriate, but particularly in positions of financial responsibility or in dealing with vulnerable clients, police checks may be arranged. Police checks shall be arranged only with the consent of the applicant concerned; however, if consent is refused this shall be taken into consideration in the selection process.

References shall be sought, where appropriate. Previous employers and referees shall be contacted, and transcripts, qualifications, publications and other certification or documentation shall be validated.

At the conclusion of the recruitment process, all applications will be filed for 10 years in the Staff Recruitment File in the CEO's office.

Appendix A

Interview Guidelines

The purpose of an interview is to provide and obtain information that will assist in making a decision about a candidate's suitability.

Whilst each interviewer will develop their own interviewing styles, there are a number of essential characteristics of an interview that must be present in all interviews.

Prior to Conducting the Interview

Review the candidate's resume before commencing the interview. This will help you feel more comfortable when the candidate arrives.

Review the similarities or differences in qualifications relating to the performance factors of the job, including:

- education or basic paper qualifications for the job;
- related work experience and areas of specialisation;
- non-work experience (such as special interests or volunteer activities) in which the candidate might have developed skills related to the position.

Conducting the Interview

Asking questions is an important part of the interviewer's role; it is not, however, their only responsibility. A good interviewer must also:

- reduce communication barriers;
- maintain control of the interview;
- ensure that the candidate reveals what the interviewer wants to know, not simply what the candidate wants to tell; and
- create a friendly, conversational atmosphere.

Having the candidate respond to questions and prompts will encourage them to do most of the talking while the interviewer ensures that all relevant topics are covered. The interviewer may be required to ask a question a second time by re-phrasing it or by returning to a particular topic at a later point in the interview.

While each interviewer develops a particular style, the following steps provide a useful guide to the structure of an interview.

Step 1: Set the Stage

It's important to create an interviewing environment that allows a candidate to put their best foot forward. An interviewer will be able to gain more information in a comfortable setting and the candidate will be left with a favourable impression of the organisation.

- Make arrangements for a private meeting room in which to conduct the interview.
- Do not allow interruptions (e.g. telephone calls etc.).
- Interviews are more comfortable if conducted in an informal "around the table" setting rather than across a desk, particularly when more than one interviewer is involved. Position the candidate so that they can comfortably direct conversation to anyone in the room.
- Introduce yourself and all members of the interview panel to the candidate (the panel members may prefer to introduce themselves).
- Body language should be relaxed and open.

- Be friendly and courteous throughout the interview. The tone should be like a slightly structured conversation.
- Sometimes it helps to begin by entering into a general conversation, for example talking about the organisation.

Step 2: Outline the Agenda

Outline for the candidate the structure that the interview will take. This will help them to relax and will put the interviewer in control of what is to follow.

- Identify areas to be covered (e.g. the duties and responsibilities involved in the job; the candidate's education and experience and how they relate to the position; the use of hypothetical situations).
- Suggest the length of time that the interview is expected to take, and any additional time that might be spent touring the work site etc.
- Provide the candidate with a description of the duties and responsibilities of the job and an overview of the workings of the organisation.
- Avoid confusing or overly technical language. Don't oversell the job or mislead the candidate about the actual duties and responsibilities involved or the future growth expectations of the position.
- Advise the candidate that there will be an opportunity later in the interview for them to ask questions or add information that may not yet have been covered.

Step 3: Gather Information

Following core questions will provide structure and should take up most of the interview time; however, some flexibility is necessary to allow for follow-up questions and for questions that will arise out of each candidate's documentation. This helps to create a comfortable, relaxed tone.

Listen for evidence of both positive and negative behaviour and focus on one specific performance factor at a time. Analyse how well those behaviours and skills would carry over to the position.

The interviewing process may take some time to master, but it can be extremely effective. Probing is particularly necessary when there are gaps in the candidate's life/work history, when inconsistencies appear or when the candidate changes the subject or is evasive.

Step 4: Welcome Added Information and Answer Questions

In the later stages of the interview, the candidate may have specific questions about the job, department or the organisation itself. A detailed discussion should be reserved until this point, so that the candidate won't simply tailor their answers to suit the position. This is a good time to probe for more detailed information, such as:

- "Now that I've described the job, do you have any relevant skills that we haven't yet heard about?"

Thank the candidate for coming to the interview and explain the time frame for decision-making and what the next step in the process will be.

3. Conditions of employment - general

Purpose

To ensure that all staff are fully informed on all areas pertaining to their employment.

Policy

- Staff will be employed under the appropriate award and/or Agreements.
- A copy of the Agreement and Award will be available to staff at all times.

The conditions of employment with Abbeyfield Australia (Abbeyfield) are in accordance with the Social Community Home Care and Disability Award 2010 (SCHADS Award).

A copy of the Agreement and the Award is available for staff reference at any time.

Abbeyfield's Chief Executive Officer coordinates all matters relating to industrial relations.

A Police Check is mandatory and all employees are required to have a current Police Check recorded with management (every three years). Employees working with residents are required to have a Working With Vulnerable People's card.

Employment Agreement

All staff members are required to enter into a written agreement with Abbeyfield which outlines the terms and conditions of their employment. Staff will receive a copy for their records after it has been signed and the original will be kept in a personal file

Personal Information

New staff are requested to complete a form with details such as name, current address, telephone number, emergency contact, driver's licence, as well as banking details to allow for payment of wages by electronic funds transfer to the financial institution of their choice.

If at any stage your address or banking details change, please complete another personal details form available from the Chief Executive Officer.

The private addresses or telephone numbers of staff are not made available to persons outside of Abbeyfield without the consent of the staff member.

Taxation

New staff will be required to complete an Australian Taxation Office Employment Declaration form.

Question 9 on the form asks whether you wish to claim the tax free threshold – if 'no', you will be taxed at the higher rate. If this job is your only source of income you are eligible for the tax free threshold – see notes to Question 9 at the front of the form for further details.

If staff can claim a rebate (eg. dependent spouse, sole parent) refer to the notes on the front of the form for calculation tables.

Superannuation

Abbeyfield contributes a percentage of each staff member's salary to an award superannuation fund. These contributions attract interest and are paid out as a retirement benefit when the staff member reaches 55 years of age.

Staff are able to make additional superannuation contributions to the fund at any stage via deductions from salary by putting their request in writing to the Executive Officer. Staff are responsible for seeking appropriate financial advice and complying with relevant laws.

Pay

Wages are paid fortnightly and processed through the Abbeyfield Australia office. Pay periods end on alternate Sundays and normally wages are paid on the following Wednesday by direct bank transfer.

It is the responsibility of each employee to correctly complete their own timesheet and submit it to the CEO for authorization. This should be done before the last Thursday of each pay period. Any incomplete timesheet will not be processed until the next payday.

Abbeyfield tries to ensure that salaries are paid correctly, however if a mistake occurs please contact the CEO. If an overpayment occurs, staff will be notified of how much they were overpaid, and arrangements will be made for repayment. If staff believe they have been underpaid, they may notify the CEO who will verify and arrange to back pay the amount on the next pay day.

Permanent Part Time Staff

A part time employee is engaged to work less than 38 hours a week on a rostered basis. The rate of pay is based on the number of hours worked and staff are entitled to sick leave, annual leave and long service leave on a pro-rata basis.

Casual Staff

Casuals are engaged as a relieving worker for work on a casual basis and are paid only for the time they actually work. Wage rates include a special loading to compensate for non-payment of certain benefits such as sick leave and annual leave.

Working Hours

As far as possible, staff preferences will be accommodated; however the final decision rests with their supervisor.

Other Employment

Abbeyfield appreciates that some staff, particularly part time and casual staff, may be employed in more than one job. It would be appreciated if staff did not allow their other employment to conflict with their obligations to Abbeyfield.

Equal Employment Opportunity

Commonwealth and State legislation is consistent with the goals of Abbeyfield with an emphasis on a workplace free from discrimination or harassment.

Discrimination in employment is unlawful on the grounds of gender; age; sexual preference; marital status; pregnancy; family responsibilities; race, colour and ethnic origin; physical, psychological or intellectual impairment whether past or presently existing (including having or being thought to have HIV/Aids); Lawful, religious or political beliefs or activities.

Grievance Resolution Procedure

Any staff member who has a grievance arising out of employment with Abbeyfield has the right to take their concern through each level of management, if necessary, to ensure that it is adequately dealt with and resolved.

The procedure for grievances is set out in your contract of employment. If you have a complaint or have issues of confidentiality, you can contact the Chief Executive Officer.

Disciplinary Procedures

When problems of performance or behaviour arise, staff will be given the opportunity to improve their conduct with a clarification of the required standards before disciplinary procedures commence.

Action will be taken on the basis of lack of performance, poor work or misconduct, in particular absenteeism, inefficiency, breaches of security and safety, harassment and fighting, substance abuse, and refusal to follow instructions.

A meeting with the staff member and their representative, and the Chief Executive Officer will be arranged to ensure that all parties are fully aware of the issues with an overall aim of resolving the problem. If after this meeting, deficiencies in performance or standards of behaviour continue, then disciplinary procedures may be instigated. The procedure for review periods, warnings and dismissal follow the terms of the Award. All matters relating to disciplinary action will involve the Chief Executive Officer and will be confidential.

For acts of serious and willful misconduct such as theft, fraud, physical violence, or gross neglect of duty, a staff member's employment may be terminated immediately.

Ceasing Employment

Staff who wish to resign are to give notice in writing of their intention.

The minimum period of notice for staff to terminate employment is:

- 1 week for not more than 1 year of continuous service;
- 2 weeks for 1-3 years of continuous service;
- 3 weeks for 3-5 years continuous service;
- 4 weeks for more than 5 years continuous service.

Staff will be required to complete documentation as requested by the CEO. The statement contains information outlining the duration of employment, and the classification or type of work performed.

Personal references may be available on request.

Leave Entitlements

Leave may be granted for a variety of purposes and it is recognised that a staff member on paid or unpaid leave remains employed by Abbeyfield.

Annual Leave

Taking Annual Leave

All applications are to be submitted at least one month in advance. When the leave has been approved, an Annual Leave form is to be completed which will be forwarded to the Pay Office for processing.

Whilst every effort will be made to grant annual leave to staff for the time they have requested, leave will be granted for times that are mutually convenient for the staff member and management. Therefore staff are asked to be responsible and flexible, particularly at peak times such as Christmas and Easter, when it is not possible to have all staff on annual leave at these times.

Payment for Annual Leave

Staff may elect to be paid in advance or fortnightly as usual. If advance pay is required, mark the appropriate section on the leave form. The pay that staff will receive prior to going on annual leave will consist of the following –

Pay for the two weeks worked;

Annual leave for the time requested.

Note: Staff need to be aware that they will not receive another pay until they have worked the next pay period.

Sick Leave

Staff are not to attempt to work if they have an illness or injury and are not able to perform their duties fully.

Notice of Absence

If staff are unable to attend work they are required to notify their Supervisor at least by the time they are scheduled to commence duty. If possible, staff should advise the nature of the illness or injury and the estimated time off work.

Should the Manager be notified later than one hour after commencement time the staff member may not be paid for that day. Failure to advise the Manager of absences may result in disciplinary action.

Single day absences

Paid sick leave without a medical certificate or Statutory Declaration is limited to single days on three occasions during the year. It is therefore necessary to provide a medical certificate or Statutory Declaration for any further days off for sick leave entitlement to be paid.

If a staff member takes sick leave immediately before, or immediately after, an ADO or public holiday, a medical certificate or Statutory Declaration must be produced for that period of time or sick leave will not be paid.

Other leave entitlements

In accordance with the terms and conditions stated in the Award, staff are entitled to the following paid leave:

Family Leave

Accrued sick leave is available to cover a range of short-term contingencies including illness of a staff member's partner or child. In such cases a medical certificate must be supplied.

Parental Leave

Staff are eligible for maternity, paternity or adoption leave if they have completed 12 months service with Abbeyfield.

Compassionate Leave

Upon the death of a partner or close relative, a staff member is entitled to paid leave including the day of the funeral up to four days per year.

Jury Service Leave

Staff required to attend court during normal working hours will be reimbursed for the amount of wages they would have received had they not been on jury service.

Long Service Leave

Staff are entitled to long service leave after the completion of fifteen years continuous service.

4. Education, training and staff development

Purpose

To ensure that staff have the appropriate skills and knowledge to perform their tasks in an efficient and capable manner, and to ensure that housekeepers and volunteers have the appropriate skills and knowledge to provide the most appropriate level and quality of care for our residents at Abbeyfield Australia (Abbeyfield).

Policy

- All employees are expected to undertake mandatory training pertaining to areas of their employment as deemed necessary by management.
- Abbeyfield strongly believes that continuing education and training is important to assist both with personal and professional development.
- All employees are encouraged to participate in training (other than mandatory) relating to areas of their employment.

Abbeyfield has a responsibility to ensure that all staff have the appropriate skills, experience and knowledge to perform their respective jobs.

Ongoing training will be facilitated on a needs basis and according to the availability of courses, seminars in the area.

All programs and training opportunities are to be made available on a fair, objective and reasonable basis to all staff and volunteers.

The Chief Executive Officer is responsible for ensuring that adequate funds are allocated in the budget for training and education. The CEO will

- Arrange training and education programs which will enhance the quality of care and services provided to our residents by staff and volunteers.
- Provide opportunities to all staff and volunteers to undertake relevant training and education programs.
- Monitor the performance and quality improvement in service and care delivery flowing from specific and/or specialist courses of training provided to staff or volunteers.
- Recommend new courses of training or programs of education to the Executive Officer for approval.
- When requested, provide a report to the Board covering the range, type and number of staff and/or volunteers who have undertaken courses of training.
- Ensure that courses of training which require renewal to maintain currency are undertaken periodically by staff members or volunteers possessing required qualifications.
- Maintain records of staff progress throughout the program.
- Maintain a record of evaluation of the program.
- Maintain a record of internal and external resource people.
- When in-service training sessions are held, a record of attendance will be made. All sessions will be evaluated as part of an employee's performance appraisal

- It is the responsibility of each staff member to keep a record of their own training and education. Staff will provide this record at their staff appraisal. A copy will be made and filed with their appraisal in their personnel file.
- A survey of staff will be undertaken regularly (at least annually) to ascertain their preferences for future training needs. From this the CEO will prioritise training needs and attempt to facilitate sessions.

Competencies

Staff will be assessed for competency in relevant areas as necessary. Appropriately qualified professionals will assess staff.

Performance Review

Abbeyfield is committed to providing regular information to staff on what is expected of them and how they are performing. Benefits accrue to the individual, the Board, the residents and the organization as a whole.

