

61. Whistle-blowing Policy

POLICY OWNER: Directors of Cufa

RELEASE DATE: February 2013

LAST REVIEWED: February 2020

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VERSION NO: 2.3

61.1. Purpose of this policy

Cufa has adopted a policy that provides a framework for employees, officers, contractors (and their employees) and members of the public to bring to the attention of the Board or senior management reports of improper conduct.

This Whistle-blowing policy has been prepared against the Australian Standard AS 8004 – Whistle-blower Programs for Entities. The policy protects individuals who in good faith, report conduct which they reasonably believe to be:

- Dishonest
- Fraudulent
- Corrupt
- Illegal
- In breach of Commonwealth or state legislation or local authority by laws
- Unethical
- Other serious improper conduct
- An unsafe work practice,
- In breach of Cufa's policies outlined in [Other policies](#) below, or
- Any other conduct which may cause financial or non-financial loss to Cufa or be otherwise detrimental to the interests of Cufa.

61.2. Scope

This policy applies to:

- Directors, employees, volunteers and interns of Cufa
- Contractors to Cufa
- Employees of contractors to Cufa

- Cufa’s partners, and
- Employees of Cufa’s partners.

In this policy these groups are referred to as a Cufa “representatives”.

Other members of the public are protected if they are making complaints.

61.3. Other policies

The principles of this policy must be read in conjunction with the [Cufa Employee Code of Conduct](#), [Anti-Harassment and Bullying Policy](#), the [Fraud and Corruption Management Policy](#), the [Complaints Handling Policy](#), [Child Protection Policy](#), [Reporting Misconduct Towards Children Policy](#) and the [Prevention of Sexual Exploitation, Abuse and Harassment Policy](#). The protections in this policy will apply to persons making disclosures in accordance with the conduct listed in the [Purpose](#) section of this Policy and related policies.

61.4. How to make a complaint or provide feedback

If any person wishes to report an instance where Cufa or a Cufa representative have not been committed to best practice in governance, compliance and ethical behaviour generally, the [Complaints Handling Policy](#) should be followed. In the instance that the incident involves Cufa’s CEO, Cufa’s Board should be immediately notified and involved in the investigation.

To ask a question, provide feedback or lodge a complaint of misconduct against anyone included within the [scope of this policy](#), you can contact us by:

AUSTRALIA

Contact form on website
In person to a Cufa staff member

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Sydney NSW 2000 AUSTRALIA
GPO Box 1016
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Chief Executive Officer

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1st Floor, Century 21 House Section 35, Allotment 51
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61.5. Assistance in languages other than English

If a local stakeholder would like to make a verbal complaint and but does not have the ability to formally submit it, a Project Officer will transcribe it, provide a copy to the local stakeholder and forward it to Country Manager and Cufa Sydney.

61.6. Definitions

Whistle-blowing

For the purpose of this policy, whistle-blowing is defined as:

"the deliberate, voluntary disclosure of individual or institutional malpractice by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated wrongdoing within or by an institution that is within its ability to control."

Whistle-blower

For the purpose of this policy, a Whistle-blower is defined as:

"any employee, director, volunteer, related officer or contractor of any member of Cufa, or a member of the general public who whether anonymously or not makes or attempts to make a disclosure as defined 'whistle-blowing' above."

Improper Conduct

For the purpose of this policy, improper conduct is defined as:

- Corrupt conduct;
- Fraudulent activity;
- A substantial mismanagement of Cufa's resources;
- Conduct involving substantial risk to public health or safety; or
- Conduct involving substantial risk to the environment.

That would, if proven, constitute by a member of Cufa or its personnel:

- A criminal offence;
- Reasonable grounds for dismissing or dispensing with, or otherwise terminating, the services of Cufa's personnel who was, or is, engaged in that conduct;
- Reasonable grounds for disciplinary action; or

- A serious breach of Cufa policies and procedures.

61.7. Protection under this policy

Whistle-blower protection

Under this Policy, a Whistle-blower who makes a report in good faith and in accordance with the Policy are protected against being victimised, including being dismissed or penalised by Cufa because of the report itself.

