



# **POLICIES & PROCEDURES**

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## Definitions

|                              |  |
|------------------------------|--|
| Service user / Participant   | Refers to people and their families who use, or participate in the services delivered.   |
| Family/whānau                | Refers to the family or an extended family/group of people who are important to the person/family engaging with BRWONZ.<br>For a child or young person (ie under 18 years old) “family” and “whānau” includes the child or young person's caregiver(s), adults with legal responsibilities for their care and other adults with whanaungatanga responsibilities for the child, young person. |
| Staff                        | Refers to anyone Burmese Rohingya Welfare Organization New Zealand Trust (BRWONZ) relies on to manage and deliver its services. This includes employees, contractors, caregivers, paid and unpaid staff for service delivery, health and safety, abuse and protection policies. For employment-related policies “staff” refers to employee unless otherwise specified.                       |
| Management or manager        | Refers to an appointed manager, or person delegated by them to assume a management role, or in their absence an appropriate member of the Board.   |
| Volunteer                    | Refers to all unpaid staff, that Burmese Rohingya Welfare Organization New Zealand Trust (BRWONZ) relies on to manage and deliver its services, including governance members.  |
| (Relevant) Service agreement | Refers to the funding arrangement/contract that governs delivery and management of a particular activity or programme Burmese Rohingya Welfare Organization New Zealand Trust (BRWONZ) undertakes. A number of agreements may apply and will include terms, such as eligibility criteria, that must be complied with.  |
| Social service provision     | Is a contracted service to which the Social Sector Accreditation Standards apply.  |

## Our organisation

### **We value cooperation based on unity, peace, freedom and justice.**

The Burmese Rohingya Welfare Organization New Zealand Trust (**BRWONZ**) was established to meet the needs of the Burmese Rohingya community who have migrated to Aotearoa/New Zealand from different countries and resettled in Tāmaki Makaurau/Auckland, or other parts of Aotearoa as former refugees. This includes Myanmar ethnic minorities who have come from different countries with the same religion from Burma.

As survivors of genocide, we have experienced various forms of persecution in Myanmar. We have witnessed our loved ones endure severe human rights violations, war crimes, and acts that constitute crimes against humanity.

We continue to grapple with the lasting trauma imposed on us.

It remains deeply distressing to witness the ongoing terror faced by our people who remain in Myanmar.

## Aim

### **We seek wellbeing for the Rohingya people.**

- We aim to assist the social wellbeing of the Burmese Rohingya community in Aotearoa.
- To strengthen and build unity in our Rohingya community and create relationships with other communities.
- To preserve the cultural heritage of the Rohingya community.
- To work along with Mangere Immigration Centre in order to assist them with any new Rohingya immigrant arrivals.

## Activities

### **We support | We empower | We celebrate**

We will implement a range of projects, and ethnic cultural activities, that aim to:

- support the development of our community and respond to social need
- empower our community to develop essential skills and gain confidence to integrate into their local communities
- maintain and celebrate our cultural identity and history
- halt the persecution of our people and bring an end to this suffering.

# Governance

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## Intent

The Board is responsible for governing Burmese Rohingya Welfare Organization New Zealand Trust (BRWONZ) ("the Organisation"). It sets our vision and ensures we adhere to our purpose and comply with our legal, ethical and financial obligations.

This policy sets out key principles and responsibilities for governance.

## Principles

In exercising its governance powers and functions, Board members will:

- represent the interests of BRWONZ now and into the future
- recognise and respect the interests of our diverse stakeholders
- act in accordance with Te Tiriti o Waitangi, the principles of good governance and sound management
- maintain high standards of integrity and ethical conduct; and
- act legally, ethically and in accord with our Constitution, organisational policies, and contractual requirements, and
- inspire and empower people in their community to reach their full potential.

## Requirements

### Speak with one voice

Board members will speak with one voice when representing the interests and position of BRWONZ. Individual Board members must not act independently or contrary to the Board's decisions.

Disagreements should be resolved within the Board through robust debate and following our Dispute resolution (Governance) policy.

### Legal and policy compliance

Burmese Rohingya Welfare Organization New Zealand Trust (BRWONZ) is a registered Charitable Trust

- Charities Registration Number: CC54285
- New Zealand Business Number: 9429045972331
- Incorporation Number: 2663051

Board members will adhere to the following in the exercise of their responsibilities:

- the law
- BRWONZ's Constitution
- BRWONZ policies
- delegations
- other relevant regulations and rules.

They will comply with their mandatory duties under the [Charities Act 2005](#) and the [Trusts Act 2019](#) including to:

- know and follow the terms of BRWONZ's Constitution
- act honestly, in good faith and in the best interest of our charity ensuring we remain focused on our purpose and the benefit we provide to the public
- exercise their powers for a proper purpose and hold or deal with the assets of the trust to further the purpose of the trust.

## Te Tiriti o Waitangi

We acknowledge and respect Te Tiriti o Waitangi as a foundational document for Aotearoa. We aim to reflect this in how we operate as an organisation. The Board will be guided by the following principles:

**Kāwangananga** - the commitment to honourable partnership

**Recognition and respect for tino rangatiratanga** – recognition of leadership and self-determination by tangata whenua. We recognise and respect the values of:

- **Manaakitanga** - acknowledgment of the mana of others and demonstrating mutual respect and care
- **Motuhaketanga** – respect autonomy, independence and supporting self-reliance
- **Whakawhanaungatanga** – collective wellbeing and relationships, connecting and relating to others
- **Kaitiakitanga** –the responsibility to be a guardian and protector of the environment

**Ōritetanga** - the commitment to equitable outcomes to tangata whenua and people from other cultures.

**Wairuatanga** - respect for the world views, values and spiritual beliefs of tangata whenua and other cultures.

## Membership

Membership of BRWONZ will be maintained in accordance with the Constitution.

Membership is open to Burmese Rohingya Community members aged 18 years and over and who are interested in helping the Organisation to achieve its aims. Every member has one vote at Annual General Meetings.



The Board acknowledge the people who help BRWONZ's activities and welcome their support even though they are not members.

## The Board

Board members are appointed to the Board by election at the BRWONZ Annual General Meeting and will hold office in the manner set down in the Constitution.

The Board will comprise a minimum of seven and a maximum of eleven elected members. This will include the following six Officer holders:

- Chairperson
- Deputy Chairperson
- Secretary
- Joint Secretary
- Treasurer
- Joint Treasurer

Board members can stand for re-election once their term has expired, however they cannot be re-elected for the same position for more than 3 continuous years. If an office holder or Board member resigns or vacates the role, the Board may co-opt a BRWONZ member to fill the position/role until the next Annual General Meeting.

## Board Roles

**The Chair** is responsible for:

- facilitating discussion at board meetings, monthly community meetings and annual general meetings to ensure that all members have equal opportunity to participate, that differing points-of-view are expressed, that thorough discussion takes place and that outcomes are logical, understandable and collaborative
- closely monitoring the performance of the Board
- establishing whether a quorum is present and ensuring the Constitution is followed
- representing the Board
- ensuring the integrity of the Board's decision-making process
- consulting with the Board promptly over any matter of major concern
- providing a report on BRWONZ activities at the annual general meeting
- if a Manager is appointed:
  - maintaining regular dialogue with the Manager over all operational matters
  - completing the annual performance review with the Manager

### **The Deputy Chair:**

Will work closely with the Chair and preside alongside the Chair at all monthly community meetings, board meetings and annual general meetings, and will preside in the absence of the Chair or where the Chair is unable to carry out their duties.

**The Secretary** is the main contact for BRWONZ and is responsible for:

- recording and keeping meeting minutes
- keeping reports and documents
- receiving and replying to BRWONZ correspondence as required by the Board
- maintaining members forms and membership register

The community membership register shall contain the names, postal and email addresses and telephone numbers of all members and the date at which they became members. The community membership register shall be provided to the board.

### **The Joint Secretary:**

Works closely with the Secretary and will take on all of the responsibilities of the role in their absence.

**The Treasurer** is responsible for:

- keeping BRWONZ financial records of all financial transactions including receipts and invoices
- preparing financial reports for presentation at board meetings, community monthly meetings and special meetings
- preparing annual financial statement for presentation at each Annual General Meeting
- working closely with the Chair and Secretary to prepare the Community's financial report and funding applications

### **The Joint Treasurer:**

Works closely with the Treasurer and will take on all of the responsibilities of the role in their absence.

The Board will undertake succession planning and new members will be recruited and selected to fill actual and projected skill gaps.

Members elected to key roles (Chair, Secretary and Treasurer) must work cooperatively, collaborate and ensure any specific duties/access rights or responsibilities are shared with their support role members (Deputy Chair, Joint Secretary and Joint Treasurer). This is to ensure effective business continuity and succession for the Board, and to promote development and capability of Board members.

Funding criteria may require that Board appointments are subject to the completion of satisfactory background checks.

## Meetings

BRWONZ holds the following regular meetings:

1. Community monthly meetings
2. Board meetings
3. Annual General Meetings
4. Special Meetings

### Community meetings

Community meetings are held monthly at specific times and places. The purpose of community meetings is to engage with the membership community towards achieving the aims of the Organisation.

### Board meetings

**The Board meeting** will normally be held every three months with additional meetings as agreed. Board members will attend Board meetings in person, however occasional virtual attendance, or meetings may be held.

**The quorum** for any Board meeting is at least 75% of the number of Board members at any given time. Virtual attendance counts towards the quorum.

**Board members are expected to** prepare for Board meetings, participate in decision-making and take on responsibilities when needed. If unable to attend, Board members shall advise the Chair as soon as possible. Board members are expected to participate fully, frankly, and constructively in Board discussions and other activities and to bring the benefit of their particular knowledge, skills and abilities to the Board environment.

**Board discussions** will be open and constructive, recognising that genuinely held differences of opinion can bring greater clarity and lead to better decisions. Meetings must be run effectively and members given the proper opportunity to discharge their functions. If controversial issues arise, appropriate and adequate discussion should take place before resolving the issue through voting (eg through facilitation, provision of information, Advisory group recommendations etc).

**Decision-making** will be based on majority rules. In the event of an equal vote at any meeting, the Chair shall have a casting vote, that is, a second vote.

**The Board must** ensure that detailed and accurate minutes of all its meetings are kept.

**At each meeting** the Board should normally receive, consider and/or decide on:

- The minutes of the previous meeting
- Minutes of any Advisory Group meetings and any relevant reports
- An operational report from the Manager if one is appointed.
- Major issues and opportunities for BRWONZ
- A financial report showing expenditure against the approved annual budget for the period

**At least once every year** at a meeting the Board shall review and agree:

- Vision, mission, and purpose and strategy for achieving these
- The annual budget
- The annual financial statement and report to members
- The annual workplan
- Manager performance and remuneration if one is appointed
- Risk assessment policies and controls including insurance covers and compliance with legal and regulatory requirements
- Levels of honorarium for Board members

## **Annual General Meetings**

Annual General meetings (AGM) will be held within two months of the end of the financial year in accordance with the Constitution.

The Business of the AGM will include:

- Receiving the minutes of the previous year's AGM
- Receiving a report from the Chair on BRWONZ activities for the year
- Receiving a report and presentation of the year's financial accounts from the Treasurer
- Electing the Officeholders and Board members for the next year
- Motions to be considered
- General business

The quorum for the AGM will be 75% of the membership. The previous year's Board will retain responsibility for BRWONZ for two weeks after the AGM in order to support a handover to the newly elected members.

## **Special Meetings**

The Board may hold a Special Meeting from time to time to vote on specific issues.

## **Advisory Groups**

The Board may establish Advisory Groups comprised of people from the wider community under the following guidelines:

- Membership of the Advisory Group will not be restricted to the former refugee community or Rohingya Community.
- The role of an Advisory Group is to support the BRWONZ Board.
- A terms of reference will be created for each Advisory Group, which includes the designation of the membership, chair of the group, purpose, timeframes and any associated budget.

- An Advisory Group should comprise of not less than one person, and not more than five people who will be approved during a community member meeting.
- Advisory Group members who are not also members of BRWONZ members can participate in discussions and at meetings but will not have any decision-making power.

## Vision and strategy

The Board will set the organisational vision and strategy. This must align with the purpose outlined in BRWONZ's Constitution. The vision and strategy should be reflected in a strategic document and regularly reviewed.

The Board will approve an annual budget to implement the vision and strategy. It will monitor and review strategic and financial performance to ensure we achieve our goals and planned outcomes.

The Board will approve strategic and governance policy for BRWONZ and ensure the system for reviewing and updating other organisational policies and procedures is effectively managed.

## Quality and risk

A robust risk management system will be maintained. The Board will oversee and review systems of financial control, internal control, and performance reporting. It must effectively manage risks associated with governance processes.

The Board will set clear parameters for the effective management of BRWONZ. It will maintain a constructive relationship with any appointed Management and monitor organisational performance through oversight of Management if appointed. It must:

- provide regular reports on the Organisation's progress in meeting its objectives and any contracted outcomes
- ensure policy reviews are regularly maintained, and in line with applicable accreditation standards
- oversee financial accounts
- provide regular health and safety updates and reports
- ensure systems for quality assurance and improvement
- monitor any audit results.

For business continuity, all systems / activities protected by a PIN/Password must have two authorised members of the Board / Management or their delegated person, assigned access at any time. This includes for example the Organisation's bank or social media accounts.

## Indemnity and Insurance

BRWONZ will indemnify, and provide and pay the premiums for insurance cover, in respect of their acts and omissions in their capacities as Board members at the time it is financially tenable.

## Review and evaluation

The Board will:

- at least once every three years, review its effectiveness and whether its governance procedures:
  - are fit for purpose, and
  - assist BRWONZ with our Kaupapa
  - assist BRWONZ with our legal and regulatory obligations.
- keep a record of reviews
- plan, record, and monitor actions to enhance the Board 's effectiveness
- ensure that review records are available to members, auditors and members of the public on request.

## Accountability

Accountability to the BRWONZ community, and other key stakeholders, will be demonstrated through regular contact, networking and reporting.

The interests and needs of stakeholders will be safeguarded and prioritised by the Board in the exercise of its functions. Board members will use their best endeavours to familiarise themselves with views and opinions of the BRWONZ stakeholders.

The Board will regularly evaluate economic, technological, political, social, and legal issues and any other relevant external matters that may impact the interests of the BRWONZ community.

## Board member conflict of interest

Board members must comply with the Conflict of Interest policy and declare relationships or interests they have that conflict with or might reasonably give rise to a perception of or could potentially conflict with, their responsibilities. Situations that should be notified include:

- when a Board member, or their immediate family, business interests or organisation, stands to gain financially from business dealings, programmes or services
- when a Board member offers a paid professional service to BRWONZ
- when a Board member stands to gain personally or professionally from any insider knowledge if that knowledge is used for personal or professional advantage
- where a decision will benefit another organisation the Board member is associated with.

Prospective Board members will be asked to identify interests that conflict or potentially conflict with their duties as a Board member before appointment to the Board.

The Board will record all declared conflicts of interest in the Register of Interests and Meeting Minutes, along with any strategies established to manage those interests.

A Board member with a conflict of interest concerning a financial matter will not participate in any decision about that matter.

## Dispute resolution (Governance)

### Principles

The following principles will be applied when dealing with conflicts and disputes at the Governance level:

- Early resolution—conflict must be addressed in an early and timely way to prevent undue escalation and deterioration of relationships.
- Respect—rights to privacy, to hold different opinions, and to be treated with dignity must be respected.
- Good faith—people must act in good faith and treat each other fairly. Power dynamics should be acknowledged and addressed through dispute resolution processes.
- Responsibility— people are encouraged to take responsibility for raising and resolving issues of conflict and engaging the supports they need for this.

### Address issues

If a conflict or dispute arises between Board members, arrangements will be made to deal with the issue following the above principles. Arrangements, such as the following, will be considered:

- a special meeting for all Board members to air and resolve the dispute
- the Chair meets with and tries to resolve grievance or dispute informally
- external facilitation of discussion to help reach agreement, or
- another resolution process that reflects our kaupapa and values and protects people's rights to natural justice when involved in a dispute.

Arrangements should be made in a timely way and no later than 28 days after the dispute arose where possible.