Performance review involves recognition and encouragement of an individual staff member's contributions, clarification of their role and responsibilities, and the provision of an opportunity to discuss their needs and points of view. An action plan and goals will be set for the future direction of each staff member, if necessary.

Reviews will be carried out with all staff members at least every twelve months. Staff members will be given sufficient notice to prepare for their session with the Manager. The content of any session and documentation are kept confidential between the staff member, the Manager and the CEO.

Courses

Staff should direct all requests to attend seminars and conferences, or discuss undertaking any training and study with the Manager, with a copy of the proposed program.

5. Workplace health and safety policy

Purpose

Abbeyfield Australia (Abbeyfield) is committed to conducting its operations in a safe and healthy manner.

Policy

The purpose of this policy is to provide general guidance to people working for Abbeyfield on the importance of work health and safety, and their roles in maintaining and promoting a safe and healthy workplace. This policy is to be read in conjunction with the Abbeyfield Australia Policies and Procedures Manual. The procedures contain detailed instructions health and safety issues, and you must familiarise yourself with the applicable procedures.

We acknowledge and accept that Abbeyfield has important work health and safety obligations. These obligations include maintaining and promoting safe and healthy workplaces. At its workplaces, whether office or houses, Abbeyfield will provide health and safety advice, information and training. Abbeyfield will consult and co-operate with workers on health and safety issues. Abbeyfield will aim to promote well-being, and will strive to continuously improve our work health and safety practices.

Abbeyfield will comply with relevant health and safety legislation.

Who this policy applies to

This policy applies to everyone who works at Abbeyfield – employees, contractors, residents, visitors and volunteers.

This policy applies at all times when a person is representing Abbeyfield, or doing work on behalf of or for Abbeyfield, whether on Abbeyfield premises or off-site. Off-site work includes business trips and working at clients' sites.

It applies to after hours and off-site activities and functions that are organised by Abbeyfield, or which are attended on behalf of Abbeyfield. This includes social events, Christmas parties and residents' entertainment.

Abbeyfield expects all workers to:

- make health and safety a priority in the workplace;
- accept responsibility for their own health and safety;
- adopt safe work practices, ensuring that workers do not put at risk their own health and safety or that of other workers, or the public;
- comply with directions on work health and safety;
- familiarise themselves with Abbeyfield work health and safety procedures and ensure they are followed;
- keep up-to-date with relevant work health and safety procedures;
- share information about work hazards and how to minimise risks to work health and safety;
- report a work health and safety incident to managers as soon as possible;
- participate in work health and safety training; and

- co-operate in processes to audit, investigate or evaluate work health and safety procedures.

Committees of management

Committees have additional obligations. They are expected to be proactive on work health and safety matters. For example, managers are expected to do the following:

- provide directions on work health and safety;
- ensure appropriate risks assessments are undertaken;
- provide information on work health and safety procedures, and organise appropriate training for all workers;
- consider and communicate appropriate resourcing for work health and safety improvements;
- co-operate with colleagues to document processes and procedures to eliminate or minimise risks to work health and safety;
- ensure work health and safety incidents are reported to senior managers in a timely manner;
- maintain accurate records on work health and safety incidents;
- lead measures to improve work health and safety; and
- co-operate with others, including work health and safety representatives, to ensure that information regarding work health and safety processes is shared within the organisation, and that work health and safety initiatives are appropriately co-ordinated.

Abbeyfield will not tolerate unlawful discrimination in relation to work health and safety matters.

Work health and safety legislation makes it unlawful to discriminate against a worker, or prospective worker in certain circumstances. These circumstances include:

- raising, or proposing to raise, an issue or concern about health and safety to another worker, health and safety representative or another person with health and safety responsibilities;
- being involved in, or proposing to be involved in, the resolution of a work health and safety issue;
- taking action, or proposing to take action, regarding compliance by another person with obligations under work health and safety legislation; and
- acting, or proposing to act, as a health and safety representative, or member of a health and safety committee.

Abbeyfield will not tolerate a person taking or organising (or threatening to take or organise) unlawful coercion or inducement of a person in relation to that person's role, functions or powers under work health and safety legislation.

Abbeyfield will not tolerate a person knowingly or recklessly making a false or misleading statement to another person about that person's rights or obligations under work health and safety legislation.

Examples of behaviour that will not be tolerated include:

- threatening to dismiss someone if they report a health and safety concern;

- denying a person overtime because they have participated in an investigation regarding a safety incident; or
- refusing to engage a contractor because they have asked for information about the health and safety committee.

If anyone thinks a worker may be breaching this policy, ask the person concerned to stop breaching this policy. If unable to do this comfortably, or if it does not work, then report the conduct to a manager or a work health and safety representative as soon as possible. If the complaint relates to workplace bullying, please refer to the Workplace Bullying Policy.

Abbeyfield will consider action against a person breaching this policy. Depending on the severity of the breach, the disciplinary action may range from provision of training or counselling through to verbal or written warning or termination of employment / engagement with Abbeyfield.

A person who commits a serious breach of this policy may also be in breach of work health and safety laws and the Crimes Act 1958 (Vic). This may result in prosecution of the person and a possible fine, intervention order or jail sentence.

This policy will be implemented through training and/or mentoring.

Complaints made about breaches of this policy will be actioned by relevant managers and, if applicable, the relevant health and safety representative. If the complaint relates to workplace bullying, please refer to the Workplace Bullying Policy.

External Complaints

Abbeyfield encourages all workers to use this policy. Workers may also have the right to make an external complaint to the relevant State or Territory Work Health and Safety authority (for example, WorkSafe in Victoria). If the complaint concerns workplace bullying, please refer to Abbeyfield's Workplace Bullying Policy.

6. Anti-discrimination

Purpose

To ensure that all employees are treated equitably and are not discriminated against or victimised in any way.

Policy

- Abbeyfield Australia (Abbeyfield) is an equal opportunity employer and does not tolerate any form of discrimination.
- All employees are treated on their merits, without regard to race, age, sex, marital status or any other factor irrelevant to the position. Employees are valued according to how well they perform their duties, along with their ability and enthusiasm to maintain Abbeyfield's Philosophy and Standards of care.

What is Discrimination?

Discrimination occurs when someone is treated unfavourably because of one of their personal characteristics. Discrimination may involve:

- Offensive "jokes" or comments about another worker's racial or ethnic background, sex, sexual preference, age, disability or physical appearance.
- Display of pictures or posters which are offensive or derogatory.
- Expressing negative stereotypes of a particular group,
- Judging someone's work performance based on their political or religious beliefs rather than their ability.

Under Federal and State anti-discrimination laws, discrimination in employment on following grounds is against the law:

- Sex
- Pregnancy
- Age
- Impairment
- Political belief and activity
- Trade union activity
- Lawful sexual activity
- Marital status
- Parental status
- Race
- Religion
- Criminal record
- Social origin

Sexual harassment is also against the law.

7. Sexual harassment and victimisation

Purpose

Abbeyfield Australia (Abbeyfield) is committed to maintaining a workplace that promotes equal opportunity for all job applicants, employees and contractors. Abbeyfield values the diversity of its people.

The purpose of this policy is to provide guidance to employees of Abbeyfield on how to identify and prevent sexual harassment or victimisation. It is also a framework for the reporting and handling of such complaints in our workplace.

Policy

This policy applies to everyone who works at Abbeyfield including managers, employees and contractors.

This policy applies at all times when a person is representing Abbeyfield, or doing work on behalf of or for Abbeyfield whether on Abbeyfield premises or off-site. Off-site work includes business trips and working at local houses.

It applies to after hours and off-site activities and functions that are organised by Abbeyfield, or which are attended on behalf of Abbeyfield.

Abbeyfield expects everyone to:

- treat everyone at work, or at a work-related activity with respect, courtesy and dignity;
- not engage in sexual harassment or victimisation;
- not encourage others to engage in sexual harassment or victimisation;
- report any sexual harassment, or victimisation that you may witness to an appropriate person;
- familiarise yourself with its workplace policies and understand your obligations under those policies.

Managers or supervisors are expected to:

- ensure people in your area or team understand their obligations;
- be a leader and role model for others in the workplace and ensure that you behave appropriately at all times;
- treat all complaints seriously and confidentially.
- where sexual harassment or victimisation is observed or reported by others, take appropriate action even if there is no formal complaint.

Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature where a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. The intention of the harasser is irrelevant.

Sexual harassment can include, but are not limited to the following examples:

- Inappropriate and gratuitous touching;
- Making jokes of a sexual nature;

- Unwelcome sexual advances;
- Sending emails that contain sexually offensive or inappropriate material.

Victimisation

Victimisation is the unfavourable treatment of someone who reports or complains about sexual harassment.

Examples of victimisation are:

- Dismissing an employee because she has made a complaint about sexual harassment in the workplace.
- Excluding or isolating a workmate because he has made a complaint of sexual harassment against one of your friends at work.

Abbeyfield provides a number of steps for dealing with complaints under this policy:

1. Consider approaching the person or people involved to resolve your concern directly.

Sometimes people do not realise when their behaviour is upsetting others. Telling the other person may be enough for the behaviour to cease.

If you do not feel comfortable with this approach, then you should report the conduct to an appropriate person.

2. If a complaint or concern cannot be resolved by informal discussion with the person or people directly, or you do not feel comfortable speaking with them yourself, you should discuss the matter with, and seek guidance from an appropriate person, who may be:
 - the CEO;
 - a Board member;
 - HR Representative;

Speaking with another person can help you understand whether the behaviour you are being subjected to could be sexual harassment or victimisation. In this discussion, the various options available for resolving your concerns will be explored.

3. Where a complaint is made, there may be alternative resolution processes available to assist resolution, such as mediation. Whether these alternative resolution processes are appropriate depends on the nature of each individual complaint.

Upon receipt of the complaint, such options will be considered by consultation between the complainant and the person handling the complaint.

4. A formal investigation may be initiated where:
 - the informal process requesting the inappropriate conduct to stop and/or informal resolution has been unsuccessful; and
 - a formal complaint is made against an Abbeyfield employee; or
 - in any other circumstances where the Abbeyfield considers it appropriate.

Abbeyfield will exercise its discretion as to whether to investigate a complaint. Not all complaints are appropriate for investigation. For example, complaints which are frivolous, vexatious or lacking in substance will not be investigated.

5. The complainant and the person against whom the complaint is made, will be informed of whether or not the complaint is substantiated. If the complaint is substantiated, Abbeyfield will take appropriate action.

If a complainant makes a malicious complaint, Abbeyfield will take the appropriate disciplinary action against the complainant.

Abbeyfield will consider disciplinary action against a person breaching this policy. Depending on the severity of the breach, the disciplinary action may range from provision of training or counselling through to verbal or written warning or termination of employment / engagement with Abbeyfield.

Where there is an alleged breach of this policy, all information will be treated confidentially, to the extent possible, by all parties involved.

Where a complaint is serious and/or the CEO believes action needs to be taken, information will be disclosed only to those people who need to know about the complaint.

The obligation of confidentiality does not prevent Abbeyfield from using or disclosing any information necessary to initiate or defend any legal proceedings, or to make any submissions in relation to any inquiry or complaint, or to refer a matter to the police.

A person making a legitimate complaint will not be treated detrimentally because they make a complaint. It is unlawful to victimise a person for making a legitimate complaint of sexual harassment.

8. Workplace bullying

Purpose

Abbeyfield Australia (Abbeyfield) is committed to treating all people with dignity and respect and maintaining a workplace that is free from bullying. The purpose of this policy is to provide guidance to employees of Abbeyfield on how to identify and prevent workplace bullying. It is also a framework for the reporting and handling of bullying complaints in the workplace.

Policy

This policy applies to everyone who works for Abbeyfield.

This policy applies at all times when a person is representing Abbeyfield, or doing work on behalf of or for Abbeyfield, whether on Abbeyfield premises or off-site or after hours. Off-site work includes business trips and working at local houses. After hours includes Abbeyfield functions or meetings.

Abbeyfield expects employees to:

- treat everyone at work, or at a work-related activity with respect, courtesy and dignity;
- not engage in bullying;
- report any bullying that you may witness to an appropriate person;
- familiarise him/herself with workplace policies and understand obligations under those policies.

Abbeyfield expects managers or supervisors to:

- ensure people in your area or team understand their obligations under this policy;
- be a leader and role model for others in the workplace and ensure that you behave appropriately at all times;
- treat all complaints seriously and confidentially and seek advice from Human Resources if unsure;
- where bullying is observed or reported by others, take appropriate action even if there is no formal complaint; and
- encourage people in your work area or team to treat each other with dignity and respect.

What is bullying?

Bullying is repeated unreasonable behaviour directed towards a person, or a group of people, that creates a risk to their mental or physical wellbeing.

“Unreasonable behaviour” is behaviour that a reasonable person, having regard to all the circumstances, would expect to victimise, humiliate, undermine or threaten.

A broad range of behaviours can be considered to be bullying. Some examples of behaviour that may constitute bullying are:

- verbal abuse, insults or name-calling;
- continually making jokes about a person, or singling out one person for remarks more often than others in a group;

- personal attacks, threats, intimidation and misuse of power;
- unjustified criticism or excessive scrutiny of work;
- deliberate exclusion or isolation;
- deliberately withholding information from someone where that information is essential to their ability to perform their work effectively;
- assigning someone meaningless or impossible tasks, or setting tasks that are unreasonably above or below someone's ability; or
- removal of responsibilities or deliberately overloading someone with work.

What is not bullying?

Abbeyfield recognises that in any working environment there will be occasional differences of opinion in working relations. Where these differences are dealt with in a professional, non-aggressive manner, then they do not constitute workplace bullying.

Reasonable management actions are not bullying. Some examples of reasonable management actions are:

- rostering and allocating working hours and work;
- setting performance goals or standards;
- performance management or disciplinary action conducted in accordance with Abbeyfield's policies and processes;
- constructive feedback;
- implementing organisational changes; or
- deciding not to select someone for a promotion or work opportunity.

Abbeyfield provides a number of steps for dealing with complaints under this policy:

1. Consider approaching the person involved to resolve your concern directly. Ask the person to stop the behaviour. Sometimes people do not realise that their behaviour may be upsetting others, and by telling them may be enough for the behaviour to cease.
2. If you do not feel comfortable with this approach, then you should report the conduct to an appropriate person. Such a person may help you understand whether the behaviour you are being subjected to is bullying. Various options available for resolving your concerns will be explored.
3. Where a complaint is made, there may be alternative resolution processes available to assist resolution, such as mediation. Whether these alternative resolution processes are appropriate depends on the nature of each individual complaint.