Prohibition on victimisation

Cufa's representatives must not victimise any Whistle-blower or cause any Whistle-blower to be victimised, because a Whistle-blower has made a report under this Policy.

Victimisation could include, but is not limited to, intimidation, harassment, threats, action causing injury, loss or damage, discrimination, disadvantage or adverse treatment in relation to a person's employment, career, profession, trade or business.

Cufa will regard any such victimisation very seriously and take appropriate action, which may include, in the case of employees, disciplinary action and dismissal.

Improper conduct

Making a report under this Policy does not shield the person from the consequences of being involved in any improper conduct alleged in a report under this Policy. In some limited circumstances, however, a full and frank admission may be a mitigating consideration in respect of disciplinary or other action.

Industrial relations issues

Employee and industrial relations related issues and human resources related issues are excluded from the operation of this Policy because there are other established mechanisms, including [NSW Industrial Relations](#) and the [Fair Work Ombudsman](#) to raise such complaints.

Vexatious complaints

Trivial, malicious or vexatious complaints must not be made and do not qualify for protection under this Policy.

61.8. Protection under the Corporations Act

Under the Corporations Act 2001 (Cth) the disclosure of information relating to improper conduct qualifies for certain protections where the disclosure is made by a Cufa representative to:

- The Australian Securities and Investments Commission (ASIC) or the Australian Federal Police (AFP);
- Cufa external auditor or a member of the external audit team; and / or
- A director, secretary or senior manager of Cufa.

A Cufa representative making the disclosure must:

- Provide his or her name prior to disclosing the information;
- Have reasonable grounds to suspect that the improper conduct relates to a breach of the Corporations Act in Australia; and
- Make the disclosure in good faith.

Where information is disclosed by a Cufa representative in accordance with these criteria, the person receiving the information may not tell anyone other than ASIC or AFP any of:

- The information disclosed;
- The identity of the person making the disclosure; or
- Any information which will enable the identification of the person making the disclosure, unless the Cufa representative consents to that disclosure.

This means that where a Whistle-blower discloses their identity prior to reporting information relating to a possible breach of the Corporations Act or other Act, Cufa will be unable to investigate the report unless the Whistle-blower consents to the information being released for use in the investigation.

61.9. Investigating reports of improper conduct

Cufa takes reports of breaches of Zero Tolerance policies ([Cufa Employee Code of Conduct](#), [Fraud and Corruption Management Policy](#), [Counter-Terrorism and Criminal Activity Policy](#), [Child Protection Policy](#) and [Prevention of Sexual Exploitation, Abuse and Harassment Policy](#)) very seriously.

In the case of a reported or suspected breach of these policies a thorough investigation will be conducted.

Who investigates a report?

When a report or suspected case of improper conduct is made the CEO will, within five (5) business days, begin an investigation.

When the case involves a Cufa staff member, volunteer or other representative a senior manager of Cufa will investigate the report. Senior managers will only be asked to investigate a matter if they can do so in a disinterested manner. For example, a manager will not be asked to investigate any matter that relates to their own department.

In certain circumstances (for example where the report involves allegations of fraud) the CEO will inform the Board and may advise them to appoint external investigators or form a Membership Investigation Committee.

Where a report of suspected improper conduct relates to a matter involving the CEO, this will be referred directly to the Board.

Reports can also be made directly to the Cufa Board. The Company Secretary can provide contact details of the Chair where appropriate.

61.10. How is an investigation carried out?

Any case of reported or suspected improper misconduct must be investigated in line with the principle of [Procedural Fairness](#), in a timely, transparent and fair manner.

- The person or committee appointed to investigate the report will commence investigations within five (5) business days of being appointed;
- They will undertake a fair, independent and discreet investigation into the substance of the report to determine whether there is evidence to support the matters raised;
- Respect will be given to individual confidentiality (Refer to [Confidentiality Policy](#) for more information);
- They will collect all available data and verify the reported information;
- Interviews will be conducted with any relevant person to understand their perspective and gather relevant information;
- They will proceed with due care and appropriate speed; and
- They will consult or inform employee representative bodies as required.