The dispute resolution process must:

- give the parties every opportunity to be heard, and
- allow due consideration by all parties of any written statement or other representation submitted by a party, and
- ensure that rights to natural justice are respected.

The outcome of the process shall be reported to the Board. If no resolution is reached, the Board may seek to deal with the dispute in another way.

In exceptional circumstances and if in the best interests of the organisation, a decision may be made to terminate the membership of one or both disputing parties.

## Relationship between Board and appointed Management

There will be a strong collaborative working partnership between the Board and any appointed Management. At the simplest level, the Board's role is to govern and the role of Management is to manage.

The Manager will form the key link and point of accountability between the Board and BRWONZ operations.

The Board can instruct the Manager. Instruction will usually be via Board policy.

The Board will delegate the operational running of BRWONZ to the Manager including the employment, management and performance management of any staff who are employed or contracted by the Organisation. It will set the parameters of this delegation in written form (ie Employment Agreement and/or variation of Employment Agreement; Delegated Authority policy.)

No Board member will issue instructions to staff without the agreement of the Board and Management except as authorised by the Board.

### **Recruitment of Management**

The Board will follow the Employment policy and process when recruiting for the Management role. The process will be open and transparent.

### **Management Succession**

The Board recognises that one of its major risks is the loss of key personnel, particularly the Manager. It will therefore arrange for an interim management regime to operate if, for some reason, a management appointment becomes vacant for a period.

### **Performance and development**

The Board will state the vision and criteria for the assessment and review of the Manager's performance.

The Manager will report on performance through regular management reports to the Board that include the financial performance of the Organisation, progress with strategic priorities and updates on risks and opportunities.

The Board will ensure the Manager receives adequate feedback and support. It may decide to delegate the Chair, another Board member or other person with responsibility for this.



# Child Protection

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## Intent

Safety and protection from abuse, exploitation and neglect is central to our kaupapa and is everyone's business. When a child or young person is being hurt, at risk of harm or where they are hurting someone else, inaction is not an option.

This policy will guide the Board, Manager and other Organisation members when working with young people under 18 years or other vulnerable people in the community in situations where there are concerns about abuse and neglect.

## Requirements

### Prevention

Anyone working on behalf of the Organisation with young people and other vulnerable persons must engage in safe practice:

- avoid any conduct which could lead a reasonable person to question their motivation and/or intentions
- not use their position or relationship with the young person or vulnerable adult or their associate to intimidate, bully, humiliate, threaten, coerce or undermine them
- avoid behaviour, communication and situations which might reasonably be seen by others as grooming a vulnerable adult or young person
- communicate with young people in ways that are open to scrutiny from other adults, including when texting and using digital and mobile devices
- record and report to the Board / Manager any situation, which may place a person at risk or compromise their own or BRWONZ' reputation and standing
- be vigilant about the risk of abuse in their own and others' interactions with a young person or other vulnerable persons in the whānau
- work within BRWONZ's policies and processes
- be aware of cultural and religious views about personal boundaries and always be sensitive to issues of gender
- use language that is inclusive of gender diversity and respectful of cultural differences
- learn to pronounce the names of participants/their family members properly
- be responsive to peoples' needs and circumstances and self-aware of beliefs, assumptions, values etc.

## No restraint

No young person or vulnerable adult engaged in an Organisation activity may be physically punished, disciplined or treated in any way that is degrading, humiliating or likely to cause fear or anxiety. Alternative methods must be used to manage behaviour e.g. behaviour supports.

## Reporting

Concerns that a young person has suffered any of the following forms of abuse, will be reported to New Zealand Police and/or Oranga Tamariki:

- sexual offences
- physical assault
- family violence
- other abuse causing or likely to cause serious harm
- neglect (e.g. depriving a child of basic necessities like kai, shelter, supervision or medical care)
- theft of money or other possessions from young person by a caregiver
- providing illegal drugs to the young person or medications that are not prescribed for them.

Concerns about serious harm to a young person will be reported to:

Oranga Tamariki on phone 0508 326 459 or

- email [contact@ot.govt.nz](mailto:contact@ot.govt.nz) or
- phone emergency services on 111

Criminal activity will be reported to New Zealand Police (including threats of assault, fraud and financial exploitation).

BRWONZ will keep a copy of a notification to Oranga Tamariki and follow up with the agency if it is not responded to in a timely way.

## Allegations against staff

Concerns and incidents of alleged abuse by a staff member or volunteer for BRWONZ must be reported to the Manager/Board. If concerns relate to the Manager, they must be reported to the Chair or a non-involved Board member.

All concerns will be investigated. Protective measures will be taken to ensure the safety of the complainant and any other person who could be impacted by abuse.

The investigation will be conducted fairly and with due regard to the rights of staff/contractor(s). Suspension of contract (for a contractor) or of an employee may be necessary for the duration of the investigation.

The New Zealand Police will be contacted if criminal conduct is alleged and Oranga Tamariki, if the allegation relates to a young person.

The Manager/Board will externally report allegations to relevant bodies (e.g. funding agency).

## Accountability

"Settlement agreements' will not be used if an abuse allegation is substantiated against a staff member and the agreement would be contrary to protecting children and young people from abuse.

# Code of Conduct

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## Coverage

This Code of Conduct outlines the standard of behaviour expected by all Board members, employees, contractors and volunteers in the performance of their duties and interactions for BRWONZ ("the Organisation"). The Code forms part of the terms and conditions and should be read in conjunction with any Individual Employment Agreement, contract agreement or appointment letter, and our policies and procedures.

## Commitments

Together we must maintain the highest level of professionalism and ethical behaviour. This means that each of us must use good judgement and think about whether our conduct or actions are appropriate to the situation and reflect well on BRWONZ.

## Conduct

All staff and volunteers must:

- act honestly and with integrity
- act in the best interests of BRWONZ and in good faith
- strive to make our services accessible and effective for the communities we serve
- support people's rights to be self-determining about the advocacy and support they need
- prioritise the safety and rights of the diverse communities in the Nelson region and their best interests
- contribute to a positive working culture.

When undertaking work for BRWONZ, all staff and volunteers must:

- read this policy when they are appointed to a role
- comply with our policies and procedures and the terms of their employment or other agreement with us
- carry out their duties in an efficient, inclusive and competent manner, and maintain specified standards of performance
- neither use, nor allow the use of organisational property, resources, or funds for other than authorised purposes
- not incur liability on the Organisation's part without proper authorisation
- maintain all qualifications (including registration and annual practising certificates) if necessary for the performance of their duties
- adhere to and maintain professional boundaries with the BRWONZ community and their families

- never misuse their position for personal gain
  - not engage in any sexual or intimate contact with a person while working with them
  - not access or use confidential information other than for a legitimate work-related or official purpose
  - not engage with the media or purport to represent BRWONZ in public forums unless specifically authorised
  - never under any circumstance, harass, discriminate against or abuse a person
  - decline gifts or benefits that could place BRWONZ under an obligation or perceived influence
  - avoid any activities, work or non-work, that may harm the reputation of BRWONZ
  - comply with lawful and reasonable instructions aimed at safe and effective working
  - role model the required behaviours and standards identified in the Code of Conduct
  - comply with mandatory reporting and regulatory requirements
  - take appropriate steps to raise and resolve conflict that arises in BRWONZ in a constructive and positive way.
- 

*I have read and understood the Code of Conduct set out here and understand that, by signing this Code of Conduct, I agree to these terms.*

Name: \_\_\_\_\_

Role in the organisation: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

# Delegated Authority

## Intent

BRWONZ is committed to managing its financial resources in a transparent, responsible and prudent manner following law and the terms of our Organisation's Constitution.

This policy outlines the respective roles of the Board and Management in the running of BRWONZ's activities, where a Manager is appointed.

## Responsibilities

Where applicable, the Organisation will delegate the operational running of BRWONZ to Management, including the employment, management and performance management of staff employed or contracted by BRWONZ.

The Organisation will set the terms and conditions for the Board and Management's role including remuneration level and for this purpose, may appoint a committee or engage an external agency to provide advice and guidance.

The Board's focus will be mainly on governance, it will:

- Decide BRWONZ's strategic direction, specifying longer-term strategic outcomes, intended shorter-term results and priorities and tracking progress with these
- Support and oversee BRWONZ's events and activities
- Ensure there are effective internal control systems to maintain the integrity and viability of BRWONZ
- Operate an effective process for identifying, managing and mitigating risks with BRWONZ's operations
- Stay informed of community concerns, interests and aspirations
- Monitor and evaluate organisational performance and account for this to our community on a regular basis
- Ensure the proper keeping of records, accounts, reports and lodgment of documents
- Provide feedback and supervision to the Board and Management about their performance and as needs and issues arise
- Manage Conflicts of Interest for Board members.

## Management's role will:

- Provide the key linkage and point of accountability between BRWONZ and operations of the Organisation through regular liaison and monthly performance reporting.
- Manage the day-to-day operations of BRWONZ and such other responsibilities as the Board delegates to them.
- Comply with the Conflict of interest policy and not exercise delegated authority if:

- they stand to gain personally from the transaction
  - they have, or may be perceived as having, some other conflict of interest
- Lead an organisational culture that values honesty, integrity and transparency
- Exercise their delegated authority responsibly and in accordance with Organisation policies and interests.

## **Review of delegation**

The scope and terms of the Board and Management's delegation will be periodically reviewed by the Board to ensure it is fit for purpose.

Performance of delegated responsibilities will be reviewed and assessed through an annual appraisal process.

# Conflict of Interest

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## Intent

Staff and other members bring a range of experiences and relationships to their roles that they use for the benefit of BRWONZ. Sometimes these interests may conflict or be reasonably perceived to conflict with their duties and responsibilities in our Organisation.

People need to be open about when these situations arise. Caution and early disclosures of interest are encouraged.

We manage the risks of conflict to ensure we operate fairly and with integrity, and to maintain public confidence in BRWONZ.

## Procedure

### Identify and disclose

Staff and volunteers including the Board will be asked to notify before and after their appointment, any relationships or interests they have that conflict, or potentially conflict or might reasonably give rise to a perception of conflict, with their responsibilities. Interests that should be notified include:

- their principal business activities
- relevant community and business interests
- relationships they have with any staff member in BRWONZ
- a relationship as a parent, child, whāngai, spouse, de facto or civil union partner of another person who will derive material financial benefit from the matter.

Concern about conflicting interests may also be raised by third parties (eg other staff, or external stakeholder).

The concern should be directed in the case of staff to the Board and Management and to the Board Chair when it relates to the Board and Management or another Board member.

### Manage financial interests

A person will be excluded from participating in any matter when:

- they or their associate have a direct or indirect financial interest, or
- they could be reasonably viewed (from an outsider perspective) as having a financial interest in the matter (even if this is not the case).



This includes where the Board or staff member is in a position of influence or involved in an organisation or commercial operation with whom BRWONZ has or could have a contractual arrangement.

## Other cases

A conflict may involve a non-financial interest, which could impair, or be reasonably viewed as impairing, the judgement of the person (eg involvement in recruitment when a family member or spouse applies). If transparency is not enough, appropriate steps will be taken to address the risks of the conflict, for example:

- the person withdraws
- the person is excluded from a committee or working group dealing with the issue
- certain tasks or duties are re-assigned
- certain information is withheld from the person or restrictions are placed on their access to information
- resignation or dismissal.

## Examples of Conflict of Interest (COI) situations

A conflict of interest can arise in a range of situations. Examples of conflicts that would need to be discussed and managed with the Board and/or Management are:

- where the person has the ability to use their position to their personal advantage
- a family member has a direct or indirect financial interest in a matter that is being decided
- an ex-spouse of a staff member applies for a job in BRWONZ
- a Board member uses organisational knowledge to support a personal business
- a Board member has shares in a business that has quoted for work for BRWONZ
- a staff member makes decisions to obtain the favour of an external person seeking to gain from the decision.

## Breach response

Anyone who is aware of a breach of this policy, or who is concerned that there has been or may be a breach, should report their concerns to the Board and/or Management.

Each reported breach will be investigated. The person(s) alleged to have an undeclared conflict of interest will be given the opportunity to explain and clarify the circumstances.

A decision will be made about whether:

- there has been or was potential for a breach and if so, the materiality of it

- further action is required, including potential disciplinary action where the breach was deliberate
- there is anyone who should be made aware of the breach.

The breach and actions taken to address it must be recorded as below.

## Recordkeeping

All disclosures, breaches and declarations of conflict of interest must be recorded (eg in the Interest Register). The record should include:

- the type of conflict of interest
- the name of the affected person
- whether the interest was declared in advance of appointment (new interests will be added to the conflict of interest register)
- a summary of the discussion and action taken to address risks (eg that Board member withdrew from the discussion and decision making; that tasks were re-allocated to avoid conflict.)

A conflict for a Board member must be recorded in the meeting Minutes.

## BRWONZ Conflict of Interest Register

|         |  |                              |                                   |
|---------|--|------------------------------|-----------------------------------|
| 1.      |  | Description of the interest: | How the conflict will be managed: |
| Date:   |  |                              |                                   |
| Person: |  |                              |                                   |
| Role:   |  |                              |                                   |

|         |  |                              |                                   |
|---------|--|------------------------------|-----------------------------------|
| 2.      |  | Description of the interest: | How the conflict will be managed: |
| Date:   |  |                              |                                   |
| Person: |  |                              |                                   |
| Role:   |  |                              |                                   |

|         |  |                              |                                   |
|---------|--|------------------------------|-----------------------------------|
| 3.      |  | Description of the interest: | How the conflict will be managed: |
| Date:   |  |                              |                                   |
| Person: |  |                              |                                   |
| Role:   |  |                              |                                   |

|         |  |                              |                                   |
|---------|--|------------------------------|-----------------------------------|
| 4.      |  | Description of the interest: | How the conflict will be managed: |
| Date:   |  |                              |                                   |
| Person: |  |                              |                                   |
| Role:   |  |                              |                                   |

# Communications

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## Intent

Organisation members and staff use a variety of communications and networking resources including email, texting and internet. These resources, along with organisational devices and equipment, must be used responsibly and in accordance with our Code of Conduct.

## Requirements

### Devices

Where BRWONZ members or staff are provided with mobile device(s) they need to work remotely and/or from home, the devices will be configured for regular backups, hard-drive encryption and to apply patches as they become available.

Organisation members or staff with organisational devices will:

- be responsible for maintaining their devices and complying with BRWONZ's maintenance and security requirements
- ensure that their devices are kept safe at all times and are used responsibly in accord with Organisation policies (including Code of Conduct)
- use wifi when available
- use devices for limited personal, provided it does not interfere with operations or impact adversely on service delivery and colleagues
- reimburse BRWONZ the cost of chargeable services additional to Organisation-arranged services
- charge and have their phones on for all work-related travel
- take precautions to prevent unauthorised use
- report the loss or theft of an organisational device to the Board or Management as soon as possible.

Data stored on an organisational device is the property of BRWONZ and may be subject to internal investigation or disclosure.

Staff must check their messages regularly and respond promptly.

When employment ends, organisational device(s), complete with associated accessories, such as SIM cards, must be returned to BRWONZ.

All data on a device must be securely erased before the device is transferred to another staff member.

Old or unwanted mobile devices will be recycled with a reputable IT recycling firm.

## Acceptable Use

Organisation members or staff must not share their username and/or password with anyone else or allow others to use their account.

A level of personal use is allowed, provided it does not detract from our mahi or interfere with others' work.

Internet and email access must not be used to download and install software games or utilities (except commonly used files such as Word documents, PDFs).

On-line conferences, discussion groups, email lists and other like services must be relevant and used for work purposes or related to professional development activities.

Staff must exercise extreme caution when opening email attachments received from unknown senders, which may contain malware.

The [Communications principles](#) of the Harmful Digital Communications Act 2015 must be complied with.

## Prohibited activities

Unauthorised access and use of another person's account details either with or without their knowledge is prohibited.

User accounts and organisational equipment must not be used to:

- gamble
- receive or make communications, edit, record or otherwise deal with material that is obscene, objectionable or likely to offend
- transmit sensitive business-related information about BRWONZ unless authorised to do so
- download and install software games or utilities (except commonly used files such as Word documents, PDFs)
- transmit personal information in breach of the Privacy and information management policy
- solicit for personal gain or profit
- access another person's electronic files, email or other electronic communications (unauthorised)
- try and circumvent the user authentication or security of any host, network, or account.
- issue or reply to "mailbombs" (ie when a large volume of email sent to a single or many addresses with malicious intent)
- upload or download commercial software in violation of copyright laws
- download any programmes or add-ons without proper authorisation to avoid conflicting with installed applications and/or the operating system
- forge user authentication or security. This includes adding or attempting to add user's addresses to any internet mailing list and altering header information to conceal one's own email address.

