

Compass Transparency Policy Statement

1. Introduction

Compass Housing Services Co Ltd (Compass) is a Not-for-Profit and Non-Government International development organisation that promotes social justice and fights poverty and homelessness by working with partners and communities around the world by providing safe, secured and sustainable shelters and build and strengthening sustainable communities and capacities.

One of Compass main international strategy is active engagement with a diverse, varied and relevant stakeholders and partners to carry out our international development activities and initiatives. This engagement is targeted at different levels including regional, national, local and communal. These stakeholders may include government, Non-government, community-based organisations, community base organisation, faith-based organisations and the private sector.

Compass shares information with people we work with, partners, associates, our donors, and the public and are accountable to our workers, partners, associates and host governments.

2. Purpose

Compass Transparency Policy (Policy) provides our commitment to open, transparent information sharing and accountability.

3. Scope

This Policy applies to all Compass international development activities. The policy is applicable to all Compass' employees and volunteers. The policy also extends to Compass' partners and associated implementing organisations.

4. Policy Statement

Compass is committed to being transparent in its work and accountable to its key stakeholders, people living in poverty and unsafe and insecure shelters.

Compass share information with people living in poverty and unsafe and insecure shelters, local communities, major stakeholders, local and international partner organizations, national & local governments and the general public, and are also accountable to our staff, volunteers, supporters, donors, funding agencies, suppliers and host governments.

What information we publish and how we respond to requests for information are important aspects of accountability. We will proactively publish information, and on request will disclose information, or give reasons for any decision not to disclose (for example, to respect confidentiality or privacy).

Our key criterion for the decision will be the impact on our mission, to overcome poverty and to provide safe and secure shelters. We will publish guidance about the implementation of this Transparency Policy.

There are two (2) related documents which provide guidance on the implementation of Compass Transparency Policy Statement. These are:

- Classes of Information Available Under Compass Transparency Policy Statement (Appendix I)
- Guidance Note on Compass Transparency Policy Statement (Appendix II)
- These two (2) documents are to be read in conjunction with the Compass Transparency Policy Statement.

5. Legislation and Compliance

Compass complies with all jurisdictional laws related to this policy and will take appropriate action to rectify any reported potential non-compliance.

6. Policy Implementation and Review

This Policy will be reviewed for effectiveness and updated as required every three years. This policy will be approved by management and the Board.

7. Related documents and resources

- Compass Privacy Policy (POL-019)
- Records Management Policy (POL-035)
- Records Management Policy Schedule (POL-035-01)
- Compass Policy and Procedure Development Approval and Review Procedure (PROC-011)
- Compass Privacy or Notifiable Data Breach Procedure (PROC-019-1).
- Compass' Group Documentation Structure and Quality Assurance ("QA") Management Guidelines (GUI-018)

8. Responsibilities

All Compass workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of Compass policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to Compass clients,
- inform Compass clients of the impact of this policy on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this policy document and complete the relevant documentation to propose any amendments, and
- report breaches of Compass policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about Compass Policies and Procedures,

- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and
- ensure appropriate processes and controls are implemented to enable breaches of approved Compass Policy and Procedures to be reported and managed.

9. Document Control

This policy is part of Compass approved policies and procedures register.

Policies and procedures on the register are reviewed regularly and revised where warranted.

The Group Chief Governance officer is ultimately responsible for the control and review of policy and procedure documents in accordance with Compass’ Group Documentation Structure and Quality Assurance (“QA”) Management Procedure

Refer to Compass Policy and Procedure Development Approval and Review (PROC-011) for information on the document review process.

10. Records

All records relevant to these procedures are to be maintained in a recognised Compass recordkeeping system in accordance with Compass Records Management Policy.

11. Definitions

| Term / Keyword | Definition |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Associate | <p>An “associate” of a regulated entity includes directors and company secretaries of the regulated entity and its related bodies corporate and may also include a range of individuals within whom the regulated entity acts in concert or is otherwise associated in a formal or informal way.</p> <p>These include visitors to our programs (including media), advisory group members, interns, supporters (donors, sponsors, advocates, ambassadors), trustees, members, staff in consulting and partnership agencies, and any other individuals or groups that have been brought in contact with children (including their personal information and images) while working with and / or supporting Compass.</p> |
| Partner | <p>individuals, groups of people or organisations that collaborate with ACFID Members to achieve mutually agreed objectives in development and humanitarian initiatives. This may include affiliates.¹</p> <p>For Compass the term refers to local, state, national, regional and international agencies that Compass has an official arrangement with via signed MoU or Partnership Agreement or Contract, to implement or deliver Compass Programs, Projects and Initiative in Australia and any part of the world</p> |
| Primary stakeholders | <p>The term used in the Code of Conduct to refer to those whom we seek to support, work with and directly benefit through development and humanitarian initiatives. The women and men, boys and girls who are</p> |