Where the Whistle-blower initiating the inquiry has identified themselves; the investigating manager would be likely to begin by interviewing that person. Their identity, however, would not be made known to other parties without their specific consent or in the circumstances set out in the [Protecting confidentiality and privacy](#) section below.

61.11. Outcome of investigations

What happens after an investigation?

At the end of the investigation, which will generally be concluded within 45 business days of commencement, the investigating manager will report their findings to the CEO who will determine the appropriate response. This response will include rectifying any improper conduct and taking any action required to prevent any future occurrences of the same or similar conduct. The target for implementing a response is 20 business days from determination.

Findings from investigations initiated by the Board will be reported back to the CEO for appropriate response.

Where issues of discipline arise, the response will also be in line with Cufa procedures for disciplinary matters outlined in the [Disciplinary Policy](#). Where allegations of unacceptable conduct made against another person cannot be substantiated, that person will be advised accordingly and will be entitled to continue in their role as if the allegations had not been made.

What if the Whistle-blower is involved?

A person who has committed or been involved in improper conduct will not be immune from disciplinary action merely because they have reported the improper conduct in accordance with this Policy. The person's conduct in making the report, however, is likely to be considered in determining what disciplinary action is appropriate.

Keeping the Whistle-blower informed

Once the matter is completed a verbal report will be made to the Whistle-blower. This report will explain the findings and actions taken to the fullest extent possible within commercial, legal and confidentiality constraints. Where the Whistle-blower initiating the matter chooses to remain anonymous, alternative arrangements will be made for providing a verbal report of the outcome of the investigation to that person.

61.12. Protecting confidentiality and privacy

Confidentiality

Cufa will take all reasonable steps to protect the identity of a Whistle-blower. Accordingly, Cufa will not disclose the Whistle-blower's identity unless:

- The Whistle-blower making the report consents to the disclosure;
- The disclosure is required by law;
- The disclosure is necessary to prevent or lessen a serious threat to a person's health or safety; or
- It is necessary to protect or enforce Cufa's legal rights or interests or to defend any claims.

A Whistle-blower can make an anonymous disclosure; however, they do not qualify for protection under this Policy if they do not disclose their name to the person to whom the disclosure is made before making the disclosure.

Cufa encourages Whistle-blowers to reveal their identity so that they qualify for protection under this Policy. It is easier for Cufa to protect the Whistle-blower and to investigate a report or disclosure when the Whistle-blower's identity is known.

Cufa will also ensure that any records relating to a report of improper conduct are stored securely and are able to be accessed only by authorised staff.

Unauthorised disclosure of:

- The identity of a Whistle-blower who has made a report of improper conduct; or
- Information from which the identity of the reporting person could be inferred, will be regarded as a disciplinary matter and will be dealt with in accordance with Cufa's [Disciplinary Policy](#).

61.13. Protection

Cufa is committed to the protection of genuine Whistle-blowers against action taken in reprisal for the making of protected disclosures.

61.14. Privacy issues

To the extent that any of the information recorded by the CEO on Cufa's behalf constitutes "personal information" about the caller under applicable Privacy legislation, it should be noted that:

- The purpose of the collection of that information is to assist the CEO and Cufa to respond to issues raised by the caller and to protect or enforce Cufa legal rights or interests or to defend any claims;
- Personal information may be used for the primary purpose for which it was collected or for any related secondary purpose that could reasonably be expected; and
- Personal information may be disclosed as described under the [62.12. Protecting confidentiality and privacy](#) section above.

Cufa's policy is to not collect "sensitive information" without the consent of the person to whom it relates unless the collection is required by law, is necessary to prevent or lessen a serious and imminent threat to the person's (or another person's) life or health or is necessary in relation to legal proceedings (current, anticipated or potential).