- any activity that violates the law, our policies, and/or Code of Conduct
- extensive private use that interferes with work productivity and/or costs BRWONZ an unacceptable amount of money.

## Media inquiries

We will engage with the media to represent and advocate for interests and concerns relevant to our kaupapa and community.

Only those authorised to interact with the media should do so.

Media contact will be followed up promptly and referred to the authorised spokespeople.

## Social Media

BRWONZ may use social media for communication and advocacy purposes. BRWONZ members must be authorised by the Board to engage in social media. The following principles will apply.

Social media engagement must be:

- **careful** – all due care must be taken when posting or messaging something. This includes when posting in a personal capacity if there is a possibility the post links or identifies the staff member to BRWONZ
- **accurate** - members must take reasonable steps to prevent the spread of misinformation and disinformation and verify information before sharing it on social media or through other means eg use a fact-checking website; check credibility of information source; use reverse image search tools to check authenticity of visuals (eg Google Image Search, TinEye)
- **helpful and responsive** – best efforts must be made to answer questions and queries politely and respectfully. Feedback and complaints must be dealt with promptly and referred to the Board /Manager to deal with.
- **respectful and courteous** – all postings, including re-postings and messages, must reflect the [digital communication principles](#) and comply with the above rules about acceptable and prohibited use
- **lawful and consistent with organisational policies** - our Code of Conduct and other policies must be complied with, including those concerning harassment and bullying, equity and inclusion and Te Tiriti o Waitangi
- **properly authorised and reflect "one voice"** – at least two members must be authorised to access all social media accounts. Members may only post/engage on behalf of, or for, BRWONZ if duly authorised; if a post is made in a personal capacity but could be reasonably linked to BRWONZ, it should incorporate an appropriate disclaimer (eg stating the views are not necessarily the views of BRWONZ)
- **respectful of privacy and confidentiality** - information that is regarded as confidential in the Organisation and personal information relating to other people should not be shared and posted except with consent.

Any violation of this policy will be dealt with as a disciplinary matter and may result in revoking or restricting the right to access/use electronic communications.

# Financial Management

## Intent

BRWONZ (“The Organisation”) will operate robust financial management systems to manage our financial resources effectively, efficiently, and transparently.

## Requirements

### Accounting systems

All financial transactions will be accurately documented, classified, and recorded promptly. The Board will monitor the Organisation’s financial records regularly at meetings.

### Internal Controls

Strong internal controls will safeguard assets, prevent fraud, and ensure the accuracy of financial information. The controls include that:

- Purchasing and procurement of goods and services must be within the scope of financial delegations or authorisation set by the Board or other Delegator.
- Debt must be avoided other than for trade payables unless otherwise approved by the Board.
- No goods, assets or services to be purchased that could bring the name of BRWONZ into disrepute.
- Anyone involved in a financial transaction for BRWONZ must take all due care to avoid a conflict of interest.
- Payment for goods and services received must be supported by invoices and/or other supporting documentation.
- All unbudgeted items must receive specific Board approval prior to purchase.
- Reconciliations of bank accounts, income and expenditure will be completed monthly. They will be checked by the Treasurer or another member of BRWONZ who is not involved in authorising transactions.

### Accounts

- Accounts will only be held with reputable banks and will be accessible only by those authorised.
- Accounts will be kept of all income and expenditure using standard accounting records.

## Payroll requirements

- Staff salaries and benefits will be paid in accordance with their contractual entitlement and the law including tax and superannuation requirements.
- Staff and contractors must be paid accurately and on time in accordance with the terms and conditions of their employment agreements.
- A separate wage and salary record will be maintained for staff who are employees, including holidays entitled to / taken, and sick days entitled to / taken.
- All non-electronic payroll information will be kept in a locked facility to ensure the security of that information.
- Payroll-related payments will be made by direct debit. Manual payments will only be made in exceptional circumstances determined by the Board.
- All staff will be advised when and why there are changes to normal pay.
- Any payment over employment agreement entitlements must be authorised by the Board.
- Advances on wages/salaries to staff will not be paid unless agreed by the Board for special reasons.
- All deductions from Gross Pay are to be made and forwarded to Inland Revenue on time. This includes Withholding Tax on certain contractors as specified in the Income Tax Act 2007.

## Monitoring and reporting

- Monthly financial reports will be prepared by the Treasurer, with support from the Manager, if appointed, for review and approval by the Board. They will:
  - be in written form and provide a true and accurate picture of the Organisation's financial performance and position
  - utilise standard financial reporting formats that present the data in a way that makes it easy to interpret and understand and complies with legal and accounting requirements
  - comply with the agreed Board reporting procedures
  - easily allow comparison between actual and budgeted expenditures/revenue
  - comment on trends and variances (see below).
- The Board will receive and review financial reports at each monthly meeting or when otherwise agreed.
- Board decisions about matters in the financial report will be minuted and followed up appropriately.
- All payroll liabilities will be fairly reflected in BRWONZ's Financial Statements and Performance Report.



## Annual Review or Independent Audit

- Financial accounts will be subject to an annual review or auditing (as required) by a suitably qualified Chartered Accountancy firm.
- BRWONZ's financial year commences 01 July and ends 30 June.
- The Board will decide on the appropriate person to conduct the Review or Audit.
- The Board will ensure that recommendations from the Audit or Review are properly followed up.

## Asset and Risk Management

BRWONZ's assets and financial risks will be managed carefully and responsibly.

### **Procedures:**

- An asset register will be maintained for Organisation assets over \$1,000.00 including purchase dates, values, locations and date of disposal and amount recuperated if the asset is on-sold.
- Reasonable care will be taken to maintain Organisation assets and to decide when and if assets should be replaced and disposed of.
- Safeguards will be applied during the disposal of assets to protect privacy and keep organisational data secure.
- A record will be kept of work undertaken to maintain assets and ensure their longevity and functionality.
- The Board will identify, assess and monitor financial risks associated with assets and implement and monitor identified mitigations.
- Assets will be insured to an appropriate level and insurance policies reviewed and updated annually to ensure adequate coverage.

## Budget

An annual budget will be developed and approved by the Board to support BRWONZ's strategic goals and provide a framework for financial decision-making.

### **Procedures:**

- The Manager (if one is appointed) will work with the Treasurer to develop a detailed budget proposal, considering historical data, strategic objectives, and anticipated changes.
- Expenditure will be linked in accounts to income streams (grants, funding, donations, trade, collections), invoices, payment type, funding lines and budget line/codes.

- The annual budget and end-of-year financial statements must identify all sources of government and other funding received.
- The budget will be reviewed and approved by the Board before the start of each fiscal year.
- Budget performance will be monitored via the monthly financial reports, with adjustments made as necessary to respond to changing circumstances.

## Analysis and reporting of variance between budget and performance

Regular analysis and reporting of budget variances will be conducted to ensure financial accountability and inform decision-making.

### Procedures:

- Monthly variance analysis will compare actual financial performance against the budget.
- Management will prepare and review variance reports, highlighting significant variances and their causes.
- Action plans will be developed to address adverse variances, and progress will be monitored regularly.

## Authorities and delegations

Financial authorities and delegations will be clearly defined and documented to empower the Board and Management to undertake their duties efficiently while maintaining accountability.

### Responsibilities:

“**The Treasurer**” is the Board member responsible for financial oversight of BRWONZ and advising the Board and Manager where necessary on financial matters.

“**The Manager**” if appointed, is the person employed by the Board member to manage the day-to-day operations of the organisation, with delegated authority to manage financial, administrative and service delivery activities for the organisation.

### Procedures:

- Financial delegations will be written and set the limits of Delegate expenditure.
- Delegated limits apply for each transaction and are inclusive of GST.
- Delegates must agree to the delegations.
- Delegates must keep within the limits of their delegations and not exercise a delegation in a matter in which they have a conflict of interest.

- Delegations will be reviewed annually by the Board to ensure they remain relevant and effective.

### **Authorising Expenditure:**

- All invoices must be authorised by the Board, or the Manager if one is appointed, or their delegate.
- The signatories for BRWONZ's bank account are the:
  - Manager
  - Treasurer
  - Chair
- Internet banking requires the authorisation of two of signatories.
- Two signatories are required for all financial transactions. Both must be Board members of the bank account.
- Evidence of transactions must be provided (eg GST receipt)
- The payment process will include verification of invoices, authorisation and timely processing.
- Electronic payment methods will be used where possible, with appropriate security measures applied to prevent unauthorised access.

### **Financial Delegations:**

| Item                                   | Amount                          | Authorisation                         |
|--|---------------------------------|---------------------------------------|
| Normal operational expenses            | No limit within approved budget | Manager or Board if none is appointed |
| GST, IRD                               | No limit                        | Manager or Board if none is appointed |
| Capital Items                          | Up to \$5,000                   | Requires Treasurer approval           |
| Capital Items                          | Above \$5,000                   | Requires Board approval               |
| Expenditure not within approved budget | No limit                        | Requires Board approval               |

## Expenses

Where funds are available and a budget exists, staff/volunteers may seek reimbursement for work-related expenses they pay for themselves if the following criteria are met:

The expenditure was:

- necessary and relatively cost-effective
- in the best interests of the Organisation
- appropriately authorised (ie within budget/ or approved by signatories)
- reasonable – (ie quantity and quality of goods or services meet our need without exceeding it.)

The expense must be defensible and if considered by an outsider, like an auditor or media, to be justified.

All expense claims must be made within a 30-day period of the expenses incurred.

If an expense was not pre-approved it will only be reimbursed if reasonable efforts were made by the claimant to obtain pre-approval or if urgent payment was required.

## Travel and Accommodation

### **BRWONZ Hui**

Where funds are available and a budget exists, travel and accommodation for the Board members to attend BRWONZ Hui may be covered by the Organisation as approved by the Board. Travel should be booked as early as possible, with a minimum lead time of 2 weeks.

Accommodation costs should not exceed \$300/night

Mileage will be reimbursed at a rate agreed annually.

### **Other travel-related costs**

Work-related travel and accommodation may be approved by the appropriate financial delegate having regard to the following criteria:

- reason for travel
- cost-efficiency
- the traveler's health and wellbeing (eg family responsibilities, access and mobility needs)
- sustainability (could other communication and meeting modes like Zoom suffice instead of travel?)
- the reputation and practices of the supplier (eg safety record; use of exploited labour etc)

Economy seats will be used when travelling by air unless exceptional circumstances apply.

Accommodation costs will not include services such as movie hire, mini-bars, room service etc. for which there is an additional charge.

Koha may be given for private accommodation (eg staying with friends, whānau) as a reasonable contribution towards the costs of stay. The amount will be pre-approved by the Organisation.

Board members and invited guests may be reimbursed for reasonable travel costs to and from meetings if kanohi-ki-te-kanohi/face-to-face is necessary, and if approved by the Board.

## Reimbursement for travel

Travel-related costs (eg bus, train, uber) will only be reimbursable if:

- the travel complies with the general Expense rules (above)
- if a private vehicle is used, there is a record of the number of kilometers travelled, date, and purpose of the journey (eg in vehicle log)
- corroboration is provided for parking and associated expenditure.

Private vehicle mileage will be reimbursed at the agreed rate or as at the [current IRD rate](#) per kilometer.

## Certain expenses will not be reimbursed

- Expenses claimed as a tax deduction
- Expenses covered by an Allowance
- Expenses normally paid by the traveler (eg grooming)
- Expenses recoverable from a third-party
- Purchases that would ordinarily be paid for through a purchase order or account with another supplier when this was known or should have been reasonably known to the claimant
- Expenses unrelated to work
- Travel and accommodation for spouse or other family member
- Late payment interest on credit cards
- Personal entertainment costs (eg Sky TV, bar fridge in accommodation)
- Parking or traffic fines and penalties
- Unauthorised expenses including upgrades on fares, except as below
- Expenses covered by an allowance.

## When no prior authorisation

Expenses that were not pre-approved will be reimbursed only if:

- the level of expense claimed is reasonable in the circumstances
- there are exceptional circumstances warranting reimbursement (e.g. there was no one available to authorise it and payment was urgently required)
- corroboration of the expense, purchase, and reasons is provided
- a bank account is provided with the claim (if not already held).

## Asset Register

| Item name | Description<br>(Including important information<br>such as PINS, recovery codes or<br>serial numbers) | Bought/<br>Donated       |                          | Current location | \$ Cost/Value | Date<br>acquired |
|-----------|---|--------------------------|--------------------------|------------------|---------------|------------------|
|           |   | B                        | D                        |                  |               |                  |
|           |   | <input type="checkbox"/> | <input type="checkbox"/> |                  |               |                  |
|           |   | <input type="checkbox"/> | <input type="checkbox"/> |                  |               |                  |
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|           |   | <input type="checkbox"/> | <input type="checkbox"/> |                  |               |                  |
|           |   | <input type="checkbox"/> | <input type="checkbox"/> |                  |               |                  |

# Fraud and Corruption

## Intent

We value honesty, integrity and transparency in all aspects of our operation.

Controls to prevent and mitigate the risks of corruption and fraud are embedded in our policies, procedures and other measures.

Allegations of corruption and fraud will be investigated promptly and fairly. Everyone in the organisation will be treated the same regardless of position, title, length of service or relationships within our organisation.

## Fraud protection

- Measures are applied to prevent, detect, and respond to fraud.
- Financial Controls are applied, reviewed and updated as necessary.
- Reconciliation of bank accounts, income and expenditure will be completed monthly. They will be checked by the Treasurer or another member of the Organisation who is not involved in authorising transactions and has been delegated by the Board.
- Segregation of duties is maintained, to the extent possible to prevent one single person having complete authority over the organisation's financial transactions.

## Types of fraud

Our policies and practices will include controls for the following types of fraud:

- Income and expenditure related fraud such as authorising or receiving payment for goods or services not received or performed
- fraudulent invoicing and grant applications or fundraising activities
- dishonest or corrupt dealing with assets including disclosing confidential information to a third party
- forgery or alteration of documents including identity fraud/theft or presenting false credentials or qualifications
- fabrication or falsification of data (e.g. timesheet, leave form or expense form), plagiarism or other dishonest practices
- accepting or offering bribes or inducements in procurement processes or gift fraud
- favouritism and preferential treatment in relation to the activities, services and resources we offer
- granting a contract or engineering the granting of a contract to a third party with a view to direct or indirect personal gain.
- property, investment or banking fraud
- unauthorised use, including the destruction or removal of the Organisation's property, equipment, materials or records



- using information technology equipment to manipulate programmes or data dishonestly, e.g. by altering, substituting or destroying records or e-crime (including 'phishing')

## Key Risks and Mitigations

Management will periodically consider how various fraudulent and corrupt behaviors can occur and the organisation's vulnerabilities. Internal controls and oversight mechanisms will be adjusted as necessary to ensure risks are adequately addressed.

## Key risks will be managed as follows:

### **Corruption risk: Bribery**

**RISK STATEMENT:** Bribery may be employed, through the use of gifts and other inducements, to influence decisions in the organisation.

#### **CONTROLS:**

- Decision making about the allocation of resources and services in our organisation will be undertaken in transparent ways, in accord with our Constitution and policies.
- Management and financial reporting
- Policies and processes for giving, receiving and reporting koha and donations (eg Gifts register)

### **Corruption risk: Favouritism and preferential treatment**

**RISK STATEMENT:** Poor management of competing business and personal interests and relationships may lead to favouritism and preferential treatment in areas such as procurement and employment.

#### **CONTROLS:**

- Conflict of Interest policy and Interests Register
- Policies and processes to guide the management of relationships in areas like employment, procurement etc
- Related transactions will be reported in the organisation's financial performance report

### **Corruption risk: Dishonest or corrupt dealing with assets**

**RISK STATEMENT:** Assets may be disposed of or improperly dealt with for reasons of personal gain including intellectual property and confidential information about the organisation.

