



Australian Afghan Hassanian Youth Association Inc Corporate Governance Policy

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Part A Introduction

1. Who we are and purpose of Policy

- (a) The Australian Afghan Hassanian Youth Association Inc (**AAHYA**) is an association incorporated in New South Wales under the Associations Incorporation Act 2009 (NSW) and is registered with the Australian Charities and Not-for-Profits Commission.
- (b) AAHYA has a responsibility to manage its operations in the best interests of the community it serves. AAHYA aims to ensure good governance, accountability and transparency is embedded in its operations.
- (c) This Policy sets out the principles and procedures that AAHYA will uphold and implement to ensure public trust in AAHYA is maintained and our stakeholders have confidence in our operations.

2. Scope and responsibilities

- (a) This Policy applies to all members of AAHYA's committee of management (**Committee**), employees, volunteers, contractors and consultants (**personnel**). All personnel are expected to comply with this Policy, as applicable to their role.
- (b) It is the responsibility of the Committee to ensure this Policy and related procedures are implemented and monitored.

Part B Objectives and guiding principles

3. AAHYA's objectives

AAHYA's objectives, as set out in its Constitution are:

- (a) To address social and economic needs of young people in Australia who are at risk due to their experiences of torture and/or trauma in the context of their refugee journey, and are unable to have these needs met by their families due to poverty, helplessness, isolation and psychological health problems caused by exposure to trauma.
- (b) To establish community centres in Australia to enable more effective provision of direct relief and information to those who, due to their helplessness and isolation, are unable to access this information through usual, everyday means.
- (c) To provide material assistance to newly arrived refugees and migrants in Australia to relieve poverty and suffering caused by traumatic refugee experiences.
- (d) To develop and support social support groups for widows and other needy refugee women who are suffering from isolation, distress and physical and mental health problems caused by exposure to trauma and difficulties settling in Australia.
- (e) To provide educational assistance to needy refugee women and young people in Australia and overseas with the aim of alleviating poverty and distress through educational and employment outcomes, whether directly or through working with other charitable and not for profit organisations.
- (f) To provide direct material aid for orphans, widows and other needy persons in Australia and overseas with the aim of alleviating poverty and distress, whether directly or through working with other charitable and not for profit organisations.

- (g) To advocate with Australian, state and territory governments and non-government service providers to ensure needy Dari-speaking refugees are able to access assistance and services they require when they are unable to self-advocate due to lack of English language, lack of knowledge of Australian systems and general helplessness.
- (h) To provide access to culturally appropriate guidance to those in Australia in need of this service due to distress caused by experiences of trauma, refugee journeys and settlement challenges.
- (i) To establish and operate a fund or funds to carry out the objects set out in paragraphs (e) and (f) above (or either one of those objects).
- (j) To receive funds and to distribute those funds in a manner that best meets the objects of the association set out in paragraphs (a) to (h) above.
- (k) To undertake any other activities which are directly in furtherance of the objects set out in paragraphs (a) to (h) above.

4. AAHYA's guiding principles

Strategic decisions and operations at AAHYA are guided by the following principles:

- (a) **Transparency:** AAHYA aims to ensure that information related to its operations, decision making, finances, structure, policies, procedures and governance is transparent, accessible and communicated to relevant stakeholders.
- (b) **Integrity and accountability:** AAHYA aims to be accountable to all stakeholders, including to the people who benefit from our services (**beneficiaries**). The integrity of AAHYA is maintained through effective communication and open, transparent valuation of our work. AAHYA endeavours to communicate our successes and challenges with stakeholders.
- (c) **Effective leadership and good governance:** The Committee is responsible for ensuring that AAHYA is well governed and well managed and for AAHYA's overall performance, including putting in place policies and procedures so that good outcomes are able to be achieved for our beneficiaries.
- (d) **Risk management:** AAHYA strives to implement effective risk management oversight to ensure any risks are managed appropriately.
- (e) **Promotion of equality and diversity:** AAHYA is committed to promoting equality and diversity in all aspects of its work and the empowerment of individuals from marginalised groups. AAHYA will treat people equally regardless of gender or gender identity, race, religious or political beliefs, age, physical or mental health (including disability), sexual orientation, family and social background and culture, economic status or criminal background.
- (f) **Productive partnerships:** The development and maintenance of critical relationships and partnerships, including with donors and development partners, is essential to progress the objectives and work of AAHYA.
- (g) **Positive engagement:** AAHYA is committed to developing positive relationships with the communities in which we work, including providing opportunities for inclusion, feedback and complaints from our beneficiaries. AAHYA will apply principles of equality and diversity in this engagement.