Upon receipt of the complaint, such options will be considered by consultation between the complainant and the person handling the complaint.

4. A formal investigation may be initiated where:
 - the informal process requesting the inappropriate conduct to stop and/or informal resolution has been unsuccessful; and
 - a formal complaint is made against an Abbeyfield employee; or
 - in any other circumstances where Abbeyfield considers it appropriate.

Abbeyfield will exercise its discretion as to whether to investigate a complaint. Not all complaints are appropriate for investigation. For example, complaints which are frivolous, vexatious or lacking in substance will not be investigated.

5. The complainant and the person against whom the complaint is made, will be informed of whether or not the complaint is substantiated. If the complaint is substantiated, Abbeyfield will take appropriate action.
6. If a complainant makes a malicious complaint, the organisation will take the appropriate disciplinary action against the complainant.

Abbeyfield will consider disciplinary action against a person breaching this policy. Depending on the severity of the breach, the disciplinary action may range from provision of training or counselling through to verbal or written warning or termination of employment / engagement with Abbeyfield.

A person who commits a serious breach of this policy may also be in breach of work health and safety laws and the Crimes Act of various States and Territories. This may result in prosecution of the person and a possible fine, intervention order or jail sentence.

Where there is an alleged breach of this policy, all information will be treated confidentially, to the extent possible, by all parties involved.

Where a complaint is serious and/or a manager believes action needs to be taken, information will be disclosed only to those people who need to know about the complaint.

The obligation of confidentiality does not prevent Abbeyfield from using or disclosing any information necessary to initiate or defend any legal proceedings, or to make any submissions in relation to any inquiry or complaint, or to refer a matter to the police.

A person making a legitimate complaint will not be treated detrimentally because they make a complaint. It is unlawful to victimise a person for making a legitimate complaint of workplace bullying.

An employee also has the right to make a complaint to an external organisation. Complaints regarding workplace bullying may be made to the relevant State or Territory Work Health and Safety authority (for example, WorkSafe in Victoria). If the complaint also concerns breaches of equal opportunity and sexual harassment laws, please refer to our Equal Opportunity and Prevention of Sexual Harassment Policy.

9. Grievance resolution

Purpose

To ensure that grievances are resolved by negotiation and discussion between the parties concerned.

Policy

Abbeyfield Australia (Abbeyfield) recognises that from time to time residents and or staff may have grievances which need to be resolved.

It is the objective of this procedure to ensure that grievances are resolved by negotiation and discussion between the parties, in the interest of building and maintaining good relationships amongst employees.

Abbeyfield may seek advice from their Industrial Relations advisor in any matters involving Grievance Resolution.

An employee shall have the right for grievances to be heard through all levels of line management.

1. In the first instance, the employee and their immediate supervisor will attempt to resolve the grievance by discussion between the parties. The local Union or other representative may be present if desired by either party
2. If the employee still feels aggrieved, then the matter will be referred to the CEO. The local Union or other representative may be present if desired by either party.
3. If the grievance is still unresolved, the matter shall be referred to the the Board or a Board representative.
4. If the grievance is still unresolved, then the state branch Union or other representative shall be advised and a meeting arranged. At this stage Abbeyfield's representative shall be advised and shall be present at the request of either party.

It is agreed that the preceding steps will take place as soon as reasonably possible

5. If the grievance still exists the matter shall be referred to the Australian Industrial Relations Commission for decision.

Until the grievance is determined, work will continue normally in accordance with the custom or practice existing before the grievance arose. No party shall be prejudiced as to the final settlement by the continuance of work. This paragraph will not apply to health and safety matters.

All new employees shall be handed a copy of these procedures on commencement of employment.

10. Information & Communication Technology (ICT)

Purpose

The use of Abbeyfield's Information and Communication Technology (ICT) resources is necessary to the everyday functions of the organisation. However, Abbeyfield expects its ICT resources to be used appropriately. This means that people working for Abbeyfield must ensure that their use of Abbeyfield's ICT resources does not create unnecessary risk to the organisation and complies with all other policies of Abbeyfield.

The purpose of this policy is to provide guidance to people working for Abbeyfield on the appropriate use of its ICT resources. This policy sets Abbeyfield's expectations around the use of its ICT resources both at the workplace and off-site.

This policy should be read in conjunction with Abbeyfield's Workplace Bullying Policy and Equal Opportunity and Prevention of Sexual Harassment Policy.

This policy applies to everyone who works at Abbeyfield, including managers, employees, contractors, visitors and volunteers.

This policy applies at all times when a person working for Abbeyfield is using Abbeyfield's ICT resources, whether at the workplace, off-site or by remote access. This policy applies to all aspects of use of Abbeyfield's ICT resources, for example:

- Browsing or publishing on the internet;
- Downloading or accessing files from the internet;
- Email;
- Social networking;
- Transferring, filing, storing, copying or sharing files;
- Video conferencing;
- Streaming media;
- Instant messaging and "chat" facilities;
- Online discussion groups;
- Viewing material electronically;
- Printing documents; or
- Subscribing to electronic mailing lists or other like services.

Abbeyfield's ICT resources

Abbeyfield's ICT resources includes, but is not limited to, all Abbeyfield's networks (whether internal or external), ICT systems, software and hardware, Abbeyfield's email systems, servers, desktop computers, printers, scanners, fax machines, portable computers, tablet computers, telephone systems, mobile phones, smart phones, portable storage devices (including digital cameras and USB memory sticks), and other ICT devices.

We expect everyone who works at Abbeyfield to use our ICT resources appropriately and efficiently. Abbeyfield's ICT resources should be predominantly used to perform work-related tasks that are consistent with the goals and objectives of Abbeyfield.

Personal Use of Abbeyfield's ICT Resources

You may use Abbeyfield's ICT resources for personal use provided that the use is during a work break, is not excessive and does not breach this policy. The following additional principles should be adhered to when using Abbeyfield's ICT resources for personal use:

- Personal usage should not interfere with the use of Abbeyfield's ICT by other people for work-related purposes;
- Subscribing to mailing lists and other subscription services using Abbeyfield's ICT resources should be for work-related purposes or professional development reasons only; and
- When using these tools, users should adhere to Abbeyfield's Social Media Policy.

Abbeyfield will not tolerate use of its ICT resources that is inappropriate, breaches any of Abbeyfield's policies or is otherwise unlawful. The following are examples of what Abbeyfield will not tolerate:

- Distributing, disseminating or storing images, text or materials that might be considered indecent, pornographic, obscene or illegal;
- Distributing, disseminating or storing images, text or materials that might be considered discriminatory, offensive, obscene, threatening or abusive, in that the context is a personal attack, sexist or racist, or might be considered harassment;
- Transmitting religious or political or defamatory messages;
- Playing games;
- Instant messaging and/or chat functions that are not part of Abbeyfield's authorised communications system or are not for reasonable operational purposes;
- Interfering with Abbeyfield's server or network;
- Disclosing your log-on password to another person without management authorisation;
- Use of another person's account or accessing their personal files, without their consent or management authorisation;
- Installing computer programs onto Abbeyfield's network without management authorisation;
- Accessing copyrighted information in a way that violates copyright laws;
- Using Abbeyfield's ICT resources to broadcast personal views that are unrelated to Abbeyfield's operations;
- Transmitting unsolicited commercial or advertising material;
- Using Abbeyfield's ICT resources to infringe the privacy of other persons;
- Disabling or circumventing anti-virus, firewall or other security systems; or
- Acting in any other manner that jeopardises the security of Abbeyfield's ICT resources, including knowingly visiting websites or downloading material that jeopardises Abbeyfield's ICT resources.

Abbeyfield will consider disciplinary action against a person breaching this policy. Depending on the severity of the breach, the disciplinary action may range from the provision of training or counselling through to verbal or written warning or termination of employment / engagement with Abbeyfield.

In addition, Abbeyfield may recover from you any costs incurred as a result of a breach of this policy.

If Abbeyfield suspects that its ICT resources have been used in any manner that is contrary to law or likely to contravene the law, the matter will be referred to the police or other relevant authority and the suspected offender's employment may be terminated.

If you discover inappropriate material on Abbeyfield's ICT system or suspect that this policy has been breached, you should report the matter to your manager immediately.

Policy Implementation

This policy will be implemented through circulation of this policy and/or training.

Complaints made about breaches of this policy will be actioned by the relevant managers and, if applicable, an HR representative. If the complaint relates to workplace bullying, equal opportunity or sexual harassment, please refer to the Workplace Bullying Policy and/or the Equal Opportunity and Prevention of Sexual Harassment Policy.

11. Social media policy

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

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

Purpose

Abbeyfield may choose to engage in social media such as:

- Twitter
- Facebook
- Google+
- WordPress/Blogger
- YouTube/Vimeo
- iTunes/Podcasting

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

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

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

Core Policy

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

- **Integrity:** Abbeyfield will not knowingly post incorrect, defamatory or misleading information about its own work, the work of other organisations, or individuals. In addition, it will post in accordance with the organisation's Copyright and Privacy policies.
- **Professionalism:** Abbeyfield's social media represents the organisation as a whole and should seek to maintain a professional and uniform tone. Staff and volunteers may, from time to time and as appropriate, post on behalf of Abbeyfield using its online profiles, but the impression should remain one of a singular organisation rather than a group of individuals.
- **Information Sharing:** Abbeyfield encourages the sharing and reposting of online information that is relevant, appropriate to its aims, and of interest to its members.

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

Responsibilities

The Board shall nominate a Communications Officer or Committee to co-ordinate Abbeyfield's social media management.

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

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

The Communications Officer or Committee has ultimate responsibility for:

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

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

Delegation

Social media is often a 24/7 occupation; as such, such responsibilities as outlined above may be delegated by the Communications Officer or Committee to another appropriate staff member/volunteer.

Posting to social media

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

- Is the information I am posting, or reposting, likely to be of interest to Abbeyfield's members and stakeholders?
- Is the information in keeping with the interests of the organisation and its constituted aims?
- Could the post be construed as an attack on another individual, organisation or project?
- Would Abbeyfield's members be happy to read the post?
- If there is a link attached to the post, does the link work, and have I read the information it links to and judged it to be an appropriate source?
- If reposting information, is the original poster an individual or organisation that Abbeyfield would be happy to associate itself with?
- Are the tone and the content of the post in keeping with other posts made by Abbeyfield? Does it maintain the organisation's overall tone?

If you are at all uncertain about whether the post is suitable, do not post it until you have discussed it with the Communications Officer or Committee. A few moments spent checking can save the organisation big problems in the future.

Damage limitation

In the event of a damaging or misleading post being made, the Communications Officer or Committee should be notified as soon as possible, and the following actions should occur:

- The offending post should be removed.
- Where necessary an apology should be issued, either publicly or to the individual or organisation involved.
- The origin of the offending post should be explored and steps taken to prevent a similar incident occurring in the future.

Moderating social media

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

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

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

- Excessive or inappropriate use of swearing
- Defamatory, slanderous or aggressive attacks on Abbeyfield, other individuals, organisations, projects or public figures
- Breach of copyrighted material not within reasonable use, in the public domain, or available under Creative Commons license
- Breach of data protection or privacy laws
- Repetitive advertisements
- Topics which fall outside the realms of interest to members and stakeholders, and which do not appear to be within the context of a legitimate discussion or enquiry.

If a post appears only once:

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

If a poster continues to post inappropriate content, or if the post can be considered spam:

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

Banning and blocking should be used as a last resort only, and only when it is clear that the poster intends to continue to contribute inappropriate content. However, if that is the case, action must be taken swiftly to maintain the welfare of other social media users.

The decision to block, ban and remove posts ultimately lies with the Communication Officer, but may, at their discretion, be delegated to responsible staff and volunteers.

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Operational policies

12. Reducing the risk of fraud and corruption policy

Policy

Abbeyfield Australia and its affiliated local societies are entrusted by government, the community and residents to manage its services and assets prudently and fairly. As such every volunteer, staff member or board member has a responsibility to guard against fraud and corruption.

Legislative and Regulatory Framework

- Crimes Act 1900 (NSW)
- Regulatory Code

Definition of fraud

A deliberate or premeditated act which involves using deception to gain advantage from a position of trust and authority. 1 (1 NSW Audit office)

Examples of fraud

- Accepting bribes or favours to gain access to housing, alternative housing or better housing
- Accepting bribes or favours to buy or lease certain properties
- Misappropriation of tenant rents or charges
- Unauthorised use of organizational assets
- Stealing organisational assets
- Falsifying time sheets or expenses
- Conspiring with others to get a tender
- Running a private business in working hours
- Sending false or duplicate invoices
- Sending invoices for work not done or not completed

Warning signs of possible fraud

The following examples are indicators of a possible (but not definite) problem:

- Conflicts of interest not declared
- Undue secrecy and lack of transparency in transactions and processes
- Illogical excuses and reasons for unusual events and actions
- Staff who do not take holidays for extended periods
- Missing documentation or alterations on documentation
- Unusual, unexpected or unexplained large transactions
- Anonymous complaints or rumours from reputable sources
- Agreed policies and procedures not followed

Managing the risk

While no organisation can ever be immune from potential fraud an organisation can put in controls to manage that risk. In order to manage the risk Abbeyfield Australia and its affiliated local societies:

- Have clear guidelines on managing conflicts of interest
- Ensure that all staff members, volunteers and board members sign that they are aware of their responsibility to always operate with the highest level of probity
- Have clear guidelines on donations and gifts
- Undertakes a fraud risk assessment annually
- Reviews processes to ensure a separation of duties in all areas where possible

Disclosing fraud or corrupt conduct

A person who suspects corrupt conduct should report it to the appropriate person so that it can be fully investigated. The appropriate person will vary depending on the nature of the conduct and the persons believed to be involved. If the suspected fraud or corrupt conduct involves:

- one or more staff members of Abbeyfield Australia, then it can be reported to the CEO or the Chairperson of Abbeyfield Australia
- the CEO of Abbeyfield Australia, then it can be reported to the Chairperson of Abbeyfield Australia
- one or more staff members of an affiliated local society, then it can be reported to the CEO or the Chairperson of the respective local society
- Where neither option above is practicable, contact another Abbeyfield Director or board members of the respective affiliated local society.

Investigating possible fraud or corrupt conduct

Investigations need to be handled discreetly. Information should be shared on a 'need to know basis only and all people questioned should be reminded of their responsibilities to maintain confidentiality. Any investigation should be handled with a view that a person who is alleged to have committed fraud:

- will be presumed innocent till proven guilty
- Should have a right to respond to allegations made against them

Allegations investigated and found to be due to corrupt conduct or fraud may lead to:

- Dismissal (staff or board member)
- Loss of home (if tenant)
- Cancellation of contracts (contractors)
- Depending on the nature of the fraud it may also lead to police prosecution.