"Sensitive information" means information or an opinion about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, memberships of a profession or trade, membership of a trade union, sexual preferences or practices, criminal record or health.

61.15. Policy Review

Reports provided under this Policy

Where a Whistle-blowing allegation has been made, the CEO will provide reports containing a general summary of the number and type of calls made, together with a description of the nature and results of any investigation conducted as a result of a call.

In the compilation of these reports the identity of any person who has made a report under this Policy in good faith or any information which may enable that person to be identified will not be disclosed.

These reports will be provided to the Cufa Board as part of their Board papers, as appropriate. A consolidated report will also be provided to the Board each year.

The CEO will use the reports provided under this Policy to monitor and review regularly the effectiveness of the protection program described in this Policy.

62. Complaints Handling Policy

POLICY OWNER: Directors of Cufa

RELEASE DATE: February 2013

LAST REVIEWED: August 2021

LAST UPDATED: August 2021

VERSION NO: 2.4

62.1. Our Commitment

At Cufa, we aim to be responsive to the needs of our employees, stakeholders and those we have contact with in the field. We take the handling of any complaints, comments or feedback on our performance seriously. We aim for transparency and accountability in our performance and this policy has been formulated with that in mind.

We aim for complete fairness in our complaints process and do not discriminate against those who make a complaint, regardless of age, sex, gender or nationality. All staff and stakeholders are encouraged to express their perspective, with the aim that they will be confident that their concerns will be treated fairly and discreetly.

Cufa commits to share this policy with all partners, either in an MoU or through another mechanism, and ensure information on the existence of this policy is readily available to any person or organisation who requests it.

62.2. Scope

This policy applies to:

- Directors, employees, volunteers and interns of Cufa
- Contractors to Cufa
- Employees of contractors to Cufa
- Cufa's partners, and
- Employees of Cufa's partners.

In this policy each person in the categories listed above is referred to as a Cufa "representative".

Other members of the public are covered to make a complaint.

Complaints that are made about another organisation and/or their personnel will be referred to that organisation. It is the responsibility of that organisation to resolve it under their own complaints handling mechanism.

62.3. How to make a complaint or provide feedback

To ask a question, provide feedback or lodge a complaint against Cufa, you can contact us by:

- Telephone: +61 1300 490 467
- Email: info@cufa.com.au
- Post: Suite 303, 275 Alfred Street, North Sydney NSW 2060

AUSTRALIA

- Contact form on website
- In person to a Cufa staff member.

The contact details for Cufa's country offices are set out at the end of this policy.

62.4. Assistance in languages other than English

If a local stakeholder would like to make a verbal complaint but does not have the ability to formally submit it, a Cufa Project Officer will transcribe it, provide a copy to the local stakeholder and forward it to relevant Country Manager and Cufa Sydney.

62.5. Complaints to ACFID

Cufa is a member of the Australian Council for International Development (ACFID) and is committed to full adherence to the ACFID Code of Conduct. Complaints against signatory agencies may be initiated by any member of the public by following ACFID's Code of Conduct Complaints Handling Process either via their website www.acfid.asn.au, email code@acfid.asn.au or telephone 02 6281 9220.

62.6. Complaints handling procedure

Cufa views suggestions and feedback as positive steps in continually monitoring and improving our operations and we take any complaints, comments or feedback seriously. Each complaint is handled in a fair and independent manner and we aim, where possible, to reply within five (5) business days of receipt and every effort will be made to resolve the issue as quickly as possible.

When a complaint is made the following steps will be taken:

- The CEO will review the complaint and assign an appropriate staff member or committee to investigate, this will normally be a senior Cufa manager. If the complaint involves the CEO the Cufa Board will be responsible for investigating the complaint. If the complaint involves the Chair or a member of the Cufa Board a Board Membership Committee will be formed;
- The responsible person or committee will lodge the details of the complaint in the Cufa complaints register, ensuring the complainants privacy is respected;
- The responsible person or committee will investigate the complaint and seek to find a solution or resolution through direct consultation with those involved;
- A formal response will be issued within five business days (where possible) and the complaint will be resolved as quickly as possible;
- The responsible person or committee will decide on a course of action to address the complaint, including potential disciplinary action under the [Disciplinary Policy](#);
- The CEO will review all complaints and responses, unless they are involved in the complaint, when the Board will be responsible for the review;
- A summary of all complaints and responses are provided to the Board each quarter as part of the Board reports allowing for identification and response to trends and emerging issues; and
- All complaint forms and information are to be filed in a confidential folder in the Cufa drive.