- (h) **Environmental sustainability:** AAHYA strives to promote environmental sustainability and improved environmental outcomes in its activities, including through minimising the environmental impact of its internal operations.

Part C Governance framework

5. Committee

5.1 General responsibilities

The Committee is responsible for overall control and management of the affairs of AAHYA. To ensure that it properly performs this role, the Committee will:

- (a) Provide leadership through informed deliberation that sets AAHYA's values, strategic objectives and policies and procedures.
- (b) Ensure AAHYA's projects and activities are consistent with its objects.
- (c) Implement effective financial and risk management policies and procedures to ensure continued organisational viability and sustainability.
- (d) Approve an annual budget and the allocation of funding and resources to projects or activities.
- (e) Ensure that AAHYA has internal processes and controls for the effective monitoring of the organisation's financial position, including regular financial reporting to the Committee.
- (f) Establish effective controls and processes for monitoring AAHYA's performance, including regular reporting to the Committee about progress in achieving outcomes associated with each project, as well as information about any issues and how those issues are being managed.
- (g) Ensure that members and other key stakeholders are able to obtain accurate, timely information in relation to the organisation's affairs.
- (h) Develop productive relationships with partners, including approving the entering of any formal partnership arrangements and establishing procedures for conducting due diligence before partnerships are entered.
- (i) Develop the collective capabilities of the Committee and regularly evaluate Committee performance.
- (j) Oversee the development of organisational capability, including the recruitment and development of personnel, to ensure AAHYA has the capacity and capability to conduct its operations effectively.
- (k) Ensure that materials that AAHYA makes available to members of the public accurately describe the organisation and its work and satisfy the requirements of AAHYA's Safeguarding Policy in relation to the use of images of children.
- (l) Oversee the activities of the President in managing the day to day operations of AAHYA.

5.2 Role of the President

- (a) The President will chair the Committee.

- (b) In his role as chair, the President will be considered the “lead” Committee member and will utilise his experience, skills and leadership abilities to facilitate appropriate governance processes.
- (c) The President represents the Committee to AAHYA’s members and acts as a liaison between the Committee and other personnel.
- (d) The President is responsible for the management of Committee meetings.

5.3 Participation by Committee members

- (a) All Committee members will be provided with access to AAHYA’s information and personnel to enable them to carry out their responsibilities.
- (b) Committee members will actively engage in their role as Committee members including not only by attending Committee meetings but, as and when reasonably required, participating in other activities of AAHYA.
- (c) Committee members will discharge their duties in good faith and honestly and act with the level of skill, care and diligence expected of a member of a similar committee established under the Associations Incorporation Act 2009 (NSW).

6. Responsibilities of management

6.1 Appointment

The Committee appoints the President to undertake the day to day management of AAHYA.

6.2 Day to day management

The President will undertake the day to day management of AAHYA in accordance with the directions of the Committee. The President will report to the Committee to ensure that the Committee is able to oversee the President’s day to day management activities.

7. Transparency

7.1 Commitment to transparency

- (a) AAHYA is committed to being transparent in our work and accountable to our stakeholders and community.
- (b) We aim to disclose timely, relevant and accurate information on our website, where it may be viewed by our stakeholders, including our members and beneficiaries. We will:
 - (i) Publish this Policy on our website.
 - (ii) Publish key policies relevant to our external stakeholders on our website.
 - (iii) Publish each of our annual financial statements on our website, after it has been submitted to our members at an annual general meeting.
- (c) AAHYA will table our annual financial report at each annual general meeting of AAHYA’s members following the approval of that annual report by the Committee.
- (d) AAHYA will provide information about our achievements and challenges with our primary stakeholders, partners and donors.

- (e) AAHYA will provide information about formal partnerships with other organisations with our primary stakeholders and donors.
- (f) AAHYA will distinguish between our development and non-development objectives and activities, as set out in paragraph 8 of this Policy.
- (g) AAHYA will ensure that our financial accounts are audited by an external auditor annually.
- (h) The publication of materials or disclosure of information to members of the public must be approved by the President or personnel to whom the President has delegated that function.

7.2 Requesting information from AAHYA

- (a) Stakeholders and members of public may request information about AAHYA by using the [Contact Form](#) on our website.
- (b) Information that is confidential or commercially sensitive will not be disclosed in response to any such request.