Quality assurance

- Clear guidelines on managing conflicts of interest.
- Clear guidelines in place on handling gifts and donations.
- All staff, volunteers and board members sign that they agree to abide by code of conduct.

- Annual fraud risk assessment undertaken.
- Clear separation of duties where possible

Approval

This policy and procedure was approved at the Board meeting held on the 13 February 2010. This policy and procedure is effective as from 13 February 2010.

This policy was reviewed by the Board on 22 February 2015 with no changes made.

Next review date – February 2018

13. Notifiable incidents policy (and procedure)

Policy

That the Abbeyfield Australia Board commit to fully complying with the obligation placed upon Abbeyfield Australia (as the Registered Community Housing Provider) and all local societies, to inform the Registrar of Community Housing NSW of all Notifiable Incidents.

Procedure (to be incorporated into the Abbeyfield House Management Manual)

Notifiable Incidents

As a Registered Community Housing Provider, Abbeyfield Australia and all Local Societies must maintain high standards of probity. In particular local societies need to be conscious of the obligation upon them to notify Abbeyfield Australia of any Notifiable Incident within their house.

What is a Notifiable Incident?

In the context of an Abbeyfield House, the Registrar of Community Housing explains that a Notifiable Incident is any serious event that may:

- compromise the delivery of services of an Abbeyfield House or Abbeyfield Australia
- compromise the good governance of an Abbeyfield House by a Local Society or Abbeyfield Australia
- compromise the viability of the Abbeyfield House (provider)
- raise public concern about standards of probity.

If in doubt, local societies should err on reporting a potential Notifiable Incident to Abbeyfield Australia. It is better to report too often, than to overlook an incident that should be reported.

How to report a potential Notifiable Incident

Local Societies should report any potential Notifiable Incident immediately (and within 24 hours) to Abbeyfield Australia. Reports can be made via email to admin@abbeyfield.org.au or fax to 03 9419 8575.

Abbeyfield Australia will:

- discuss the matter with the Local Society to confirm any details
- Immediately report to the Registrar of Community Housing.

Local societies should not fear repercussions or sanctions from reporting a Notifiable Incident. The intention is to gather the information and continually improve procedures. It is not a punitive process.

14. Whistle-blower policy

Policy

Abbeyfield Australia and its affiliated local Abbeyfield societies are committed to high standards of conduct and ethical behaviour. This policy aims to ensure that employees, volunteers and directors can raise concerns without fear of reprisal.

This policy aims to encourage people to report an issue if they genuinely believe someone has contravened the Code of Ethical Conduct, Conflict of Interest Policy or the law.

Who does this policy apply to?

This policy applies to all employees, volunteers, directors inclusive of Board members of Abbeyfield Australia and its affiliated local Abbeyfield societies.

What concerns should be raised?

All employees, volunteers and directors are encouraged to report any genuine matters of concern that they honestly believe contravene Abbeyfield Australia's Code of Ethical Conduct. This will include:

- Conduct or practices which are illegal
- Corrupt activities
- Theft , fraud, misappropriation
- Significant mismanagement of funds or resources
- Abuse of authority
- Serious harm to public, resident, volunteer or employee safety

Procedure

A person who becomes aware of any matter of concern or behaviour that they think seriously contravenes the Code of Ethical conduct, Conflict of Interest policy or the law should raise the matter with (in order):

- their immediate supervisor (if an employee of a local society)
- the Manager for issues relating to an Abbeyfield Hostel
- the CEO of Abbeyfield Australia
- the Chairman or another member of the Board of Abbeyfield Australia (if raising the matter with the CEO of Abbeyfield Australia is not appropriate)

Investigating concerns

Abbeyfield Australia will investigate all reported concerns and where appropriate will provide feedback regarding the outcome. Abbeyfield Australia will take any necessary action as a result of a report and if no action is taken will give an explanation.

Protection of whistle-blowers

A whistle-blower will not be discriminated against or disadvantaged for making a report in accordance with this policy. This applies if the matter is proven or not, regardless of whether it is reported to an external authority.

Abbeyfield Australia will not disclose the identity of any person who makes a whistle-blower report unless:

- it is required to do so by law
- it is required to assist a police investigation
- the identity of the whistle-blower would be self evident by the nature or location of the report
- it is impossible to investigate the issue without divulging the identity of the whistle-blower.

In all instances where the identity of the whistle-blower is likely to be disclosed, Abbeyfield Australia will try to give prior notice to the whistle blower.

Responsibility to act in good faith

Whistleblowing is about reporting real or perceived malpractice. If a report is not made in good faith, or is found to be malicious, deliberately misleading or frivolous, the Whistle-blower may be subject to disciplinary action.

Linked Policies

- . Code of Conduct & Ethics
- . Conflict of Interest

Quality Assurance

- . Employees, volunteers and directors and directors are aware of this policy
- . Any incidents dealt with in accordance with this policy.

Approval

This policy was approved in principle by the Abbeyfield Australia Board on 13 February 2010 and finalised under the Chairman's authority on 8 March 2010.

This policy was reviewed by the Board on 19 September 2015, with no changes made.

Next review date – July 2018

15. Gifts policy

Policy

Abbeyfield Australia and its affiliated local societies are entrusted by government, the community and residents to manage its services and assets prudently and fairly. The receiving of a gift or benefit may lead to a perception of corrupt conduct in that the recipient, donor or observers may assume that:

- the recipient may lack impartiality in the course of their duties;
- the recipient is under obligation to the donor;
- the recipient may favour the donor in business dealings.

As any perception of corrupt conduct or favouritism reflects badly on the organisation and the sector, the receiving of gifts by Committee members, Board members, employees or volunteers in the course of their duties with Abbeyfield Australia or its affiliated local societies is strongly discouraged.

Definition

Gifts include goods, services, services at reduced cost, favours. Examples include:

- Money
- Gifts
- Free or reduced tickets to shows or events
- Use of accommodation
- Contractors or suppliers providing goods or services at no or at a reduced cost

Where a volunteer, staff member or board member of Abbeyfield Australia or of an affiliated local society is concerned that the gift could be viewed as a possible act of bribery or corrupt behaviour they should report their concerns to the CEO or Board of Abbeyfield Australia or their respective local society.

. Linked policies

- Reducing the Risk of Fraud and Corruption
- Code of Ethics and Conduct
- Donations

Gifts of nominal value

In some cases gifts of nominal value may be accepted particularly where the rejection may cause unnecessary distress or offence. Common examples of these include:

- Calendars
- Fridge magnets
- Pens
- Food
- Flowers

Gift register

Abbeyfield Australia and each affiliated local society will maintain a gift register. For all gifts or benefits with a fair value of \$25 or more, the description of the gift, value, name of donor, name of recipient and reason for accepting or declining the gift must be recorded in register. In some cases the gift may be given to another charity or not for profit organisation when that is considered more appropriate. The gift register will be monitored by the Board of Abbeyfield Australia or the respective local society.

Complaints and appeals

Any person who believes that there has been a breach of this policy can complain using the "Reducing the risk of fraud" policy.

Quality assurance

All volunteers, staff, Board and Committee members are aware of this policy on gifts.

Any gifts that are received are recorded in the gift register.

Approval

This policy and procedure was approved at the Board meeting held on the 13 February 2010 and is effective immediately.

This policy was reviewed by the Board on 19 September and updated with minor changes to the following sub-headings:

- Policy
- Definition
- Linked policies (added)
- Gifts register
- Quality assurance

Next review date – May 2018

16. Donations policy

Policy

Abbeyfield Australia and its affiliated local societies are entrusted by government, the community and our residents to manage its services and assets prudently and fairly. As not for profit organisations Abbeyfield Australia and its affiliated local societies can receive donations, however it is extremely important that a donation does not lead to a perception of corrupt conduct where the recipient, donor or an observer assumes that:

- the recipient may lack impartiality in the course of their duties; or
- the recipient is under obligation to the donor; or
- the recipient may favour the donor in business dealings.

Further, Abbeyfield Australia and its affiliated societies wish to ensure that any donation will be of benefit to the organisation and that acceptance of it will be consistent with the values, policy objectives and the Constitution of Abbeyfield Australia or the relevant affiliated society.

As any perception of corrupt conduct, favouritism or a lack of propriety or values reflects badly on Abbeyfield and the sector, this policy outlines the procedures to be followed if receiving donations.

Donations

Donations include donations in kind such as goods, services, services at reduced cost, staffing, use of resources as well as money. Examples include:

- Money
- Gifts
- Free or reduced tickets to shows or events
- Use of accommodation
- Use of staff at no cost
- Contractors or suppliers providing goods or services at no or at a reduced cost.

A donation may be declined or returned if acceptance of the donation is considered not to be in the interests of Abbeyfield Australia, taking into account factors, including whether:

- the donation might be subsequently challenged in the courts;
- the conduct, communications or values of a donor or their associated undertakings are or have been harmful to the objectives, values, reputation or to the employees, members or volunteers of Abbeyfield Australia or any of its affiliated local societies;
- the cost to Abbeyfield Australia or a particular local society of accepting a donation will be greater than the value of the donation itself;
- acceptance of the donation could give rise to a perception of corrupt conduct as set out above; or
- if acceptance of the donation otherwise gives rise to or is likely to give rise to a conflict of interest (actual or perceived).

Acceptance of any donation does not imply endorsement of the conduct, communications, values, or business of the donor, and this should be communicated to the donor before acceptance.

If a donation is declined as a result of this policy, it will be returned to the donor at the earliest opportunity.

If any volunteer, staff member or Board or Committee member of Abbeyfield Australia or the relevant local society holds a concern about a particular donation, he or she may raise it for consideration with the CEO or Board of Abbeyfield Australia or their local society.

Linked policies

- Reducing the Risk of Fraud and Corruption
- Code of Ethics and Conduct
- Gifts

Register of donations

Abbeyfield Australia and its affiliated local societies will each maintain a register of donations. For all donations with a fair value of \$200 or more, the description of the donation, value, name of donor, and reason for accepting or declining the donation must be recorded in the register of donations. The register of donations received will be reported in the respective entities' Annual Report.

The Treasurer shall monitor all donations received or offered to Abbeyfield Australia or the relevant affiliated local society over \$200 and ensure all donations which could be declined or returned under this policy are promptly referred to the Board for consideration.

Complaints and appeals

Any person who believes that there has been a breach of this policy can complain using the Reducing the risk of fraud policy.

Quality assurance

All volunteers, staff and directors are aware of the policy on donations.

Any donations that are received are recorded in the register of donations and reported in the Annual Report.

7. Approval

This policy and procedure was approved at the Board meeting held on the 13 February 2010 and is effective immediately.

This policy was reviewed by the Board on 19 September and updated with minor changes to the following sub-headings:

- Policy
- Donations
- Register of donations

Next review date – May 2018

17. Abbeyfield Australia Investment Fund policy

(As adopted by the Abbeyfield Australia Board on 18 November 2012)

I. Introduction

The Abbeyfield Australia Limited (“Abbeyfield”) Investment Fund (hereafter referred to as the “Fund”) was created from funds donated by persons that share the mission and vision of Abbeyfield. The benefactors were of the belief that the funds should be used to provide perpetual financial support to Abbeyfield Australia Limited.

The purpose of this Investment Policy Statement is to establish guidelines for the Fund’s investment portfolio (the “Portfolio”). The statement also incorporates accountability standards that will be used for monitoring the progress of the Portfolio’s investment program and for evaluating the performance of the Fund.

II. Measuring Investment Risk

The Australian Prudential Regulatory Authority (APRA) requires superannuation funds to use a ‘Standard Risk Measure’ for investment options.

The Standard Risk Measure is based on industry guidance to allow members to compare investment options that are expected to deliver a similar number of negative annual returns over any 20-year period.

The Standard Risk Measure is not a complete assessment of all forms of investment risk, for instance it does not detail what the size of a negative return could be or the potential for a positive return to be less than a member may require to meet their objectives. Further, it does not take into account the impact of administration fees and tax on the likelihood of a negative return. Investors still need to ensure they are comfortable with the risk and potential losses associated with their chosen investment option/s.

Investment options are graded across seven risk bands from ‘very low’ to ‘very high’ as detailed below.

Risk Band Risk Label Estimated number of negative annual returns over any 20 year period

Risk Band	Risk Label	Estimated number of negative annual returns over any 20 year period
1	Very low	Less than 0.5
2	Low	0.5 to less than 1
3	Low to medium	1 to less than 2
4	Medium	2 to less than 3
5	Medium to high	3 to less than 4
6	High	4 to less than 6
7	Very high	6 or greater

The risk band and the risk label reflect the estimated number of negative annual returns over any 20-year period expected for each investment option. The estimated number is calculated by the asset consultant using their long-term capital market assumptions for each asset class, including unlisted and ‘other’, and applied to each option’s strategic asset allocation.

III. Role of the Investment Committee

The Investment Committee (the “Committee”) is acting in a fiduciary capacity with respect to the Portfolio, and is accountable to the Board of Abbeyfield Australia, for overseeing the investment of all assets owned by, or held in trust for, the Portfolio.

A. This Investment Policy Statement sets forth the investment objectives, distribution policies, and investment guidelines that govern the activities of the Committee and any other parties to whom the Committee may delegate investment management responsibility for Portfolio assets.

B. The investment policies for the Fund contained herein have been formulated to be consistent with Abbeyfield’s anticipated financial needs and in consideration of Abbeyfield’s tolerance for assuming investment and financial risk, as reflected in the majority opinion of the Committee.

C. Policies contained in this statement are intended to provide guidelines, where necessary, for ensuring that the Portfolio’s investments are managed consistent with the short-term and long term financial goals of the Fund. At the same time, they are intended to provide for sufficient investment flexibility in the face of changes in capital market conditions and in the financial circumstances of Abbeyfield.

D. The Board has determined that Risk Profile for Abbeyfield Australia sits at Risk Bands 4-5 meaning that there is a Medium to High Risk Profile.

E. The Committee will review this Investment Policy Statement at least once per year. Changes to this Investment Policy Statement can be made only by the Board of Abbeyfield after having received a recommendation from the Investment Committee. Written confirmation of the changes will be provided to all Committee members and to any other parties hired on behalf of the Portfolio as soon thereafter as is practical.

IV. Investment objective and spending policy

A. The Fund is to be invested with the objective of preserving the long-term, real purchasing power of assets while providing a relatively predictable and growing stream of annual income. The income from the Investment Fund will be available to appropriate to the Operating Income of the organisation.

