



QUALITY EMPLOYMENT

POLICY MANUAL

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August 2023
Classification: Public

Job-matching | Training | Support | Careers

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Table of Contents

NATIONAL STANDARDS FOR DISABILITY SERVICES.....	3
NDIS PRACTICE STANDARDS	3
POLICY 1.0 RIGHTS.....	4
POLICY 1.1 PRIVACY.....	8
3.2 HOW TO MAKE A PRIVACY-RELATED COMPLAINT	8
POLICY 1.2 SCREENING CHECKS FOR CLIENTS.....	16
POLICY 1.3 CHILD SAFETY AND WELLBEING	19
POLICY 1.4 INFORMATION SECURITY MANAGEMENT	23
POLICY 2.0 PARTICIPATION AND INCLUSION	31
POLICY 3.0 INDIVIDUAL OUTCOMES.....	34
POLICY 4.0 FEEDBACK AND COMPLAINTS.....	36
COMPLAINTS PROCESS FLOW CHART	41
POLICY 4.1 EMPLOYEE COMPLAINTS	42
COMPLAINTS PROCESS FLOW CHART	48
POLICY 5.0 SERVICE ACCESS	49
POLICY 5.1 POSITIVE BEHAVIOUR MANAGEMENT	54
POLICY 5.2 PREVENTION OF VIOLENCE AND AGGRESSION	57
POLICY 6.0 SERVICE MANAGEMENT AND QUALITY.....	59
POLICY 6.1 BOARD CODE OF CONDUCT	62
POLICY 6.2 CODE OF CONDUCT	66
POLICY 6.3 EMPLOYEE RECRUITMENT AND SELECTION.....	71
POLICY 6.4 EQUAL EMPLOYMENT OPPORTUNITY	74
POLICY 6.5 EMPLOYEE SCREENING CHECKS	77
POLICY 6.6 EMPLOYEE TRAINING AND APPRAISAL.....	83
POLICY 6.7 WORK HEALTH AND SAFETY	85
POLICY 6.8 FINANCIAL MANAGEMENT	88
POLICY 6.9 RISK MANAGEMENT.....	92
POLICY 6.10 FRAUD AND CORRUPTION CONTROL	94
POLICY 6.11 CLIENT TRAINING AND SUPPORT	97
POLICY 6.12 CLIENT EMPLOYMENT CONDITIONS.....	99
POLICY 6.13 MOTOR VEHICLE USE.....	101
POLICY 6.14 INFORMATION TECHNOLOGY AND CYBER SAFETY.....	108
POLICY 6.15 POLICY MAKING	114
POLICY TEMPLATE	115
POLICY X POLICY TITLE	115
POLICY 6.16 EMPLOYEE LEAVE	116
POLICY 6.17 WORKPLACE DISCRIMINATION AND HARASSMENT.....	120
TERMS AND DEFINITIONS	125

National Standards for Disability Services

Disability Employment Services must meet independent quality assurance requirements to receive Australian Government funding under the Disability Services Act (1986). The Quality Strategy for disability employment and rehabilitation services was introduced in 2002, with all government-funded services requiring independent certification by December 2004. In December 2013, revised National Standards for Disability Services (NSDS) were endorsed by all Australian jurisdictions, taking effect in January 2015.

The NSDS aim to establish consistent, person-centered approaches that prioritize the rights and outcomes of people with disabilities. Individuals, with the support of their support network (families, friends, carers and advocates), shape and direct services based on their strengths, needs, and goals.

Six National Standards apply to disability service providers:

1. **Rights:** The service promotes individual rights to freedom of expression, self-determination and decision-making and actively prevents abuse, harm, neglect and violence.
2. **Participation and Inclusion:** The service works with individuals and families, friends and carers to promote opportunities for meaningful participation and active inclusion in society.
3. **Individual Outcomes:** Services and supports are assessed, planned, delivered and reviewed to build on individual strengths and enable individuals to reach their goals.
4. **Feedback and Complaints:** Regular feedback is sought and used to inform individual and organisation-wide service reviews and improvement.
5. **Service Access:** The service manages access, commencement and leaving a service in a transparent, fair, equal and responsive way.
6. **Service Management:** The service has effective and accountable service management and leadership to maximise outcomes for individuals.

Ref: [National Standards for Disability Services | Department of Social Services, Australian Government \(dss.gov.au\)](https://www.dss.gov.au/national-standards-for-disability-services)

NDIS Practice Standards

The NDIS Practice Standards set performance benchmarks for providers to show how they deliver safe and high-quality supports to NDIS participants. Along with the NDIS Code of Conduct, they help participants know what to expect from providers. The standards include a core module and additional modules based on the types of supports and services provided. The Core module covers:

1. Rights and responsibilities
2. Provider governance and operational management
3. Provision of supports, and
4. Provision of supports environment

Each module has participant-focused outcomes, and quality indicators that auditors use to assess a provider's compliance.

BIZLINK is a registered NDIS provider for Employment Supports and is required to apply the practise standard and quality indicators for the Core Module.

Note: BIZLINK uses the term 'client' with the same meaning as 'participant'.

Ref: [NDIS practice standards | NDIS Quality and Safeguards Commission \(ndiscommission.gov.au\)](https://www.ndiscommission.gov.au/ndis-practice-standards)

Policy 1.0 Rights

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers, clients, prospective clients and client's support networks and stakeholders. ('Client' same meaning as 'participant').
What	To uphold BIZLINK client's legal and human rights and prevent or respond to allegations and incidences of human rights infringements or abuses. BIZLINK has a duty of care responsibility to clients and an obligation to protect clients from all forms of abuse or neglect and to report any observed or suspected abuse or neglect.
How	By defining human rights and providing guidelines for employees in the management of human rights infringements. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police.
Resources	NSDS 1 Rights NDIS Practice Standards 1 Right and Responsibilities, 2 Provider Governance and Operational Management, 3 Provision of Supports, 4 Provision of Supports Environment Department of Social Services Deed and Guidelines Australian Human Rights Commission Act 1986 (Cth), Privacy Act 1988 (Cth), United Nations Convention on the Rights of People with Disability, National Principles for Child Safe Organisations, Electronic Transactions Act 1999 (Cth) BIZLINK Policy on: Feedback and Complaints, Employee Complaints, Child Safety and Wellbeing, Challenging Behaviours, Service Access, Codes of Conduct, Screening Checks for Clients, Screening Checks for Employees
Approved	14/08/2023

2. Policy Statement

BIZLINK employees are dedicated to upholding human rights and providing a service that respects the fundamental rights of all clients. This includes the right to freedom of expression, self-determination, and decision-making, as well as freedom from abuse, harm, neglect, and violence. Employees recognize the importance of involving clients and their support network, with consent, in decisions that impact their lives. They actively encourage and facilitate client engagement in decision-making processes, this safeguards human rights and promotes the well-being and interests of people with disability.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Report all incidents or any reasonable belief for concern about a client's wellbeing or safety that come to their attention.
- b) Ensure all disclosures and notifications are in accordance with advice from the Department for Child Protection (for people aged under 18 years), Department of Social Services, NDIS Quality and Safeguards Commission and / or NDIA or Police or a legal representative engaged by BIZLINK if involved.

- c) Refer to the following documents for incident management and reporting:
 - (i) Complaint or Incident Notice (COIN)
 - (ii) Improvement Corrective Action Notice (ICAN)
 - (iii) Accident / Incident Report

4. Responsibilities

4.1 Management

- a) Ensure policies are available to employees, clients, and other stakeholders.
- b) Policies and codes of conduct will reiterate that BIZLINK has a zero tolerance of child abuse and that child safety is everyone's responsibility.
- c) Policies and codes of conduct will reiterate that BIZLINK has a zero tolerance of violence and aggression.
- d) Implement stringent recruitment, induction, training and supervision procedures and policies that consider risks and risk mitigation strategies.
- e) Foster an organisational culture that supports employees to discuss any concerns about client wellbeing. Including supervision, team meetings and relevant training.
- f) Provide opportunities for clients and support networks to give feedback on BIZLINK services and management, including Annual General Meetings, satisfaction surveys and quality audits.
- g) Ensure employees and volunteers have current Employee Screening Checks and those working directly with children have a current Working with Children Check.
- h) **Responding to Allegations of Abuse or Neglect**
 - i. Management will determine whether an investigation, enquiry grievance resolution or other process is required in relation to allegations of abuse or neglect.
 - ii. If an investigation or other enquiry is determined appropriate, Management may suspend an employee on full pay while it is undertaken. Management may be required to notify Police in some circumstances.
 - iii. Management must seek independent advice e.g. CCIWA, legal, as to whether it is appropriate to suspend an employee, and must document that advice.

4.2 Employees

- a) Respect freedom of individual choice and involvement in decisions by clients. Remove unnecessary restrictions and be flexible and responsive to the client's individual needs and preferences, with consideration of practicality and being reasonably achievable.
- b) Sign the Policy Acknowledgement form to signify commitment to comply with the policies listed.
- c) Uphold and respect client privacy and confidentiality in accordance with the Policy on Privacy and Policy on Information Security Management.
- d) Provide individualised job matching in accordance with the Policy on Client Employment Conditions.
- e) Speak positively and respectfully about clients and avoid the use of labels, derogatory, disrespectful or patronising language with regard to age, gender identity, culture, heritage, language, faith, sexual orientation (LGBTIQ+), relationship status or disability.

- f) Provide personalised assistance or training to clients at their worksite and/or off-site as appropriate with consideration of the client's individual needs and with consideration of their employment arrangements and Job Plan or Goal Plan.
- g) Present people with disability positively in BIZLINK publications and promotions, for example, photographs, newspaper articles and reports demonstrate valued status.
- h) Adhere to the Policy on Code of Conduct, which outlines expectations for employee conduct and stipulates sexual activity with clients is strictly forbidden.
- i) Foster a work-place culture that values human rights and the protection of clients against any form of abuse or neglect.
- j) **Responding to Allegations of Abuse or Neglect:**
 - i. Respond as soon as possible and advise the Managing Director.
 - ii. Refer the client to the Complaints Resolution and Referral Service (CRRS), the National Disability Abuse and Neglect Hotline, NDIS participants contact the NDIS Quality and Safeguards Commission, and other appropriate government departments or external services that may assist with advocacy or support.
 - iii. Support the client through the process as appropriate, including referral and/or involvement of appropriate supports.
 - iv. Provide information about the use of an advocate (including an independent advocate) and facilitate access to an advocate where allegations of violence, abuse, neglect, exploitation or discrimination have been made.

5. References

National Disability Abuse and Neglect Hotline [National Disability Abuse and Neglect Hotline](#)

Child Safe Organisations [National Principles | Child Safe Organisations \(humanrights.gov.au\)](#)

6. Definitions

Basic legal and human rights:

- a) Respect for human dignity and freedom
- b) Equality before the law
- c) Privacy
- d) Protection against discrimination
- e) Equal opportunity in employment.

Types of abuse include (but are not limited to):

- a) **Physical abuse:** Any non-accidental physical injury or injuries to a child or adult. This includes inflicting pain of any sort or causing bruises, fractures, burns, electric shock, or any unpleasant sensation.
- b) **Sexual abuse:** Any sexual contact between an adult and child 16 years of age and younger; or any sexual activity with an adult who is unable to understand, has not given consent, is threatened, coerced or forced to engage in sexual behaviour.

- c) **Psychological or emotional abuse:** Verbal assaults, threats of maltreatment, harassment, humiliation or intimidation, or failure to interact with a person or to acknowledge that person's existence. This may also include denying cultural or religious needs and preferences.
- d) **Constraints and restrictive practices:** Restraining or isolating an adult for reasons other than medical necessity or the absence of a less restrictive alternative to prevent self-harm. This may include the use of chemical or physical means or the denial of basic human rights or choices such as religious freedom, freedom of association, access to property or resources or freedom of movement.
- e) **Financial abuse:** The improper use of another person's assets or the use or withholding of another person's resources.
- f) **Legal or civil abuse:** Denial of access to justice or legal systems available to others.
- g) **Systemic abuse:** Failure to recognise, provide or attempt to provide adequate or appropriate services, including services that are appropriate to that person's age, gender identity, culture, needs or preferences.