#### **CONTROLS:**

- Privacy and information management policy

- Internal controls outlined in the Financial management policy
- Asset management policy and processes eg Asset management register.
- All controls will be monitored and updated as and when new risks of fraud and corruption are identified, or the level of a risk changes.

### **Corruption risk: False reporting on performance for funding purposes**

RISK STATEMENT: Funding and performance pressures and job insecurity can lead to false reporting by management about outcomes and performance targets to governance and funding bodies.

#### **CONTROLS:**

- Management will set performance targets that align with the strategic vision and are realistic in light of funding uncertainties and variability
- Progress on performance will be reported and regularly reviewed
- Performance reviews and appraisals will be undertaken in accord with policies
- Internal audits will include checks on performance reports to external funders.

### **Fraud risk: False financial reporting**

RISK STATEMENT: Financial reports may overstate revenues and misrepresent expenses to create a misleading financial picture of high return on investment and/or to hide fraud.

#### **CONTROLS**

- Management will ensure financial reports are actively reviewed and questioned
- Financial targets will be set by reference to confirmed funding sources like grants and government contracts with funding uncertainties explicitly identified and addressed.
- Compliance with internal controls (eg segregation of duties) will be monitored and checked
- Internal and external audits.

### **Awareness-raising**

Staff will be informed of this policy and their obligations to report concerns about fraud and corruption through induction and training. They will be informed of:

- the risks of fraud and corruption relevant to their roles, and
- controls to prevent and detect fraud eg Financial Controls, and
- their duty to comply with controls (eg Financial Controls), and
- [the common red flags for internal fraud](#)
- their duty to report suspected fraud and corruption, the reporting process and Whistleblower protections.

## Fraud response

- Allegations of fraud will be dealt with by the Manager. Allegations against the Manager are to be handled by the Board Chairperson. The Manager will notify the Chairperson of the suspected fraud.
- Any suspected fraud will be investigated promptly, and when warranted, appropriate disciplinary and legal actions will be taken.
- Concerns will be investigated and followed up in accordance with the law, this policy and disciplinary policies. The investigation will be undertaken by someone independent of the matters to be investigated. Full and accurate documentation will be compiled from initial report to outcome.
- All due care will be taken to treat fraud and corruption concerns confidentially until proven. All related records and written information must be kept secure. A breach of confidentiality in this respect may lead to disciplinary action being taken.
- Allegations will be subject to due process, equity and fairness. Anyone who is subject to a fraud or corruption investigation may be suspended pending the outcome of the investigation.
- Funding agencies and Regulators will be notified of fraud/corruption complaints and investigations. Allegations of criminal activity that are substantiated through initial investigation, will be referred to Police.
- Anyone who is or was an employee, volunteer or otherwise involved with the management of the Organisation and who reports fraud will have the rights and protections of the [Protected Disclosures \(Protection of Whistleblowers\) Act 2022](#). However, if a complaint is found to be malicious or mischievous, disciplinary action may be taken for serious misconduct.

## Recovery of Loss

It is the BRWONZ's policy to pursue the recovery of lost money or other property wherever possible and practicable.

## Public Relations

Queries from outside the organisation with respect to any fraud investigation shall be referred to the Manager. Staff should not discuss matters under investigation with any party.

# Gifts Register

| Date     | Description of Gift              | Given/<br>Received       |                                     | \$ Value | Name of<br>employee | Name of<br>other party | Purpose of<br>gift        |
|----------|----------------------------------|--------------------------|-------------------------------------|----------|---------------------|------------------------|---------------------------|
|          |                                  | G                        | R                                   |          |                     |                        |                           |
| Xx/xx/xx | Example: Bottle of<br>Champaigne | <input type="checkbox"/> | <input checked="" type="checkbox"/> | \$250    | Joe Blogs           | Fred Smith             | Thank-you<br>for services |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |
|          |                                  | <input type="checkbox"/> | <input type="checkbox"/>            |          |                     |                        |                           |

# Employment

---

## Intent

This policy guides the recruitment and selection of staff for BRWONZ. The processes will be conducted in a fair, inclusive and timely way.

Successful appointees will be expected to work to high standards and in accord with their contractual terms.

## Requirements

### Recruitment

An open process will be used to recruit and engage contractors and staff. This will usually involve:

- advertising the role in areas most likely to attract suitable candidates
- shortlisting
- interviewing suitable candidates
- advising candidates of the recruitment outcome
- background checks for a preferred candidate (see Background Checks Policy).

### Contractual offer

Contractual negotiations will be conducted legally and in good faith.

The agreed terms and conditions will be stated in writing and agreed and signed by the new contractor or employee and the Manager/Chair.

The agreement will be subject to the completion of a background check (including referee reports).

### Good employer

The Organisation will be a “good employer” and when employing staff, will comply with the Human Rights Act 1993 and the Employment Relations Act 2000, in particular, with obligations to:

- act in good faith
- provide minimum conditions including annual leave, Public Holidays, paid sick leave, bereavement leave etc
- not discriminate, harass or bully any staff member or other person involved with BRWONZ
- apply fair disciplinary processes when necessary to address misconduct and/or unsatisfactory performance.

Staff will be adequately supervised and provided with guidance to assist them to develop in their role.

## Documentation

Before starting their contract or employment, staff will be required to provide:

- their bank account details
- original copies of qualifications (if applicable)
- driver's license (if necessary)
- contact details (including emergency back up/ next of kin)
- information about their risk management processes.

## Induction

BRWONZ will ensure that staff are appropriately inducted.

Induction will include:

- what they need to know to work safely and competently for BRWONZ
- reporting and communication lines
- Organisation policies
- health and safety procedures (eg emergency responses, incident management)
- professional development goals (for staff)
- resources required and provided for the role.

A record will be kept of the induction and will be signed and dated by the staff member and Manager/Chair on completion of the induction.

Successful appointees will be expected to work in accord with their agreement terms and will be supported into the role through induction and regular performance feedback.

## Terms and conditions of employment

The terms and conditions of employment for each staff member, including leave entitlements, are set out in their employment agreement. Terms will satisfy or exceed minimum entitlements of the Employment Relations Act 2000, the Holidays Act 1993 and related legislation. They include that staff may work remotely and flexibly.

# Volunteers

## Intent

Volunteers can contribute in a variety of ways to our organisation eg governance, advisory roles and by direct involvement in activities and services. They may work on an ongoing or time-limited basis depending on need and agreement.

We value the contribution of volunteers/kaiawhina and reflect this in the opportunities we provide and how we work with volunteers.

## Definition

A "volunteer"/"kaiawhina" is a "volunteer worker" under the Health and Safety at Work Act 2015. It includes a member of governance.

## Requirements

### Recruitment

Volunteers will be recruited in an open and transparent way based on pre-set criteria unless they are recruited for a specific purpose (eg powhiri; ad hoc assistance).

Volunteers recruited for ongoing operational roles will be asked to sign a volunteer agreement.

Volunteers must agree to background checks required by law and/or our policies to undertake. They will be informed about the outcome of checks.

### Commencement

Appropriate arrangements will be made to welcome and induct volunteers to BRWONZ (eg induction, buddying, safety and emergency procedures, mihi whakatau etc).

Management/delegated staff will ensure that new volunteers are informed about:

- policies and procedures relevant to their role in the organisation including the Code of Conduct and Health and Safety processes
- who and how to contact in the organisation if they have a concern or issue to raise
- the Feedback and complaints and Grievance and disputes processes.

Particular care will be taken to support volunteers who are recruited for their lived experience and to advise and contribute to planning and other activities. They will be given clear (usually written) instructions about the scope and purpose of their role, how they can participate, who they can access for support, and what they can expect in return for their volunteering.

When involved in an advisory group, a volunteer will be provided with Terms of Reference about the purpose and role of the group.

## Feedback and complaints

Volunteers will be provided with feedback to help them grow and develop. They will also be given opportunities to feedback and contribute to service planning, development and review processes.

A volunteer may rely on the Grievance and disputes policy to raise and deal with a conflict or dispute with another paid or unpaid worker.

The Feedback and complaints policy should be used for a volunteer's complaint about the service.

## Performance

A volunteer must abide by our Code of Conduct and organisational policies insofar as they are relevant to their role. If they breach, or are unwilling to comply with our policies, they will not be able to continue to volunteer.

Where reasonably practicable, volunteers' training needs for their role will be identified before they commence. Strategies such as supervision, induction, mentoring, coaching and training will be arranged to meet those needs and to support their ongoing development.

Volunteers are expected to take responsibility for performing the tasks they are assigned in a timely and reliable way. They should notify management or a nominated other person if they are unable to perform their role.

## Privacy

Any information obtained about a volunteer or potential volunteer will be retained only for as long as it is needed for the purpose for which it was collected. The Privacy and information management policy will apply.

## Payment and reimbursement

With limited exceptions, voluntary work will be unpaid. If, at any stage, a volunteer undertakes paid work, their payment will be taxable income.

A volunteer may be reimbursed for work-related costs (as per Expenses policy).

## Termination

BRWONZ may terminate a volunteer arrangement for any reason including for performance problems, misconduct etc.

A fair process will be followed and the volunteer will be informed of the reason for termination.



# Background Checks

## Intent

Due diligence and background checks are carried out during recruitment. The checks will vary depending on the responsibilities of the role.

If we work with families, children and young people and have regular contact with children/young people, we will ensure that staff and volunteers engaged in this work are properly vetted as “Children’s Workers” under the Children’s Act 2014. Where required, a Ministry of Justice check for criminal history will be undertaken with others who work in paid and unpaid roles for BRWONZ.

## Definitions

“**Children's worker**” refers to a staff or volunteer member who may have regular contact with a child/young person without their parent or guardian being present.

“**Contact**” means physical contact, oral communication (whether in person or by phone), or communication through an electronic medium.

“**Disqualifying offence**” is an offence in Schedule 2 of the Children's Act 2014 for a core children's worker role for which an exemption (under s35 Children's Act) has not been obtained. The Board may also identify other disqualifying conditions for appointment to and ongoing employment in particular roles.

“**Regular**” means at least once a week or at least four days a month.

“**Vulnerable person/people**” includes an “adult at risk of harm, abuse and neglect who because of circumstance (eg in care, or detention) is unable to protect themselves from harm.

## Responsibilities

**The Board** (ie delegate or officer) will ensure that all its members and the Manager are background checked to meet applicable legal and policy criteria.

**The Manager** will:

- keep adequate records of initial and periodic background checks and risk assessments
- ensure background check information is kept confidential and secure.

**Staff or volunteers** must participate in periodic checks and keep management or governance informed of any event, including a criminal charge, relevant to their role and position within the Organisation.

## Requirements

### Background checks for recruitment of staff, volunteers including Board members

Background checks will be conducted before a person is employed or appointed as a staff or Board member, as follows:

- confirm the person's identity (eg sight license, passport, or RealMe verification)
- obtain the person's consent to background checks -
  - [police vetting](#) for all Children's Worker roles and for other direct work with people who are at risk of harm - elderly, disabled people
  - [Ministry of Justice criminal history check](#) for other roles eg Board members
- verify qualifications
- contact at least two referees for information about the person's suitability for the role
- for a Children's Worker role or work with other vulnerable people:
  - check for any concerns or issues from any professional organisation or licensing or registration authority the person belongs to
  - check the chronological work history (for the last 5 years) including any gaps in the history
- for driving-related work, the level and nature of traffic convictions will be checked
- for positions with a financial delegation, budget responsibility or requiring cash handling, a credit/financial check may be done.

If a person has a conviction for an offence listed in Schedule 2 of the Children's Act 2014, they will not be employed unless they can provide a lawful exemption.

Police/ Criminal History Checks will be repeated at least once every three years.

As below, risks identified through these checks must be assessed (see attached form). An appointment will not proceed if:

- the risks cannot be adequately mitigated and managed, or
- there is a disqualifying condition.

### Record keeping

A record will be kept of:

- the result(s) of checks and any notifications of pending charges, investigations
- the risk assessment
- decisions and responses (including the person's agreement to controls)
- when and how the risks and controls are monitored and reviewed
- changes made to safety management arrangements and reasons for changes.

The record will be kept confidential and secure.

# Children's worker initial safety checking cover sheet



## Organisation and candidate details

|                     |   |   |
|---------------------|---|---|
| Organisation name:  |   |   |
| Candidate name:     |   |   |
| Role:               |   |   |
| Role specification: | <input type="checkbox"/> Core worker role | <input type="checkbox"/> Non-core worker role |
| Start date:         |   |   |

## 1. Verification of identity

|  |  |
|--|--|
| <p>Check the person's identity by:</p> <ul style="list-style-type: none"> <li>• using an electronic identity credential such as <a href="#">RealMe</a>, or</li> <li>• sighting original primary and secondary identity documents (ID) from the list below.</li> </ul> <p>If the names on the IDs do not match, then you must include a supporting name change document.</p> <p>One form of identification must be primary, and one must be secondary. One of the IDs should include a photo but if neither does see section 1A. Current (not expired) IDs are preferred. If expired IDs are used you must consider whether this poses any risk.</p> <p>You must also do a search of your personnel records to check if the person's identity is being, or has been, used by another person.</p>  |  |
| <b>Primary ID</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> NZ passport</li> <li><input type="checkbox"/> Overseas passport (may include INZ visa or permit. Visa itself is not valid ID)</li> <li><input type="checkbox"/> NZ emergency travel document</li> <li><input type="checkbox"/> NZ refugee travel document</li> <li><input type="checkbox"/> NZ certificate of identity (issued under the Passports Act 1992 to non-NZ citizens who cannot obtain a passport from their country of origin)</li> <li><input type="checkbox"/> NZ certificate of identity (issued under the Immigration Act 1987 to people who have refugee status)</li> <li><input type="checkbox"/> NZ firearms licence</li> <li><input type="checkbox"/> NZ full birth certificate (issued on or after 1 January 1998)</li> <li><input type="checkbox"/> NZ citizenship certificate</li> </ul> | <b>Secondary ID</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> NZ driver licence</li> <li><input type="checkbox"/> Kiwi Access Card (previously known as 18+ card)</li> <li><input type="checkbox"/> Community services card</li> <li><input type="checkbox"/> SuperGold Card</li> <li><input type="checkbox"/> Veteran SuperGold Card</li> <li><input type="checkbox"/> NZ student ID card</li> <li><input type="checkbox"/> NZ employee photo ID card</li> <li><input type="checkbox"/> NZ electoral roll record</li> <li><input type="checkbox"/> Inland Revenue number</li> <li><input type="checkbox"/> NZ issued utility bill (not issued more than 6 months earlier e.g. phone, power, internet bill etc)</li> <li><input type="checkbox"/> Steps to Freedom form</li> </ul> |
| <b>Supporting name change documents</b>  |  |
| <ul style="list-style-type: none"> <li><input type="checkbox"/> NZ full birth certificate (issued for purpose)</li> <li><input type="checkbox"/> NZ marriage certificate (particulars of marriage is not valid)</li> <li><input type="checkbox"/> Change of name by statutory declaration</li> <li><input type="checkbox"/> Change of name by deed poll</li> </ul>   | <ul style="list-style-type: none"> <li><input type="checkbox"/> NZ name change certificate</li> <li><input type="checkbox"/> NZ civil union certificate</li> <li><input type="checkbox"/> NZ order dissolving marriage or civil union</li> <li><input type="checkbox"/> NZ order declaring marriage or civil union void</li> </ul>   |

|  |                 |  |
|--|-----------------|--|
| <input type="checkbox"/> Copy of RealMe verification attached OR<br><input type="checkbox"/> Copy of identity documents attached | Date completed: |  |
| <input type="checkbox"/> Completed a search of personnel records   | Date completed: |  |

## 1A. Verification of identity by an identity referee (if applicable)

|   |                 |  |
|---|-----------------|--|
| <p>If neither of the primary or secondary identity documents has a photo of the person you must ask them to provide:</p> <p><input type="checkbox"/> The name and contact details of an identity referee, and<br/> <input type="checkbox"/> A photo of themselves authenticated by the identity referee.</p> <p>OR</p> <p><input type="checkbox"/> The name and contact details of an identity referee, and<br/> <input type="checkbox"/> A statement signed and dated by the identity referee that confirms that the primary identity document relates to that person.</p> |                 |  |
| <p>The identity referee must:</p> <ul style="list-style-type: none"> <li>• have known the person for at least 12 months,</li> <li>• be at least 16 years of age,</li> <li>• not be related to the person</li> <li>• not be part of the person's extended family,</li> <li>• not be a spouse or partner of the person, and</li> <li>• not live at the same address as the person.</li> </ul>   |                 |  |
| Name of identity referee:   |                 |  |
| <input type="checkbox"/> Copy of the authenticated photo or verification statement attached   | Date completed: |  |