B. For the purpose of making distributions (to the Operating Income), the Fund shall make use of a total-return-based spending policy, meaning that it will fund distributions from net investment income, net realized capital gains, and proceeds from the sale of investments.

C. The distribution of Fund assets will be permitted to the extent that such distributions do not exceed a level that would erode the Fund’s real assets over time. The Committee will seek to reduce the variability of annual Fund distributions by factoring past spending and Portfolio asset values into its current spending decisions. The Committee will review its spending assumptions annually for the purpose of deciding whether any changes therein necessitate amending the Fund’s spending policy, its target asset allocation, or both.

D. Periodic cash flow, either into or out of the Portfolio, will be used to better align the investment portfolio to the target asset allocation outlined in the asset allocation policy at Section IV. A. herein.

V. Portfolio investment policies

A. Asset allocation policy

1. The Committee recognizes that the strategic allocation of Portfolio assets across broadly defined financial asset and sub-asset categories with varying degrees of risk,

return, and return correlation will be the most significant determinant of long-term investment returns and Portfolio asset value stability.

2. The Committee expects that actual returns and return volatility may vary from expectations and return objectives across short periods of time. While the Committee wishes to retain flexibility with respect to making periodic changes to the Portfolio's asset allocation, it expects to do so only in the event of material changes to the Fund, to the assumptions underlying Fund spending policies, and/or to the capital markets and asset classes in which the Portfolio invests.

3. Fund assets will be managed as a "Conservative" portfolio composed of five major components: an equity portion split into Australian and Overseas shares, REIT's, Fixed Income and a cash portion. The expected role of Fund equity and REIT investments will be to maximize the long-term real growth of Portfolio assets, while the role of fixed income and cash investments will be to generate current income, provide for more stable periodic returns and provide some protection against a prolonged decline in the market value of equity and REIT investments.

4. Cash investments will, under normal circumstances, only be considered as temporary Portfolio holdings, and will be used for Fund liquidity needs or to facilitate a planned program of dollar cost averaging into investments in either or both of the equity and fixed income asset classes.

5. Outlined below are the long-term strategic asset allocation guidelines, determined by the Committee to be the most appropriate, given the Fund's long-term objectives and short-term constraints. Portfolio assets will, under normal circumstances, be allocated across broad asset and sub-asset classes in accordance with the following guidelines:

Asset class	Sub-asset class	Target allocation	Range
Australian shares		30%	25 – 40%
Overseas shares		5%	0 – 10%
Real Estate Investment Trusts (REIT's)		10%	7.5 – 12.5%
Fixed income		40%	20 – 50%
	o Investment grade	35%	
	o Below-investment grade	5%	
Cash (Term Deposits)		20%	0 – 50%

B. Diversification policy

1. Diversification across and within asset classes is the primary means by which the Committee expects the Portfolio to avoid undue risk of large losses over long time periods. To protect the Portfolio against unfavourable outcomes within an asset class due to the assumption of large risks, the Committee will take reasonable precautions to avoid excessive investment concentrations. Specifically, the following guidelines will be in place:

a) With the exception of fixed income investments explicitly guaranteed by an Australian government (Federal or State), no single investment security shall represent more than 6% of total Portfolio assets.

b) With the exception of passively managed investment vehicles seeking to match the returns on a broadly diversified market index, no single investment pool or investment company (mutual fund) shall comprise more than 20% of total Portfolio assets.

c) With respect to fixed income investments, for individual bonds, the minimum average credit quality of these investments shall be investment grade (Standard & Poor's BBB or Moody's Baa or higher).

C. Rebalancing

It is expected that the Portfolio's actual asset allocation will vary from its target asset allocation as a result of the varying periodic returns earned on its investments in different asset and sub-asset classes. The Portfolio will be rebalanced to its target normal asset allocation under the following procedures:

1. Use incoming cash flow (contributions) or outgoing money movements (disbursements) of the Portfolio to realign the current weightings closer to the target weightings for the Portfolio.
2. Review the Portfolio semi-annually (June 30 and December 31) to determine the deviation from target weightings. During each semi-annual review, the following parameters will be applied:
 - a) If any asset class (equity or fixed income) within the Portfolio is +/-5 percentage points from its target weighting, the Portfolio will be rebalanced.
 - b) If any fund within the Portfolio has increased or decreased by greater than 20% of its target weighting, the fund will be rebalanced.
3. The investment committee may provide a rebalancing recommendation at any time.
4. The investment committee shall act within a reasonable period of time to evaluate deviation from these ranges.

D. Other investment policies

Unless expressly authorized by the Committee, the Portfolio and any investment advisers engaged are prohibited from:

1. Purchasing securities on margin or executing short sales.
2. Pledging or hypothecating securities, except for loans of securities that are fully collateralized.
3. Purchasing or selling derivative securities for speculation or leverage.
4. Engaging in investment strategies that have the potential to amplify or distort the risk of loss beyond a level that is reasonably expected, given the objectives of their Portfolio.

VI. Monitoring portfolio investments and performance

The Committee will monitor the Portfolio's investment performance against the Portfolio's stated investment objectives. At a frequency to be decided by the Committee, it will formally assess the Portfolio and the performance of its underlying investments as follows

A. The Portfolio's composite investment performance (net of fees) will be judged against the following standards:

- The Portfolio's absolute long-term real return objective.

B. In keeping with the Portfolio's overall long-term financial objective, the Committee will evaluate performance over a suitably long-term investment horizon, generally across full market cycles or, at a minimum, on a rolling five-year basis.

D. Investment reports should be available on a (calendar) quarterly basis or as more frequently requested by the Committee. Each investment manager is expected to be

available to meet with the Investment Committee once per year to review portfolio structure, strategy, and investment performance.

E. The Committee is authorised to engage the use of an Investment Wrap Platform to assist with the Reporting Function as required by the policy.

Governance policies

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18. Introduction

Abbeyfield Australia Limited's Policy & Procedure Manual has been written to provide all stakeholders a framework and guidelines by which all operations are required to comply.

These policies and procedures are developed in line with the Abbeyfield Australia Limited Constitution and comply¹ with relevant legislation, regulations and funding guidelines.

Policy and procedure are dynamic documents which need regular review to maintain relevance to the operations of the organisation.

¹ Policy & Procedure are to be reviewed at regular intervals to ensure compliance.

19. Definitions

AAL	Abbeyfield Australia Limited
Stakeholder	Includes but is not limited to <ul style="list-style-type: none"> • Directors • Employees • Volunteers • Residents • Contractors/consultants • Any person representing AAL
Conflict of Interest	Actual, potential or perceived conflicts between a person's duties and responsibilities for and on behalf of AA and that person's private interests. <i>This also applies where an individual has a competing duty to another entity in which that individual may have no personal interest.</i>
Actual Conflict of Interest	A real conflict between the person's duties and responsibilities and their private interests
Potential Conflict of Interest	A person's private interests that could potentially conflict with the person's duties and responsibilities
Perceived Conflict of Interest	Situation where a third party could form the view that a person's private interest could improperly influence the performance of their duties, now or in the future
Private interests	includes not only a person's own personal, professional or business interests, but also the personal, professional or business interests of individuals or groups with whom they are closely associated. This can include relatives and friends. Private interests can be divided into two types: pecuniary and non pecuniary.
Pecuniary interests	actual, potential or perceived financial gain or loss. Money does not need to change hands for an interest to be pecuniary. A person has a pecuniary interest if they (or a relative, or a close associate) own property, have a position in a company bidding for AAL's work, or receive benefits such as concessions discounts, gifts or hospitality from a particular source.
Non-pecuniary interests	No financial component. They may arise from personal or family relationships, or involvement in sporting, social or cultural activities. They include any tendency toward favour or prejudice resulting from friendship, animosity, or other personal involvement with another person or group.
Individual Member	Individual who takes up membership in accordance with Rule 8.5(a)
Life Member	Individual who is nominated for and takes up membership in

	accordance with Rule 8.5(d)
Local Society²	Incorporated association or company which has entered into an affiliation agreement with AAL for the purpose of carrying out work which is consistent with the objectives of AAL in a particular geographical area
Local Society Member	Local society (Association) that takes up membership in accordance with Rule 8.5(b)
Member	Person who is, or who is registered as, a member of AAL
Members	More than one Member
Members Guarantee Amount	Amount equal to \$10.00
Membership	Member of AAL
Register of Members	Register of Members maintained pursuant to the Corporations Act.
Notifiable Incident	Any serious event that may: <ul style="list-style-type: none"> • compromise the delivery of services of an AAL House or AAL • compromise the good governance of an AAL House by a Local Society or AAL • compromise the viability of the AAL House • raise public concern about standards of probity.
Communications materials	Include but are not limited to: <ul style="list-style-type: none"> • Advertising • Publications • Signage, banners and display materials • Business forms and documents • Corporate stationery • Multimedia • Internet and intranet web pages • Promotional material • Sponsorship activities • Strategic Alliance arrangements • Media Releases
Marketing and communications activities	Include but are not limited to: <ul style="list-style-type: none"> • Development and application of the corporate image • Internal communications • Market research • Sponsorship applications and contracts • Relations with the media and public • Events and promotions • Development, production and distribution of communications materials, display materials and promotional merchandise

² **Note:** **Local Society** is applied colloquially by AAL in place of **Local Association** as used in the AAL Constitution – all references to Local Society therefore apply where Local Association should be used.

	<ul style="list-style-type: none"> • Development and media booking for campaign and non-campaign advertising • Development and management of intranet and internet
Media	<p>All television, internet, radio and print media representatives including but not limited to:</p> <ul style="list-style-type: none"> • Editors • Chiefs-of-staff • Journalists • Columnists • Feature writers • Photographers and • Camera operators. <p>Includes, but is not limited to, specialist, industry and trade publications and on-line media</p>
Media Relations activities	<p>Include but are not limited to:</p> <ul style="list-style-type: none"> • Media releases, statements and alerts • Media enquiries • Media interviews • Journalist briefings • Editorial for newspapers, newsletters, magazines, trade journals, other publications • Television broadcasts • Radio broadcasts • Letters to the editor • Internet and intranet web pages
Media Relations ³	<p>Activity using the media to communicate or promote messages about AAL, excluding advertising, but encompassing issues relating to management and crisis response.</p> <p>Covers the management and preparation of</p> <ul style="list-style-type: none"> • Media releases • Statements • Interviews • Media conferences and • Journalist briefings.
Public Relations ⁴	<p>Provision of means to promote AAL's values and beliefs and ensure these activities reflect and support communicating AAL's goals to the general public and can include issues management and crisis response.</p>

³ Media relations differ from public relations in that it is specifically targeted at media contacts and journalists, whereas public relations extend that relationship to include the general public. It also includes issues management and crisis response. (Definition from Southbank Institute of Technology Media and Publicity Policy)

⁴ Public Relations is the deliberate, planned and sustained effort to establish and maintain mutual understanding between an organisation (or individual) and its (or their) publics. (Definition from Public Relations Institute of Australia website)

20. Policy and procedure development

Purpose

To ensure that all policies are responsibly developed, documented, resourced, communicated, implemented and evaluated in a consistent manner

Guidelines

1. All activities associated with consultation, drafting and presenting policies to the Board will be the responsibility of the Governance Committee and follow the attached process for policy and procedure development and review.
2. People who are affected by any policy issue will be consulted and involved in the process of developing such policies.
3. All existing law (including legislation, regulations, codes and guidelines) and relevant external policies will be considered and complied with in the process of policy development, consultation and drafting.
4. People in the organisation who are responsible for implementing and reviewing policies will be documented at the end of each policy.
5. All endorsed policies and procedures will be filed on the Local Member Log In on the AAL website under Policies & Procedures, the master copy to be openly available at the office, and updated by the Governance Committee.
6. Policies will be distributed to all people in the organisation who are directly affected by or involved with them as soon as they are introduced.
7. Changes to existing policies will follow the same procedure as the development of a new policy.
8. The central themes in developing new policies and changing existing policies will be:
 - Adherence to the organisation's expressed philosophy and purpose, current legislation and the organisation's constitution or rules of association;
 - Maximum possible benefit to the organisation's participant/member group



Signature

CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 4 July 2014

21. Board roles and responsibilities

Purpose

To provide strong strategic guidance of Abbeyfield Australia Limited (hereafter referred to as AAL)
To ensure effective monitoring of management of AAL
To ensure accountability to AAL and its stakeholders

Guidelines

Board Roles and Power

1. Strategic Guidance

The Board of AAL is to provide guidance to its stakeholders via

1.1. Strategic Direction

The Board is to set the strategic direction for the activities of AAL consistent with its Objects and Purpose as set out in the Constitution.

1.1.1. The strategic direction of AAL should be:

- 1.1.1.1. Set for a defined period as agreed by the Board;
- 1.1.1.2. Developed in collaboration with the Management team [and other stakeholders, as the Board sees fit];
- 1.1.1.3. Communicated via the Management team to the stakeholders responsible for implementing the strategy;
- 1.1.1.4. Monitored on a regular basis [e.g. results reported against goals each meeting]; and
- 1.1.1.5. Reviewed and updated annually at the Strategic Planning Meeting [See *Meetings and Decision Making Policy*]

1.1.2. The AAL Strategic Plan will detail achievable and measurable targets and milestones.

1.1.3. An Annual Business Plan will be developed in accordance with the Strategic Plan.

1.2. Policies

All AAL activities will be governed by policy and procedure that informs, empowers, and protects the stakeholders and the organisation.

1.2.1. Policy development and implementation will be the responsibility of the Governance Committee.

1.2.2. Policy will comply with the AAL constitution, legislation and regulations enacted at the time and any funding requirements as may be in place [See *Policy Development Policy*].

1.2.3. Policies and procedures will be reviewed at the annual Strategic Planning Meeting for relevance and compliance.

1.3. Culture

The Board should promote a culture aligned with the Objects and Purpose of the Constitution and the Code of Ethical Conduct.

2. Monitoring

2.1. Fiduciary Responsibility

The Board is responsible for ensuring the financial viability of AAL. They will achieve this by:

- 2.1.1. Overseeing the development of an annual budget and other performance indicators that is realistic and reflects the environment in which AAL is operating;
- 2.1.2. Ensuring current and accurate financial reports are presented to every Board meeting, or more frequently as circumstances dictate;
- 2.1.3. Instigating corrective measures as circumstances may dictate;

- 2.1.4. Ensuring a revenue raising strategy capable of delivering AAL's strategic and business plans;
- 2.1.5. Appointing an Audit Committee with oversight of the audit process, including the authority to recommend internal and external auditors; and
- 2.1.6. Holding an annual Audit by an independent and accredited agency;

2.2. Executive Management

The Board is responsible for by:

- 2.2.1. Appointing a Chief Executive Officer with the skills, capacity and attributes necessary to implement AAL's strategic and operational goals;
- 2.2.2. Setting the Chief Executive Officer and other Management team members' remuneration and succession plan;
- 2.2.3. Evaluating the Chief Executive Officer's performance through predetermined key performance indicators and other assessment methods.