Types of neglect include (but are not limited to):

- a) **Physical neglect:** Failure to provide adequate food, shelter, clothing, protection, supervision and medical and dental care, or to place persons at undue risk through unsafe environments or practices.
- b) **Passive neglect:** A caregiver's failure to provide or wilful withholding of the necessities of life including food, clothing, shelter or medical care.
- c) **Wilful deprivation:** Wilfully denying a person who, because of age, health or disability, requires medication or medical care, shelter, food, therapeutic devices or other physical assistance - thereby exposing that person to risk of physical, mental or emotional harm.
- d) **Emotional neglect:** The failure to provide the nurturance or stimulation needed for the social, intellectual and emotional growth or wellbeing of an adult or child.

Policy 1.1 Privacy

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers, clients, prospective clients, client's support networks and stakeholders. ('Client' same meaning as 'participant').
What	To ensure the collection and use of personal information that assists our employees to work effectively with clients registered or applying to register with our service is in accordance with the Australian Privacy Principles.
How	By providing guidelines for employees on how to manage personal and sensitive information in accordance with the Australian Privacy Principles. Establishing standards of privacy and confidentiality as regards BIZLINK services to prospective, current and past clients. Providing information for clients on how BIZLINK manages personal information and how they can access or update their information. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 1 Rights NDIS Practice Standard 1 Right and Responsibilities The Australian Privacy Principles (APP), Privacy Act 1988 (Cth), Electronic Transactions Act 1999 (Cth), Privacy (Tax File Number) Rule 2015 (Cth) BIZLINK Policy on: Code of Conduct, Board Code of Conduct, Feedback and Complaints, Employee Complaints, Rights, Service Access, Information Security Management Business Continuity Plan, Fraud Control Plan
Approved	14/08/2023

2. Policy Statement

BIZLINK employees respect the privacy of the personal information we collect and are committed to managing that information in a responsible manner. Employees aim to comply with the Australian Privacy Principles under the Privacy Act 1988 (Cth).

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Immediately report all incidents.
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Business Continuity Plan – Data Breach Response Plan
 - iv. Fraud Control Plan

3.2 How to make a privacy-related complaint

Any stakeholder can complain about how BIZLINK has handled personal information. Refer to our Policy on Feedback and Complaints. If you are not satisfied with our response, you can complain to the Complaints Resolution and Referral Service or Department of Social Services or the Office of the Australian

Information Commissioner (OAIC). You can make a complaint directly to the OAIC before contacting us. However, the OAIC recommends you try to resolve your complaint by contacting us first and giving us 30 days to respond.

For further information on privacy or to lodge a complaint:

BIZLINK: Telephone 1300 780 789 Email bizlink@bizlink.asn.au Website www.bizlink.asn.au

Office of the Australian Information Commissioner (OAIC): Telephone 1300 363 992

Email enquiries@oaic.gov.au Website www.oaic.gov.au

4. Responsibilities

4.1 Management

- a) Implement stringent recruitment, induction, training and supervision procedures and policies. Policies and codes of conduct will reiterate the importance of privacy and confidentiality. Ensure that employees have Employee Screening Checks as per the Policy on Employee Screening Checks.
- b) Ensure data is secure, routinely backed up, retained, archived and disposed in accordance with contractual obligations and Privacy Law.
- c) Consider risks and risk mitigation strategies.
- d) Provide information about the Complaints Resolution and Referral Service (CRRS), the Office of the Australian Information Commissioner (OAIC) and other government departments or external services that may assist with advocacy or support related to privacy breaches.
- e) Respond to any reports of incidents involving privacy breaches with reference to the Policy on Feedback and Complaints. Report serious offences to the relevant Government Department and/or police and pursue laying of charges and prosecutions against offenders where appropriate.

4.2 Employees

a) **Open and transparent management of personal information**

Take reasonable steps to respond to any general request about how BIZLINK collects, holds, uses and discloses personal information.

b) **Collecting information**

- i. Only collect personal information necessary for providing BIZLINK services. Explain why personal information is needed unless the purpose for collection is obvious e.g. contact details.
- ii. Advise clients they have the right to access information held about them.
- iii. Obtain client permission to request sensitive information e.g. health or medical history.

c) **Anonymity and pseudonymity**

Whilst APP 2 requires that individuals must have the option of not identifying themselves, or of using a pseudonym (false name), due to the nature of BIZLINK services, except in the instance of a general enquiry, clients must identify themselves and provide specific personal details. Clients may choose not to provide particular personal information, however, BIZLINK has operational and legal obligations to collect personal information for services and activities.

d) Use and disclosure of personal information

- i. Complete the relevant Consent Form when personal information is shared with other people or organisations and for media / promotion purposes.
- ii. Only use personal information for the purpose it was collected or for a related purpose reasonably expected to be used.
- iii. Not use personal information for any other purpose without consent, except in circumstances relating to the public interest. These circumstances may include a legal demand, a public or individual health and safety issue, or the protection of BIZLINK rights and property, and operational integrity.
- iv. Not share personal information with other people, organisations, or departments outside of BIZLINK, except where BIZLINK has contractual arrangements, such as with the Department of Social Services (DSS), Department of Human Services (Centrelink) and the National Disability Insurance Agency (NDIA). These organisations or departments adhere to the Australian Privacy Principles and the Privacy Act and to strict conditions governing use of personal information.

e) Direct marketing

Must not give or sell personal information to third parties for marketing purposes.

f) Quality of personal information

- i. Ensure personal information is accurate, complete, and up to date.
- ii. Encourage clients to advise BIZLINK of any changes to personal information.

g) Security of personal information

- i. Protect personal information from misuse, loss and unauthorised access, modification or disclosure. Store personal information securely and do not leave personal information on public view.
- ii. Do not disclose any information about BIZLINK business or services (including the personal information it collects) to third parties without appropriate authorisation.
- iii. Limit access to personal information to appropriate employees.
- iv. Do not discuss or disclose personal information in any manner that could identify an individual in public places.
- v. Do not discuss or disclose personal information in any manner with persons or other organisations that do not have the client's consent to do so.

h) Disposal of personal information

Only dispose of personal information by secure means and as detailed in the 'Policy on Information Security Management', 'Quality and ISM Manual' and as required by any Department Guidelines.

i) Making an enquiry about eligibility for a service with BIZLINK

When making an enquiry about registering, an employee may need to collect information to assist in determining eligibility. The employee will ordinarily use the Direct Registration form, which includes: Surname and Given Name(s) / Job Seeker Identification Number JSID (if known) / Customer Reference Number CRN (if applicable/known) / Residential and Postal Address / Contact Phone Number(s) / Email / Gender / Date of Birth / Country of Birth / Australian Citizenship or Residency / Identification as an Aboriginal, Australian South Sea Islander or Torres Strait Islander (optional) / Preferred language / Whether an interpreter is required and for which language including Auslan /

Disability and health conditions. If working, additional details may include: Whether you have a Tax File Number (BIZLINK do not require the number, just the knowledge of if you have one for the purposes of employment, BIZLINK may assist to obtain one for employment purposes) / Salary information e.g. pay and hours / employer name, address and contact details.

This information is used by the Department of Social Services (DSS) to ensure specific eligibility requirements are met. This information is entered into our DES database (JobReady) and the DSS database (ESSWeb). If such personal information is not provided, we may be unable to determine eligibility and will then be unable to provide a service.

j) When registered for a service as a job seeker or worker

In addition to the information collected to determine eligibility, we will collect more information for work preparation, job-matching, and job support services, with consent, including:

- i. Contacting doctors or other health services or education/training providers or past employers about disability, health, skills and experience to develop a Job Plan or Goal Plan.
- ii. Talking with prospective employers for job matching.
- iii. Providing training, work experience or services to overcome any barriers to finding and keeping a job. Assisting with résumés, job applications and interviews.
- iv. Accessing other services or supports e.g. an interpreter if required.
- v. Providing on-the-job training and ongoing support and assisting the employer and/or co-workers as required.
- vi. Assisting with reporting requirements to the Department of Human Services (Centrelink) e.g. employment status, pay and hours.
- vii. Recording and keeping up-to-date information about employment e.g. pay information, contact details. We may share this information with the Department of Social Services to meet our legal and contractual requirements.
- viii. Accessing the Employment Assistance Fund e.g. for purchasing modifications or specialised technology if needed.
- ix. Liaising with support networks (family, friends, carers and advocates), if involved, and with client consent, about Job Plans or Goal Plans and service needs.
- x. Conducting surveys for voluntary feedback to help us improve our service.
- xi. Resolving any complaint or issues.

k) Identifiers

An identifier is a number assigned by an organisation to an individual to identify uniquely the individual for the purposes of the organisation's operations. Whilst our database (JobReady) will include identifiers like the Job Seeker ID (JSID) and Customer Reference Number (CRN), BIZLINK does not adopt, use or disclose an identifier assigned by a Commonwealth government service except in circumstances directly related to those departments. For instance, when communicating with the Department of Social Services (DSS) about a specific client the JSID may be used instead of a name.

l) Cross-border (overseas) disclosure of personal information

BIZLINK does not disclose personal information to any person or organisation in a foreign country, if that country does not have a comparable information privacy scheme, except in circumstances where the client consents to such disclosure.

m) Sensitive information

BIZLINK does not collect sensitive information such as details about religion or ethnic origin, unless the client has consented, or it is required by law, or it relates to the provision of a health service, or it relates to individual or public health or safety.

n) Website viewing and “cookies”

Our website, www.bizlink.asn.au and our web server host may use an Internet browser feature called a "cookie". A cookie is a small data file that may be placed on the computer of a web user (usually in the browser software folder) the first time a computer visits a website that operates cookies. Cookies by themselves cannot identify you personally. They only identify your computer when you visit our website. The information that we gain by using cookies provides us with statistics to analyse and improve our website. If you do not wish to receive any cookies you can set your browser to refuse cookies. This may mean you are not able to take full advantage of our website features.

o) Email communication

- i. Our website allows you to make comments or give feedback, we collect your email address and other contact details provided by you. We may use your email address to respond to your feedback. We store this personal information on servers located in Australia.
- ii. We may use email to correspond with you if that is a preferred way to communicate and provide information to you. There are risks when transmitting information over the internet, including via email. We will consider these risks before we correspond with you via email.
- iii. BIZLINK may use SharePoint or similar encrypted methods to safely share electronic information via email using links and passwords if necessary.
- iv. You should be aware of risks when sending personal information to us via email. If this is a concern to you, then you should use other methods of communication such as SharePoint (OneDrive or similar), post, phone, fax or face-to-face.
- v. BIZLINK will choose to use other methods of communication such as SharePoint (OneDrive or similar), post, phone, fax or face-to-face for sensitive or confidential information as required and in accordance with the Policy on Information Security Management.

5. Accessing Personal Information

5.1 Withholding the release of personal information

A client can request access to their personal information as per the clause in this Policy “Procedure for Clients to Access Personal Information”. While BIZLINK will accommodate these requests, we reserve the right to withhold this information under certain circumstances, such as, if providing access:

- i. would pose a serious or imminent threat to the life or health of any individual.
- ii. would have an unreasonable impact upon the privacy of other individuals.
- iii. is frivolous or vexatious.
- iv. would be unlawful, would prejudice any legal investigations, or would compromise the integrity of the operation of BIZLINK.
- v. Refer to APP 12 and 13, to determine if other relevant circumstances exist to withhold the release of personal information.