¹ Definition adopted from ACFID general definitions provided to clarify the use of key terms with reference to the ACFID Code of Conduct, June 2019, <https://acfid.asn.au/content/general-definitions>

| Term / Keyword | Definition |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | participants in, and are directly affected by, development and humanitarian initiatives. They may also be known as beneficiaries or local people ¹ |
| <p>Worker (Compass)</p> | <p>Compass has adopted a modified version of SafeWork NSW definition of a 'worker' where the term is used in policy.</p> <p>The definition of a 'worker' for Compass includes any person who is an Officer under the Corporations Act 2001 or who carries out work for a 'person conducting a business or undertaking' (PCBU - includes employers).</p> <p>The term 'Worker' includes any person who works as an:</p> <ul style="list-style-type: none"> • Employee, trainee or volunteer • outworker or apprentice • work experience student • contractor or sub-contractor • employees of a contractor or sub-contractor • employee of a labour hire company assigned to work for a PCBU. <p>For clarity Directors, Committee and Advisory Group members are listed separate from workers in this document.</p> |
| <p>Worker (Compass QLD)</p> | <p>is 'a person who works under a contract and, in relation to the work, is an employee for the purpose of assessment for PAYG withholding under the Taxation Administration Act 1953 (Cwlth), schedule 1, part 2-5'. This applies to a person for whom PAYG tax instalments are required or would be required to be withheld by their employer.</p> |

12. Document Information

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|--------------------------------|--------------------------------------------------------------------------------|
| Document Number | POL-059 |
| Document Administration: | Governance and Compliance Business Unit companydocuments@compasshousing.org |
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Next review no later than 30/06/2022

13. Version Administration

| Version | Date | Status and Changes | Author |
|---------|------------|------------------------------|-------------------------------------------------------|
| 0.1 | 14/06/2019 | Created | Ben Wong, International Stakeholder Relations Manager |
| | | Reviewed | Martin Kennedy, Manager of Public Affairs |
| 1.0 | 28/06/2019 | Reviewed and further refined | Julie Barnett, Group Chief Governance Officer |
| | | Approved for release | Greg Budworth, Group Managing Director |

Appendix I: Categories of Information Available Under Compass' Transparency Policy Statement

Category 1 – Compass Corporate Governance

Materials defining Compass legal entity status in Australia. The overall mission, values and purpose of the organisation, Compass' Constitution, the governance structure including profiles of current members of the Board, the Board Charter and Schedule of Delegations.

Category 2 - Current Activities and significant International Programmes

Basic details and description of current significant programmes in and beyond Australia including international programs in the Pacific and Asia.

Category 3 – External Communications and Policy Briefings

Compass policy papers, reports and media releases and communications, including annual report and audited financial statement.

Category 4 – Partnerships

Formal agreements and Memorandum of Understanding with other organisations in Australia and internationally.

Category 5 – Strategic Direction and Plan Material

Compass Strategic Plan setting out Compass' Oxfam's strategic objectives and directions including prioritisation and the allocation of resources. Includes Compass' International Strategy.

Category 6 – Accounts, Financial Information

Financial statements and reports published in the public domain in accordance with Compass' legal entity and associated legal obligations in Australia and other countries which it has operations.

Category 7 – Guidance

Documented Guidelines and Procedures Rules according to which Compass operate. Internal Guidelines and procedures relating to Compass public functions and external guidance specific to Compass.

Category 8 – Impact of our work

The research and reports by which Compass measures our own success and communicate our achievements.

Category 9 – Working for Compass

Policies that govern the creation and recruitment to Compass positions; position descriptions including the rights and responsibilities of the incumbents.

Category 10 – Environmental Information

Information about Compass environmental sustainability policy, accountability reports sections and Compass' annual Report and reports on activities to responsibly manage Compass' carbon footprint and achievement.

Appendix II: Guidance Note on Compass Transparency Statement

Introduction

The Guidance Note aims to provide clear and concise guidelines on the following:

- How to make a request for information
- Timescale for response to requests for information
- Compass and Freedom of Information legislation
- Compass Data Protection and privacy legislation
- What information do we publish and in what media?
- Language and translation policy
- What use may I make of the information Compass discloses?
- What information is subject to disclosure restrictions, and when might we decline disclosure in whole or in part?
- Multiple requests and requests with no discernible public benefit
- Appeals and complaints mechanism /
- What if I am unhappy with the way my request has been handled?
- No contractual rights
- Who is responsible for the development of this policy?

How to make a request for information

Requests for information can be made in writing to: Group Chief Information Officer / Group Chief Governance Officer , Compass , SSuite 1/44 Beaumont Street , Hamilton NSW Australia 2303 by email to governance@compasshousing.org

Timescale for response to requests for information

We endeavour to respond promptly, and if there is any delay, all requests made should nevertheless be responded to within 21 days, unless there is a compelling reason why this is not practical. Where it is not practical Compass will communicate with the person requesting the information to arrange an extension of time.