3. Accountability

3.1. Independence

- 3.1.1. The Board should be independent of day-to-day operational aspects of AAL.
- 3.1.2. The Chair should be independent of management.
- 3.1.3. Directors have no individual authority to participate in the operations of AAL unless:
 - 3.1.3.1. Such authority is specifically delegated by a resolution of the Board; and
 - 3.1.3.2. Such authority has a sunset clause.

3.2. Fairness

- 3.2.1. The Board should act in the interest of its stakeholders.
- 3.2.2. The Board should ensure all stakeholders are treated fairly.
- 3.2.3. The Board must take all steps necessary to provide members with the opportunity to raise issues on the governing of AAL.

4. Board Composition

- 4.1. AAL must have at least five (5) and no more than ten (10) Directors. At least two (2) Directors must reside ordinarily in Australia.
- 4.2. Appointment
 - 4.2.1. The members of the Board are elected as per the Constitution.
 - 4.2.2. Where necessary, the Board has the power to co-opt members to the Board [See Clause 6].

5. Election of Board Executive

Office bearers will consist of:

- Chairman
- First Vice Chairman
- Second Vice Chairman
- Secretary
- Treasurer
- 5.1. Election of office bearers must be undertaken by the Board annually as per the Constitution Clause 24.
- 5.2. The Board may ask an office bearer to step down if required.

6. Co-option of New Board Members

- 6.1. Where the Board has appointed a member to the Board as per Clauses 18.2 and 18.3 of the Constitution, the Board should seek the best candidate to complement the skill set of

sitting members⁵.

7. Orientation of Board Members

7.1. On appointment to the Board, all appointees should be given an orientation, including but not limited to:

7.1.1. Welcome Pack containing:

- Constitution
- Policy and Procedure Manual
- Board Member Responsibilities
- Board Nominee form [to be completed by Co-opted Member]
- Meeting Dates Schedule
- Annual Report
- Copies of relevant insurance Certificates of Currencies
- Other information as required

7.1.2. Confidential discussion with Chairman and CEO

7.1.3. Site tour [where practicable]

7.1.4. Induction or orientation session by AAL Management

8. Attendance at Board Meetings

8.1. All Board members are expected to attend all Board meetings as set out in the Annual Meeting Dates Schedule.

8.2. Where attendance is not possible, an apology should be provided to the Chair as soon as practicable.

8.3. Where a Board member has not attended three meetings without leave of absence, the Board may choose to dismiss that Member as per Clause 18.5 (f) of the Constitution.

8.4. A record of Board Attendance should be included in AAL's Annual Report to its members.

9. Board Performance Appraisal

9.1. The Board should undertake an annual review of its performance in areas such as, but not limited to:

- Compliance with Code of Ethical Conduct, policies, legislation and other criteria
- Director performance, both individual and collective
- Culture

9.2. Individual Board members should be cognisant of the following:

- AAL's purpose
- Their role
- AAL's financial position
- Their legal and other obligations as a Board member
- The Constitution, rules and policies

10. Public Officer

The Public Officer [also known as Company Secretary] is responsible for reporting to governing bodies as per relevant current legislation.

10.1. Core responsibilities include, but are not limited to:

10.1.1. Compliance with all legal obligations including Company law and the Constitution

⁵ Desirable skill sets for a strong Board should include but not be limited to:

- Legal
- Financial
- Marketing
- Consumer/Advocacy

- 10.1.2. Accurate record keeping, including minutes
- 10.1.3. Correspondence
- 10.1.4. Current contact details for all Board members
- 10.2. Delegation of any of these tasks can be made to the Management team as agreed by the Board.

11. Appointment of Patron[s]

When appointing a patron and/or one or more vice-patrons of AAL, the following should be considered:

- 11.1. The objectives or outcomes which will demonstrate the contribution of the patron and the value of such a role to the organisation
- 11.2. Allocation of resources such that all stakeholders, including the patron, know and understand the role and function of the patron, thereby increasing effectiveness and confidence in this role
- 11.3. Consistent acknowledgement and support to the role, function and contribution of the patron
- 11.4. Formal review process annually to ascertain satisfaction from both the organisation and the patron in the role and its contribution to the organisation

12. Committees

When convening committees of AAL, the rules which apply under the Constitution also extend to any committees or advisory groups as agreed by the Board.

- 12.1. The Board will develop Terms of Reference for any committees or advisory groups under its auspice
 - 12.1.1. Any committees or advisory groups will be bound by these Terms of Reference
 - 12.1.2. Terms of Reference will be reviewed on a regular basis as stipulated within the relevant policy
- 12.2. Reports of any committees or advisory groups will be presented at each Board meeting.

13. Expense Reimbursement

- 13.1. Directors will be reimbursed for all reasonable costs and expenses related to their role including attendance at Board meetings and Board-appointed committees.
- 13.2. Directors will provide whatever documentation is required to support their claims.



Signature: CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 16 April 2016

22. Meetings and decision making

Purpose

To ensure that all meetings, and decisions made, are conducted within a framework that ensures transparency, honesty, integrity and accountability.

To obtain relevant information in which to consider matters and discuss issues in order to make decisions in the best interests of AAL's constituents

Guidelines

Meetings

1. All meetings must follow accepted practice and provide adequate notice as defined in the Constitution
2. An annual calendar of meetings and significant organisational events should be developed to provide Board, Committee or Local society members sufficient notice to meet their the Board, Committee or Local society obligations
3. All meetings will be provided with an agenda, minutes from previous meeting and relevant papers and information, sufficient for Board, Committee or Local Society members to consider and make knowledgeable decisions
 - 3.1. Papers should be circulated a minimum of five (5) days prior to any meeting
 - 3.1.1. Papers should contain reports from areas of operations including, but not limited to:
 - Finance
 - CEO, Committee Chair or Local Society Chair as applicable
 - Activity of relevant operations
 - Committees
 - Projects/programs
 - 3.2. It is the responsibility of all Board, Committee or Local society members to be conversant with the information provided and prepare for meetings
 - 3.3. Papers should note whether they are for Information Only or For Decision as well as contain sufficient information and any recommendations for consideration
 - 3.3.1. Items requiring discussion should not be tabled at the meeting to ensure there is sufficient time for Board, Committee or Local society members to consider the issue
 - 3.4. A set of papers pertaining to each meeting must be maintained in accordance with the Public Records guidelines
 4. Meetings can be convened as Face-to-Face or via telecommunications means as available, e.g. teleconference, video conferencing etc. to facilitate attendance by Board, Committee or Local Society members
 5. A quorum as set out in the Constitution must be reached before a meeting can commence
 - 5.1. Where a quorum is not reached, reconvening of the meeting will be as per the rules of the Constitution
 6. All members of the Board, any Committee or Local Society should attend a minimum of 75% of scheduled meetings, unless good reason exists otherwise
 - 6.1. If unable to attend a meeting, a Board, Committee or Local society member should provide notice for noting in the Minutes as an Apology
 - 6.2. If a Board, Committee or Local society member is unable to fulfil his or her obligations for good reason, a Leave of Absence may be granted by the Board, Committee or Local society
 - 6.3. If a Board, Committee or Local society member does not participate in the activities of the Board, Committee or Local society without good reason, the Board, Committee or Local society may request the a Board, Committee or Local society member resigns from that position

7. The Chair should ensure a copy of the Constitution and the Register of Conflicts of Interest is available for each meeting
 - 7.1. The Chair should ask :
 - 7.1.1. that any Conflicts of Interest, real or potential, be declared before each meeting
 - 7.1.1.1. Where a conflict of interest, real or potential, is known or suspected, the Board, Committee or Local Society member should declare that conflict of interest as per the Conflict of Interest Policy
 - 7.1.1.2. Where a conflict of interest exists, the Board, Committee or Local Society member concerned will withdraw from participating in discussion and decision making
 - 7.1.2. if there are any other items of business to be raised and adjust the agenda accordingly
 - 7.2. The Chair will balance the need for all parties to be provided adequate opportunity to express their views openly and frankly whilst progressing the meeting in a timely manner
 - 7.3. The Chair should resolve any disputes arising during the meeting as per the Dispute Resolution process
8. Draft minutes from any Board, Committee or Local Society should be provided to the Chair as soon as practicable (usually one working day) for approval before distribution to the Board, Committee or Local Society members

Annual General & Special Meetings

9. All Annual General and Special Meetings will be held in accordance with the rules set out in the Constitution
 - 9.1. Special Meetings should only be convened for urgent business
 - 9.2. Members can request a Special Meeting at any time, provided the rules as set out in the Constitution are followed
10. When establishing a quorum, attending individuals from Local society, body corporate representatives and proxies will be included in the quorum
 - 10.1. Where a quorum is not established, reconvening the Annual General or Special meeting will follow the Constitutional rules
11. Delegations from Local society and members' proxies must follow the rules as set out in the Constitution
12. Annual General Meetings will include at a minimum:
 - Consideration of all reports presented
 - Election of Directors
 - Appointment of, and remuneration for (if required) the Auditor
13. The Annual Report and accompanying Audited Statements will be available for the Annual General Meeting

Annual Report

14. The Annual Report must be prepared as soon as is practicable after the end of the financial year
15. The Annual Report will include, but not be limited to:
 - Chair's Report
 - CEO's Report
 - Audited Financial Statement and Auditor's Report
16. The Annual Report must be available for the Annual General Meeting

Compliance

17. Reporting to the relevant legislation body must be undertaken within the prescribed time as outlined in the relevant Act

Board Meetings

18. See [Meetings](#)
19. Where required, the Chair can declare items to be discussed *In Camera*
 - 19.1. Where *In Camera* discussion is necessary, any decisions or outcome arising from this discussion should be provided for inclusion in the relevant Minutes
20. Where required, the Chair can request that items be circulated for discussion *Out of Session*
 - 20.1. Where a decision is required from *Out of Session* discussion, the written decision of each Board member will be forwarded to the Chair and a copy included in Board papers for the next meeting
 - 20.2. Any decision arising from an *Out of Session* discussion must be ratified at the next Board meeting and recorded in the Minutes

Resolutions

21. Resolutions need to be recorded in the Minutes of the meeting during which they are taken
22. Wording should be clear and concise
23. The 'Mover' and 'Seconder' of each proposal must be recorded in the Minutes
24. Any actions arising from discussion during meetings should be noted on an Actions Arising list for follow up at subsequent Board, Committee or Local society meetings

Annual Strategic Planning

25. See ***Planning and Evaluation Policy***

Project Management Framework

26. Any projects undertaken by AAL should follow established protocols relevant to the size, risk and scope of the project including, but not limited to:
 - Project lifecycle
 - Project control cycle
 - Standardised tools, templates, and language
- 26.1. Project lifecycle to provide guidance should include, but not be limited to:
 - Business development
 - Tender process
 - Contract
 - Start up including scoping, risk assessment, budget etc.
 - Implementation
 - Closure, including review
- 26.2. Project control cycle should follow, but not be limited to, a continuous improvement method, e.g. Plan-Do-Check-Act
- 26.3. Standardised tools, templates and language should effectively support implementation, management and processes used in a project

Staff and User Participation

27. AAL will provide opportunity for AAL staff, members and users of AAL services to raise issues through its Local society's committees or the Board as required.
28. Any issues raised will be dealt with in accordance with the rules of the Constitution
29. Decisions arising from issues raised will be communicated as soon as practicable in accordance with the rules of the Constitution

Decision Making

30. All activities associated with decision making and communicating these decisions to those who will implement them will follow the related procedures and processes.
31. The central themes in decision making will be:
 - Adherence to the organisation's expressed philosophy and purpose, current legislation and the organisation's constitution or rules of association;

- Maximum possible benefit to the organisation's participant/member group
32. The decision making process should be thorough, transparent and made in consultation with those affected by the decision
 - 32.1. To assist with decision making, independent advice from external sources may be sought
 - 32.2. Before a decision is final, it should be scrutinised to ensure it meets ethical, moral and social standards
 33. Decisions made during any the Board, Committee or Local society meeting will be noted in the Minutes and followed up in subsequent the Board, Committee or Local society meetings if required
 - 33.1. Where a member of the Board, any Committee or Local society abstains from a decision, a quorum must still be reached before the decision can be taken
 34. Decisions should be communicated i promptly to the relevant stakeholders
 35. Any grievances or disputes arising from decisions made by the Board, Committee or Local society should be raised as per the Grievance and Dispute Policy.
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Signature: CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 16 April 2016

23. Membership

Purpose

To ensure that membership of AAL complies with relevant statutory and constitutional guidelines

Guidelines

1. Membership of AAL and/or its local societies must be in line with guidelines set out in the AAL constitution.
2. The Board or Local society may convene a Membership Committee to review membership applications and present its recommendations to the Board or the Local society for approval
 - 2.1. Before acceptance as a Member, applications must be approved as set out in the Constitution
 - 2.1.1. The Members Guarantee Amount needs to be paid at the same time as membership is applied for
 - 2.2. To remain a Member, relevant fees as set and reviewed by the Board from time to time must be current
3. A Register of members will be maintained and be available for inspection by any Member as set out in the Constitution
4. Members have the right to attend meetings and vote as set out in the Constitution
5. Cessation of membership will follow the guidelines as set out in the Constitution
 - 5.1. Members who are expelled or fail to meet the eligibility of membership have the right to appeal as set out in the Constitution
6. *Categories of Membership*
7. Categories of membership will be determined by the Board from time to time as required.
8. Current membership categories are set out in the Constitution



Signature

CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 4 July 2014

24. Code of ethical conduct

Purpose

To provide a framework of ethical behaviour to which all stakeholders of AAL should adhere to ensure the highest standards of conduct are met.

To guide all stakeholders in meeting their governance and good business practice obligations.

Guidelines

1. Standards of Ethical Behaviour

AA is committed to adhering to the Principles of Ethical Conduct as set out in the Code of Ethical Conduct.

1.1. These principles include but are not limited to:

- 1.1.1. Honesty
- 1.1.2. Integrity
- 1.1.3. Transparency
- 1.1.4. Accountability
- 1.1.5. Confidentiality
- 1.1.6. Objectivity
- 1.1.7. Respectfulness

1.2. These guiding principles are to be embedded into the culture and practice of AA and the way it conducts its business.