5.2 Accessing and correcting personal information

Under the Privacy Act (APP 12 and 13) clients have the right to access their personal information and can ask that BIZLINK correct personal information. Employees will:

- a) Respond to any request for access or correction within 30 days.
- b) Provide access to personal information as per the clause in this Policy “Procedure for Clients to Access Personal Information” and take reasonable steps to correct it if considered incorrect unless a law allows or requires us not to.
- c) Verify the client’s identity before providing access to information or correcting it.
- d) Provide written advice if, following consultation with a Manager, access to, or correction of personal information is denied and detail the reasons. If we refuse to correct the client’s personal information, the client can ask to associate with it (e.g. attach or link) a statement that they believe the information is incorrect and why.
- e) If a correction is made and we have disclosed the incorrect information to others, obtain client consent to advise the correction.

5.3 Procedure for Clients to Access Personal Information

- a) Clients can request access to personal information held by BIZLINK by contacting any employee. The employee will notify the Quality Manager of the request. The Quality Manager will assist with the request.
- b) The request should be specific, that is, detailing what information is needed and will preferably be in writing e.g. email.
- c) Advise the purpose for the request, this assists in the determination as to whether the clause in this Policy “Withholding the release of personal information” is appropriate or otherwise assists the employee to locate and prepare the appropriate information.
- d) An employee, usually a Coordinator, will make an appointment at a BIZLINK site and at a time that is mutually convenient.
- e) An employee will require identification for the protection of privacy and personal information. This identification should include photo ID where the client is not known to the employee.
- f) Where a family member or advocate is present, they must have client consent to access personal information. A ‘Consent Specific’ form must be completed.
- g) The employee is only required to provide information as per the initial request. If during the appointment additional information is requested, the employee has the right to schedule another appointment to enable adequate time to prepare the information and ensure that this additional information is appropriate to release as per the clause in this Policy “Withholding the release of personal information”.
- h) An employee should print the required information or must be present to navigate to the information and limit access to the information requested.
- i) An employee will ensure access to the information is in an appropriate environment and with a reasonable amount of time for review.
- j) An employee will be present and available to assist during the appointment.
- k) Personal information must remain at BIZLINK. Employees may photocopy documents as requested.
- l) Emailing of personal information is as per the clause in this Policy “Email communication”.

- m) A 'Consent Specific' form must be signed by the client or legal advocate as required for the release or transfer of personal information.

5.4 Conflict of Interest

- a) Where an employee encounters someone they know, including family members, when providing services, they should:
 - i. advise their manager of the potential conflict of interest
 - ii. not access the individual's records
 - iii. not be involved in providing employment services to that individual; and
 - iv. not have a role in processing the individual's claims (or any other decisions making functions)
- b) The Managing Director will refer the client to another employee for case management, or provider as appropriate.

6. Definitions

The Australian Privacy Principles (APPs):

1. Open and transparent management of personal information.
2. Anonymity and pseudonymity.
3. Collection of solicited personal information.
4. Dealing with unsolicited personal information.
5. Notification of the collection of personal information.
6. Use or disclosure of personal information.
7. Direct marketing.
8. Cross-border disclosure of personal information.
9. Adoption, use or disclosure of government related identifiers.
10. Quality of personal information.
11. Security of personal information.
12. Access to personal information.
13. Correction of personal information.

Personal information is information or an opinion about an individual whether or not the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. The APPs apply only to information about individuals. Personal information may include contact details, background information that may include referral source, work history, work skills, interests and any barriers to employment.

Sensitive information includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information.

Confidential Information refers to any information or document that a business or individual wishes not to make public. It can include anything that has been acquired by or made available to an individual or

other legal entity during the relationship between the parties. Types of information that is considered confidential includes, but is not limited to:

- name, date of birth, age, sex and address
- current contact details of family, guardian etc
- bank details
- medical history or records
- personal care issues
- service records and client notes
- individual personal plans e.g. Job Plans, Goal Plans NDIS.
- assessments or reports
- guardianship orders
- police checks / employee screening checks
- incoming or outgoing personal correspondence

Privacy (Tax File Number) Rule 2015 (Cth) – TFN Rule

The TFN Rule, which is legally binding, regulates the collection, storage, use, disclosure, security and disposal of individuals' tax file number (TFN) information. The TFN Rule applies to the TFN information of individuals. Unauthorised use or disclosure of TFNs can be an offence under the Taxation Administration Act 1953 (Cth) and attract penalties including imprisonment and monetary fines.

Approved recipient means a TFN recipient that:

- a) is engaged by an authorised recipient to provide services where it is reasonably necessary to have access to TFN information; or
- b) has obtained an individual's consent to access their TFN, to help manage that individual's taxation, superannuation or personal assistance affairs.

It is important to protect the privacy of TFNs because they are unique identifiers which are issued to individuals for life. Some of the privacy concerns associated with TFNs include:

- they could potentially be used by all TFN recipients as part of a national identification system
- they could be used to match or link records of personal information held by many different TFN recipients, which could:
 - enable a TFN recipient to look up detailed information about a person just by knowing their TFN
 - increase the risk of serious breaches of personal privacy if data is lost or misused
 - increase the risk of identity theft.

BIZLINK employees may assist clients with obtaining their TFN, e.g. in the instance of a first job. BIZLINK employees must not retain any TFN related information or record the client's TFN in any form.

Ref: [Tax file numbers - Home \(oaic.gov.au\)](http://taxfilenumbers.gov.au) [Privacy \(Tax File Number\) Rule 2015 \(legislation.gov.au\)](http://legislation.gov.au)

Policy 1.2 Screening Checks for Clients

1. Policy Summary

Who	BIZLINK employees, clients, prospective clients. ('Client' same meaning as 'participant').
What	To obtain and assess Screening Checks for clients to determine suitability for activities and the management of records related to Screening Checks. To ensure clients have Screening Checks as required to minimize risk or harm. The policy recognises the legal and moral duty of care obligations to clients, employers and the broader community.
How	By providing guidelines for employees about processing Screening Checks for clients. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 1 Rights NDIS Practice Standards 1 Right and Responsibilities, 2 Provider Governance and Operational Management, 3 Provision of Supports, 4 Provision of Supports Environment Working with Children (Criminal Record Checking) Act 2004 (WA), Spent Convictions Act 1988 (WA), National Disability Insurance Scheme (Worker Screening) Act 2020 (WA), Electronic Transactions Act 1999 (Cth) Department of Social Services Deed and Guidelines BIZLINK Policy on: Rights, Prevention of Violence and Aggression, Child Safety and Wellbeing, Privacy, Feedback and Complaints
Approved	14/08/2023

2. Policy Statement

BIZLINK employees will ensure that clients obtain relevant Screening Checks to participate in activities as required by the employer or training provider and as necessary due to assessed risk.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Immediately report all incidents (including near misses).
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Accident / Incident Report

4. Responsibilities

Note: In most instances, the employer or training organisation will undertake the assessment of the client's Screening Checks and determine whether there is an unacceptable risk in engaging the client in the activity.

4.1 Management

- a) Ensure policies are available to employees, clients, and other stakeholders.
- b) Assist employees to determine if the results pose an unacceptable risk when the Screening Check indicates a criminal conviction or an issue that requires further scrutiny.
- c) Authorise payments to reimburse clients for the cost of Screening Checks in accordance with the Policy on Client Training and Support.

4.2 Employees

- a) Determine if the activity requires Screening Checks e.g. Police Checks, Working with Children Check, NDIS Check and obtain relevant checks prior to commencing. Refer to the current Department Guidelines regarding “Criminal Records Checks Guidelines” for further procedural and compliance advice.
- b) Obtain the client’s consent to get a copy of any Screening Checks.
- c) Consult their Manager to determine if the Screening Check poses an unacceptable risk.

If the Manager determines there are relevant records of convictions for crimes, do not arrange for the client to participate in the activity.

If there are records of convictions for crimes that are not relevant to the activity and the Manager determines it is appropriate to participate in the activity, risk mitigation strategies must be documented.

- d) Review the Job Plan or Goal Plan with the client and reassess which activities will be appropriate when Screening Checks indicate an unacceptable risk for some activities.
- e) Use and store Screening Check documentation in accordance with the Policy on Privacy and any contractual requirements with the Department of Social Services.

5. References

Working with Children Check [About the WWC Check in Western Australia \(workingwithchildren.wa.gov.au\)](http://workingwithchildren.wa.gov.au)

NDIS Worker Screening Check [NDIS Worker Screening Check \(www.wa.gov.au\)](http://www.wa.gov.au)

National Police Certificates [National Police Certificates | Western Australia Police Force](http://www.wa.gov.au)

Spent Convictions [FAQ | Western Australia Police Force](http://www.wa.gov.au)

6. Definitions

Activity: includes paid employment, work experience, paid and unpaid work trials, volunteer work, job sampling, training, education.

Screening Check: includes Criminal Record Check, National Police Certificate, National Police Check for Volunteers, State Traffic Certificate, the Working with Children Check, International Police Checks, NDIS Check or any other check required for the activity. Screening checks assist organisations to determine whether someone is suited to the activity. One check cannot substitute for another.

Activities that require Screening Checks include those:

- a) Subject to industry accreditation requirements, industry standards, or a legal requirement that the activity can only be done by people who have not been convicted of particular crimes.
- b) Specified by the Department of Social Services as requiring criminal records checks.

- c) With regular or unsupervised contact with children, elderly, or other classes of vulnerable people.

Working with Children Check (WWCC): a comprehensive criminal record check for people working with children in Western Australia. The WWC Check aims to protect children by:

- a) deterring people from applying to work with children where they have a relevant charge or conviction on their criminal record that indicates they may harm a child
- b) detecting new charges and convictions of those people who hold a current WWC Card and preventing them from continuing to engage in child-related work where their criminal record and behaviour indicates they may harm a child and
- c) protecting children by creating awareness that child safety is a whole of community responsibility

NDIS Worker Screening Check (NDIS Check) a screening process for NDIS workers to determine that applicants do not present an unacceptable risk of harm to people with disability. The NDIS Check is a national tool that helps NDIS providers determine that individuals seeking to work (or already working) in certain NDIS roles do not present an unacceptable risk of harm to people with disability.

Spent Conviction: Having a conviction declared spent effectively limits the disclosure of that conviction. For example, a conviction that has been spent is not listed on a National Police Certificate. However, certain government departments, licensing bodies as well as the Police and Courts of Law have exemptions under the Spent Convictions Act 1988 (WA) and have access to convictions that have been spent.

Policy 1.3 Child Safety and Wellbeing

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers, clients, prospective clients, client's support networks and stakeholders. ('Client' same meaning as 'participant').
What	BIZLINK has a zero tolerance of child abuse. To provide a safe, healthy, supportive and secure environment for all clients and protect the wellbeing of children and young people. BIZLINK is committed to preventing child abuse and identifying risks early, removing and reducing these risks.
How	Provide procedures to uphold the safety and wellbeing of client's aged under 18 years. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police.
Resources	NSDS 1 Rights NDIS Practice Standards 1 Right and Responsibilities, 2 Provider Governance and Operational Management, 3 Provision of Supports, 4 Provision of Supports Environment Privacy Act 1988 (Cth), Australian Human Rights Commission Act 1986 (Cth), National Principles for Child Safe Organisations BIZLINK Policy on: Rights, Feedback and Complaints, Employee Complaints, Prevention of Violence and Aggression
Approved	14/08/2023

2. Policy Statement

BIZLINK has a zero tolerance of child abuse, and all allegations and safety concerns are treated seriously. BIZLINK employees are committed to preventing child abuse and identifying risks early, removing and reducing risks.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Report all incidents or any reasonable belief for concern about young people's wellbeing or safety that come to their attention.
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)

4. Responsibilities

4.1 Management

- a) Ensure policies are available to employees, clients, and other stakeholders.