## 2. Interview

|  |                                       |                                |                                 |  |
|--|---------------------------------------|--------------------------------|---------------------------------|--|
| Interview the person. Document the interview conducted, such as interview notes or summary. Detail questions asked and answers provided. |                                       |                                |                                 |  |
| Interview type:  | <input type="checkbox"/> Face to face | <input type="checkbox"/> Phone | <input type="checkbox"/> Other: |  |
| Interviewer(s):  |                                       |                                | Interview date:                 |  |
| <input type="checkbox"/> Copy of detailed interview notes attached   |                                       |                                |                                 |  |

## 3. Work history

|  |                 |  |
|--|-----------------|--|
| Obtain a chronological summary of the person's work history for a minimum of the preceding 5 years, including a description of positions held. This can be a copy of a CV or job application. Any gaps in the 5-year period must be explained. If the person has moved from children's worker roles to non-children's worker roles, this also needs to be explained. |                 |  |
| <input type="checkbox"/> Copy of work history attached   | Date completed: |  |

## 4. Referee checks

|   |  |                            |  |
|---|--|----------------------------|--|
| Contact and request relevant information from at least two referees. At least one referee cannot be related to the person or be part of the person's extended family. Confirm with the referees that the information in the person's CV is correct. Ask the referee if they have any concerns regarding the person's suitability to work with children. |  |                            |  |
| Referee name:   |  | Relationship to candidate: |  |
| Contact details:  |  | Date of check:             |  |
| Referee name:   |  | Relationship to candidate: |  |
| Contact details:  |  | Date of check:             |  |
| <input type="checkbox"/> Copy of referee checks including questions asked and detailed answers attached   |  |                            |  |

## 5. Professional membership

|   |   |  |
|---|---|--|
| Seek information from any relevant professional organisation, licensing authority or registration authority to confirm if the person is a current member and has been issued a licence or is registered or certificated by the authority. |   |  |
| <input type="checkbox"/> Person holds professional membership(s), has been licensed, registered or certificated   | <input type="checkbox"/> Not applicable |  |
| Name of any professional organisations, licensing authorities, or registration authorities:   |   |  |
|   |   |  |
| <input type="checkbox"/> Copies of relevant information from the professional organisation, licensing or registration authority attached<br>AND/OR<br><input type="checkbox"/> A screenshot from an online register check attached        | Date completed:                         |  |

## 6. Police vet

|  |   |
|--|---|
| Conduct a police vet via the New Zealand Vetting Service.  |   |
| <input type="checkbox"/> Police vet obtained   | <input type="checkbox"/> Not applicable, person holds professional membership that police vets at least every three years |
| Police vet results show:   |   |
| <input type="checkbox"/> No convictions<br><input type="checkbox"/> Convictions<br><input type="checkbox"/> Convictions for a <a href="#">specified offence as per Schedule 2 of the Children's Act 2014</a> (person must not be employed or engaged in a core children's worker role unless they have an exemption) |   |

|  |                 |  |
|--|-----------------|--|
| Conviction details:  |                 |  |
|  |                 |  |
| <input type="checkbox"/> Copy of police vet and results attached<br>OR<br><input type="checkbox"/> Evidence attached that confirms the person holds current professional membership, licence or registration that requires a police vet every three years<br>AND (if applicable)<br><input type="checkbox"/> If the person is employed or engaged in a core worker role and has a specified offence, evidence attached that the person holds a current core worker exemption | Date completed: |  |

## 6A. Overseas police vet (optional)

|   |   |
|---|---|
| <p>In addition to obtaining a NZ Police vet, you should ask people who have lived overseas to provide copies of police certificates from their countries of citizenship and from any country in which they have lived for one or more years, within the last 10 years.</p> <p>If overseas police certificates cannot be provided, you should ask for proof of attempts to obtain them, and a statutory declaration stating whether they have any criminal convictions or not.</p> |   |
| <input type="checkbox"/> Overseas police certificate(s) obtained  | <input type="checkbox"/> Not applicable |
| Details obtained from the overseas police certificate(s):   |   |
|   |   |
| <input type="checkbox"/> copy of police certificate from their countries of citizenship attached  |   |
| <input type="checkbox"/> copy of police certificate from any country in which they have lived for one or more years, within the last 10 years attached  |   |
| When a person cannot provide an overseas police certificate:<br><input type="checkbox"/> proof of attempts to obtain a certificate attached, and<br><input type="checkbox"/> Statutory declaration attached stating whether they have any overseas criminal convictions or not  |   |

## 7. Risk assessment

|   |  |   |   |
|---|--|---|---|
| <p>Evaluate all the information you have gathered to assess the risk the candidate poses, or would pose, to the safety of children if employed or engaged.</p> <p>You must detail how all information gathered for the other components of the safety check (identity check, work history, interview, referee, membership, and police vet) have been considered for the risk assessment.</p> <p>Also consider if there is any other information that may be relevant to the risk assessment, including any requirements regarding robust decision-making outlined in the Social Sector Accreditation Standards.</p> |  |   |   |
| REFLECT   | Is the person safe to work with children?  |   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No |
|   | Would the person support and adhere to your child protection policy, and actively contribute to a culture of child protection in your organisation?  |   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No |
|   | Are there any inconsistencies in information supplied, e.g. information not mentioned on the person's work history or during interview that was provided by the referees or in the police vet?   |   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No |
|   | Are there any patterns of concerning attitudes or behaviours? These can be subtle and wider than the presence or absence of criminal convictions.  |   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No |
|   | Do you need to follow-up or gather any additional information, e.g. from another referee or more information from a referee already contacted?   |   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No |
|   | Do you need to clarify any issues with the applicant directly, e.g. allowing them an opportunity to respond to any information that is unclear or inconsistent? Did they deliberately withhold information?  |   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No |
|   | Do you need to talk to anyone else about the person?   |   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No |
| <p>Assess the person to determine whether they pose, or would pose, any risk to the safety of children.</p> <p>If the person does, or would, pose a risk, assess the extent of that risk. Consider actions that could be taken to eliminate or mitigate the risk.</p>   |  |   |   |
| ASSESS  | I have assessed the person as posing   | <input type="checkbox"/> no risk<br><input type="checkbox"/> risk<br><input type="checkbox"/> high risk | to children   |
|   | <p>Notes on the assessment of information and decision in the interest of children's safety.</p> <p>Please also note any additional information you may have also considered when determining whether the person poses, or would pose, a risk to children.</p> |   |   |
|   | <p><i>if the person has any convictions or comments on their police vet, ensure you include these in your assessment notes here.</i></p>   |   |   |

## Children's worker initial safety checking sign-off

|   |  |
|---|--|
| Name of person who completed the risk assessment: |  |
| Signature:  |  |
| Date:   |  |
| Due date of next periodic safety check:           |  |



# Children's worker periodic safety checking cover sheet



## Organisation and candidate details

|                            |   |   |
|----------------------------|---|---|
| Organisation name:         |   |   |
| Candidate name:            |   |   |
| Role:                      |   |   |
| Role specification:        | <input type="checkbox"/> Core worker role | <input type="checkbox"/> Non-core worker role |
| Start date:                |   |   |
| Date of last safety check: |   |   |

## 1. Identity confirmation/name change

|  |  |  |
|--|--|--|
| Check the person's identity records held on file and confirm whether they have changed their name since the last safety check.   |  |  |
| <input type="checkbox"/> There has been a name change  | <input type="checkbox"/> Not applicable  |  |
| <b>Supporting name change documents</b>  |  |  |
| <input type="checkbox"/> NZ full birth certificate (issued for purpose)<br><input type="checkbox"/> NZ marriage certificate (particulars of marriage is not valid)<br><input type="checkbox"/> Change of name by statutory declaration<br><input type="checkbox"/> Change of name by deed poll | <input type="checkbox"/> NZ name change certificate<br><input type="checkbox"/> NZ civil union certificate<br><input type="checkbox"/> NZ order dissolving marriage or civil union<br><input type="checkbox"/> NZ order declaring marriage or civil union void |  |
| <input type="checkbox"/> Copy of name change documents attached  | Date completed:  |  |

## 2. Professional membership

|   |   |  |
|---|---|--|
| Seek information from any relevant professional organisation, licensing authority or registration authority to confirm if the person is a current member and has been issued a licence or is registered or certificated by the authority. |   |  |
| <input type="checkbox"/> Person holds professional membership(s), has been licensed, registered or certificated   | <input type="checkbox"/> Not applicable |  |
| Name of any professional organisations, licensing authorities, or registration authorities:   |   |  |
|   |   |  |
| <input type="checkbox"/> Copies of relevant information from the professional organisation, licensing or registration authority attached<br>AND/OR<br><input type="checkbox"/> A screenshot from an online register check attached        | Date completed:                         |  |

### 3. Police vet

|  |   |  |
|--|---|--|
| Conduct a police vet via the New Zealand Vetting Service.  |   |  |
| <input type="checkbox"/> Police vet obtained   | <input type="checkbox"/> Not applicable, person holds professional membership that police vets at least every three years |  |
| Police vet results show:<br><input type="checkbox"/> No convictions<br><input type="checkbox"/> Convictions<br><input type="checkbox"/> Convictions for a <a href="#">specified offence as per Schedule 2 of the Children's Act 2014</a> (person must not be employed or engaged in a core children's worker role unless they have an exemption)   |   |  |
| Conviction details:  |   |  |
|  |   |  |
| <input type="checkbox"/> Copy of police vet and results attached<br>OR<br><input type="checkbox"/> Evidence attached that confirms the person holds current professional membership, licence or registration that requires a police vet every three years<br>AND (if applicable)<br><input type="checkbox"/> If the person is employed or engaged in a core worker role and has a specified offence, evidence attached that the person holds a current core worker exemption | Date completed:   |  |

### 3A. Overseas police vet (optional)

|  |   |
|--|---|
| In addition to obtaining a NZ Police vet, you should ask people who have lived overseas to provide copies of police certificates from their countries of citizenship and from any country in which they have lived for one or more years, within the last 10 years.<br><br>If overseas police certificates cannot be provided, you should ask for proof of attempts to obtain them, and a statutory declaration stating whether they have any criminal convictions or not. |   |
| <input type="checkbox"/> Overseas police certificate(s) obtained   | <input type="checkbox"/> Not applicable |
| Details obtained from the overseas police certificate(s):  |   |
|  |   |

|  |
|--|
| <input type="checkbox"/> copy of police certificate from their countries of citizenship attached   |
| <input type="checkbox"/> copy of police certificate from any country in which they have lived for one or more years, within the last 10 years attached   |
| When a person cannot provide an overseas police certificate:<br><input type="checkbox"/> Proof of attempts to obtain a certificate attached, and<br><input type="checkbox"/> Statutory declaration attached stating whether they have any overseas criminal convictions or not |

## 4. Risk assessment

|   |  |   |             |
|---|--|---|-------------|
| <p>Evaluate all the information you have gathered to assess the risk the candidate poses, or would pose, to the safety of children if employed or engaged.</p> <p>You must detail how all information gathered for the other components of the safety check (identity check, work history, interview, referee, membership, and police vet) have been considered for the risk assessment.</p> <p>Also consider if there is any other information that may be relevant to the risk assessment, including any requirements regarding robust decision-making outlined in the Social Sector Accreditation Standards.</p> |  |   |             |
| REFLECT   | Is the person safe to work with children?  | <input type="checkbox"/> Yes<br><input type="checkbox"/> No   |             |
|   | Would the person support and adhere to your child protection policy, and actively contribute to a culture of child protection in your organisation?  | <input type="checkbox"/> Yes<br><input type="checkbox"/> No   |             |
|   | Are there any inconsistencies in information supplied, e.g. information not mentioned on the person's work history or during interview that was provided by the referees or in the police vet?   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No   |             |
|   | Are there any patterns of concerning attitudes or behaviours? These can be subtle and wider than the presence or absence of criminal convictions.  | <input type="checkbox"/> Yes<br><input type="checkbox"/> No   |             |
|   | Do you need to follow-up or gather any additional information, e.g. from another referee or more information from a referee already contacted?   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No   |             |
|   | Do you need to clarify any issues with the applicant directly, e.g. allowing them an opportunity to respond to any information that is unclear or inconsistent? Did they deliberately withhold information?  | <input type="checkbox"/> Yes<br><input type="checkbox"/> No   |             |
|   | Do you need to talk to anyone else about the person?   | <input type="checkbox"/> Yes<br><input type="checkbox"/> No   |             |
| <p>Assess the person to determine whether they pose, or would pose, any risk to the safety of children.</p> <p>If the person does, or would, pose a risk, assess the extent of that risk. Consider actions that could be taken to eliminate or mitigate the risk.</p>   |  |   |             |
| ASSESS  | I have assessed the person as posing   | <input type="checkbox"/> no risk<br><input type="checkbox"/> risk<br><input type="checkbox"/> high risk | to children |
|   | <p>Notes on the assessment of information and decision in the interest of children's safety.</p> <p>Please also note any additional information you may have also considered when determining whether the person poses, or would pose, a risk to children.</p> |   |             |

|  |  |
|--|--|
|  | <p><i>if the person has any convictions or comments on their police vet, ensure you include these in your assessment notes here.</i></p> |
|--|--|

### Children’s worker periodic safety checking sign-off

|   |  |
|---|--|
| Name of person who completed the risk assessment: |  |
| Signature:  |  |
| Date:   |  |
| Due date of next periodic safety check:           |  |

## Background checks - risk assessment criteria

This form must be completed to help assess risks identified from a police or criminal history check for roles where the person does not have regular or overnight contact with children. This risk assessment will be conducted in collaboration with the agency with whom we are providing a service (eg Department of Corrections.)

| Elements   | Notes<br>Eg from interview with applicant and consideration of relevant checks eg referees; professional body; police vet | Assessment of risk<br>Type and level of risk: low, medium, high |       | Risk Management<br>Enter N/A if no risk to manage |
|--|---|---|-------|---|
| Describe the issue/offence and related circumstances eg whether charged, convicted, harm caused  |   | Type  | Level |   |
|  |   |   |       |   |
| Outline the person's rehabilitative behaviour including their work history, recovery, use of supports and attitude towards issue/offence   |   | Type  | Level |   |
|  |   |   |       |   |
| Consider wellbeing and best interests of the service user/participant group.   |   | Type  | Level |   |
|  |   |   |       |   |
| Consider interests of vulnerable people (eg people on release; people with disability etc)   |   | Type  | Level |   |
|  |   |   |       |   |
| Consider relevance of issue/offending to the position and responsibilities (eg frontline v admin role)   |   | Type  | Level |   |
|  |   |   |       |   |
| Consider the benefits of engaging or employing the person (eg value of lived experience) over other applicants.  |   | Type  | Level |   |
|  |   |   |       |   |
| <b>Recommendation/decision</b> Include any risk mitigation strategies to manage any identified risks with employing candidate. Consider effects on community and the Association, reasonableness, practicality of managing risks etc.) |   |   |       |   |
| <b>Signed – Manager</b>  |   |   |       | <b>Date:</b>                                      |
| <b>Approval (if required)</b><br><b>Signed – Executive Committee chair/delegate</b>  |   |   |       | <b>Date:</b>                                      |

# Remote Working

## Intent

BRWONZ acknowledges its obligations as an employer under the Health and Safety at Work Act 2015 and will work with staff to support their safety and wellbeing while remote working.

This policy sets out the responsibilities and processes that apply with remote working. It applies in conjunction with other Organisation policies like Health and Safety and Privacy and Information Management.

## Requirements

When working from home staff are subject to the same standards and will have access to the same rights and entitlements as if they were based in an BRWONZ workplace. They must comply with Organisation policies and procedures as follows:

Work from home/remote working arrangements must be agreed between staff and the Organisation and recorded in writing (eg employment agreement or variation). Arrangements will cover matters like:

- access to files, policies, procedures and technology
- equipment for the mahi
- hours of work/mahi
- supply and use of technology (eg zoom, teams, phone, texting)
- how safety and wellbeing will be monitored
- responsibility for work-related expenses
- updates about the staff member's health status.