1.3. All stakeholders are required to be familiar with the Code of Ethical Conduct and to practise the principles therein espoused.

1.3.1. The Code of Ethical Conduct will be available to all stakeholders via AA's website, in the Policy and Procedures Manual and other means as appropriate from time to time.

1.4. Breaches of the Code of Ethical Conduct will be subject to the provisions of the Disciplinary Action Policy.

2. Whistle-blowers' Protection

2.1. Where any *Whistle-blowers Protection* legislation enacted at the time applies to the AAL, AA will comply with and be bound by the provisions of that Act.



Signature: CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 4 July 2014

Related Documents:

Code of Ethical Conduct

Whistle-blowers' Protection legislation [current]

25. Conflict of Interest

Purpose

To ensure that AAL provides a framework for all Board members⁶, staff (paid or unpaid) in formally declaring an interest that might give rise to an actual, potential or perceived conflict of interest.

To ensure the highest levels of integrity and trust in AAL are fundamental to the organisation's operation by avoiding actual, potential and perceived conflicts of interest.

Note:

Directors and other Officers of AAL are subject to the provision of the Corporations Act in dealing with fiduciary duties at law, including Conflicts of Interest and employees are equally subject to duties of good faith under relevant legislation as well as the terms of employment arrangements.

This policy does not derogate from any of these obligations.

Guidelines

1. All Board members, staff members or volunteers as well as all affiliated local societies are subject to this policy.
2. All Board members, staff members or volunteers must:
 - 2.1 take reasonable steps to restrict the extent to which a private interest could compromise, or be seen to compromise, their impartiality when carrying out their duties and responsibilities;
 - 2.2 abstain from involvement in decisions and actions that could reasonably be seen to be compromised by their private interests and affiliations;
 - 2.3 avoid private action in which they could be seen to have an improper advantage from inside information they might have access to because of their duties and responsibilities;
 - 2.4 not use their position or AAL's resources for private gain;
 - 2.5 ensure that there can be no perception that they have received an improper benefit that may influence the performance of their responsibilities and duties; and
 - 2.6 not take improper advantage of their position or privileged information gained in that position when seeking employment outside AAL.
3. The application of the 'reasonable person' test⁷ can be applied with regard to managing conflict of interest in the same way as it is applied to any other action or decision.
4. The Secretary of AAL will maintain a Register in which details of the existence of a possible or potential conflict of interest are formally advised and noted.
 - 4.1 *Where a conflict of interest, real, potential or perceived, may arise, it is incumbent upon that individual to declare the nature and substance of the conflict to the Secretary.*
 - 4.2 *Where the reporting individual is the Secretary, that conflict, real, potential or perceived, will be reported to the Chair.*
5. *Where a conflict of interest has been registered, a standing notice will be permitted until such time that that conflict is resolved or ends.*
 - 5.1 *Where the conflict may arise in the future, this will constitute a 'new' conflict of interest and the due process is required to be followed.*

⁶ In providing their consent to appointment as a Director of the Abbeyfield Australia Limited Board, directors are required to give notice or standing notice of the nature and extent of the Director's interest in matters, with the Secretary of AAL to maintain a record of notice or standing notice on behalf of the AAL Board.

⁷ That is, would another reasonable person make the same decision in light of the same facts and circumstances. "Reasonableness" should take into account the nature of an individual's relationship with AAL.

6. The proper management of conflicts of interest requires the appropriate management of the interaction between private interests and a person's duties and responsibilities to AAL via a range of procedures including, but not limited to:
 - 6.1 **Register** – details of the existence of a possible or potential conflict of interest are formally advised and noted.
 - 6.2 **Restrict** – restrictions are placed on the person's involvement in the matter.
 - 6.3 **Recruit** – a disinterested third party is appointed to oversee part or all of the process that deals with the matter
 - 6.4 **Remove** – the person does not participate at all in the matter
 - 6.5 **Relinquish** – the private interest concerned is relinquished
 - 6.6 **Resign** – the person steps down from the position they hold on a temporary or permanent basis.
7. *Where a conflict of interest has been determined, the appropriate course of action will be discussed with the individual and if not satisfactorily resolved, the Board will determine what course of action will be taken.*
8. If required by the conditions of any funding agreements, conflicts of interest must be reported to the relevant funding body as per the specific clauses contained in the agreement.

Signature

Position Held:

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement:

Date Last Reviewed:

26. Planning & evaluation

Purpose

To ensure our programs and services are effective in meeting the needs of AAL's clients and the community.

Guidelines

1. To achieve the strategic and operational goals of AAL, a range of planning initiatives will be employed including annual Strategic and Operational Planning days with regular reviews on a bi-annual basis.

Strategic Planning

2. The Strategic Plan should be developed to cover an agreed timeframe and reviewed regularly over that agreed period to monitor goals are being met and to permit revision should circumstances alter.
3. The Strategic Plan should consider social, economic and environmental circumstances when identifying achievable goals and outcomes which meet the objectives of the organisation.
4. Identified goals and outcomes should be within the capability of the organisation to resource and implement within the projected timeframes.
5. The organisation's mission and vision should be reviewed during the strategic planning process to ensure it continues to reflect AAL's aspirations and commitment.
6. Strategic planning should assess that management and governance practice is sound, accountable and consistent with current state housing and disability policy and practice.
7. A representative Strategic Planning committee should include the Board, senior management and where deemed appropriate, residents' representatives.
8. The plan must be communicated to all staff and residents clearly outlining the goals and aims of the organisation.

Operational Planning

9. Operational planning should be based on the strategic goals and outcomes identified in the Strategic Plan.
10. The senior management team will implement the strategic goals and outcomes as outlined in the Strategic Plan within the timeframes projected.
11. Operational goals both arising from the Strategic Plan and/or goals identified which facilitate organisational functions will be incorporated into staff key performance indicators (KPIs).
12. Regular meetings should be conducted with management and staff to ensure the operational objectives are being met.

Staff and Resident Participation

13. The view of all staff and residents will be sought on a regular basis and staff and residents will be encouraged to participate in the planning process.
14. Fair and equitable practice that is consistent with funding obligations, applicable legislation and purpose of AAL will be applied when managing and allocating resources.

15. Support options are planned, developed, implemented and reviewed in a manner that is responsive to the decisions, choices and aspirations of individuals and within the capacity of the organisation to deliver.

Organisational Performance Measures

16. Performance measures will be taken to ensure AAL is achieving service delivery standards in order to comply with its funding obligations, and to meet and exceed community expectations.
17. Regular evaluations of the strategic aims and operational goals of AAL will be undertaken to ensure the organisation reaches its planned objectives within the timeframes outlined in the Strategic and Operational Plans.
18. KPIs will be aligned with the goals identified during strategic and operational planning.

Quality Assurance

19. As much as is practicable, AAL will ensure that all planning and development of services and facilities will adhere to Quality Assurance principles:
 - Fit for purpose
 - Right the first timeand meet or exceed regulatory and community standards
20. Evaluation of standards practised will be undertaken at appropriate intervals by external monitoring bodies to ensure standards are maintained.

Continuous Improvement

21. AAL is committed to continuous improvement in all its operations and processes and this will be embedded in policies and procedures throughout the organisation.
22. Models such as Plan-Do-Check-Act (PDCA) or similar will be implemented to ensure ongoing efforts to improve operations and processes.

Service Research and Development

23. To ensure best practice is undertaken with service delivery, AAL is committed to undertaking research and evaluations to develop their operations.

Compliance with Regulatory Housing and Disability Service Standards

24. Standards and monitoring performance are central to ensuring that people living with disability or disadvantage can access high quality and accountable services and AAL aims to comply with the relevant housing and disability legislations.
25. Current Industry Standards used to measure organisational systems and processes include, but are not limited to:
 - Service access
 - Individual needs
 - Decision-making and choice
 - Privacy, dignity and confidentiality
 - Participation and integration
 - Valued status
 - Complaints and disputes
 - Service management
 - Freedom from abuse and neglect
26. If AAL does not meet the performance measures, conditions of funding or any other requirement of the Act, the Secretary has the power to take action.
27. AAL will develop and maintain a plan for improvement, regardless of its performance against the current Standards.



Signature

CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 4 July 2014

27. House Governance

PROVISO:

This policy is one for which consultation with a focus group of relevant stakeholders is essential. This draft policy must be viewed with the understanding this consultation has not yet taken place.

Purpose

To ensure the wellbeing of residents and effective operation of an AAL House through the establishment and maintenance of a strong governance structure

Guidelines

1. Each AAL House will be managed by a Committee of Management elected by the financial members of the locally incorporated AAL society
2. The Committee of Management and all volunteers are required to abide by national AAL policies

Committees

3. The principal governing body for each AAL House is the **Committee of Management**
 - 3.1. Each Committee of Management should have, where practicable, five (5) members in compliance with House Management Manual.
 - 3.2. The Committee should aim to have an appropriate level of expertise in, but not limited to, the following:
 - 3.2.1. Finance
 - 3.2.2. Business management
 - 3.2.3. Law
 - 3.2.4. Health care
 - 3.2.5. Human resources management or
 - 3.2.6. Public relations
 - 3.3. Election of the Executive
 - 3.3.1. Election of committee members and office bearers must be undertaken by the Committee of Management annually as per the House Management Rules Part 5 Division 3.
 - 3.4. Roles must include:
 - Chairperson
 - Vice Chairperson
 - Secretary
 - Treasurerand may include:
 - Building Maintenance Officer
 - Housekeeper Supervisor
 - Food Safety Officer
 - OHS Officer
 - Resident Liaison Officer
 - Applications Officer
 - Publicity Officer
 - 3.5. Office bearers can hold more than one role simultaneously
4. Each AAL House will elect a **Resident's Committee**
 - 4.1. Every resident is eligible to participate on the Committee
 - 4.1.1. Participation is voluntary and can be exercised as the resident feels appropriate

- 4.1.2. A resident can request a third party, including the Housekeeper, to support them at a Resident's Committee meeting
- 4.1.3. The third party is not to be considered a member of the Committee
- 4.1.4. Where a resident requires an advocate or Power of Attorney to represent their interests, that advocate may represent the resident and his or her interests at Residents' Committee meetings
- 4.2. A representative of the Committee of Management, usually the Resident Liaison Officer, will participate in all Resident's Committee meetings
- 5. Each AAL House Committee of Management will form a committee, i.e. **Applications Committee** to review applications for residency
 - 5.1. The Applications Committee will comprise three (3) to five (5) members with a minimum of
 - 5.1.1. Two (2) Committee of Management representatives and
 - 5.1.2. One (1) independent community representative if possible

Committee Roles and Responsibilities

6. Committee of Management

- 6.1. The Committee of Management is responsible for the general oversight and overall management of, but not limited to:
 - 6.1.1. Finances including
 - 6.1.1.1. Separate Asset Maintenance Reserve
 - 6.1.1.2. Annual budgets and audit
 - 6.1.1.3. Timely correction of Resident's fees
 - 6.1.2. Maintenance including
 - 6.1.2.1. Development and updating of Asset Management Plans (AMPs)
 - 6.1.2.2. Annual review of AMPs
 - 6.1.2.3. Lodgement of AMPs with AAL as per the relevant schedule
 - 6.1.3. Employment
 - 6.1.4. Risk Management including
 - 6.1.4.1. Insurance
 - 6.1.4.2. Occupational health and safety (OHS)
 - 6.1.4.3. Food safety and hygiene
 - 6.1.5. Publicity
 - 6.1.6. Record keeping
 - 6.1.7. Dispute resolution
 - 6.1.8. Applications and
 - 6.1.9. Resident assessment through an annual survey and support as required
- 6.2. The Committee of Management must adhere to the Code of Ethical Conduct policy including:
 - 6.2.1. Advice of Notifiable Incidents to AAL
- 6.3. The Committee of Management must ensure that a set of House Rules are developed, prominently displayed and enforced

Residents' Committee

- 6.4. The Residents' Committee, in consultation with the Committee of Management, is responsible for
 - 6.4.1. Household operations such as
 - 6.4.1.1. Menus and meal times
 - 6.4.1.2. Cleaning
 - 6.4.1.3. Bookings for the guest room
 - 6.4.1.4. Pets
 - 6.4.1.5. Garden use

- 6.4.2. Residents' issues including
 - 6.4.2.1. Smoking
 - 6.4.2.2. Interpersonal problems
 - 6.4.2.3. Grievances and complaints
- 6.4.3. Emergencies such as
 - 6.4.3.1. Death of a resident
 - 6.4.3.2. Accidents
 - 6.4.3.3. Fire
 - 6.4.3.4. Other issues as arise

7. Applications Committee

- 7.1. The Applications Committee is responsible for recommendations for residency in the AAL House
- 7.2. Applications will be assessed against the Eligibility Criteria including the minimum criteria and priority considerations

Compliance

8. Quality Assurance Framework

An annual review of each AAL House will be conducted by AAL to ensure compliance with the relevant legislative, regulatory and funding obligations

- 8.1. Where the AAL House does not meet the requisite standards, a timeframe within which the Committee of Management will commit to meet these standards will be set
- 8.2. Where this is not met, the Board of AAL will take measures as required to ensure compliance



Signature _____ CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 4 July 2014

28. Environmental Sustainability & Compliance

Purpose

To provide AAL with an integrated approach to business sustainability with safety, quality and environmental management systems.

Guidelines

1. Ensure AAL shows respect and concern for the physical environment and for its future users in all its operations.
2. Ensure AAL reduces its impact on the environment and climate change as much as is practicable without adversely affecting the provision of service to our clients by
 - 2.1 Implementing waste management, energy and resource saving strategies;
 - 2.2 Educating and encouraging staff to practise conservation in the workplace and in residences;
 - 2.3 Strengthening appropriate partnerships to facilitate environmental sustainability (e.g. paper recyclers, local councils, water boards, funding bodies).
 - 2.4 Considering environmental sustainability as an integral part of policy development and operations within the organisation.
3. AAL will develop and implement a program to:
 - 3.1 Evaluate environmental performance
 - 3.2 Identify environmental risks
 - 3.3 Record and monitor environmental impacts from Abbeyfield operations
 - 3.4 Implement environmental and social sustainability measures



Signature

CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 4 July 2014

29. Risk Management

Purpose

To provide the framework to identify and analyse risks associated with AAL's activities and operations

To protect AAL from those risks of significant likelihood and consequence in the pursuit of the AAL's stated strategic goals and objectives, including maintaining a safe workplace, minimising losses and maximising opportunities, developing appropriate risk treatment options, and informing decision-making.