- b) Implement stringent recruitment, induction, training and supervision procedures and policies. Policies and codes of conduct will reiterate that BIZLINK has a zero tolerance of child abuse and that child safety is everyone's responsibility.
- c) Ensure employees working directly with children have current Working with Children Checks as per the Policy on Employee Screening Checks.
- d) Foster an organisational culture that supports employees to discuss any concerns about child abuse or child safety concerns. Including supervision, team meetings and relevant training.
- e) Consider risks and risk mitigation strategies.
- f) Provide information about the Complaints Resolution and Referral Service (CRRS), the National Abuse and Neglect Hotline, and other appropriate government departments or external services that may assist with advocacy or support. NDIS participants contact the NDIS Quality and Safeguards Commission.
- g) Respond to any reports of incidents involving children or young people with reference to the Policy on Rights and the Policy on Feedback and Complaints.
- h) Report offences to the relevant Government Department and/or Police and pursue laying of charges and prosecutions against offenders where appropriate.
- i) Implement relevant post-incident strategies including the treatment, de-briefing, counselling and support of affected parties.

4.2 Employees

- a) Ensure contact appointments take place at a BIZLINK site with at least two staff present. Avoid working in isolation wherever possible. Where this is not possible, discuss risk mitigation strategies with the Site Manager.
- b) Employees will:
 - i. Preserve the wellbeing of each child and young person
 - ii. Provide a safe and secure environment for all clients and employees
 - iii. Provide an open, welcoming environment in which everyone's contribution is valued and respected
 - iv. Respect the inherent worth and dignity of each child
 - v. Never act in a manner that shames, humiliates, oppresses, belittles or degrades children or young people
 - vi. Never engage in any activity with a child or young person that is likely to physically or emotionally harm them
 - vii. Never initiate unnecessary physical contact with a child or young person, or do things of a personal nature for them that they can do for themselves
 - viii. Never act in a manner so as to develop a 'special' relationship with a specific child or young person for their own needs
 - ix. Never arrange contact, including online contact, with children or young people outside of BIZLINK service, programs and activities
 - x. Never photograph or video a child or young person without the consent of the child and their parents or guardians
 - xi. Never work with children or young people while under the influence of alcohol or illegal drugs

- xii. Never engage in open discussions of a mature or adult nature in the presence of children or young people, including inappropriate language.
- c) Employees will recognise the right of a child or young person to:
 - i. Live free from abuse including neglect or exploitation
 - ii. Realise their potential in every area of their life
 - iii. Have control over their own lives as developmentally appropriate
 - iv. Take part in decisions that affect their lives
 - v. Be given information and to communicate in a way that suits their needs
 - vi. Raise concerns or complaints and provide feedback.

4.3 Stakeholders

- a) Comply with their legal obligations under relevant Work Health and Safety legislation to protect risks to physical and psychological health and safety.

5. References

Child Safe Organisations [Home | Child Safe Organisations \(humanrights.gov.au\)](https://humanrights.gov.au/child-safe-organisations)

National Principles [National Principles | Child Safe Organisations \(humanrights.gov.au\)](https://humanrights.gov.au/national-principles)

6. Definitions

The National Principles for Child Safe Organisations aim to provide a nationally consistent approach to creating organisational cultures that foster child safety and wellbeing across all sectors in Australia.

1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes for complaints and concerns are child focused.
7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the national child safe principles is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

Child abuse includes: Any act committed against a child involving a sexual offence, or an offence under section 49B(2) of the Crimes Act 1958 (grooming); physical violence or serious emotional or psychological harm; serious neglect.

Reasonable belief is formed if a reasonable person in the same position would have formed the belief on the same grounds. A 'reasonable belief' is not the same as having proof. Factors contributing to reasonable belief may include when:

- a) A child states they have been sexually abused.
- b) A child states they know someone who has been sexually abused (sometimes the child may be talking about themselves).
- c) Someone who knows a child states that the child has been sexually abused.
- d) Professional observations of the child's behaviour or development leads a professional to form a belief that the child has been sexually abused.
- e) Behaviour consistent with that of an abuse victim is observed.

The source of abuse can be any person, including clients, the client's support network, carers, friends, members of the public, members of other services/employers and work colleagues.

Hazard is defined as anything that may result in (a) injury to the person; or (b) harm to the health of the person.

Interested Party/Stakeholder means clients, employers, funders, client's support network, referral sources, contractors, volunteers, community services. An interested party or stakeholder includes a person or organisation who engages with BIZLINK and directly or indirectly with our clients.

WHS Act means the Work Health and Safety Act 2020 (WA).

Risk is defined as the probability of injury or harm occurring.

Policy 1.4 Information Security Management

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers, clients, prospective clients, client's support networks and stakeholders (users). ('Client' same meaning as 'participant').
What	To ensure information security controls are in place to protect BIZLINK IT from theft, fraud, malicious or accidental damage, and privacy or confidentiality breaches. BIZLINK IT includes, but is not limited to, all client, contract, service, operational, financial, HR and strategic information whether held as hard-copy or electronically in any form. All Information Technology devices, networks, databases, web or cloud-based applications, all associated files, folders and information storage and systems related to BIZLINK services.
How	By implementing technical, physical, and administrative security controls to safeguard BIZLINK IT from inappropriate, illegal or accidental misuse, exposure or corruption of data and technology. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, termination of supplier contracts, or other necessary response.
Resources	ISO 27001 Information Security Management System, Statement of Applicability (SoA), Australian Government Information Security Manual, Electronic Transactions Act 1999 (Cth) BIZLINK Policy on: Privacy, Information Technology and Cyber Safety, Fraud and Corruption Control Business Continuity Plan, Fraud Control Plan Department of Social Services Deed; Department of Employment and Workplace Relations: Security Policy for External Service Providers and Users NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management
Approved	14/08/2023

2. Policy Statement

BIZLINK management requires effective information security management to protect the confidentiality, integrity and availability of our information and IT systems (BIZLINK IT). Protecting confidentiality is essential for maintaining the privacy of our clients and other stakeholders. Protecting the integrity of personal and sensitive information is critical for ensuring the privacy of our clients and other stakeholders. Ensuring the availability of BIZLINK IT is critical for service delivery. Users of BIZLINK IT will ensure that access, use, and disclosure is in accordance with this policy. All users are responsible for protecting BIZLINK IT from unauthorised access, modification, destruction, or disclosure.

3. Incident Management

3.1 Users must:

- a) Immediately report all incidents (including near misses) and send advice of incident to ithelp@bizlink.asn.au
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Business Continuity Plan – Data Breach Response Plan
 - iv. Fraud Control Plan
 - v. Incident Response Plan
 - vi. Continuous Monitoring Plan

4. Information Security Objectives

1. **Confidentiality** treat information in accordance with the Policy on Privacy and only disclose with permission or ensure each individual has an understanding of the intended use of the information
KPI: 100% of clients have signed Authorities, COINs show that stakeholders are encouraged to report incidents or breaches with the aim of minimising risk through reporting, mitigation and responding with the aim of zero confidentiality breaches
2. **Privacy** respect privacy and uphold each individual's right or expectation that personal information and other identifying information will not be disclosed
KPI: COINs show that stakeholders are encouraged to report incidents or breaches with the aim of minimising risk through reporting, mitigation and responding with the aim of zero privacy breaches
3. **Integrity** protect data and information against unauthorised alteration or destruction
KPI: COINs show that stakeholders are encouraged to report incidents or breaches with the aim of minimising risk through reporting, mitigation and responding with the aim of zero breaches of unauthorised access to BIZLINK IT or unauthorised data destruction
4. **Availability** provide authorised users with timely and reliable access to BIZLINK IT for authorised purposes
KPI: COINs show that stakeholders are encouraged to report incidents with the aim of ensuring ready access to BIZLINK IT when needed
5. **Respond** be capable of responding to a data breach and protect information and physical assets
KPI: The Fraud Control Plan and Business Continuity Plan are current, COINs show that stakeholders are encouraged to report incidents or breaches with the aim of minimising risk through reporting, mitigation and responding with the ultimate aim of zero data breaches or damage/loss to information and physical assets
6. **Continuous Improvement** understand our operational risks and implement adequate controls to prevent identified risks. Commit to continual improvement as cyber risks change and develop.
KPI: The Statement of Applicability SoA, shows continuous revision and updates to mitigate evolving security risks. COINs and ICANs show responses to incidents and breaches and actions taken

5. Guidelines on Information Security Management

5.1 Access Control

a) Principles

Access to BIZLINK IT must be controlled and limited as follows:

- i. **Need-to-Know and Need-to-Use principles:** users are only granted access to the information they need to perform their tasks.

- ii. **Principle of Least Privilege:** only the minimum privileges necessary to complete required tasks will be assigned to each user.
- iii. **Segregation of Duties:** the granting of roles, duties and associated access rights must be sufficiently segregated to minimise risk and avoid conflict of interest.

b) Passwords and Authentication

Access to the Department's IT Systems (ESSWeb), BIZLINK Cloud, and any Third-Party Database e.g. JobReady (DES), SupportAbility (NDIS), Accounting and HR packages e.g. MYOB, Employment Hero, must be protected with passwords, or other secret authentication information, to validate user identity. A password complexity policy is implemented for all BIZLINK accounts. Multi-factor Authentication is applied where practical. Passwords must be kept confidential and securely stored.

c) Privileges

A formal user registration and termination process includes:

- i. Privileges are assigned to each user as per role / access need, and monitored, modified, or revoked as required and periodically reviewed to ensure they are complete, accurate and that access is still required.
- ii. Access rights are removed upon termination of employment or contract (including suppliers) or need for access is otherwise no longer required.

Access is immediately revoked when a user exits BIZLINK and when under investigation for fraud or other conduct the Managing Director determines revoking of access is required.

- iii. Users must agree to comply with this Policy and the Policy on Information Technology and Cyber Safety and a record of this must be maintained (Policy Acknowledgement).
- iv. Accounts created for more than one individual to use e.g. client generic login, require passwords to be updated as required, that confidentiality is maintained, and that usage can be monitored.

5.2 Statement of Applicability (SoA)

- a) The Quality Manager will maintain the Statement of Applicability (SoA). The SoA will detail the necessary controls and justifications for inclusions, whether they are implemented or not, and the justification for exclusion of any controls detailed in Annex A of ISO 27001 Information Security Management Systems and the Australian Government Information Security Manual.
- b) The Quality Management system will include documents, policies, and procedures to implement the SoA controls so users can comply with the requirements and mitigation strategies. For example, but not limited to, this Policy, the Quality and ISM Manual, the Information Security Declaration, 101 procedures.

5.3 Cloud services

Agreements with cloud service providers require that:

- i. BIZLINK has ownership of information.
- ii. information storage site(s) are known and within Australia.
- iii. information retention and disposal are in accordance with relevant recordkeeping plans and retention and disposal schedules.
- iv. security arrangements are in place to protect and prevent misuse of information.

- v. information is managed in accordance with the Privacy Act.
- vi. critical data is encrypted, and encryption is managed by BIZLINK.

5.4 Cyber threats and malware - detection, prevention, reporting and management of incidents

BIZLINK IT (including third party managed systems) must have security controls to prevent vulnerabilities to cyber threats and malware. Cyber security planning, processes and procedures including detection, prevention, reporting and management of incidents must meet the SoA. Users must report any suspected or actual incident in accordance with the section on Incident Management.

5.5 Data transfer and encryption

Where practical, encryption must be used to protect the security of BIZLINK IT at rest and in transit as per the SoA. Email is the least secure way of sharing information. Users will be advised of alternate methods of sharing sensitive information e.g. SharePoint and/or to encrypt files with personal information e.g. OSA request for Client Notes.

Employees that are transporting information from one site to another, to an employer or client or for any other purpose (e.g. mail, documents for signature) aim to do same day. If this is not possible, then transported information must not be left in the employee's motor vehicle and must be stored securely.

5.6 USB devices

Users will use SharePoint/OneDrive or similar as an alternative to USB's for transferring data externally. The use of non-authorised USB devices is prohibited and is a breach of security.

5.7 Bluetooth

Users will turn Bluetooth off unless in use. Users will ensure devices use the latest versions and protocols i.e. devices that use Bluetooth 1.x, 2.0, or 4.0-LE are banned. Users will change the default PIN code to something hard to guess.