8. Aid and development activities and non-development activities

8.1 Commitment

AAHYA is committed to ensuring that we accurately represent our activities through the separation of aid and development activities from non-development activities in our operations and to ensuring that funds and other resources designated for the purpose of aid and development will be used only for those purposes.

8.2 Aid and development activities

- (a) Aid and development activities are activities undertaken in order to reduce poverty and address global justice issues, via direct engagement through community projects and education, emergency management, advocacy, volunteer sending, provision of technical and professional services and resources, and promotion and protection of human rights.
- (b) AAHYA is committed to ensuring that funds and other resources designated for the purpose of aid and development are used only for those purposes. The concept of aid and development activities can be distinguished by the following principles:
 - (i) strengths based approaches which encourage people and communities to create solutions for themselves;
 - (ii) processes that seek to address the causes of poverty;
 - (iii) processes that seek to empower rights holders to claim their rights and ensure that duty bearers exercise their duties;
 - (iv) supporting systems and structures which enable people to move out of poverty; or
 - (v) humanitarian response and emergency relief, disaster recovery and meeting the immediate needs of refugees and internally displaced people.

8.3 Non-development activities

- (a) Non-development activities are activities which are not aid and development activities (as defined in paragraph 8.2 of this Policy). These include religious and political activities, which are described in subparagraphs (b) and (c) below.

- (b) Religious activities
 - (i) Religious activities are those activities that promote a particular religious adherence or are undertaken with the intention of converting individuals or groups from one faith and/or denominational affiliation to another.
 - (ii) AAHYA holds prayers and religious gatherings at its Muhammad Rasulallah Islamic Centre in Australia. For the purposes of making a distinction between aid and development and non-aid and development activities, any activities such as these whose objectives could be considered to include the promotion of religious adherence will be considered as a non-development activity and will be managed and accounted for separately by AAHYA.
 - (iii) AAHYA does not discriminate in the delivery of its services in Australia or overseas. Access to our services is based on need, regardless of the faith of the individual.
 - (iv) AAHYA may partner with faith-based organisations in Australia or overseas on the basis that their delivery is without evangelising or making participation conditional on conversion or adherence to a particular religion.
- (c) Political activities
 - (i) Political activities are those that are associated with facilitating or supporting a specific political party, candidate or party political organisation. This does not include advocacy which is aimed at persuading and influencing decision makers and opinion leaders, and is not aimed at promoting partisan political objectives.
 - (ii) AAHYA does not support activities that promote a particular political party, candidate or party political organisation.

8.4 Separation of development and non-development activities

To ensure separation of aid and development activities and non-development activities AAHYA will endeavour to undertake the following steps:

- (a) Ensure that information provided by it to the public, including fundraising information and communications with stakeholders, will distinguish between aid and development activities and non-development activities.
- (b) Assess all project proposals to determine whether they include non-development activity components and record the outcome of that assessment.
- (c) If a project involves components that are both aid and development activities and non-development activities:
 - (i) the non-development activity components will be managed, reported and accounted for separately to aid and development activity components; and
 - (ii) monitoring of the project will include monitoring of the separation of non-development activities from aid and development activities.
- (d) Before partnering with another organisation in relation to aid and development activities, determine whether the partner is engaged in non-development activities and, if so, how it manages and accounts for those activities separately to aid and development activities.
- (e) Ensure that funds raised for non-development activities will be tracked, managed, reported and accounted for separately to those raised for aid and development activities.

9. Donations acceptance or refusal

- (a) In soliciting donations from individuals or organisations, AAHYA will act with integrity and honesty, will not put undue influence or pressure on those from whom we are soliciting funds and will not mislead or knowingly give false information.
- (b) AAHYA may review and/or refuse donations that are not in line with its objectives or ethical standards.
- (c) AAHYA will refuse donations where:
 - (i) acceptance of the donation would be unlawful (for example, where AAHYA knows the donation is from the proceeds from crime or illegal activity);
 - (ii) the donor or donating organisation does not have values that are consistent with AAHYA's values or objectives;
 - (iii) the source of the donation is questionable, unethical or immoral; or
 - (iv) the donor restricts the donation to be used for activities that are outside AADO's objectives.
- (d) Some donations may need to be reviewed by AAHYA prior to acceptance or refusal. These include donations that:
 - (i) may have detrimental implications for achieving AAHYA's objectives or where the detriment is likely to be greater than the benefit;
 - (ii) are not financially viable or are from those deemed vulnerable;
 - (iii) are outside the plans and budgets of AAHYA;
 - (iv) would be difficult to utilise within a reasonable period of time; or
 - (v) have conditions attached that AAHYA may not be able to fulfil.
- (e) Only the President or Treasurer can review and/or refuse a donation. Records will be kept of decisions to accept or refuse a donation following a review under this Policy.