A copy of the arrangement/agreement will be given to the employee(s) and a record kept on their personnel file.

## Responsibilities while working from home

### Staff

While working remotely, staff must:

- comply with Organisation policies and procedures, Code of Conduct etc
- keep BRWONZ informed about their health status, hazards and risks
- meet the costs of general utilities (use of internet, power, gas) unless otherwise agreed
- take all reasonable steps to safeguard their health and safety
- work in the manner agreed with the Organisation

- keep all work information secure especially personal information and any other sensitive material
- take reasonable care of BRWONZ's property (eg hardware provided)
- use Organisation-approved communication tools (eg Microsoft Teams, Zoom) for work purposes
- be available during usual working hours for contact with other members of the Organisation via video calls, phone calls, emails or messaging apps
- use secure internet connection and Organisation approved security software.

## Board

The Board will tautoko remote working as agreed with staff. It will ensure that staff:

- have the equipment and access to technology they need
- are supported with their performance through regular check-ins and feedback
- are consulted about relevant workforce developments and health and safety matters
- are not disadvantaged in their employment by working from home.
- are safe and have access to the support and supervision they need for work-related duties.

## Health and safety

For health and safety purposes, the employee's remote location is considered their workplace.

Staff must take personal responsibility for their safety and wellbeing while working remotely and will be supported by the Board. They must comply with BRWONZ's health and safety policies including the following:

- have a safe and suitable workspace at home they can use
- take regular breaks
- have an appropriate ergonomic setup to prevent strain and injury
- report any health and safety concerns to the Manager/Board immediately including concerns about potential stress
- work with the Manager/Board to address health and safety concerns (including to eliminate hazards and properly assess and manage risks)
- have contact numbers and a plan in place for an emergency
- have access to First Aid equipment and supplies.

## Board and Management

The staff, volunteers and Management will liaise with the Board about health and safety matters. They will:

- monitor and manage health and safety matters for operational staff and volunteers
- consult with staff about health and safety matters
- ensure that a record is kept of all hazards (Hazard and Risk Register)
- eliminate hazards to the extent possible
- if a hazard is unable to be eliminated, substituted or isolated, mitigate/manage risks
- monitor hazards and the effectiveness of any controls that are applied.
- maintain a record about controls in the Hazard and Risk Register.

# Grievance and Disputes



## Intent

This policy guides the resolution of disputes between staff (paid and unpaid BRWONZ members) and [employment relationship problems](#). It does not apply to:

- a dispute or conflict between BRWONZ and a contractor
- disputes at governance level (see governance policy).

Our aim is to avoid escalation of disputes and to support the early resolution of concerns and problems between staff or with the Board and Management.

## Requirements

### Informal approach

Staff, including volunteers, are encouraged to resolve their issues directly and as soon as possible with the person concerned. If necessary and appropriate, the Manager, another colleague, or a member of the Board, will offer to support them ("the complainant") in seeking resolution (eg through coaching).

### Formal approach

A formal approach to the Board and Management will be appropriate if:

- the complainant is not comfortable with a direct and informal approach
- the seriousness of concerns make an informal and direct approach inappropriate
- if the informal approach doesn't resolve the concern/problem.

Where there is concern with a member of the Board or Management that has been unable to be resolved, a formal approach to the Board will be appropriate.

The [Protected Disclosures \(Protection of Whistleblowers\) Act 2022](#) will apply when serious wrongdoing is alleged by a staff or volunteer against another.

The formal process will involve the following:

1. Receipt of concern/complaint
2. Acknowledgement of complaint in writing/email within 5 days of receipt to the complainant
3. Information gathering about issues in dispute to decide the best way to resolve concerns



4. Decide and implement a process to resolve concerns, for example:
  - follow-up with those in the dispute (disputants) by the next level up (eg the Board and Management, Board chair)
  - referral of dispute to mediation
  - arrange a facilitated meeting with those involved
  - appointment of external person to investigate and help resolve issues
  - investigate and report on the cause of the incident
  - implement the Disciplinary process for misconduct allegation(s).
5. The process used will protect the rights of disputants to [natural justice](#), will aim to restore positive and productive working relationships and achieve a sustainable resolution of concerns.
6. Disputants will be kept informed throughout the process and advised of their rights including the right to access and engage support.
7. When applicable, staff will be advised of external options to address concerns (eg [Human Rights Commission](#); [Personal Grievance process](#)).

## Health and Safety Complaint

Staff and volunteers should raise any health and safety concerns they have with the Board or Management.

The concern must be entered in the Hazards and Risk Register and addressed as a health and safety matter. Staff and volunteers will have the opportunity to participate in the process.

## Recordkeeping

The Board and Management will ensure a record is kept of all complaints raised with them, including those that are informally resolved and steps taken in the formal process.

## Appeal process

If a complainant or other party is unhappy with the process or outcome, they may appeal in writing outlining their reasons.

The Board and Management will review the process and outcome or, in the interests of fairness and transparency, may ask another person who is independent of the complaint and the process to conduct the review.

## [Employment-related disputes](#)

An issue or concern with a management decision or action should be raised as soon as possible with the Board and/or Management or, with the Board Chair (if the complainant is not comfortable dealing directly with the Board and Management or it is a governance issue).

The concern may be raised verbally or in writing with the Board and Management. It must be in writing if addressed to the Board Chair or other Board member if the grievance concerns the Board Chair.

In most circumstances, a meeting will be held to deal with the issue. Parties will be entitled to bring support to the hui, for example, union or legal support.

The outcome(s) of the hui will be recorded in writing with each party provided a copy.

## Assistance under the Employment Relations Act 2000

If an employment-relation problem cannot be satisfactorily resolved through hui and discussion, assistance may be sought under the [Employment Relations Act 2000](#) from:

- the [Labour Inspector](#) (e.g where an issue concerns a minimum entitlement, refusal of domestic violence-related request)
- [mediation](#), or
- [a determination from the Employment Relations Authority](#).

If an issue concerns the interpretation or operation of a collective contract, other parties to the contract must be notified of the dispute.

## Grievances

If there are grounds, a complainant/disputant may pursue [a personal grievance](#) under the Employment Relations Act 2000. This is not available to a contractor. The grievance must be filed with the Employment Relations Authority within 90 days of when the concern arose (i.e date when decision or action by the Manager or Board).

Assistance with resolving a grievance relating to unlawful discrimination, sexual and racial harassment may also be sought from and provided by the Human Rights Commission eg information, advice, and mediation.

# Disciplinary Action

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## Intent

Staff must work in a professional and competent manner. This includes refraining from behaviour, which while it may not occur during work time, could adversely affect the functioning or reputation of BRWONZ.

We respect the rights of our staff to a fair and unbiased investigation and will be fair and reasonable when responding to concerns about poor performance and allegations of misconduct. For example, we address lesser misconduct with lighter disciplinary measures while more serious misconduct may lead to a dismissal.

## Requirements

### Unsatisfactory performance concerns

Performance issues will be addressed with staff when they arise, even if they seem minor. This will usually be through feedback.

Care will be taken to help staff understand:

- the nature of the under-performance
- the steps required to improve it
- the length of time they have to improve
- the repercussions of continuing under-performance.

However, significant and ongoing performance concerns will be dealt with formally. The employee will be:

- notified of the concerns in writing
- invited to meet with the relevant Organisation delegate to discuss concerns
- advised they may bring a support person or an advocate to the hui.

### Improvement plan

A plan may be agreed with the employee to deal with the performance concerns. The plan must be dated, agreed and signed by them. It will state:

- the performance issues to be addressed
- how improvement(s) will be demonstrated, and
- a timeframe to improve.

Training and support for the employee may also be covered.

The staff member will be given a copy of the plan and a copy will be retained for their file. Depending on the circumstances, a first warning letter may also be issued.

The plan will be regularly monitored and reviewed.

Disciplinary action may be taken if improvement does not occur within the agreed timeframe, or if improvements are made but are not sustained for a reasonable period.

## Preliminary investigation

Where misconduct is alleged, a preliminary investigation will be undertaken to ascertain whether there should be a further investigation. The staff member(s) involved, will be informed in writing of the allegation if it is decided that further investigation is warranted.

## Further investigation

The investigation must be fair, unbiased and consider each alleged incident of misconduct. The extent of the investigation will depend on the circumstances but will be proportionate to the seriousness of the allegation or performance concern and the potential consequences.

The investigation of a misconduct allegation will be conducted by a person who is able to be impartial in the matter.

An external person will be employed for complex investigations or where no one in our Organisation can provide an impartial perspective.

## Address risks

Risk of information being destroyed or people being harmed while the investigation is underway will be assessed and steps taken, as necessary, to address any risk. For example, property and files may be re-located, a change in duties negotiated with the staff member whose conduct is being investigated.

## Suspension

In limited circumstances, such as where an employee's continuing presence at work would impede an investigation or pose an immediate health or safety risk, it may be necessary to suspend the staff member concerned.

Unless delaying a decision would be dangerous to an employee or others, the person will first be informed about the proposed suspension and given an opportunity to comment. The Board or Management will make a final decision after considering the employee's response.

If the suspension proceeds, it will be on normal pay unless otherwise specified in their employment contract. The period of suspension will only be for the time necessary to investigate the alleged misconduct.

## Right of reply

Information from the investigation and the outcome of the investigation will be shared with the staff member but with our Privacy and information management policy complied with. They will be notified in writing of the initial findings including whether misconduct or serious misconduct occurred. A timeframe will be given for their reply.

A meeting will be held to discuss the initial findings. Staff will be encouraged to seek legal advice and bring support and/or a union or legal advocate.

Staff feedback on the findings will be carefully considered and any new facts or issues they raise duly considered.

Once a final determination is made about misconduct, the staff member will be informed of the proposed disciplinary action and given an opportunity to comment. Their feedback will be considered with an open mind before a final decision is made about the type of misconduct and what disciplinary action should be taken.

## Misconduct versus serious misconduct

The decision about whether misconduct or serious misconduct occurred will depend on the particular circumstances of a given case including:

- whether it was repeated behaviour
- any combination of behaviour
- the harm caused or potentially caused
- how requests to desist were responded to.

### **Misconduct includes, but is not limited to, the following:**

- failing to obey lawful and reasonable instructions
- failing to properly follow policies, procedures and rules
- failing to share relevant information
- unacceptable disruptive behaviour
- unauthorised absence from the workplace
- repeatedly being late for work without lawful excuse.

### **Serious misconduct includes, but is not limited to, the following behaviours:**

- theft, dishonesty and fraud in the course of employment
- violence and assault
- intoxication at work
- use of derogatory, violent or abusive language
- failure to observe safety rules causing danger to self and others
- failure to declare a conflict of interest causing undue risk to the organisational integrity
- obscenity

- criminal conduct including conduct that, if proven, renders the person unfit for work
- sexual or racial harassment
- bullying and deliberately aggressive conduct towards a colleague
- breach of professional boundaries with the service user/participant

## Disciplinary Action

Disciplinary action for misconduct and unsatisfactory performance must be fair and proportionate to the finding of misconduct or unsatisfactory performance. Any, or a combination, of the following may be taken:

- **Remedial strategies** such as counselling, coaching, training and agreed change of duties.
- **A verbal warning.** This is appropriate for a less severe disciplinary breach. The purpose is to correct behaviour or performance. The warning must state the grounds for concern and the likely consequences of non-improvement.
- **A written warning.** This is appropriate where the disciplinary breach is more severe or a previous verbal warning has been given. A written warning must:
  - Outline the unsatisfactory conduct or behaviour
  - Refer to any previous relevant verbal/written warnings and any explanations offered
  - Identify steps to be taken to rectify the problem
  - Outline the consequences if the steps are not taken, which may include dismissal without notice
- A decision to end a contractual arrangement or dismissal of an employee. This may be appropriate in severe instances or where there has been a pattern of unsatisfactory performance or conduct
- Dismissal of a staff member may be with or without notice. Reasons must be given in writing.
- Summary dismissal (ie dismissal without notice) will be warranted where serious misconduct is found. The employee must be informed of the decision, given the opportunity to have support present, given reasons and asked to leave the premises immediately. Details will be subsequently confirmed in writing.

## Recordkeeping

A copy and notes of the disciplinary action and processes, including the staff member's response to allegations and feedback on the proposed disciplinary action, will be kept on their file and kept confidential.

# Equity & Diversity

## Intent

BRWONZ recognises that inequality and discrimination occur in many forms. We respect and comply with the [Human Rights Act 1993](#) and other laws addressing discrimination, harassment, and inequality.

This policy outlines our expectations of safety, equity and inclusiveness in the workplace and guides how to raise issues of discrimination and harassment.

## Definitions

**"Bullying"** is behaviour directed at a person or group in the workplace that can cause physical and psychological harm. It is unreasonable and usually repeated behaviour and includes victimising, humiliating, intimidating or threatening a person.

**"Cultural competency"** refers to the ability to interact with others with due regard to differences of beliefs, culture, gender, age etc. It requires a self-awareness of the biases, assumptions, stereotypes, and prejudices we hold and that they affect our interactions and ways of working.

**"Discrimination"** refers to unequal treatment based on a prohibited ground that may be direct or indirect or result from a structural bias. It includes adverse treatment of a person because they have suffered family violence, or because of their union involvement.

**"Harassment"** is unwelcome verbal or physical behaviour or conduct (including displaying visual material) which is either repeated or of such a significant nature, that it causes offence, humiliation, fear, or intimidation of another person in the workplace. It may or may not be intentional.

It may involve behaviour ranging from emailing, texting and social media posts through to the use of physical force. It includes sexual harassment, racial harassment and bullying.

**"Prohibited ground"** - refers to grounds listed in [s21 of the Human Rights Act 1993](#) and the equivalent in the [Employment Relations Act 2000 \(ss103-105\)](#)

**"Sexual harassment"** involves inappropriate sexual behaviour or displays in the workplace that cause fear, intimidation and detriment. It includes a direct or indirect request to a staff member for sexual contact or activity that contains:

- An implied or overt threat of detrimental treatment, or
- Threat to current or future employment status, or
- A promise of preferential treatment behaviour that is unwelcome or offensive to a staff member and
- Is repeated or significant enough to have a detrimental effect on their employment, job performance or job satisfaction.

**"Racial harassment"** involves behaviour or use of language and visual displays that directly or indirectly express hostility against, or brings another person into contempt or ridicule because of their race, colour, ethnic or national origins and is likely to be unwelcome or offensive to that person (whether or not it was conveyed directly to them).

## Procedure

### Non-discriminatory employment

Recruitment and appointment practices and decisions will comply with the [Human Rights Act 1993](#) and the [Employment Relations Act 2000](#). They will not involve:

- [any form of unlawful discrimination](#) in the course of duties nor induce or attempt to induce others to do so
- victimisation, harassment or intimidation of anyone on a [discriminatory ground](#) or other circumstances.

Cultural competency will be encouraged through staff training, promotion of Te Reo Māori and performance development initiatives.

### Equity measures

BRWONZ will take all reasonable steps to facilitate access by and inclusion of Deaf, disabled and neurodivergent people in our staffing and operations. This may include:

- Staff training
- Reasonable accommodations to support staff with disabilities

We will ensure that no staff member is subject to unfavourable treatment if they choose to disclose a disability or a neurodivergent condition.

### Bullying and harassment

Bullying and harassment are hazards that will not be tolerated in work-related contexts including sexual and racial harassment and bullying behaviour and harassment directed at gender-diverse staff and disabled staff.

We will manage the risks of bullying and harassment carefully through strategies like staff training, our grievance process and standards of behaviour our community work. The efficacy of controls will be monitored and regularly reviewed.

### Speaking Up

Anyone who experiences or sees others bullied, discriminated against or harassed because of race, gender identity, sexuality, religion or another prohibited ground will be encouraged to speak up and report the behaviour to the Board /Manager.



If staff do not feel comfortable reporting concerns to the Manager, they may report their concerns to the Board Chair or may choose to take their concern to an external body like the Human Rights Commission.

There are both internal and external avenues for raising and resolving discrimination concerns:

### **Internal options**

Community/third-party concerns about discrimination or harassment within BRWONZ should be raised directly with the Manager, Board or through our complaints process.