5.8 Data storage

- a) **Data storage centres:** BIZLINK Information must be hosted, transacted, processed, and supported in data centres that are connected by high bandwidth, low latency communications, and supported by reliable infrastructure and utilities.
- b) **Storage on workstation or laptop computers:** Workstation or laptop computer hard drives must not be used as primary or permanent storage for BIZLINK information. Confidential, personal, or sensitive information should not be stored on workstation or laptop hard drives.
- c) **Storage in output devices (printers/fax):** Printers, facsimile machines and other devices that output confidential or personal information must be subject to security controls. Where output devices store information on internal hard drives these must be destroyed in accordance with the section on Disposal of storage media.
- d) **Storage on portable devices:** Where portable devices are used for the capture or transport of original data, such data must be transferred to a primary storage facility as soon as practical. Confidential or personal information (including digital images, downloaded client data, commercially sensitive information etc) must not be held on portable devices unless the device is protected by approved cryptography (e.g. USB devices or laptops issued by BIZLINK; encrypted mobile phone).

5.9 Disposal of storage media

Storage media maintained by or for BIZLINK that is no longer required must be disposed of in a secure manner appropriate to the sensitivity of the information. Data contained in physical media or equipment must be removed using appropriate data sanitisation methods at the time of decommissioning IT equipment

(including mobile phones). Approved sanitisation and destruction methods will be detailed in the BIZLINK IT Security 101 document.

5.10 Mobile devices

This section provides additional security considerations when using a BIZLINK owned mobile device (this includes mobile telephones, laptops, and tablets.)

- a) To ensure the security of mobile devices issued by BIZLINK, management must:
 - i. Ensure all devices have up-to-date virus protection, security software patches and software updates installed.
 - ii. Ensure all devices require users to have authentication controls i.e. Password or biometric (fingerprint / face ID), and MFA where practical.
 - iii. Ensure all devices have remote disabling, erasure or lockout software installed.
 - iv. Re-allocate or dispose of devices in line with the section on disposal of storage media.
- b) Users are responsible for the security of mobile devices at all times, users must:
 - i. Remove all service related or other personal information from the device when the device is disposed of, transferred to another person or is to undergo repair.
 - ii. Comply with the Policy on Information Technology and Cyber Safety, Policy on Work Health and Safety, and the Policy on Motor Vehicle Use.
 - iii. Ensure mobile devices are not left unattended, including in vehicles, offices, offsite. Individuals may be held liable for any negligence resulting in lost, stolen or damaged devices, or delay in reporting. Lost, stolen or damaged mobile devices must be reported as soon as possible. If stolen, a report should be made to the police to obtain an official report number for insurance purposes. Users storing private data do so at their own risk.
 - iv. Applying the 'clear desk and clear screen' rule to prevent unauthorised viewing or access to information, e.g. awareness of line-of-sight of screen, laptop locked or logged off when unattended, printed material securely filed.
- c) **Privately-owned devices** employees are not permitted to use privately-owned devices to access BIZLINK IT.

5.11 Remote access and Teleworking

The BIZLINK Cloud provides remote access capabilities for flexible work arrangements. Using the BIZLINK Cloud allows employees to access information offsite. User must:

- a) Only use BIZLINK owned mobile devices (laptop, tablet, mobile telephone) to access BIZLINK IT.
- b) Only connect to the internet via a secure home Wi-Fi connection (must have password protection) or Hotspot to a BIZLINK mobile telephone.
- c) Not connect to the internet via any other networks for example, but not limited to, hotel, airport, restaurant and other such public or unsecured Wi-Fi connections.
- d) Protect devices and information from theft, loss, or damage.
- e) Apply the 'clear desk and clear screen' rule to prevent unauthorised viewing or access to information, e.g. awareness of line-of-sight of screen, laptop locked or logged off when unattended, printed material securely filed.

5.12 Provision of Guest Internet Services

Providing access to the internet via personal devices for guests or visitors of BIZLINK sites should be assessed against the business objectives and associated costs. Where guest internet services are established for that site and available for use, privately owned mobile devices may connect to the BIZLINK system network under the following conditions:

- i. appropriate technical capabilities and Wi-Fi to support guest internet services have been established for that site.
- ii. guest/visitor technical support arrangements have been established by BIZLINK, in conjunction with UCIT (IT Support), to manage any faults or visitor connection requirements.

5.13 Monitoring and logging

- a) Access to BIZLINK IT is provided on the understanding that use will be monitored. Logs should be kept for the retention period as per the SoA, to assist in future audit and access control monitoring. Audit logs must be checked regularly.
- b) Devices e.g. laptops and mobiles, along with emails and phone records, are the property of BIZLINK.
 - i. Management has the right to check the content at anytime.
 - ii. Management may direct an employee's email to be accessed or forwarded to another employee, e.g. when on leave or upon exit to monitor emails and respond as required.
 - iii. Management may reissue an employee's mobile when on leave or upon exit to monitor calls and respond as required.

5.14 Network security management

Networks are managed and controlled to protect information in systems and applications as per the SoA.

5.15 Personnel security

The requirements listed in this section must be addressed to ensure BIZLINK employees and employees engaged by IT Providers are aware of their responsibilities in relation to information security and are suitable for the roles they undertake.

- a) Employees must provide identification and have a valid right to work in Australia – a person who is not an Australian citizen must hold appropriate work entitlements.
- b) Employees with certain Administrator rights may need to be Australian citizens or permanent residents.
- c) Employee competency must be verified by qualifications, certifications, and experience as per the Policy on Employee Recruitment and Selection.
- c) Employees must complete Screening Checks as per the Policy on Employee Screening Checks.
- d) Employees must sign an Information Security Declaration that details their obligations and responsibilities.
- e) BIZLINK employees must be:
 - i. Advised of their information security roles and responsibilities at orientation and as required.
 - ii. Able to recognise cyber threats, data-breaches and the security responses required of them, including reporting incidents.

- iii. Aware of the information security risks and threats in the use of social media, including identity theft.
 - iv. Educated on security incident management procedures and reporting.
- f) **IT Provider support** should be provided by personnel who are physically located in Western Australia and subject to Australian and Western Australian laws and policies wherever possible. Some non-routine problem resolution, upgrade or maintenance services may be provided remotely by personnel located outside Western Australia, however, such services must be subject to strict security controls, network access under formal access arrangements and ongoing monitoring e.g. JobReady and SupportAbility (Third Party databases are Eastern States based, but are still Australian companies and use Australian servers for our data) must comply with the Departments information security requirements.
- g) **Exit checks** for employees must include ensuring the individual has returned and accounted for all BIZLINK IT assets, including any electronic records. Employee exit procedures must include the restriction of access to BIZLINK IT. Employees must acknowledge they do not have possession of any BIZLINK Information or access to any BIZLINK IT upon exiting.

5.16 Physical security

Physical and environmental security of BIZLINK IT is necessary to prevent unauthorised physical access, damage and interference and will be implemented by management as per to SoA.

5.17 Information security continuity management

- a) **Business Continuity Plan** will include Data Breach Response Plan and will consider maintenance of data security during an adverse situation.
- b) **Data Breach Response Plan** the response plan should enable BIZLINK to contain, assess and respond to data breaches quickly, to help mitigate potential harm to affected individuals and comply with the Notifiable Data Breach (NDB) scheme.
- c) **Disaster Recovery Plan** to ensure ongoing availability of information backups must be stored in a remote location. For critical systems and services, backup arrangements must cover all systems information, applications, and data necessary to recover the complete system in the event of a disaster. Where appropriate backup data should be encrypted.
- d) **Incident Response Plan** an information security incident is any event that results in unauthorised access to data, applications, services, networks and/or devices, through bypassing underlying security mechanisms. BIZLINK IT and physical environments must be monitored for security incidents. If detected, incidents are managed as per QP04 Improvement, the Business Continuity Plan, and Incident Response Plan as relevant.

5.18 Software / Application licencing, installation and use

Only authorised and licenced software and applications must be used. Unauthorised software and applications may introduce malware or viruses. Users will be restricted, as per their role, in the ability to install or download software and applications.

5.19 Third parties and supplier relationships

Where third party organisations are contracted to provide services that include IT services, contracts must contain appropriate measures to ensure the protection of BIZLINK IT and adhere to policies and procedures.

5.20 Ai Programs

Employees may use Ai (Artificial Intelligence) programs such as ChatGPT or similar, to assist with their work productivity. Ai that is part of Microsoft 365 and other programs authorized for use are not external to our systems, the following applies to inputting information into a program separate to our authorized systems.

- a) **Confidentiality of Sensitive Information:** employees must maintain the confidentiality of sensitive information during interactions with ChatGPT or similar.
- b) **Data De-identification:** any sensitive information shared with ChatGPT or similar must be de-identified or redacted to minimize the risk of identification.
- c) **Reporting Security Incidents:** Any suspected or actual security breaches, unauthorized access, or disclosure of sensitive information through ChatGPT or similar must be immediately reported to ithelp@bizlink.asn.au

5.21 Compliance, monitoring and evaluation

- a) The Quality Manager, in consultation with UCIT and Quality Review Committee (QRC) must develop internal processes to manage and monitor compliance with this policy.
- b) UCIT may log transactions and communications whether private or business related. UCIT may also carry out compliance audits to ascertain the level of site-wide compliance with this Policy and may provide updates to the Quality Manager regarding findings of compliance monitoring activities. The Quality Manager will report to the QRC, or as per the Incident Management section in this Policy as relevant.
- c) Although systematic and ongoing surveillance of user emails and internet access logs will not occur, UCIT may monitor or investigate users of BIZLINK IT. This will only occur to confirm compliance with the requirements of this Policy and to investigate possible incidents of breaches of security, unauthorised access or Human Resources matters.
- d) The Quality Manager will undertake audits as per ISO 27001 requirements and will complete internal audit reports that employees can review.
- e) The Department systems are monitored and there is a Department Policy on monitoring system use:
 - i. Any data or material created, captured, transmitted or stored using department IT resources may be viewed by authorised personnel as part of normal monitoring processes.
 - ii. Users will not necessarily be notified that an item has been inspected.
 - iii. Where inappropriate use is detected it is followed up and reported to the appropriate authorities including the Australian Federal Police.
 - iv. The department may disclose the contents of log files or data stored on IT facilities to appropriate third parties.
 - v. The department may use any material gathered as evidence when misconduct or criminal action is being considered or undertaken.

6. Definitions

As per the Australian Government Information Security Manual “Glossary of cyber security terms” www.cyber.gov.au

Policy 2.0 Participation and Inclusion

1. Policy Summary

Who	BIZLINK employees, clients and client's support networks. ('Client' same meaning as 'participant').
What	To ensure BIZLINK designs and delivers services that provide opportunities for meaningful participation and inclusion, and are considerate of individual values and beliefs
How	By providing guidelines for employees to deliver our services in a manner that enables people with disability, as far as possible, to live and work in ways that the community values and to participate and be included in society. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 2 Participation and Inclusion NDIS Practice Standards 1 Right and Responsibilities, 3 Provision of Supports
Approved	14/08/2023

2. Policy Statement

BIZLINK employees actively work to create meaningful opportunities for people with disability and strive to reduce or eliminate barriers to participation and inclusion. We believe in promoting valued roles and that clients should have the freedom to access supports that respect their unique culture, diversity, values, and beliefs. We understand the importance of tailoring our support to meet individual needs and preferences.

3. Responsibilities

3.1 Management

- a) Ensure policies are available to employees, clients, and other stakeholders.
- b) Foster a commitment to achieving quality employment and other outcomes to achieve valued roles e.g. clients work in a wide range of jobs in a variety of roles and with commensurate income levels.
- c) Provide opportunities for participation of clients and other stakeholders in feedback meetings, Annual General Meetings, surveys and quality audits.