To minimise the impact of potential risks upon AAL business operations through timely management of those risks.

Guidelines

Risk Management Framework

1. Provide a consistent risk management framework in which the risks concerning business processes and functions of the AAL will be identified, considered, and addressed in key approval, review and control processes by
 - 1.1. Providing appropriate resources to develop and maintain an effective risk management framework
 - 1.2. Developing, reviewing and documenting procedures and processes to implement a risk management strategy
 - 1.3. Ensuring all relevant levels of the AAL management, including the Finance and Risk Management committee, are aware of any risks and associated actions and treatments required
 - 1.4. Establishing and monitoring performance against meaningful and measurable objectives
 - 1.5. Identifying competency needs and providing appropriate training and professional development of staff to meet those needs⁸ and
 - 1.6. Undertaking risk reviews and audits on an annual basis
2. Encourage pro-active rather than re-active management
3. Provide assistance to, and improve the quality of decision making within AAL
4. Ensure AAL's activities are compliant with, and complementary to, AAL's quality framework
5. Review this framework regularly, e.g. during the Strategic Planning process

Asset Management

6. Safeguard AAL's assets – people, finance, property and reputation – through well- defined policies relating to these areas.
7. *Reduce material risks through*
 - *Risk reduction*
 - *Risk management and*
 - *Behaviour modification*

Business Continuity Plan

8. Develop and maintain a Business Continuity Plan to

⁸ This should be conducted on an annual basis

- 8.1. Define potential threats
- 8.2. Mitigate the effects should potential threats occur
9. Review the Business Continuity Plan on a regular basis, e.g. during the Strategic Planning process.

Insurance Coverage

10. Develop and maintain an Insurance Coverage Plan as outlined in the Insurance Policy.

Intellectual Property

11. Develop an Intellectual Property Policy to ensure any and all intellectual property developed by AAL remains the property of AAL and is protected by copyright or other legislation as may apply to intellectual property.

Illegal or Unconstitutional Practices

12. Comply with prevailing legal or statutory requirements in relation to
 - 12.1. Legislation
 - 12.2. Agreements, contracts, etc.
 - 12.3. National and international standards, protocols, and prevailing community standards of best practice *[See Code of Ethical Conduct Policy]*
13. Take action when practices or potential for practices to be, contrary to the Code of Ethical Conduct are identified or suspected of occurring



Signature: CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 4 July 2014

30. Publicity & Media Contact

Purpose

To provide AAL with a set of guidelines which inform the development of Abbeyfield Australia's (AAL) communications strategy including public relations, media and/or associated activities having a risk management, marketing or promotional aspect.

Guidelines

1. The Board will appoint an official spokesperson for AAL, which unless otherwise resolved from time to time will be the Board Chair and/or the Chief Executive Officer.
2. Contact with the media [see Definitions] includes but is not limited to:
 - 2.1. Media releases
 - 2.2. Statements
 - 2.3. Alerts and
 - 2.4. Direct contact with media companies and journalists
3. This person/s will be authorised to speak on behalf of AAL to communicate AAL's official stance on matters including, but not limited to:
 - 3.1. Operational matters including policy
 - 3.2. Current trends
 - 3.3. Future directions and
 - 3.4. Issues of a highly political or sensitive nature
 - 3.5. Staff or others may be delegated to speak on matters pertaining to technical or other specialised areas as the authorised person/s deems appropriate.
 - 3.5.1. The staff or other so delegated cannot comment outside his or her area of expertise.
 - 3.5.2. Delegation of this nature must be in writing.
4. All media communications including press releases must be approved by the official spokesperson.

Communications Strategy

5. Development and/or conduct of AAL's media or public relations strategy any associated activities must adhere to the guidelines set out in these guidelines.
6. When developing promotional activities with a media or public relations element, staff will adhere to the relevant policies and procedures including, but not limited to, marketing policies and procedures.
7. When staff members are invited to present to the public, either by solicitation or by proactive recruitment of such opportunities, prior approval from the official spokesperson is required.
 - 7.1. Any material prepared for such presentations must be approved by the official spokesperson.

Response to Media Requests

8. All media enquiries must be channelled through the official spokesperson.
9. Unless delegated as per Clause 3.5, staff members must not:
 - 9.1. Make contact with media
 - 9.2. Provide information to the media or external stakeholders

- 9.3. Where an employee is approached by the media at presentations, events, etc. all queries must be directed to the official spokesperson.
10. As much as is practicable, the official spokesperson must ensure that the information provided is not misused or inappropriately disseminated to other organisations.

Style Guide

11. To ensure consistency of branding, a style guide must be developed and maintained.
12. All communications and branded material must adhere to the principles set out in the Style Guide.
13. The Style Guide will provide advice on, but not limited to:
 - 13.1. Logos and branding
 - 13.1.1. Rules regarding logos
 - 13.1.2. Acceptable variations of the logos
 - 13.1.3. Unacceptable use of the logos
 - 13.1.4. Misuse of logos
 - 13.2. Colour
 - 13.2.1. Use of Board approved PMS colours
 - 13.3. Design of material
 - 13.3.1. Layouts, dimensions and templates
 - 13.3.2. Press releases
 - 13.3.3. Stationery, including letterhead, with compliment slips, etc.
 - 13.3.3.1. Organisational details
 - 13.3.3.2. Layout
 - 13.3.3.3. Appearance
 - 13.3.4. Brochures and other promotional information
 - 13.3.5. Media
 - 13.3.5.1. Print media
 - 13.3.5.2. Web and social media
 - 13.4. Print Guidelines
 - 13.4.1. Fonts and sizes



Signature CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 19 November 2014

Governance procedures

31. Policy & Procedure Development

Purpose

To ensure that all policies are responsibly developed, documented, resourced, communicated, implemented and evaluated in a consistent manner

Guidelines

1. The Governance Committee will oversee all activities associated with policy development, including:
 - consultation
 - drafting
 - presenting
2. The method to be used in developing a policy is outlined in the attached process diagram which ensures adequate consultation with all stakeholders.
3. The Board will establish short term working groups to draft policy statements for Board endorsement.
4. All decisions and actions within the organisation will follow the policy framework resulting from this policy making process.

Resources

5. All decisions and actions associated with implementation of policies and procedures will undergo careful costing during the planning stages.
6. The Board will allocate sufficient resources to ensure effective and efficient implementation of each endorsed policy and procedure.



Signature

CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 4 July 2014

32. Code of ethics

Purpose

To ensure clear expectations of the standards of conduct to which AAL aspires are given to all stakeholders of AAL.

To guide all stakeholders in meeting their governance and good business practice obligations.

Guidelines

Access to Code of Ethical Conduct

Stakeholders of AAL are required to be familiar with the Principles of Ethical Conduct as set out in the Code of Ethical Conduct.

- 1.1. The AAL Code of Ethical Conduct will be available on the AAL website and intranet for access by all stakeholders
- 1.2. The Code of Ethical Conduct will be included in the induction process for all Directors, employees, volunteers and residents
- 1.3. Directors, employees, volunteers and residents will be required to acknowledge in writing that they will uphold the AAL Code of Ethical Conduct.
 - 1.3.1. A signed copy will be kept on the pertinent file
 - 1.3.2. A signed copy will be provided to the stakeholder
- 1.4. All contractors/consultants and others will be provided a copy on request or be directed to the AAL website.
 - 1.4.1. Under certain circumstances, written acknowledgement may be required, e.g. commercial in confidence, privacy issues, etc.
 - 1.4.2. Where required, a signed copy will be kept on the relevant file
 - 1.4.3. A signed copy will be provided to the contractor/consultant or other

Practice of Ethical Conduct

Stakeholders of AAL are required to adhere to the Principles of Ethical Conduct as set out in the Code of Ethical Conduct.

- 2.1. The Code of Ethical Conduct sets out the guiding attributes and actions expected. These are:
 - 2.1.1. Honesty
 - 2.1.2. Integrity
 - 2.1.3. Transparency
 - 2.1.4. Accountability
 - 2.1.5. Confidentiality
 - 2.1.6. Objectivity
 - 2.1.7. Respectfulness
- 2.2. These guiding principles are to be embedded into the culture and practice of AAL and the way it conducts its business.
- 2.3. When planning and conducting its business, AAL will consider its actions against the values espoused in the Code of Ethical Conduct.
- 2.4. AAL will report to the stakeholders its commitment to its Code of Ethical Conduct via the Annual Report.

Breaches of the Code of Ethical Conduct

- 3.1. To ensure the highest standards of ethical conduct are maintained, breaches will be dealt with in accordance with the provisions of the Disciplinary Action Policy and Procedure.

- 3.1.1. For Directors and employees, this may result in dismissal, depending on the degree of breach, or other disciplinary action as set out in the relevant policy.
- 3.1.2. For volunteers and residents, this may result in being denied access to AAL services and premises, depending on the degree of breach.
- 3.1.3. For contractors/consultants and others, this may result in being denied access to AAL services and/or legal proceedings, depending on the degree of breach.

Whistleblower' Protection

- 4.1. Where any *Whistleblowers Protection* legislation enacted at the time applies to the AA, AAL will comply with and be bound by the provisions of that Act.
- 4.2. Where a breach of the Code of Ethical Conduct or other matters that raise concern has been reported, AAL undertakes to investigate that claim.
 - 4.2.1. Action where necessary will be taken.
 - 4.2.2. Where no action is deemed necessary, an explanation will be provided to the reporting party.
- 4.3. The reporting party will not be disadvantaged nor discriminated against.
- 4.4. All reports should be made in good faith.
- 4.5. Where a report is found to be malicious, deliberately misleading or frivolous, the Whistleblower may be subject to disciplinary action as set out in **Clause 3.1**.



Signature

CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 4 July 2014

Related Documents:

Code of Ethical Conduct Policy

Privacy, Confidentiality and Duty of Care Policy

Whistleblowers' Protection legislation

33. Conflict of interest

Purpose

To provide a framework for all Board members, staff (paid or unpaid) in declaring conflicts of interest as defined below.

Guidelines

1. All Board members, staff and volunteers as well as affiliated local societies are bound by this policy during the time of their tenure with the organisation.
 - 1.1. Incoming Board members are to be advised of the AAL's policy during their induction.
 - 1.2. The CEO is responsible for managing actual or potential conflicts of interest relating to staff.
 - 1.3. Managers are responsible for facilitating the compliance of those they supervise by:
 - 1.3.1. Being aware of the risks of conflicts inherent in the work of the staff they manage;
 - 1.3.2. Making staff aware of this policy;
 - 1.3.3. Advising staff about appropriate ways to manage conflicts;
 - 1.3.4. Recording the receipt of disclosures of conflicts of interest reported to them by staff.
 - 1.3.5. Assisting with preparation of management strategies for staff who disclose conflicts of interest; and
 - 1.3.6. Monitoring the work of staff and the risks to which they are exposed.
 - 1.4. All members of staff are responsible for:
 - 1.4.1. Being aware of their obligations under this policy;
 - 1.4.2. Assessing their private and personal interests, and whether they conflict, or have the potential to conflict or be perceived to conflict with their duties and responsibilities; and
 - 1.4.3. Disclosing conflicts of interest they may have in accordance with this policy.
 - 1.5. The Chair of affiliated local societies is responsible for managing conflicts of interest that arise with the Committees of Management and staff of the residential houses under their jurisdiction.
 - 1.6. Unless of a serious nature, the Chair of affiliated local societies will advise the Board of AAL of any conflicts of interest in their regular report.
 - 1.7. Any serious conflict of interest should be communicated to the Chair of the Board of AAL as soon as practicable.

Disclosure

2. Any potential conflict of interest must be declared at the time the conflict is perceived or established, or prior to any meeting where the matter is to be considered, or at the first meeting after the acquisition of such interest by:
 - 2.1.1. Board members to the Board and/or Chairman;⁹
 - 2.1.2. Paid staff to their manager; or
 - 2.1.3. Unpaid staff to their supervisor.
3. A Board member or staff with a financial or personal interest in any matter, during any consideration or discussion of the pertinent matter being considered, must¹⁰:
 - 3.1. Board
 - 3.1.1. Abstain from voting;

⁹ This clause is to cover Clause 23.1 in the Constitution

¹⁰ This clause is to cover Clause 23.2 in the Constitution

- 3.1.2. Absent themselves where a person's presence may influence the decision making process;
- 3.1.3. Stand down for the period of the conflict; or
- 3.1.4. Resign from the AAL Board or take other action to eliminate the conflict.
- 3.2. Staff
 - 3.2.1. Declare that interest at the first opportunity
 - 3.2.2. Not be involved in the decision making of any matter which relates to the interest.
 - 3.2.3. Where a conflict of interest of a serious nature arises with staff, the CEO will report this, together with actions taken to mitigate, to the Chair of the Board as soon as practicable.
 - 3.2.4. Where a member of staff believes a conflict of interest, or potential conflict of interest, may occur, the CEO should be notified.
- 4. Any matter where a conflict of interest has been declared must be minuted accordingly.
- 5. The Secretary will maintain a register recording notice or standing notice of any conflicts of interest on behalf of the AAL Board.

Failure to Disclose

- 6. All steps deemed appropriate must be taken to ensure the conflict of interest does not affect the ethical, financial, employment or legal responsibilities of the AAL.
- 7. Board
 - 7.1. Where a minor conflict of interest is not reported, the Chair will seek to resolve the issue by, but not limited to:
 - 7.1.1. An informal investigation and/or
 - 7.1.2. An agreement to avoid future conflict of interest
 - 7.2. Where a major conflict of interest is not reported or corrupt behaviour is identified, the Chair will:
 - 7.2.1. Request the Director's resignation and/or
 - 7.2.2. Report the matter to the relevant authorities
 - 7.3. Where the party in question fails to resign, a special meeting of AAL members will be convened to expel the Director.
- 8. Staff/Volunteers
 - 8.1. Where a minor conflict of interest is not reported, the CEO will seek to resolve the issue by, but not limited to:
 - 8.1.1. An informal investigation and/or
 - 8.1.2. An agreement to avoid future conflict of interest
 - 8.2. Where a major conflict of interest is not reported or corrupt behaviour is identified, the CEO will:
 - 8.2.1. Instigate formal disciplinary action as per the Disciplinary Action Policy and/or
 - 8.2.2. Report the matter to the relevant authorities



Signature: _____ CEO, Abbeyfield Australia Ltd

Person(s) responsible for implementation and review of this policy:

Governance Committee

Date of Endorsement: 4 July 2014

Date Last Reviewed: 4 July 2014



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