Part D Managing risk, partnerships and finances

10. Risk management

10.1 Introduction

- (a) AAHYA acknowledges that the work it undertakes in Australia or overseas may be impacted by risks and that risk management is essential to ensure AAHYA's activities are conducted in a safe and legal manner. AAHYA will prioritise safeguarding, financial transparency and good governance in its risk management procedures.
- (b) Examples of the types of risks that may impact on AAHYA's work in Australia and overseas include but are not limited to:
 - (i) health and safety risks related to AAHYA's beneficiaries, personnel, partners and visitors, including safeguarding and child protection;
 - (ii) social and cultural risks, such as community support and involvement in a project or cultural sensitivities that may affect project delivery or success;

- (iii) financial risks, including income generation, corruption and fraud;
- (iv) political risks, such as changes in the political or security situation in a foreign country in which we operate or changes to the foreign aid priorities of the Australian Government;
- (v) environmental risks, including natural disasters and environmental impacts arising from AAHYA's work or the work of its partners;
- (vi) legal and compliance risks, including compliance with laws and regulatory requirements that AAHYA is subject to in Australia or overseas; and
- (vii) capacity or human resources risks, including levels of staffing within AAHYA, internal capability and relationships with partners.

10.2 Risk management procedures

AAHYA aims to manage the risks associated with its programs and operations by implementing the following process prior to commencing a new project:

- (a) *Establishing the context and objectives:* Developing the scope and objectives of the project, identifying what factors may impact success and understanding who it may impact (for example, a project that involves working with children will need to be assessed for safeguarding risks).
- (b) *Identifying the risks:* Identifying what the risks are and in what circumstances they could arise having regard to the types of risks set out in paragraph 9.1 and any other risks that are relevant to the particular project.
- (c) *Analysing the risks:* Analysing the risks and the level of risk exposure, including by considering the following factors:
 - (i) the likelihood of the risk occurring;
 - (ii) the nature and severity of the consequences if the risk does occur;
 - (iii) the effectiveness of the existing controls that AAHYA has in place to manage the risk and mitigate any negative effects should that risk occur. An example of an existing control is the Working With Children Checks AAHYA conducts in accordance with its Safeguarding Policy to minimise safeguarding risks.

The risk rating that AAHYA will give following this analysis will reflect the likelihood of the risk occurring and the magnitude of the consequences.

- (d) *Evaluation and risk mitigation:* Determining whether the current level of risk is acceptable or not and, if necessary, developing risk mitigation strategies to reduce or eliminate the risk. The Committee will record the steps taken to reduce or remove risks in the minutes for the Committee meeting at which a new project is discussed.
- (e) *Monitoring and review:* Taking reasonable steps to monitor risk over the life of the project, including monitoring the effectiveness of risk mitigation strategies. There will be regular discussion of risks and receipt of reports about risks at Committee meetings.

11. Working with partners

- (a) AAHYA may work with partners in circumstances where partnership is mutually beneficial and will improve the quality of the services AAHYA delivers and the outcomes that may be

achieved for our beneficiaries. A **partner** for the purposes of this Policy means any organisation receiving AAHYA funding in Australia or overseas to deliver our services or implement aid and development activities, or is otherwise working in coordination with AAHYA in pursuance of a shared goal or where there is shared accountability.