3.2 Employees

- a) Participate in training regarding cultural awareness, including Aboriginal and Torres Strait Islander culture, human rights and person-centred approaches.
- b) Respect clients as individuals who can make a valuable contribution by participating in their community, including work, learning and social pursuits. Do not assume that a particular job is appropriate because of the client's age, gender identity, culture, heritage, language, faith, sexual orientation (LGBTIQ+), relationship status, disability or other factors.
- c) Demonstrate positive communication and attitudes that reflect our values. For example, speak positively and respectfully about clients and avoid the use of labels, derogatory, disrespectful or patronising language.

- d) Ensure clients have a current Job Plan or Goal Plan completed in accordance with the Policy on Individual Outcomes and:
 - i. Consider physical or social barriers and detail strategies to overcome or lessen their impact on achieving participation and inclusion.
 - ii. Build on existing competencies to increase the prospect of securing and maintaining employment.
 - iii. Develop job preferences and, where required, training or other development opportunities to enable the achievement of employment or life goals.
 - iv. Engage the support network (families, friends, carers and/or advocates), where involved with the client's consent, to participate in developing the Job Plan or Goal Plan.
- e) Present people with disability positively in our publications and promotions e.g. photographs and articles demonstrate people with disability in valued roles.
- f) Provide clients with opportunities to secure and maintain quality employment and
 - i. Match jobs to current and potential skills and employment goals, as detailed in the Job Plan or Goal Plan or as otherwise agreed.
 - ii. Ensure pay is award level or matched to productivity using the Supported Wages System.
 - iii. Provide on and off-site support to facilitate inclusion and participation with co-workers and others e.g. customers, with consideration of individual needs and employment arrangements. Reflecting our value that "people with disability have a right to receive individualised support to become competent and valued employees".
 - iv. Use support strategies that utilise typical workplace facilities, equipment, training and services in a manner and at times that coincide with those of co-workers e.g. breaks, meals, social events. This avoids segregation.
 - v. Use natural workplace supports e.g. co-workers as mentors whose behaviours and attributes the client can model.
 - vi. Monitor placements within the same worksite to avoid the risk of creating an enclave that may promote social isolation, emphasise difference and create segregation from the general workforce.
- g) Provide opportunities to participate by connecting with people and services by using local community resources, e.g. assisting clients to link in with mental health supports, leisure, recreation, accommodation and advocacy services as per individual needs, employment or other goals.
- h) Provide clients with opportunities to have their voices heard on decisions that affect them e.g. participation in developing their Job Plan or Goal Plan, being encouraged to provide feedback through surveys and groups and promoting awareness of the complaints procedure.
- i) Understand the key roles that culture, diversity, values and beliefs play in clients lives and ensure these roles are identified and responded to in a sensitive manner. Services are responsive to the diversity of each client and promote a respectful workplace for everyone.
- j) Research the persons cultural background and seek advice or assistance if required. Culture, diversity, values and beliefs is especially important when considering how people respond to disability. Cultures have differing views towards disability and it's important to gain insight into the possible impact this may have before offering information or support. The first point of contact can either be successful or create an unnecessary barrier that may take a long time to rectify. The stigma of disability within some communities may also be a barrier. Some Aboriginal communities

do not have a word for disability and the way in which Aboriginal people with disability are part of their local community may differ to that of the wider community. Understanding the cultural context and background of people with disability is critical to addressing their needs and to building inclusive communities. Respect, understanding, and a flexible approach to communication can assist in overcoming many of these barriers to participation.

- k) Employees support each client's right to practise their culture, common values, and beliefs. While accessing supports employees:
- Build a trusting relationship with the client
 - Are aware of and sensitive to their own culture and behaviour
 - Do not make assumptions
 - Focus on similarities, for example, being a parent, shared interests (sport, hobbies, TV shows), knowledge of disability, shared life experiences
 - Are flexible and patient to foster and cater for diverse needs
 - Explain that BIZLINK has some obligations that cannot be changed and that we must do certain things and complete certain forms. For instance, our legal and duty of care requirements, accountability for funding, quality assurance. That we must provide our service in accordance with any guidelines and that some parts of our service cannot be changed
 - Are aware of community resources that support people from diverse cultures
 - When necessary, we will involve other support and services, such as professional interpreters. It is important to note that relying on friends or family members may not always guarantee clear and unbiased communication.
- l) Undertake continuous professional learning in cultural awareness training. Employees must make every effort to support client values and beliefs as well as understand the individuality and culture needs of people from culturally diverse backgrounds.
- m) Support active decision-making and individual choice of each client including the timely provision of information using the language, mode of communication and terms the client is most likely to understand.
- n) Support each client's right to the dignity of risk in decision-making. When needed, clients are supported to make informed choices about the benefits and risks of the options being considered.
- o) Client autonomy is respected, including their right to intimacy and sexual expression.
- p) Clients are given sufficient time to consider and review their options and seek advice if required, at any stage of support provision, including assessment, planning, provision, review and exit.
- q) Support the client's right to access an advocate (including an independent advocate) of their choosing and their right to have the advocate present. This may include their support network (families, friends, carers) or an external service.

Policy 3.0 Individual Outcomes

1. Policy Summary

Who	BIZLINK employees, clients and client's support networks. ('Client' same meaning as 'participant').
What	To establish standards of practice that recognize each client has unique skills, abilities, employment goals and support needs. To design services so that each client's employment goals reflect individual needs and personal objectives.
How	By using individual employment goals as the foundation for service provision, and providing guidelines for employees to plan, review and adjust services to facilitate the achievement of each client's goals. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 3 Individual Outcomes NDIS Practice Standards 1 Right and Responsibilities, 3 Provision of Supports, 4 Provision of Supports Environment Policy on Privacy
Approved	14/08/2023

2. Policy Statement

BIZLINK employees provide services that meet each client's individual needs and employment goals in a way that is considerate of individual circumstances, needs and choices. Wherever practical and within the resources of BIZLINK, unnecessary restrictions or constraints are removed so clients can achieve their employment and other life goals.

3. Responsibilities

3.1 Management

- Ensure policies are available to employees, clients, and other stakeholders.
- Foster a commitment to providing individualised, person-centred services to achieve quality employment and other outcomes.
- Match employees to each client following consultation or request by the client e.g. matching age, gender identity or experience, wherever practical, appropriate and within the resources of BIZLINK.
- Fund individualised services as far as practical given the resources of BIZLINK, approved budgets and any policies.

3.2 Employees

- Provide service and support to meet client's individual needs, employment and other life goals.
- Engage the client and their support network, where involved with consent, in Job Plan or Goal Plan development or reviews.
- Collect necessary information and documentation about the client to develop the Job Plan or Goal Plan in accordance with the Policy on Privacy, consider:

- i. Education, leisure, vocational development and employment history.
 - ii. Work related skills including cognitive, physical, medical, personal and social aspects.
 - iii. Interests, likes and dislikes, availability, barriers
- d) Provide services to achieve the objectives of the agreed Job Plan or Goal Plan as far as practical given the resources of BIZLINK.
- e) Provide a copy of the current Job Plan or Goal Plan to the client.
- f) Review the Job Plan or Goal Plan in accordance with any Department Guidelines or NDIS requirements, and whenever there is a change in circumstance, needs or preferences or as requested.
- g) Secure good job matches and maintain quality sustainable jobs:
 - i. Identify employment that matches work related skills and employment goals to create a short-list of suitable jobs for job search or career development.
 - ii. Implement vocational development strategies as required to build work readiness.
 - iii. Consider flexible employment options, including naturally occurring vacancies, job creation, job restructuring, job sharing and supported wage system arrangements.
 - iv. Develop support strategies to maintain employment.
 - v. Use the least restrictive and intrusive supports, use flexible support strategies including off-site support and the use of naturally occurring supports e.g. a suitability matched workplace co-worker or mentor.
- h) Communicate with each client about their service and be responsive to their needs and provide information in the language, mode of communication and terms the client is most likely to understand. The choices and decision making of clients is fundamental to successful participation and achievement of goals. Recognise that for clients to have choice and control over their service, they must be informed, understanding can be achieved by:
 - i. Communicating in a form, language and manner that is accessible and appropriate. Using a range of communication tools, using assistive technology and alternative forms of communication, e.g. email, text messages or video, documents with images and icons.
 - ii. Confirming the client and their support network understand what has been explained and are aware of potential benefits and risks associated with any part of a proposed plan.
 - iii. Responding to the choices, preferences and concerns of the client in relation to their service and address requests or complaints as required.
 - iv. Providing consistent support, to build a good working relationship to understand the individual communication style, choices, preferences and needs.

Policy 4.0 Feedback and Complaints

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers, clients, prospective clients, client's support networks and stakeholders. ('Client' same meaning as 'participant').
What	To establish mechanisms for clients and other stakeholders to make a complaint and/or give positive or negative feedback. To provide a process for making and resolving complaints and ensure complaints are managed fairly, confidentially, and effectively.
How	By providing guidelines for clients and other stakeholders on the complaints management process. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 4 Feedback and Complaints NDIS Practice Standards 1 Right and Responsibilities, 2 Provider Governance and Operational Management, 3 Provision of Supports, 4 Provision of Supports Environment National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018 BIZLINK Policy on: Privacy, Service Access, Rights, Child Safety and Wellbeing, Prevention of Violence and Aggression, Employee Complaints
Approved	14/08/2023

2. Policy Statement

BIZLINK employees are committed to fair and confidential complaint handling. This policy provides guidance for clients and other stakeholders to make a complaint and provides the key principles and concepts of our complaint management system.

3. Complaints Process

The following procedures focus on client complaints, however, the principles apply to any stakeholder that wishes to complain. Complaints can be raised at any of the stages listed, it is generally preferred that complaints are addressed and resolved at stage 1 and/or with the employee directly concerned. Complainants have the right to involve their support network or advocate e.g. family member, friend, carer, or other service provider, at any time during the complaints process.

3.1 What complaints may be about

- a) Any aspect of our service including service access, the registration process, job preparation, job search, job support and service exit.
- b) The way we provide assistance to secure or maintain employment or assist with training or community participation opportunities.
- c) Treatment of clients.
- d) Breaches of privacy or human rights.
- e) The access to or physical condition of BIZLINK offices.

- f) Where these matters relate to our services e.g. job match, on-the-job support and the actions or inactions of employees in relation to these matters:
 - i. Treatment of clients by employer or co-workers
 - ii. Rates of pay and wage assessments
 - iii. Physical working conditions or Work Health and Safety issues
- g) **External services or people:**
 - i. Where complaints involve legal disputes or legal action, or where BIZLINK may have contradictory obligations to other stakeholders, BIZLINK will, where necessary, refer the complainant to more appropriate supports.
 - ii. As employers of clients are also a user of BIZLINK services, BIZLINK may have contradictory obligations to employers and the Managing Director may conclude that, because of these contradictory obligations, BIZLINK is not able to support complainants against employers in legal disputes or legal action or may only be able to provide limited support.
- h) **Criminal allegations** e.g. financial fraud, assault, physical or sexual abuse, neglect:
 - i. BIZLINK will respond to criminal allegations immediately. The Managing Director will report these to the relevant Authorities and to the Department of Social Services as required.
 - ii. Complainants will be encouraged to contact the police.
 - iii. BIZLINK cannot investigate criminal activity but will take reasonable steps to reduce exposure to such risks to our clients and stakeholders.
 - iv. For matters related to abuse or neglect refer to the Policy on Rights and the Policy on Child Safety and Wellbeing.

3.2 Who can complain?

Anyone with a genuine concern about BIZLINK services and in particular clients, clients support network e.g. family member, friend, partner, advocate, guardian, BIZLINK employees, external services e.g. schools, health and other professionals, employers and co-workers.

3.3 Timelines

The timelines for complaints handling will depend on the seriousness and nature of the complaint. The following provides a guide for employees to respond at all stages:

- a) Acknowledge complaints within two working days of notice.
- b) Complainants will receive regular feedback on progress.

3.4 Documenting Complaints

All formal complaints at any stage will be documented, even if resolved immediately, for continuous improvement and monitoring purposes on a Complaint or Incident Notice (COIN). All parties will respect confidentiality in reporting as discussed with the complainant and any respondent. The Quality Review Committee, or sub-committee of the QRC, as deemed by the Managing Director for confidentiality, will review documented complaints.