Concerns from staff about discrimination or another breach of this policy, should be progressed following the Grievance and Dispute policy and process. The Incident Management process may also apply.

The Manager or Board will ensure that all concerns are taken seriously, promptly acknowledged and followed up. Complainants will be offered support.

The rights of staff who are the subject of a complaint will be respected. Due process and the [Principles of Natural Justice](#) will apply.

Any form of harassment, discrimination, or retaliation directed against a person who makes a complaint will not be tolerated.

### **External options**

A complaint about discrimination or some forms of harassment in employment or the provision of services may be made to the [Human Rights Commission](#).

Discrimination may also be a ground for a personal grievance by an employee.

# Privacy and information management



## Intent

Personal information collected in the course of our activities from staff, volunteers and others will be treated respectfully and carefully. The law and regulatory standards will be complied with.

This policy outlines BRWONZ's approach to protecting personal information and managing other categories of business information. It includes the cybersecurity controls the Organisation applies.

## Definitions

"Confidential information" may include, but is not limited to:

- information about the Organisation's operations, strategy, contracts, and financial records
- commercial information about the Organisation or held by the Organisation about others
- leadership or third-party documents, emails and information
- 'internal use only' or 'limited circulation' documents and information.

"Personal information" is information about an identifiable, living human being. It includes health information and all other types of information whether paper, digital, or electronic which identifies a person.

## Requirements

### Liaison and training

The Chair or Manager if appointed, will:

- act as the Privacy Officer for the Organisation and fulfill the responsibilities of [s201 of the Privacy Act 2020](#)
- ensure that contractors understand and will comply with their obligations under the [Privacy Act 2020](#)
- collect and deal with the personal information of staff and volunteers carefully and responsibly
- ensure that anyone employed by the Organisation in the future [is sufficiently trained to](#) comply with this policy and the [Privacy Act 2020](#).

## When and how we collect personal information

Personal information may be collected about people in the course of preparing and providing BRWONZ activities/services. It will be collected in a fair manner with due regard to the person's abilities, level of maturity, language needs and privacy preferences.

Personal information will only be collected for legitimate purposes. If non-identifying information would suffice, we will collect and use that in preference to personal information.

When personal information is collected from people they will be informed of:

- The reasons for collecting it
- When it might be disclosed
- Who will have access to it
- What information the Organisation will hold about them
- How their personal information is used and kept secure

The person providing the information will be asked to consent to it being collected, stored and used for Organisation activities.

Personal information provided by third parties will, wherever practicable, be checked for accuracy with the person concerned (eg referral information).

## What we do with personal information

Personal information will only be used for the purposes for which it was collected (eg emails, training). We do not use it for any other purpose except if authorised by law.

Personal information will be securely disposed of once it is no longer required and provided there is no legal requirement to keep it (eg financial records).

## Safety and security of personal and confidential information

The following safeguards will be applied to keep personal and confidential information secure:

- It will be stored securely (eg as a password-protected electronic record.) It may only be accessed by staff or volunteers on as-necessary basis
- personal information will not be discussed or stored in public
- paper records will be scanned and stored electronically. If this is not reasonably practicable, paper records containing personal information will be kept in a secure place (eg locked filing cabinet)

- when sharing information, all due care will be taken to transmit the information securely to the intended recipient
- staff or volunteers will be advised when information is confidential and will understand the obligation to keep the information secure
- personal information will only be accessible to others on an authorised basis (eg person consents).

Personal information that is held and stored electronically will be safeguarded as follows:

- password/login system for secure access
- a screen saver programme to minimise risk of unauthorised access to files
- regular back-up of records with recovery of information from the back-up tested regularly
- terms and conditions of software or database to which personal details are input are complied with
- a person's data is not left on an unattended screen or left open when other people are present
- anti-virus software is installed and run regularly.

## Retention and disposal of personal information

Personal information will be kept for as long as necessary and required by law.

Reasonable care will be taken to safeguard privacy during the disposal process and where possible, the personal information (on our hardware and any third party service used for backup or storage) will be irretrievably destroyed. If irretrievable destruction is not possible, arrangements will be made to prevent access.

## Disclosure of personal information to others

Personal information will not be disclosed for trade or commercial purposes. It will only be shared with others with the consent of the person concerned or when allowed under law (eg to protect a person from serious harm).

## Access to personal information

If a person wants to check and access their information, they will be given access within 20 working days of request unless there is good (lawful) reason to decline the request. They will be advised they can request a correction of their information.

Personal information in this context does not include information relating to people other than the requester. Safeguards will be applied to protect personal information of third parties during the process of accessing personal information.

## Breach of privacy

If personal information is wrongly released or privacy is breached in another way, The Organisation will take immediate steps to contain the breach (eg change access code; shut down activity) and to notify affected people and the Privacy Commissioner if serious harm is caused or may be caused from the breach.

The privacy breach will be investigated to ascertain the cause and prevent a recurrence.

## Business/tax records

Business records will be managed in compliance with the law.

The following financial records will be maintained and kept for income tax purposes for a seven-year period:

- receipt and payment account books
- bank statements
- invoices (including GST tax invoices)
- receipts
- documents necessary to the confirmation of entries into our accounts (eg charts, codes of accounts, programme specs, contracts)
- interest and dividend payment records.

Records contain sufficient detail to enable a complete audit trail.

When records are stored in paper form, they will be printed off and stored in a secure location that is accessible for audit purposes.

## Wages/salary and time record

A record will be kept for each staff member of the following:

- name
- age if under 20 years of age
- postal address
- the kind of work in which they were usually employed
- whether employed under an individual or collective agreement
- the title and expiry of any applicable collective agreement and the employee's classification under it
- the number of hours usually worked in a pay period and the pay for those hours
- entitlements to leave including for public holidays, annual leave, sick leave and when leave was taken and paid out
- details of any employment relations education leave taken.

The wages and time record must be written or easily convertible to written form (eg wages record, or roster).

Personnel files must be kept for at least six years and pay and leave records for seven years after an employee leaves.

A copy or extract from the record will be provided on request during their employment or in the six years after the end of employment.

## Preference for electronic storage

Where possible, records, including paper documents, will be stored electronically. Legal criteria will be met including that:

- the electronic form maintains the integrity of the information
- the information is readily accessible and usable eg for subsequent audit purposes
- the backup and recovery procedures are sufficient to ensure the electronic records are accessible for a requisite period (eg 7 years for financial records).

## Security

The electronic records system in which business and personal information is stored will be secure against unauthorised access, loss, accidental destruction and corruption:

- the system, including archived records, will only be accessed by the Manager or Board delegate
- there will be a robust system for backup and recovery of records
- sensitive and classified electronic records the Organisation holds will be appropriately safeguarded (eg passwords, restrictions on access etc)
- user accounts, passwords and system access rights (for staff and contractors) will be reviewed regularly (at least once every six months)
- as above, personal and confidential information on hardware and any third-party service used for backup or storage will be destroyed before disposing of the hardware itself.

# Health and Safety

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## Intent

BRWONZ will ensure the safety and wellbeing of staff and volunteers through careful risk management and by supporting staff and volunteers to take reasonable care of themselves and others from harm during work.

This policy outlines how we give effect to our obligations under the [Health and Safety at Work Act 2015](#) and associated regulations.

## Definitions

### “Common Hazards”

- **Ergonomic Issues:** Poor workstation setup can lead to musculoskeletal problems.
- **Isolation:** Working remotely can lead to feelings of isolation and loneliness.
- **Mental Health:** Increased stress and burnout due to lack of separation between work and personal life.
- **Electrical Safety:** Ensure all electrical equipment is in good condition and used safely.
- **Fire Safety:** Keep your workspace free from fire hazards and have a fire extinguisher nearby.
- **Emergency Preparedness:** Ensure there is access to First Aid and a plan for emergencies, including natural disasters.

**"Incident"** refers to an adverse event which causes or could have caused injury, illness, death, damage to reputation, equipment, vehicles, property or the environment. It includes near-misses and events involving:

- aggression
- a fire or explosion
- a vehicle accident
- any other notable event.

## Responsibilities

The Board will oversee health and safety through health and safety updates and regular reporting of risks and incidents, and at least, once every six months, review the Hazard and Risk Register and follow up on incidents.

The Board and/or Management will:

- regularly review and update the Remote Working policy to reflect good practice in health and safety
- in consultation with the Chair, report notifiable events and [notifiable incidents and injuries to WorkSafe](#)
- ensure that all incidents and injuries that occur in the course of work are investigated and that appropriate corrective actions are taken
- keep track of and take reasonably practicable steps to eliminate risks or if not possible, to manage them
- ensure that contractors are adequately briefed on health and safety risks and controls when they are engaged
- keep a record of hazards and risks and strategies to mitigate and manage them (Hazard & Risk Register) and provide this to the Board every six months
- keep the Board sufficiently informed of risks and mitigations and work incidents
- establish procedures for dealing with emergencies that may arise
- take such other measures that are necessary to fulfill our obligations under the [Health and Safety at Work Act 2015](#).

## Staff responsibilities

- Maintain a safe and ergonomic workspace.
- Follow health and safety guidelines provided by BRWONZ
- Report any health and safety concerns to the Manager
- Participate in health and safety training and meetings.

## Procedures

The Manager will ensure staff and volunteers are properly informed about their duty to keep themselves safe and prevent harm to themselves and others including to keep safe from common hazards of remote work.

A hazard and risk record will be maintained and monitored. It will include strategies to manage common hazards that are relevant to remote working staff or volunteers.

Risks will be properly managed through the application of controls if they are unable to be eliminated.

Staff, volunteers and anyone else we work with will be encouraged to participate in the identification of hazards and to report them to the Manager.

The Remote Working policy addresses the Organisation's health and safety responsibilities in the workplace. The Manager will ensure this policy is regularly reviewed and updated to ensure it provides the necessary support for health and safety.



Safety and wellbeing will be addressed in supervision with staff and will be a standing item on the Board meeting Agenda.

The Organisation will provide necessary tools and resources to support a safe remote working environment.

Training and information on health and safety topics like ergonomic setup, mental health awareness, and emergency preparedness will be offered to staff.

Frequent check-ins and team meetings will be organised to discuss health and safety concerns and provide support where remote working is adopted.

## Incident management

- Staff and volunteers must report any health and safety concerns or incidents to the Manager immediately.
- If possible, the site of an incident must be protected to enable an investigation of the incident.
- The Manager will investigate all reported incidents to determine the cause and prevent recurrence. Staff, volunteers and anyone affected by the incident will be given the chance to participate in the investigation and development and implementation of corrective actions.
- Staff and volunteers will be informed of the outcome of the investigation and follow-up.
- [Notifiable events](#), including [notifiable injuries and illnesses](#) (i.e serious injuries and illnesses) that arise in the course of work will be [reported to Worksafe](#) with the fastest means available used:
- Telephone 0800 030 040
- Complete the online [Notifiable Event notification form](#)

If a verbal report is made to Worksafe, the Manager will provide a written report about the incident within 48 hours of its occurrence.

They will ensure that a copy of the report and any other documents relating to the incident are kept on file for at least five years or for a serious injury or accident, 10 years.

## Support for affected employees

Staff affected by an incident will be offered support such as access to supervision and debriefing.

## Recordkeeping

Records must be kept of the following:

- Discussions about health and safety at staff and Board levels
- Hazards, risks and controls

- Incident details and follow-up
- Notifications to Worksafe
- Health and Safety guidance issued to staff

## Business Continuity Plan

Our plan to deal with a disaster or other emergency is as follows:

### Within 24 hours (initial response)

|                     |  |
|---------------------|--|
| Safety Check:       | Check in on the safety of each staff member.   |
| Information Access: | Access relevant emergency sites for information and guidance (e.g., Civil Defence).  |
| Communication:      | Liaise with staff and other Organisation members to ensure they are notified of the disruption and to reschedule activities as needed. |
| Notification:       | Notify the funding agency if contracted services are disrupted.  |
| Assessment:         | Assess when business operations may be resumed.  |
| Backup Records:     | If ICT systems are down or inaccessible, access backup records and manual records will be used until systems are restored.             |

### Short term (up to one week)

|                         |  |
|-------------------------|--|
| Impact Assessment:      | The impacts and extent of the disaster or emergency will be assessed to inform next steps. Liaise and comply with the instructions of Civil Defence and/or other relevant agencies.                    |
| Relocation:             | If necessary, Organisation records and assets will be moved to ensure safety and security.   |
| Communication:<br>pause | Stakeholders will be informed of Organisation plans to resume or activities. Schedule regular check-ins with staff to discuss any issues or concerns related to their work environment and well-being. |
| Insurance:              | Staff will arrange for insurance cover as necessary.   |

### Ongoing (beyond one week)

|                             |   |
|-----------------------------|---|
| Recovery<br>Implementation: | A long-term recovery plan will be implemented to support the Organisation to return to normal operations. |
| Plan Review:                | Review and update the business continuity plan based on lessons learned from incident.                    |

# Accident and Incident Register

Record the accident or incident, including a near miss, in the register below.

| 1. Date & time of occurrence   |      | Details<br>Outline incident or near miss, including location and people involved. | Immediate action taken?        |     |    | Next Steps                                   |
|--------------------------------|------|---|--------------------------------|-----|----|--|
| Date                           | Time |   | ACTION                         | YES | NO |  |
|                                |      |   | First Aid                      |     |    | Does incident require Worksafe notification? |
|                                |      |   | Corrective Action              |     |    | Should this incident be investigated?        |
|                                |      |   | Update  review hazard register |     |    | Is more follow up needed?                    |
|                                |      |   | Controls in place              |     |    | Is debriefing and review necessary?          |
| Follow-up notes (if required): |      |   |                                |     |    |  |

| 2. Date & time of occurrence   |      | Details<br>Outline incident or near miss, including location and people involved. | Immediate action taken?        |     |    | Next Steps                                   |
|--------------------------------|------|---|--------------------------------|-----|----|--|
| Date                           | Time |   | ACTION                         | YES | NO |  |
|                                |      |   | First Aid                      |     |    | Does incident require Worksafe notification? |
|                                |      |   | Corrective Action              |     |    | Should this incident be investigated?        |
|                                |      |   | Update  review hazard register |     |    | Is more follow up needed?                    |
|                                |      |   | Controls in place              |     |    | Is debriefing and review necessary?          |
| Follow-up notes (if required): |      |   |                                |     |    |  |

# Hazard and Risk Register

## Overview

| RELEVANT POLICIES:  | RESPONSIBILITIES:  | KEY:   |
|---|--|--|
| <ul style="list-style-type: none"><li>• Health and safety</li><li>• Worksite checking</li><li>• Risk Management</li><li>• Incident management</li><li>• Financial and property management</li><li>• Quality assurance and improvement</li></ul> | <p><b>Board</b> must monitor this register and review it at least once each quarter or more frequently, if necessary.</p> <p><b>Management or Board</b> must ensure this register:</p> <ul style="list-style-type: none"><li>• is kept updated and accurately records the risks and controls</li><li>• considered and reviewed regularly (eg a standing item in team meetings)</li></ul> | <p><b>Hazard/risk</b> – is the risk of something happening</p> <p><b>Risk Management</b> – describe how the risk is managed or substituted for a lower risk work method/controls or measures.</p> <p><b>Likely</b> – refer to the Risk Severity Matrix: Certain, Likely, Possible, Unlikely or Rare</p> <p><b>Impact</b> – refer to the Risk Severity Matrix: significant, Minor, Moderate, Major or Severe</p> <p><b>Severity</b> – refer to the Risk Severity Matrix: Low, Medium, High or Very High</p> <p><b>Review</b> – date and describe any changes made as a result of an incident or review.</p> |

Risk severity matrix

| <div>Risk Severity Matrix</div> <div>Establish the severity rating by using the following matrix.</div> |  |                | Potential Impact  |  |   |
|---|--|----------------|---|--|---|
|   |  |                | Minor injuries or discomfort, no medical treatment or measurable physical effects | Injuries or illness requiring medical treatment, temporary impairment. | Injuries or illness requiring hospital admission. |
|   |  |                | Not Significant   | Minor  | Moderate  |
| Likelihood  | Expected to occur regularly under normal circumstances | Almost Certain | Medium  | High   | Very High   |
|   | Expected to occur at some time                         | Likely         | Medium  | High   | High  |
|   | May occur at some time                                 | Possible       | Low   | Medium   | High  |
|   | Not likely to occur in normal circumstances            | Unlikely       | Low   | Low  | Medium  |
|   | Could happen but probably never will                   | Rare           | Low   | Low  | Low   |

# Register of hazards and risks

| IDENTIFICATION |                 | RATING   |  |   | MANAGEMENT   |             |
|----------------|-----------------|--|--|---|--|-------------|
| Hazard/risk    | Date identified | Likelihood<br>Almost Certain-<br>Likely-Possible-<br>Unlikely-Rare | Impact<br>Not Significant-<br>Minor-Moderate-<br>Major-Significant | Severity<br>Low-Moderate-<br>High-Very High | Risk management<br>Eliminate-substitute-<br>minimise-how | Responsible |
|                |                 |  |  |   |  |             |
|                |                 |  |  |   |  |             |
|                |                 |  |  |   |  |             |
|                |                 |  |  |   |  |             |
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|                |                 |  |  |   |  |             |
|                |                 |  |  |   |  |             |

# Event & Activity Management



## Intent

BRWONZ may organise and host events with their community, for example:

- Funded projects
- Forums, workshops and creative craft activities
- Cultural celebrations and social events
- Guest Speaker events
- collaborations with other stakeholders
- Markets and displays

Events may be conducted at third-party venues and in partnership with others. This policy provides general guidance on how risks with these activities should be managed.