- (b) Before partnering with a third party AAHYA will endeavour to undertake due diligence of the legal registration, reputation, experience and practices of that third party, which will include consideration of:
 - (i) the size of the organisation;
 - (ii) its experience in managing similar projects;
 - (iii) the complexity and length of the project and whether the organisation has the capacity necessary to perform the tasks required;
 - (iv) whether the organisation's objects and values are consistent with those of AAHYA, having regard to the length and purpose of the proposed partnership;
 - (v) whether any approvals or permissions from foreign government bodies will be required and, if yes, who will obtain those approvals/permissions;
 - (vi) the organisation's approach to risk management, transparency and accountability, including how it manages conflicts of interest;
 - (vii) the adequacy of the organisation's practices relating to safeguarding, including prevention of sexual exploitation, abuse and harassment of children and adults;
 - (viii) the organisation's approach to environmental sustainability and the potential positive and negative environmental impacts of partnership;
 - (ix) if the organisation engages in non-development activities (as defined in paragraph 8.3 of this Policy), the organisation's approach to managing and accounting for these activities separately to aid and development activities;
 - (x) the location of the activities and whether there are known or perceived issues with corruption in the area where the activities will be carried out; and
 - (xi) any issues with other activities the organisation has carried out in the past (for example, breaches of law or other legally binding obligations).
- (c) If any partnership arrangement is intended to be longer term or involves the payment of money by AAHYA to the proposed partner, AAHYA will wherever possible enter a written agreement with the partner which sets out what each party's responsibilities are. Such an agreement will, if practicable in the circumstances, include regular reporting to AAHYA by the partner on progress of implementation and/or project delivery, challenges, outcomes and finances.
- (d) AAHYA will monitor the work carried out by any partner it works with to ensure that funds, equipment, supplies and other resources are used properly and for the benefit of the intended recipients. Records will be kept in accordance with Part E of this Policy.

- (e) AAHYA will not partner with a third party that is a listed terrorist organisation¹ or on the Department of Foreign Affairs and Trade (DFAT) Consolidated List of persons subject to sanctions.²

12. Financial Management

12.1 Responsibilities of the Committee

The Committee is responsible for ensuring that AAHYA has internal processes and controls for the effective monitoring of AAHYA's financial position and to ensure members and, where appropriate, other stakeholders are able to obtain accurate, timely information in relation to AAHYA's affairs. The Committee is responsible for:

- (a) putting in place and monitoring systems of financial management and control;
- (b) scrutinising and approving annual budgets to ensure those budgets reflect agreed objectives and priorities and are based on realistic assumptions;
- (c) receiving and reviewing reports on monthly financial accounts to monitor progress against budget and ensuring that personnel work within the financial limits of the budget, including from each office located overseas;
- (d) identifying major financial risks, including the risk of financial wrong-doing such as fraud or corruption, and ensuring they are managed effectively;
- (e) ensuring AAHYA complies with all applicable laws in the jurisdictions it operates, including in relation to taxation, money laundering, terrorism funding and fraud;
- (f) approving AAHYA's annual financial statements;
- (g) engaging external auditors to audit AAHYA's annual financial statements in accordance with accounting standards, applicable laws and AAHYA's regulatory obligations, and ensuring that any recommendations of the auditors are acted upon;
- (h) providing members AAHYA's audited annual financial statements as well as a verbal report at each annual general meeting of members;
- (i) lodging AAHYA's annual financial statements with the relevant regulatory authorities within the required timeframes; and
- (j) ensuring personnel are educated about financial wrong-doing and facilitating the reporting of and addressing any instances of suspected financial wrong-doing.

12.2 Responsibilities of the Treasurer

The Treasurer is responsible for:

- (a) ensuring that all money due to AAHYA is collected and received and that all payments authorised by AAHYA are made;

¹ The Australian National Security website sets out those organisations that are listed terrorist organisations, available at: <https://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx>.

² The Consolidated List is published on the Department of Foreign Affairs and Trade website, available at: <https://www.dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list>.

- (b) ensuring that correct books and accounts are kept showing the financial affairs of AAHYA, including full details of all receipts and expenditure connected with the activities of AAHYA;
- (c) preparing annual budgets for consideration and approval by the Committee;
- (d) monitoring AAHYA's income and expenses, reviewing and reporting on actual progress, noting any variations in comparison with the budget, and reporting on progress and variations to the Committee at each of its regular meetings;
- (e) ensuring AAHYA's income and expenditure is mapped against individual project budgets;
- (f) ensuring AAHYA's aid and development activities are accounted for separately to non-development activities;
- (g) ensuring AAHYA's bank statements are reconciled against AAHYA's records of financial activity to ensure that all accounts are current and balanced; and
- (h) assisting with AAHYA's annual audit process and ensuring that each audit of AAHYA's financial statements is completed in time for the auditor's report to be ready for presentation at each annual general meeting of members.

12.3 Financial delegation

From time to time, the Committee may make delegations in relation to financial matters to one or more personnel. Any such delegation will be discussed at a meeting of the Committee, recorded in the minutes of the meetings of the Committee and will be recorded in a separate delegation instrument.

