

Transparency Policy

1. Purpose

HOME in PLACE Transparency Policy provides our commitment to open, transparent information sharing and accountability.

HOME in PLACE 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 HOME in PLACE 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.

HOME in PLACE 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. Scope

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

3. Policy Statement

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

HOME in PLACE 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 HOME in PLACE Transparency Policy Statement. These are:

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

4. Responsibilities

All HOME in PLACE workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of HOME in PLACE policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to HOME in PLACE clients,
- inform HOME in PLACE's 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 HOME in PLACE's policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about HOME in PLACE Policies and Procedures,
- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and

5. Implementation and Review

This policy is listed on HOME in PLACE's Controlled Documents Register and is a controlled document requiring approval of any changes. It may not be amended or shared outside HOME in PLACE without approval. The policy is reviewed regularly and published on HOME in PLACE's SharePoint intranet once approved. Employees receive communications and training on new and reviewed policies and procedures.

HOME in PLACE complies with relevant contractual compliance obligations and jurisdictional laws and regulations when implementing this policy. Confirmation of internal compliance with this policy is undertaken regularly.

It is the responsibility of HOME in PLACE Group Executive Services to maintain and update the HOME in PLACE's Master Policy Document, Policy Directory and the Policy Review Register, administer the review and approval process and inform and distribute new and amended policies and procedures once approved (refer PROC-011 Policy and Procedure Development Approval).

HOME in PLACE Workers should refer to SharePoint for the latest version which takes precedent over any uncontrolled version. If this document is printed, downloaded, or saved elsewhere from this site it becomes an uncontrolled version.

For further information contact the Responsible Officer listed under Document Information.

6. Resources and related documents

Related documents

- POL-019 Privacy Policy
- POL-035 Records Management Policy
- POL-035-01 Records Management Policy Schedule
- PROC-011 Policy and Procedure Development Approval and Review Procedure
- POL-036 ICT Breach Management Policy
- PROC-011 QMS Documents (Policy and Procedure) Management Procedure

Related legislation/standards

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

7. Definitions

Please refer to HOME in PLACE Glossary of Definitions for Policies and Procedures. Terms and definitions identified below are specific to this policy and are critical to its effectiveness:

Term	Definition
Appeals	<p>A Community housing appeal is defined as ‘any expression of dissatisfaction with a decision made by a social housing provider to provide or not provide a service (such as housing, transfer or priority on the housing register) or, a decision relating to a tenant or service user’s dissatisfaction of a decision made by the organisation.’</p> <p>An application for a decision to be reversed or overturned. Includes but is not limited to: • Allocation decisions; • Level of rent or rent subsidy; • Eligibility for a housing transfer; • Permission to undertake modifications; • Permission to keep pets; • Calculation of water charges;</p>
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 HOME in PLACE.</p>
Compass	<p>Compass Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the <i>Corporations Act 2001</i> (Cth)) and as a charity with the Australian Charities and Not-for-profit Commission (ACNC).</p>

Term	Definition
Complainant	Person with a Complaint ongoing with HOME in PLACE.
Complaints	An expression of dissatisfaction with an aspect of the services provided by [Organisation], where the complainant is unhappy with the standard or type of service. Types of Complaint include: <ul style="list-style-type: none"> • Where HOME in PLACE have failed to provide or there has been a delay or problem in providing a service; • Where HOME in PLACE have failed to follow or have been unfair or inconsistent in applying our policies or procedures. • Where HOME in PLACE have failed to keep Tenants informed, through lack of or insufficient information • Where there has been inappropriate behaviour or attitude from a HOME in PLACE Employee or contractor.
Director	Has the same meaning as defined in the Corporations Act 2001 Part 1.2 Division 1 Section 9 Dictionary in Australia and as defined in the Companies Act 1992 Part 1 Section 2 Interpretation .
Employee	A person engaged under an employment agreement or award by any company in the HOME in PLACE Group.
Executive Manager	Many positions within HOME in PLACE include the title “Executive Manager”. Regardless of whether an Executive Manager heads a Business Unit, the delegated authority of each Executive Manager depends on the functions and reporting relationship of the Business Unit for which the Executive Manager is responsible. Executive Managers should refer to the document HOME in PLACE Organisational Chart in Terms of Levels of Delegated Authority for confirmation of the band of authority they hold.
HOME in PLACE	Compass Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the <i>Corporations Act 2001</i> (Cth)). This includes Compass Housing Services Co (Queensland) Ltd Trading as HOME in PLACE and Compass Housing Services Co (Victoria) Ltd Trading as HOME in PLACE both of which are a wholly owned subsidiary of Compass registered in Australia.
HOME in PLACE Group	The corporate structure that includes HOME in PLACE (as the Parent Company) and the boards of Subsidiary Companies, Governance Committees and advisory groups as created from time to time.
Independent contractor	means a party engaged directly by HOME in PLACE pursuant to a contract for services. In the context of workforce engagements, this includes sole traders, companies, or partnerships with whom HOME in PLACE enters into an agreement for the provision of specified individuals to supply specific skills, services, or consultancy arrangements. It does not include individuals engaged through labour hire agencies. Independent contractors are not employees of HOME in PLACE.
Officer	Has the same meaning as defined in the Corporations Act 2001 Part 1.2 Division 1 Section 9 Dictionary in Australia and as defined in the Companies Act 1992 Part 1 Section 2 Interpretation in New Zealand
Parent Board	The current directors of HOME in PLACE.
Parent Company	HOME in PLACE