## Responsibilities

**The Organisation** will ensure that:

- legal requirements of the Health and Safety at Work Act 2015 are complied with
- staff and other Board members are appropriately delegated and trained for their roles at events
- arrangements with suitable third parties address parties' health and safety responsibilities
- risks are properly managed
- everyone understands the process for raising concerns and complaints during and after an event.

Staff with roles in an event must participate in relevant training and briefings and comply with this policy.

## Requirements

### Risk assessment and management

When planning an event, the Organisation will identify hazards and assess the likelihood and severity of risks to:

- the health and safety of those involved in the event including likely attendees
- the Organisation's resourcing and strategy
- the Organisation's reputation.

An event may involve third-party venue hire and other parties who have their own health and safety policies and processes. Before the event, the Organisation will liaise with these parties to plan to manage risks. The plan will reflect the parties' understanding of:

- likely hazards and associated risks
- each other's Health and Safety responsibilities, policies and strategies
- training and induction needs of staff and attendees
- emergency and evacuation procedures
- standards of conduct that are expected of people involved in the event
- relevant legal requirements and prohibitions against unlawful discrimination and harassment under the Human Rights Act 1993
- how the parties will communicate during and after the event
- feedback and complaints mechanism both during and after the event.

The Organisation will ensure that a record is maintained of hazards, the nature and level of associated risk and planning for controls with an event. The record will be incorporated into an event Risk Assessment Management Strategy (RAMS) and will guide event preparations.

The event's Risk Assessment Management Strategy will be updated as new information emerges about hazards and risks.

## Event risk management

The Organisation will ensure that the event's Risk Assessment Management Strategy includes controls (ie measures to adequately address the risks).

Where, after the application of controls, there is significant residual risk, the Board /Manager will consider:

- if expertise should be engaged to address those risks
- if the event should be postponed until risks can be appropriately managed
- revision of the budget and/or event strategy
- cancellation of the event because of undue risk.

The event or activity will not proceed if the Board assesses that the risks cannot be properly managed and do not therefore approve the event's Risk Assessment Management Strategy.

## Event preparation (Health and Safety)

To prepare for any event organised or hosted by the Organisation:

- staff and/or volunteers will be adequately prepared for their role at the event (eg through training)
- everyone involved will be briefed about health and safety risks and measures including evacuation and emergency procedures
- a walk-around of the premises will be undertaken to ensure staff/ volunteers organising the event are familiar with emergency and evacuation processes and supplies
- attendee numbers will be checked or confirmed beforehand to ensure the maximum allowed for the venue is not exceeded



- arrangements will be made for the venue to be accessible to people with disabilities and/or experiencing health and other conditions.

## During an event

If reasonably practicable, a list of attendees will be compiled and checked off.

At the start of the event, attendees will be informed about health and safety matters, and emergency and disaster procedures, including access and egress and the location of the emergency evacuation assembly point.

Attendees will be reminded of their obligations to look after their health and safety, to avoid causing harm to others and informed about behaviour standards.

They will be advised of the process for raising concerns and complaints during and after the

## Staff role at event

Everyone involved in the event from BRWONZ must be mindful at all times that they represent BRWONZ.

Staff and other members of BRWONZ, may be given certain responsibilities at the event, for example:

- to co-ordinate and collaborate with other parties
- report harmful behaviour that they observe and/or are unable to manage
- monitor and check on the availability of food, water and low/no alcohol options throughout the event.

## Responding to anti-social behaviour

Anti-social behaviour during an event will be addressed by trained staff/volunteers or third-party personnel (eg Security Firm). We will aim to intervene early to prevent harm and the escalation of behaviour.

Staff/volunteers will NOT be expected to intervene with anti-social behaviour and behaviours that are prohibited under the Human Rights Act 1993 (eg sexual harassment) if:

- they have not been appropriately trained, or
- feel unsafe to intervene.

Staff/volunteers and anyone harmed by anti-social behaviour at an event will be offered appropriate support.

## Incident management

The Incident Management procedures in the Health and Safety policy will guide the management of an incident during an event.

## Documentation

The following shall be documented (eg Risk Assessment Management Strategy):

- the hazards and risks relating to the event and/or venue
- the controls and responsibility for implementing them
- record of any third-party's health and safety policy/process (eg venue owner; co-host)
- the documents and information we shared with a third party (eg the venue owner; or event organiser)

Event /Activity Risk Assessment Management Strategy (RAMS)

|  |                                     |           |                                  |   |  |
|--|-------------------------------------|-----------|----------------------------------|---|--|
| Event/Activity summary:                                    |                                     |           |                                  | Date:   |  |
| Location:  |                                     |           |                                  | Staff / Volunteer(s):   |  |
| RISK   | FACTORS THAT COULD LEAD TO THE RISK |           |                                  | REDUCE THE RISK<br>Eliminate   Isolate   Mitigate<br>(CANCEL IF RISKS CANNOT<br>BE REDUCED) |  |
|  | People                              | Equipment | Environment                      |   |  |
|  |                                     |           |                                  |   |  |
|  |                                     |           |                                  |   |  |
|  |                                     |           |                                  |   |  |
|  |                                     |           |                                  |   |  |
|  |                                     |           |                                  |   |  |
| Minimum skills required by staff/volunteers (if relevant): |                                     |           |                                  |   |  |
| National standards (if applicable):                        |                                     |           |                                  |   |  |
| Comments:  |                                     |           |                                  |   |  |
| Activity approved  | YES                                 | NO        | Managers/Board member signature: |   |  |

# Feedback and Complaints



## Intent

We will resolve complaints carefully, fairly and promptly and aim to learn and improve from the feedback we receive.

We will ensure people understand their right to complain and will aim to resolve issues and concerns early. We will respect complainants' privacy and a person's right to be treated with dignity.

This policy applies to feedback and complaints received about service delivery from the people we work with and external services. For guidance on dealing with staff grievances and conflicts see our Grievances and Disputes policy.

## Definitions

**"Complainant"** is a person who makes a complaint.

A **"complaint"** is feedback expressing dissatisfaction with the standard, type or way in which a service is provided, or not provided, changed or withdrawn. It may be a complaint about a breach of privacy.

**"Feedback"** includes positive and negative feedback, suggestions and compliments. It may be an informal complaint that provides the opportunity for improvement.

**"Privacy Officer"** - management acts as our Privacy Officer.

**"Stakeholder"** refers to the community members we work with as well as agencies and other people that have a stake or interest in BRWONZ.

## Principles for complaints resolution

These principles will be applied when dealing with complaints:

**Early resolution** - complaints will be addressed in an early and timely way to prevent undue escalation and deterioration of relationships. Ideally, complaints will be addressed as they are raised.

**Open and transparent** - we advise complainants of the process, expected time frames for the process, their likely involvement and possible or likely outcomes. We will be clear about what can and can't be done and pass on complaints about other organisations to them with the complainant's consent.

**Respect** – complaints must be promptly acknowledged. We will listen to the parties, safeguard their privacy and respect their views.

**Protection of rights** – parties to the complaint will be advised of their rights and given the information they need to exercise them including rights to:

- participate in the process
- access support and advocacy

- a fair and impartial investigation and decision
- not be adversely treated for making a complaint.

**Information** - the parties will be kept informed through the process and given reasons for the decision on the complaint. The information will be provided in a way that is understandable to each party (eg suited to language and preferred communication style).

**Support** - parties will be told of their right to access support and advocacy throughout the complaints process (eg family, community, union representation).

## Process

### Information provided to service users/participants

The complaints process is shown to every service user/participant as part of our engagement with them.

### Receipt of complaint

A complaint about BRWONZ may be made by an internal or external stakeholder ("complainant").

Whoever receives a complaint on behalf of BRWONZ will:

- confirm with the complainant whether they want their concern treated as a complaint and if they want it formally or informally resolved (see below for process)
- seek details of the complaint from the complainant in the manner they prefer and if it's verbally made, record and confirm the details with the complainant
- forward the complaint (without comment) to management/the Board.

### Resolution of complaint

The Board /Management will:

- ensure the principles for complaint resolution are applied through the complaints process
- ensure that receipt of the complaint is acknowledged within 5 working days
- enter the complaint in the Complaints Register (date and key details)
- discuss the complaint with appropriate people (eg a witness) to clarify the issue and agree the course of action to be taken based on the nature of the complaint
- if concerns can be quickly problem solved, try to informally resolve the complaint by engaging with the complainant and other appropriate people and agreeing on a course of action (for present and future)
- if concerns can't be quickly resolved, implement the formal complaint process to deal with the complaint
- if a complaint is vexatious, abusive or otherwise unreasonable and if so, decide and advise the complainant that no further action will be taken.

## The following steps will be undertaken for formal complaints

- Acknowledge the formal complaint in writing
- Contact the complainant to outline the general steps that will be taken, including timeframes, possible outputs of the process, and the limits of confidentiality
- Complaint investigated - relevant facts ascertained.
- The complainant and any staff involved will be kept informed of the process.
- Within 15 days of receiving the complaint, management will contact the complainant and any involved staff to discuss preliminary findings from the investigation. Feedback on findings will be carefully considered.
- A final decision on the complaint will be made and communicated to the parties within 21 days of receiving the complaint unless there is good reason for delay.
- The complainant and any involved staff or volunteers will be notified in writing of the decision and reasons.
- The complainant will be informed of external review options if they are not happy with the complaint outcome:
  - the Office of the Privacy Commissioner (if the complaint concerns privacy); phone 0800 803 909 Monday to Friday, 10:00 am to 3:00 pm)
  - a relevant professional membership organisation (ie one to which our staff belong)
  - the funding or regulatory agency.
- The staff member will be informed of any further action (as below).
- Once finished, the complaint will be marked as closed on the complaints register.

## Further action

### **Staff (misconduct allegation)**

If a complaint indicates misconduct by staff, the Disciplinary Action policy will apply. The rights of the staff member or volunteer concerned will be respected, in particular:

- their privacy
- their rights to natural justice (including right to know details of complaint, right of reply).
- their right to access support eg union advocate, personal support.

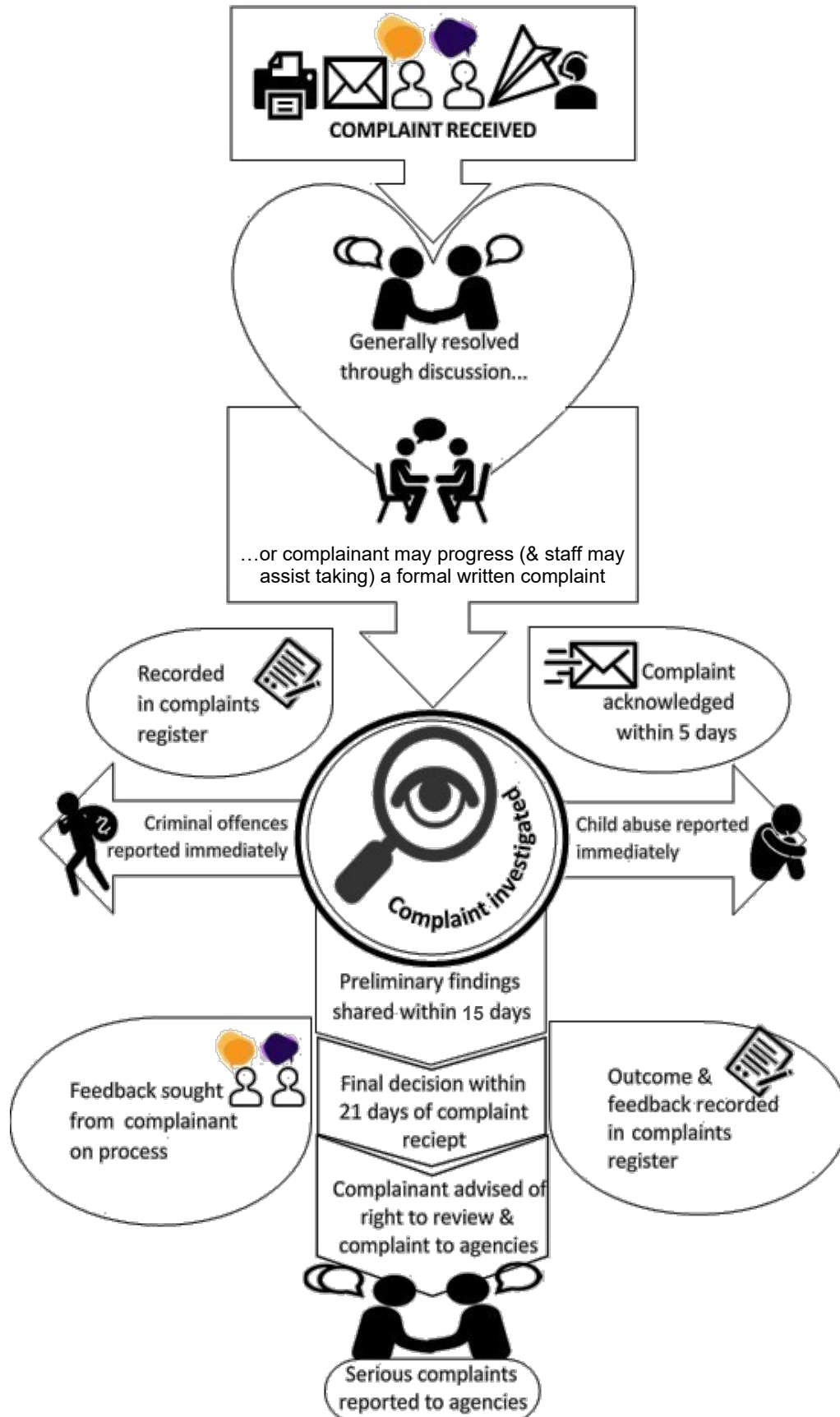
### **Learning and improvement**

Feedback and complaints will be seen as opportunities to learn and improve. Lessons from complaints will be shared with staff and appropriate change(s) made (eg staff training; amendment of procedure).

## Record management

- BRWONZ will maintain records of all complaints in the Complaints Register
- Records relating to formal resolution of complaints will be stored in individual files

## Complaints Process





# Complaints Register

|  |                      |
|--|----------------------|
| Date complaint received  | Summary of complaint |
| Complainant details<br><br>Name:<br><br>Email:<br><br>Phone:                                       |                      |
| Date complaint acknowledged<br>(within 5 days)   |                      |
| Complaints policy sent<br><div>Yes <input type="checkbox"/>      No <input type="checkbox"/></div> |                      |

|  |                      |
|--|----------------------|
| Date complaint received  | Summary of complaint |
| Complainant details<br><br>Name:<br><br>Email:<br><br>Phone:                                       |                      |
| Date complaint acknowledged<br>(within 5 days)   |                      |
| Complaints policy sent<br><div>Yes <input type="checkbox"/>      No <input type="checkbox"/></div> |                      |