3.5 Stage 1 – Internal Conciliation

a) Conciliation by Employee / Manager

- i. Employees will encourage complainants to try sort out the complaint or concern first by discussing with the employee and/or the employee's Manager.
- ii. Employees will provide information about the complainant's right to involve their support network (families, friends, carers, advocate) in handling the complaint and about accessing external advocacy services.
- iii. Employees will document any client complaint in the client's notes and may formally document the complaint (COIN), even if resolved immediately, for continuous improvement and monitoring purposes. Managers will assist and advise if this is required.

b) Conciliation by Managing Director

- i. If the complainant would rather not discuss the issue with the employee and/or the employee's Manager, or they have and are not satisfied, the complaint can progress to the Managing Director.
- ii. Where the complaint involves an employee's conduct, acts or omissions, the employee will have an opportunity to discuss the issue with the complainant, if deemed appropriate by the Managing Director, and with the complainant's agreement.
- iii. The Managing Director may seek external advice as required. Such advice may include the Department of Social Services, Complaints Resolution and Referral Service (CRRS), Australian Human Rights Commission, its insurers, Directors or other appropriate supports and services. This advice may include information on how best to proceed with service and assistance, particularly for complaints involving legal disputes or legal action.
- iv. The Managing Director will report disputes or complaints that pose a risk, to the Board of Directors.

c) Conciliation by Director of the BIZLINK Board

- i. If the complainant would rather not discuss the issue with the Managing Director, or they have and are not satisfied, the complaint can progress to a Director.
- ii. The Director will advise the Managing Director and Chairman of the complaint.
- iii. The complaint (COIN) will be tabled at a Board of Directors meeting to discuss the nature of the complaint and the actions taken or required to resolve it.

3.6 Stage 2 – External Conciliation

- a) If the complainant would rather not discuss the issue with any employee or Director, or they have and are not satisfied, the complaint can progress to the Complaints Resolution and Referral Service (CRRS), Fair Work Commission or other advocacy service of their choosing. NDIS participants contact the NDIS Quality and Safeguards Commission.
- b) Where the Managing Director deems it necessary, complaints conciliated externally will be tabled (COIN) at the next Board meeting to discuss the nature of the complaint and the actions taken or required to resolve it.
- c) Complainants may opt to use the Complaint Resolution and Referral Service (CRRS) or any other external service of their choosing, at any time during the complaints handling process.

- d) Employees will inform the Managing Director of any such complaints. The Managing Director will manage the process of the external conciliation, which may include delegation to the most appropriate employee.

3.7 Stage 3 – Disputes

- a) Where the complainant has used stage 1 and/or 2 and is not satisfied with how the complaint was handled, they may make a further complaint to the Complaints, Resolution and Referral Service (CRRS), the Department of Social Services, NDIS Quality and Safeguards Commission, the National Disability Abuse and Neglect Hotline, Fair Work Commission, the Privacy Commissioner and/or the Commonwealth Ombudsman as appropriate.
- b) Where the complaint was unable to be satisfactorily resolved, the Managing Director will inform the Board of Directors at the next Board meeting advising on the source and nature of the complaint and the actions taken or required to resolve it.

4. Responsibilities

4.1 Management

- a) Ensure policies are available to employees, clients, and other stakeholders.
- b) Promote a culture that values complaints and their effective resolution. Respects that clients, employees and stakeholders have a right to raise complaints and/or provide feedback, both positive and negative, regarding BIZLINK services.
- c) Manage complaints promptly, fairly and in a non-threatening manner without fear or concern of adverse consequences or impact on service. Preserve the privacy, dignity and confidentiality of the complainant, with due regard to the duty of care of employees and disclosures required in matters of a serious nature.
- d) Aim to have complaints resolved wherever possible and consider complaints and feedback, both positive and negative, as an opportunity to improve our service.
- e) Ensure complainants have access to policies and independent mechanisms for complaints, appeals or disputes as required. Including information about the Complaints, Resolution and Referral Service (CRRS), the National Disability Abuse and Neglect Hotline, the Privacy Commissioner, Fair Work Commission, the Commonwealth Ombudsman's Office and other advocacy services.
- f) Encourage clients and other stakeholders to give feedback, both positive and negative, and provide avenues to provide feedback that meets individual needs e.g. client and employer surveys.

4.2 Employees

- a) **Do not admit fault**, it is important that no admission or agreement as to responsibility for any acts or omissions by employees be made as this may prejudice any investigation or insurance coverage.
- b) Report to the Managing Director immediately any complaint that poses an insurance exposure or other risk.
- c) **Abuse or Neglect:**
 - i. Immediately report to the Managing Director.
 - i. Contact the National Disability Abuse and Neglect Hotline.
 - ii. Contact the Police when any suspected illegal activity is taking place, or where life is endangered for advice on how to proceed.

- d) Seek informal feedback from clients and employers to encourage them to raise any concerns to prevent potential complaints.
- e) When responding to any complaint adhere to the following principles:
 - i. **Transparent** follow procedures and document actions and outcomes (COIN).
 - ii. **Fair** document evidence and facts from all relevant parties. Complaints will not prejudice the complainant or respondent with respect to the quality of services or any form of retribution.
 - iii. **Confidential** respect the complainant and respondent privacy.
 - iv. **Resolve** commit to achieving a solution.
 - v. **Boundaries** refer to external services as required.
 - vi. **Four A's** consider the Four A's of successful resolution. The approach recognises that people who make a complaint are generally seeking one or more of these four outcomes:
 - Acknowledgment
 - Answers
 - Action
 - Apology

5. References

'Is BIZLINK Working for You' brochure [Standards & Policies - BIZLINK Quality Employment](#)

Feedback via website [Feedback - BIZLINK Quality Employment](#)

DES Complaints [Complaints Page | Department of Social Services, Australian Government \(dss.gov.au\)](#)

NDIS Complaints [For Participants - Make a Complaint | NDIS Quality and Safeguards Commission \(ndiscommission.gov.au\)](#)

6. Definitions

Complaint: anything that the complainant perceives as unfair, makes them unhappy, dissatisfied or concerned. Many complaints can be resolved immediately and are conciliated by the employee or Manager to whom the complaint was reported. Complaints that are not resolved immediately or remedied immediately from the agreed action being implemented will move to a formal complaint and may include dispute resolution.

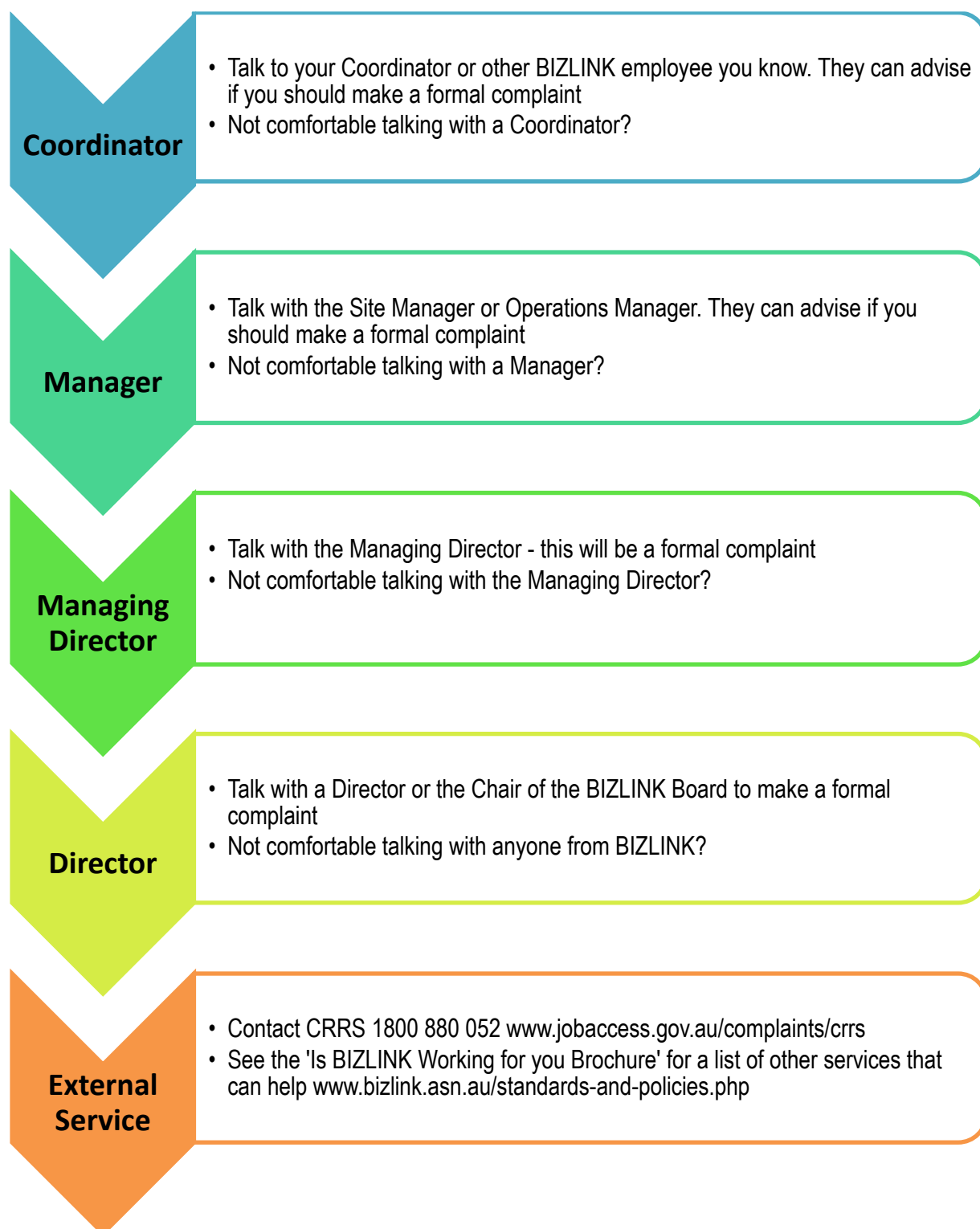
Formal Complaint: anything that the complainant perceives as unfair makes them unhappy or dissatisfied with our service and for which a solution requires the involvement of management to achieve. Includes complaints that could not be resolved informally, those considered as serious or that pose a risk e.g. insurance, financial, reputation, health and safety. Complaints of this type will be reported to the Managing Director.

Risk: the likelihood and consequence of a potential injury or harm occurring. This may involve Work Health and Safety concerns / incidents and/or exposure to insurance claims or legal action.

Complainant: the client or other stakeholder who has a concern or an issue and is making a complaint to BIZLINK.

Respondent: the person(s) accused by the complainant of any perceived breach.

Complaints Process Flow Chart



Policy 4.1 Employee Complaints

1. Policy Summary

Who	BIZLINK employees, directors, contractors and volunteers.
What	To establish mechanisms for employees and volunteers to make a workplace related complaint. To provide a process for making and resolving complaints and to ensure we handle complaints fairly, confidentially and effectively.
How	By providing guidelines for employees who wish to make a workplace related complaint on the complaints management and dispute resolution process. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management BIZLINK Policy on: Rights, Code of Conduct, Workplace Discrimination and Harassment Labour Market Assistance Industry Award, 2020 Electronic Transactions Act 1999 (Cth), Fair Work Act 2009 (Cth)
Approved	14/08/2023

2. Policy Statement

BIZLINK management is committed to fair and confidential complaints handling. This policy provides guidance for employees and volunteers to make a work-related complaint and provides the key principles and concepts of our complaint management system. All formal complaints will be documented, and the complainant's requests will be considered in determining the appropriate steps and actions. Complainants and respondents will not be intimidated or unfairly treated in any respect when they use this Policy to resolve an issue.