Term	Definition
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 HOME in PLACE the term refers to local, state, national, regional and international agencies that HOME in PLACE has an official arrangement with via signed MoU or Partnership Agreement or Contract, to implement or deliver HOME in PLACE Programs, Projects and Initiative in Australia and any part of the world</p>
Primary stakeholders	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 participants in, and are directly affected by, development and humanitarian initiatives. They may also be known as beneficiaries or local people ¹
Stakeholder	person or organisation that can affect, be affected by, or perceive themselves to be affected by a decision or activity, may also be called 'interested party'.
Subsidiary Boards	The appointed board of directors of a Subsidiary Company.
Subsidiary Company	A company in which HOME in PLACE owns all or at least a majority of the shares.
User	any person or entity that use HOME in PLACE Information or ICT Assets.
Worker (HOME in PLACE)	<p>has the same meaning as defined in the NSW Work Health and Safety Act 2011 No 10 Subdivision 2 Part 7 Meaning of 'worker' (1) A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as:</p> <ul style="list-style-type: none"> • an employee, or • an independent contractor or subcontractor, or • an employee of a contractor or subcontractor, or • an employee of a labour hire company who has been assigned to work in the person's business or undertaking, or • an outworker, or • an apprentice or trainee, or • a student gaining work experience, or • a volunteer, or • a person of a prescribed class.

8. List of Annexures

- Annexure I: Categories of Information Available Under HOME in PLACE' Transparency Policy Statement
- Annexure II: Guidance Note on HOME in PLACE Transparency Statement

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>

Annexure I: Categories of Information Available Under HOME in PLACE’ Transparency Policy Statement

Category 1 – HOME in PLACE Corporate Governance

Materials defining HOME in PLACE legal entity status in Australia. The overall mission, values and purpose of the organisation, HOME in PLACE’ 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 Programs

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

HOME in PLACE 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

HOME in PLACE Strategic Plan setting out HOME in PLACE’ Oxfam’s strategic objectives and directions including prioritisation and the allocation of resources. Includes HOME in PLACE’ International Strategy.

Category 6 – Accounts, Financial Information

Financial statements and reports published in the public domain in accordance with HOME in PLACE’ 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 HOME in PLACE operate. Internal Guidelines and procedures relating to HOME in PLACE public functions and external guidance specific to HOME in PLACE.

Category 8 – Impact of our work

The research and reports by which HOME in PLACE measures our own success and communicate our achievements.

Category 9 – Working for HOME in PLACE

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

Category 10 – Environmental Information

Information about HOME in PLACE environmental sustainability policy, accountability reports sections and HOME in PLACE’ annual Report and reports on activities to responsibly manage HOME in PLACE’ carbon footprint and achievement.

Annexure II: Guidance Note on HOME in PLACE 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
- HOME in PLACE and Freedom of Information legislation
- HOME in PLACE 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 HOME in PLACE 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 Strategic Engagement Officer, HOME in PLACE, Suite 1/44 Beaumont Street, Hamilton NSW Australia 2303 by email to governance@homeinplace.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 HOME in PLACE will communicate with the person requesting the information to arrange an extension of time.

HOME in PLACE and Freedom of Information legislation

HOME in PLACE 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. HOME in PLACE 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.

HOME in PLACE 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 HOME in PLACE's Privacy Policy for information about how we protect data and manage personal information.

What information do we publish and in what media?

A large amount of information is published on HOME in PLACE website www.homeinplace.org. HOME in PLACE Corporate Services will also maintain a list of Category of Information (Categories of Information Available Under HOME in PLACE' 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 HOME in PLACE' Corporate Office in Australia.

Most information is published in the English language and if required and needed with substantiating reasons, HOME in PLACE 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 HOME in PLACE 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@homeinplace.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 HOME in PLACE 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** - HOME in PLACE' 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.

- **Harm to operations** - HOME in PLACE 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 HOME in PLACE Group Chief Strategic Engagement 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 HOME in PLACE to HOME in PLACE Complaint and Customer Service Officer by email to complimentsandcomplaints@homeinplace.org or by post to PO Box 967, Hamilton NSW 2303 Australia. As HOME in PLACE is not a public body, there is no right of appeal to the Information Commission.

If you consider HOME in PLACE 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 HOME in PLACE 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 Group Chief Strategic Engagement Officer and the Manager of Public Affairs. They will report annually on the implementation of this policy to HOME in PLACE' Group Executive Management (GEM) and to the HOME in PLACE Board, including with patterns of requests for information.

End of document.