Compass and Freedom of Information legislation

Compass is registered as a charity with the ACNC and a company limited by guarantee in Australia. As we are not a public institution or organisation not subject to the Australia Freedom of Information Act (FOI Act) except where it relates to a request for information about a government contract. Compass will comply with all requests under the FOA Act where we are obliged to do so.

Nevertheless, in framing this policy we have had regard to the policy aims behind the Freedom of Information Act, and our general approach is in keeping with the Act's assumption that information should be disclosed unless there is a good public policy reason for withholding it, or the cost of disclosure would be disproportionate.

Compass Data Protection and privacy legislation

This policy is subject to Australia's data protection and privacy legislations. Accordingly, we will not disclose data and personal information about living individuals where this is prohibited under applicable legislations. Refer to Compass's Privacy Policy for information about how we protect data and manage personal information.

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What information do we publish and in what media?

A large amount of information is published on Compass website www.compasshousing.org

Compass Corporate Services will also maintain a list of Category of Information (Categories of Information Available Under Compass' Transparency Policy Statement) which explains the sorts of information that are or will be published on our website, and items within it that can be disclosed on request.

Language and translation policy

This Transparency Policy Statement applies primarily to information requests in the English language addressed to Compass' Corporate Office in Australia.

Most information is published in the English language and if required and needed with substantiating reasons, Compass will provide translation of the information requested and/or facilitate access to appropriate translator to communicate the information requested.

What use may I make of the information Compass discloses?

Most of our publications are copyright, but may be reproduced without fee for advocacy, campaigning and non-commercial teaching, but not for resale. Any request to reproduce copyright material (save as permitted under applicable mandatory exceptions to copyright law) should be referred to governance@compasshousing.org

What information is subject to disclosure restrictions, and when might we decline disclosure in whole or in part?

If we do not disclose information, we will give reasons for not disclosing. The most frequent reasons are:

- **Security**- The safety of our staff is a primary concern. We will not disclose information where we consider it could jeopardise our ability to operate or the safety of our staff and that of our partners.
- **Privacy**- Some information is by its nature private to the individuals concerned.
- **Confidential information**- Information may be confidential because of legal, commercial or contractual reasons, or because its premature disclosure would jeopardise action that Compass is planning to take.
- **Copyright limitations** - In some cases we do not have the right to disclose information because it is someone else's copyright, and while we have the right to make internal use of it this does not extend to publishing it. We do favour open publishing where we can, such as for our policy papers.
- **Cost** - Where we consider that the cost of disclosure, whether as a time cost or a monetary cost, would be disproportionate to the request, we may decline disclosure but will explain that this is the reason.
- **Detailed information about programmes** - Compass' priority is providing information to our partners and the people for whom we work. We may decline to provide information to requests made about our international work in other countries where this would take up significant staff time and incurs a significant cost.
- **Internal planning, drafts and trivial or ephemeral information**- We will generally not disclose internal working papers that address future plans, or drafts of work, or information which we consider is of ephemeral interest such that the work involved in disclosure is in our view disproportionate.

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- **Harm to operations** - Compass recognises the importance of how we put principles into practice. But there will be occasions where we do not disclose information because we consider that the disclosure could harm our work, whether in Australia or in our international operations. An example would be information about an advocacy campaign involving target and stakeholders' groups, where the disclosure could jeopardise the effectiveness of the campaign.

Multiple requests and requests with no discernible public benefit

Where a person makes multiple requests for information, or we consider that the work involved in dealing with the request has no discernible public benefit, we may decide not to spend time in dealing with the request and raise an objection. Such decision will be taken by the Compass Chief Group Governance Officer in consultation with the Group Managing Director and Company Secretary. If any person makes a request in an offensive manner, or has otherwise been abusive to staff or volunteers, then we may decline to engage in correspondence with that person.

Appeals and complaints mechanism / What if I am unhappy with the way my request has been handled

You may request a review of any decision under this Policy to withhold information by Compass to Compass Complaint and Customer Service Officer by email to complaints@compasshousing.org or by post to P O Box 967, Hamilton NSW 2303 Australia. As Compass is not a public body, there is no right of appeal to the Information Commission.

If you consider Compass is acting illegally, you may complain to the ACNC, whose details are available from their website using the following link <https://www.acnc.gov.au/contact-us>.

No contractual rights

This policy is not a binding contract and does not confer legal rights on any person. Individuals may however have rights concerning their personal data held by Compass under applicable legislation.

Who is responsible for the implementation, monitoring and reporting of this policy

The day to day aspects of this Policy are the responsibility of the Chief Group Governance Officer and the Manager of Public Affairs. They will report annually on the implementation of this policy to Compass' Group Executive Management (GEM) and to the Compass Board, including with patterns of requests for information.

End of document