62.7. Confidentiality

Cufa guarantees that all complaints will be treated with complete confidentiality. Coming forward with a complaint will in no way prejudice Cufa's treatment of either a staff member or stakeholder.

62.8. Whistle-blowing

Cufa staff must adhere to the [Whistle-blowing Policy](#). In the event that a member of the public wishes to report an instance where Cufa staff have not been committed to best practice in governance, compliance or ethical behaviour generally, the [Whistle-blowing Policy](#) and the Complaints Handling Policy should be followed. In the instance that the incident involves Cufa's Chief Executive Officer, the Cufa Board will be immediately notified and involved in the investigation.

Country Office contact details

Head Office

Level 8/1 O'Connell Street
Sydney NSW 2000 AUSTRALIA

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AUSTRALIA

Chief Executive Officer

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63. Fraud and Corruption Management Policy

POLICY OWNER: Directors of Cufa

RELEASE DATE: March 2014

LAST REVIEWED: November 2019

LAST UPDATED: December 2019

VERSION NO: 2.0

63.1. Overview

Cufa has zero tolerance for fraud or corruption in its operations and programs; and is committed to the highest standards of legal, ethical and moral behaviour in all we do.

63.2. Scope

This policy applies to:

- Cufa's directors, employees, volunteers and interns of Cufa
- Contractors to Cufa;
- Employees of contractors to Cufa;
- Cufa's partners;
- Employees of Cufa's partners; and
- Members of the public (for making complaints).

In this policy each person in the categories listed above is referred to as a Cufa "representative".

63.3. Definitions

For the purpose of this policy Cufa defines the following as:

Bribery

The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages.

Corruption

The abuse of entrusted power for private gain.

Counter-terrorism

The practice, techniques and strategy used to combat or prevent terrorism.

Financial Wrongdoing

Behaviour that is illegal or immoral with regards to financial transactions. Includes bribery, corruption, fraud, money-laundering, terrorism financing and violation of sanctions imposed by the Australian government.

Fraud

Dishonestly obtaining a benefit, or causing a loss, by deception or other means.

Money Laundering

The process of concealing the origin, ownership or destination of illegally or dishonestly obtained money and hiding it within legitimate economic activities to make them appear legal.

Terrorism Financing

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

Whistle-blowing

The deliberate, voluntary disclosure of individual or institutional malpractice by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated wrongdoing within or by an institution that is within its ability to control.

Whistle-blower

Any employee, director, volunteer, related officer or contractor of any member of Cufa, or member of the general public, who whether anonymously or not makes or attempts to make a disclosure as defined 'whistle-blowing' above.

63.4. Fraud Control Strategy

Cufa's fraud control strategy adopts a range of internal control measures to detect, prevent and correct identified fraud risks, including policies, processes and systems used to minimise fraud. The internal controls are set at the organisational, employee, project and partner level to inform, direct and manage Cufa's day to day activities.

Cufa manages fraud risks by:

- Having a **robust financial system** where:
 - there is a separation of duties between those who approve expenditure and those who benefit or carry out the transaction whether for project activities or other purposes. For example, Monthly Expenses Reconciliation is reviewed and approved by three separate teams.
 - Spot-checks in various modes including phone calls, photos, attendance sheets, validation checks, audits, reviews and cross-checking with relevant project budgets and budget line items are completed to identify any fraudulent activities or misuse of funds.
 - no bank account has a sole signatory.
 - all expenditure is accounted for against approved project budgets and corresponding budget lines. Cufa prepares and provides monthly financial statements to its management team to review and monitor all expenditure for each project and across all budget line items to identify any anomalies or discrepancies in spending.
 - Receipts are required for each and all transactions.
 - Expenditure of project funds must comply with the [Delegation Policy](#).
 - Financial accounts and processes are externally audited on an annual basis.