12.4 Operation of bank accounts

- (a) AAHYA is committed to wherever possible using formal banking channels in Australia and in each overseas jurisdiction in which it operates. Money received through donations or otherwise related to AAHYA's operations and activities will be deposited in bank accounts and transferred through formal channels of money transfer. Bank accounts may be opened only with the approval of the Committee.
- (b) In Australia AAHYA will only operate bank accounts with authorised deposit taking institutions. Appropriate controls for managing each bank account (including approval requirements and withdrawal limits) will be established as approved by the Committee, which must be discussed at a meeting of the Committee and recorded in the minutes of the meetings of the Committee.
- (c) A bank account with a legitimate bank is to be opened as soon as practicable following Committee approval of the establishment of an office in another country. Overseas bank accounts are to be subject to the same withdrawal limits and approval requirements as determined in accordance with this Policy for AAHYA's Australian bank accounts, unless the Committee determines otherwise.

12.5 Transferring money overseas

Wherever possible AAHYA will use regulated channels for international money transfers. The procedure to be followed when money is transferred overseas is as follows:

- (a) Personnel will check that the recipient is not a listed terrorist organisation³ or on the DFAT Consolidated List of persons subject to sanctions⁴. AAHYA will not transfer money to a recipient on either of these lists.
- (b) Money may only be sent using AAHYA's bank or a remittance service provider that is registered with the Australian Transaction Reports and Analysis Centre (**AUSTRAC**). Personnel must check that the service is a registered remittance service provider on the AUSTRAC online register prior to arranging for any overseas transfer.⁵
- (c) If there is no alternative but to mail physical cash, AAHYA will declare any amount exceeding AUD10,000 to AUSTRAC before sending that amount and will otherwise comply with its legal obligations in mailing physical cash as may apply from time to time.
- (d) All international money transfers must be authorised by the Committee and the President and the Treasurer must be signatories to all international money transfers.

12.6 Financial wrongdoing

- (a) Personnel will be instructed that they are required to immediately report any possible or potential financial wrongdoing, including theft, bribery, corruption, fraud, money-laundering, misappropriation or other similar irregularity relating in any way to AAHYA to the Treasurer or President. No actions will be taken by AAHYA against personnel that report suspected incidents of financial wrongdoing in good faith no matter whether the incident is proven or not.
- (b) AAHYA will investigate all suspected acts of financial wrongdoing that are reported to it. AAHYA may obtain external assistance, such as external auditors or legal advice as the circumstances require.
- (c) Disciplinary action may be taken against personnel who engage in financial wrongdoing, up to and including dismissal for serious cases (such as fraud). Criminal conduct will be reported to the relevant authorities.

Part E Other

13. Review

This Policy will be reviewed every five years by the President. If the President recommends any amendments to this Policy, those amendments will be implemented if approved by the Committee.

14. Interaction with the Constitution

- (a) AAHYA's Constitution, as amended from time to time, is available at **[insert link]**.
- (b) This Policy supplements the requirements of AAHYA's Constitution. In the event of any inconsistency between this Policy and AAHYA's Constitution, as amended from time to time, AAHYA's Constitution will prevail to the extent of the inconsistency.

³ The Australian National Security website sets out those organisations that are listed terrorist organisations, available at: <https://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx>.

⁴ The Consolidated List is published on the Department of Foreign Affairs and Trade website, available at: <https://www.dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list>.

⁵ The AUSTRAC online register is available at: <https://online.austrac.gov.au/ao/public/rsregister.seam>.

15. Recordkeeping

AAHYA is required to keep records relating to all of its activities, whether these occur in Australia or overseas, on a country-by-country basis. All records must be kept for 7 years (or such other period required by Australian law). AAHYA will keep records relating to:

- (a) minutes of all Committee meetings, annual general meetings of members or special general meetings and papers prepared in support of business at those meetings;
- (b) all expenditure and financial transactions;
- (c) the projects and activities that AAHYA conducts, including risk assessments and how those activities enabled AAHYA to pursue and achieve its purposes;
- (d) the monitoring of its activities, which may include reports made to AAHYA by third parties, minutes of Committee meetings and copies of reports provided to the Committee about those activities;
- (e) details of all of the partners that AAHYA works with and how they were selected (including the due diligence undertaken), as well as any written agreements with those partners;
- (f) details of any claims of inappropriate behaviour by AAHYA's employees or its partners, and subsequent actions taken by AAHYA as a result; and
- (g) any other matters as required by the Committee or required by any law to which AAHYA is subject from time to time.

Part F Updates to this Policy

Version	Date approved by Committee	Summary of changes
Version 1.0	February 2021	Original publication.