- Internal controls are integrated within several finance policies, including [Accounting Policy](#), [Financial Transactions Policy](#), [Credit Card Policy](#), [Auditing of Financial Statements](#) and [Efficiency and Value for Money Policy](#).
- Cash transactions are minimised and there are strong controls in place to mitigate fraud by providing training on procedures, having clear and comprehensive procedures including robust record keeping, ensuring cash is stored securely and limiting access, and conducting checks to ensure procedures are being followed and record keeping is clear and well maintained.
- **Providing fraud training to all Cufa representatives as outlined in the [Staff Training Policy](#).** All staff members are provided induction training on Fraud and Corruption, including communicating their obligations, what fraud is, and how and where to report it. Checking for understanding and application in practice is a key component of the training by providing examples to illustrate the application of the policy. All staff are informed they face immediate termination if they violate the Fraud and Corruption Management Policy;
- **Having Zero Tolerance for breaches of this Policy** as set out in the [Disciplinary Policy](#) and [Whistle-blowing Policy](#).
- **Having an [Employee Code of Conduct](#)** which specifies prohibited behaviours including corruption and/or bribery, and non-disclosure of any material gifts or offers of gifts for personal use, amongst other fraud-related prohibited behaviours; and avoiding situations where any possible conflict of interest may occur, including informing their direct supervisors of any potential conflicts of interest.
- **Having in place a Whistle-blowing Policy** which allows all Cufa representatives to report any suspicious behaviour.
- **Supporting this Policy through other related policies including** Cufa's [Operating Guidelines Policy](#), [Ethics and Integrity](#), and [Counter-Terrorism and Criminal Activity Policy](#).
- **Being aware and giving effect to the fraud control steps as set out in DFAT's Fraud Control Toolkit and ACFID's Financial Wrongdoing Policy** for example by reviewing this Policy and undertaking periodic self-assessments.
- **Requiring all Australia-based staff members to undergo a police background check** prior to commencement as set out in the [Selection of Staff and Volunteers Policy](#).
- **Requiring overseas-based staff members, where police checks are not available or accessible, to complete a Fraud and Corruption Declaration** prior to commencement as set out in the [Selection of Staff and Volunteers Policy](#).
- **Requiring all staff members to be held accountable and detect any misuse of funds or fraud through a range of internal and external audits and program quality review procedures** such as robust monthly and quarterly project monitoring which is cross-checked with the corresponding project budgets and financial records included in the Monthly Expenses Reconciliation, financial acquittal processes, in-country offices monitoring visits and project site visits.

63.5. Fraud Risk Responsibilities

Cufa takes a whole-of-organisation approach to risk management, including fraud risks as set out in the [Risk Management Policy](#) and [Development Partner Relationships Policy](#).

63.6. Detection and Reporting of any fraud-related activities

If you would like to provide feedback or lodge a complaint against Cufa, a Cufa partner or Cufa's employees, volunteers, or interns use the process set out in the [Complaint Handling Policy](#) or the [Whistle-blowing Policy](#).

Refer to the [Whistle-blowing Policy](#) regarding information on investigating reports, how an investigation is carried out, outcomes of investigations, protecting confidentiality and privacy, protection and privacy issues.

63.7. Reporting to DFAT

As a DFAT funding recipient (Australian NGO Cooperation Program (ANCP) and Direct Aid Program (DAP), Cufa must report any suspected or real incidents of fraud within five (5) business days of being notified or identifying the potential fraud using the DFAT [Fraud Referral Form](#).

63.8. Fraud Register

In addition to reporting fraud to DFAT, Cufa maintains records of all instances of fraud using a Fraud Register. Maintaining records of past incidents of fraud will inform future fraud management practices to mitigate future risks.