3. Complaints Process

The following procedures focus on employee and volunteer workplace related complaints. The principles are like the Policy on Feedback and Complaints which applies to any stakeholder that wishes to complain. Complaints can be raised at any of the stages listed, it is generally preferred that complaints are addressed and resolved at stage 1 and/or with the employee directly concerned. Complainants and respondents can involve an advocate at any time during the complaints process. Complaints will be handled on a needs-to-know basis.

3.1 Complaints may include concerns regarding:

- a) Any aspect of our service management.
- b) The access, safety, or physical condition of BIZLINK offices and equipment.
- c) Treatment of employees.
- d) Matters relating to contract of employment or Award conditions.
- e) Working conditions or Work Health and Safety issues.
- f) **Criminal allegations** e.g. fraud, assault, physical or sexual harassment:

- i. BIZLINK will respond to criminal allegations immediately. The Managing Director will report these to the relevant Authorities and to the Department of Social Services or NDIA as required and in accordance with relevant policies and Department Guidelines.
- ii. BIZLINK cannot investigate criminal activity but will take reasonable steps to reduce exposure to such risks to our employees, clients, and stakeholders.
- iii. For matters related to abuse or neglect of a client refer to the Policy on Rights and the Policy on Child Safety and Wellbeing.

3.2 Timelines

The timelines for complaints handling will depend on the seriousness and nature of the complaint. The following provides a guide for employees to respond at all stages:

- a) Acknowledge complaints within two working days of notice.
- b) Complainants will receive feedback on progress as agreed.

3.3 Documenting Complaints

All formal complaints at any stage will be documented, even if resolved immediately, for continuous improvement and monitoring purposes on a Complaint or Incident Notice (COIN). The complainant will be advised if a COIN is required. All parties will respect confidentiality in reporting as discussed with the complainant and any respondent.

COINs related to employee complaints will be handled as sensitive information and will be saved to a folder with restricted access. COINs will be logged on the COIN and ICAN Register as a number and date only, marked as restricted and noted when closed out. There will be no identifying information on the register.

3.4 Stage 1 – Internal Conciliation

- a) Complainants will be encouraged to try sort out the complaint or concern first by discussing with the employee concerned. If the complainant is not comfortable doing this, or have and were not satisfied with the outcome, it may progress to a formal complaint.
- b) **Conciliation by Manager** The complainant is encouraged to resolve the complaint with the support of their manager.
- c) **Conciliation by Human Resources** If the complainant is not comfortable discussing with their manager, they can contact HR and seek advice on how to manage their complaint (employees can contact HR at any time for advice). HR can:
 - i. Advise how to manage the complaint and which staff should be included.
 - ii. Advise complainants that in some situations where serious allegations are raised, for example, fraud, bullying, sexual harassment, legal liability; the issue may need to be reported to the Managing Director and managed as a formal complaint.
 - iii. Where appropriate, assist the complainant to try and resolve the issue personally.
 - iv. Provide information about support services, for example, workplace counselling (EAP).
 - v. Outline other options available, such as lodging a complaint with an external agency.
- d) **Conciliation by Managing Director**
 - i. If the complainant would rather not discuss the issue with their Manager, HR or they have and are not satisfied, or the complaint concerns their Manager, the complaint can progress to the Managing Director.

- ii. Where the complaint involves another employee's conduct, acts or omissions, the accused employee (respondent) will have an opportunity to discuss the issue with the complainant, if deemed appropriate by the Managing Director, and with the complainant's agreement e.g. mediation meeting.
- iii. The Managing Director may seek external advice as required. Such advice may include the Department of Social Services, CCIWA, insurers, Directors or other appropriate supports and services. This advice may include information on how best to proceed, particularly for complaints involving Award, contracts of employment, Work Health and Safety, criminal, or legal matters.
- iv. The Managing Director will report disputes or complaints that pose a risk, to the Board of Directors and insurers, whilst maintaining confidentiality as far as practical.

3.5 Conciliation by Director of the BIZLINK Board

- i. If the complainant would rather not discuss the issue with the Managing Director, or they have and are not satisfied, or the complaint is regarding the Managing Director, the complaint can progress to a Director.
- ii. The Director will advise the Managing Director and Chairman of the complaint, as appropriate.
- iii. The complaint will be tabled at a Board of Directors meeting at the discretion of the Chairman, to discuss the nature of the complaint and the actions taken or required to resolve it, whilst maintaining confidentiality as far as practical.

3.6 Stage 2 – External Conciliation / Dispute Resolution

- a) If the complainant would rather not discuss the issue with any Manager or Director, or they have and are not satisfied, the complaint can progress in accordance with the Labour Market Assistance Industry Award – Dispute Resolution, for complainants covered by the Award.
- b) Where the Managing Director deems it necessary, complaints conciliated externally will be tabled at the next Board meeting to discuss the nature of the complaint and the actions taken or required to resolve it.
- c) Complainants may opt to use the Fair Work Commission or any other external service of their choosing, at any time during the complaints handling process, in accordance with the Labour Market Assistance Industry Award – Dispute Resolution, if covered by the Award.
- d) Employees will inform the Managing Director of any such complaints. The Managing Director will manage the process of the external conciliation, which may include delegation to the most appropriate employee.

3.7 Conciliation Meeting Process

- Ensure the complainant feels listened to and supported.
- If more than one person is present, establish the role of each person.
- Explain the conciliation process and refer to any applicable policies and procedures.
- Inform the parties that any information obtained in the meeting is confidential.
- Record a chronology of events (who, what, why, when, how etc).
- Ask the complainant what kind of outcome they are hoping for (best case scenario) and then talk them through next steps e.g. you will discuss the matter confidentially with the respondent to determine a way in which to deal with the issue and report back to them within a set timeframe.

- Advise the complainant they cannot be adversely affected because they have made a complaint and explain who to report matters to internally if they do feel they are being adversely affected.
- Provide the complainant with time to ask questions.
- Offer the complainant assistance, such as counselling through the Employee Assistance Program (EAP).
- Provide the complainant with a direct contact number that they can call if they have any concerns or queries.
- Take accurate and detailed notes of all conversations (including dates, people involved) and attach any supporting documentation to the COIN.
- If deemed necessary, provide the complainant with a written summary of the meeting and clarification of the next steps to be taken.
- Ensure that the meeting is conducive to maintaining positive working relationships, and will provide a fair, objective and independent analysis of the complaint.
- All parties must maintain confidentiality.
- If the matter is not resolved, follow the relevant conciliation stages until satisfactory resolution is achieved. The Managing Director, and if the Managing Director is the subject of the complaint, the Chair of Directors, has discretion for a final decision as to how the complaint will be resolved.

3.8 Investigating a Complaint or Dispute

Procedural fairness and transparency are essential to a successful workplace investigation. Maintaining procedural fairness means that you can:

- protect the interests of the participants in the investigation
- enhance the credibility of the investigation process
- rely on the investigation and findings when making employment decisions and
- defend the decisions in a court or tribunal.

The investigator should ensure that:

- the respondent is aware of the allegations made against them in sufficient detail
- the respondent is given opportunity, and adequate time, to respond to the allegations
- the investigation is carried out in a reasonable time frame
- all participants are given the opportunity to have a support person (advocate) in interviews
- all participants are required to maintain confidentiality and sign a confidentiality agreement as deemed necessary
- the investigator has no personal interest or bias in the matter being investigated
- all participants are given the opportunity to respond to any contradictory evidence
- the investigator makes reasonable and diligent enquiries to ensure there is sufficient evidence before making findings on the balance of probabilities.

3.9 Impartiality

It is critical to ensure that the person responsible for carrying out an investigation is impartial. The investigator must not have a vested interest in the outcome of the matter. Employees will often consider

that their Manager is not sufficiently impartial because of their involvement and role in the workplace. If such a concern is raised, it is important to consider:

- whether the use of an external investigator is necessary to ensure impartiality
- whether any conflicts of interest need to be disclosed e.g. if any individuals are friends outside the workplace, and
- whether the investigator has handled any previous disciplinary matters.

If there is the possibility that a person's employment will be terminated if the allegations are proven as part of an investigation, then the use of an external investigator to ensure the investigation and the process followed will stand up in any potential court proceeding should be considered.

4. Responsibilities

4.1 Management

- a) Encourage complainants to resolve any issues or concerns at the earliest opportunity with the respondent, where appropriate.
- b) Promote a culture that values complaints and their effective resolution. Respect the right to raise complaints and/or provide feedback, both positive and negative, regarding BIZLINK, our employees and managers and provide avenues to give such feedback.
- c) Manage complaints promptly, fairly and in a non-threatening manner without fear or concern of adverse consequences or impact on employment or treatment at work. Preserve the privacy, dignity, and confidentiality of the complainant and respondent, with due regard to the duty of care of clients and other employees and disclosures required in matters of a serious nature e.g. criminal or Work Health and Safety.
- d) Aim to have complaints resolved wherever possible and consider complaints and feedback, both positive and negative, as an opportunity to improve our supervision and management practices.
- e) Ensure complainants have access to policies and independent mechanisms for complaints, appeals or disputes as required. Including information about the Award, Privacy Commissioner, Fair Work Commission, the Commonwealth Ombudsman's Office and other advocacy services.
- f) Encourage feedback, both positive and negative.

4.2 Employees

- a) Whilst employees must provide honest accounts and report the facts, it is important that no admission or agreement as to responsibility for any acts or omissions by employees be made as this may prejudice any investigation or insurance coverage.
- b) Report to the Managing Director immediately any complaint that poses an insurance exposure, work health and safety, or other risk.
- c) **Abuse or Neglect:**
 - i. Immediately report to the Managing Director.
 - ii. Contact the National Disability Abuse and Neglect Hotline.
 - iii. Contact the Police when any suspected illegal activity is taking place, or where life is endangered for advice on how to proceed.
- d) When responding to any complaint adhere to the following principles:
 - i. **Transparent** follow procedures and document actions and outcomes (COIN).

- ii. **Fair** document evidence and facts from all relevant parties. Complaints will not prejudice the complainant or respondent with respect to any form of retribution.
- iii. **Confidential** respect complainant and respondent privacy.
- iv. **Resolve** commit to achieving a solution.
- v. **Boundaries** refer to external services as required.

5. Definitions

Complaint anything that the complainant perceives as unfair, makes them unhappy, dissatisfied or concerned. Many complaints can be resolved immediately and are conciliated by the Manager to whom the complaint was reported. Complaints that are not resolved immediately or remedied immediately from the agreed action being implemented will move to a formal complaint and may include dispute resolution.

Formal Complaint or Grievance a formal complaint raised by an employee or volunteer to an employer. With a formal complaint or a grievance, there is usually a serious breach e.g. of the terms and conditions of employment, policies or procedures. This may include legalities involved with pay and conditions, discrimination, bullying and harassment. A solution requires the involvement of management or external conciliation. Includes complaints that could not be resolved informally, those considered as serious or that pose a risk e.g. insurance, financial, reputation, health and safety. Complaints of this type will be reported to the Managing Director.

Risk the likelihood and consequence of a potential injury or harm occurring. This may involve Work Health and Safety concerns / incidents and/or exposure to insurance claims or legal action.

Complainant the employee or volunteer who has a concern or an issue and is making a complaint.

Respondent an employee or volunteer who is accused by the complainant of a breach of any work-related policy or procedure. The person who is the subject or reason for the complaint.

Workplace Bullying is repeated unreasonable behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by a person or persons against another or others in the course of employment that creates a risk to health and safety. It includes behaviour that harms, threatens, victimises, intimidates, offends, degrades or humiliates a worker, possibly in front of co-workers, clients or customers.

Reasonable management action that is carried out in a reasonable way is not bullying. An employer or manager can: make decisions about poor performance, take disciplinary action, direct and control the way work is carried out. Management action that is not carried out in a reasonable way may be considered bullying.

6. References

Fair Work Commission [Fair Work Commission](#)

Human Rights Commission [Australian Human Rights Commission | Make a Complaint](#)

[What is bullying?: Violence, Harassment and Bullying Fact sheet | Australian Human Rights Commission](#)

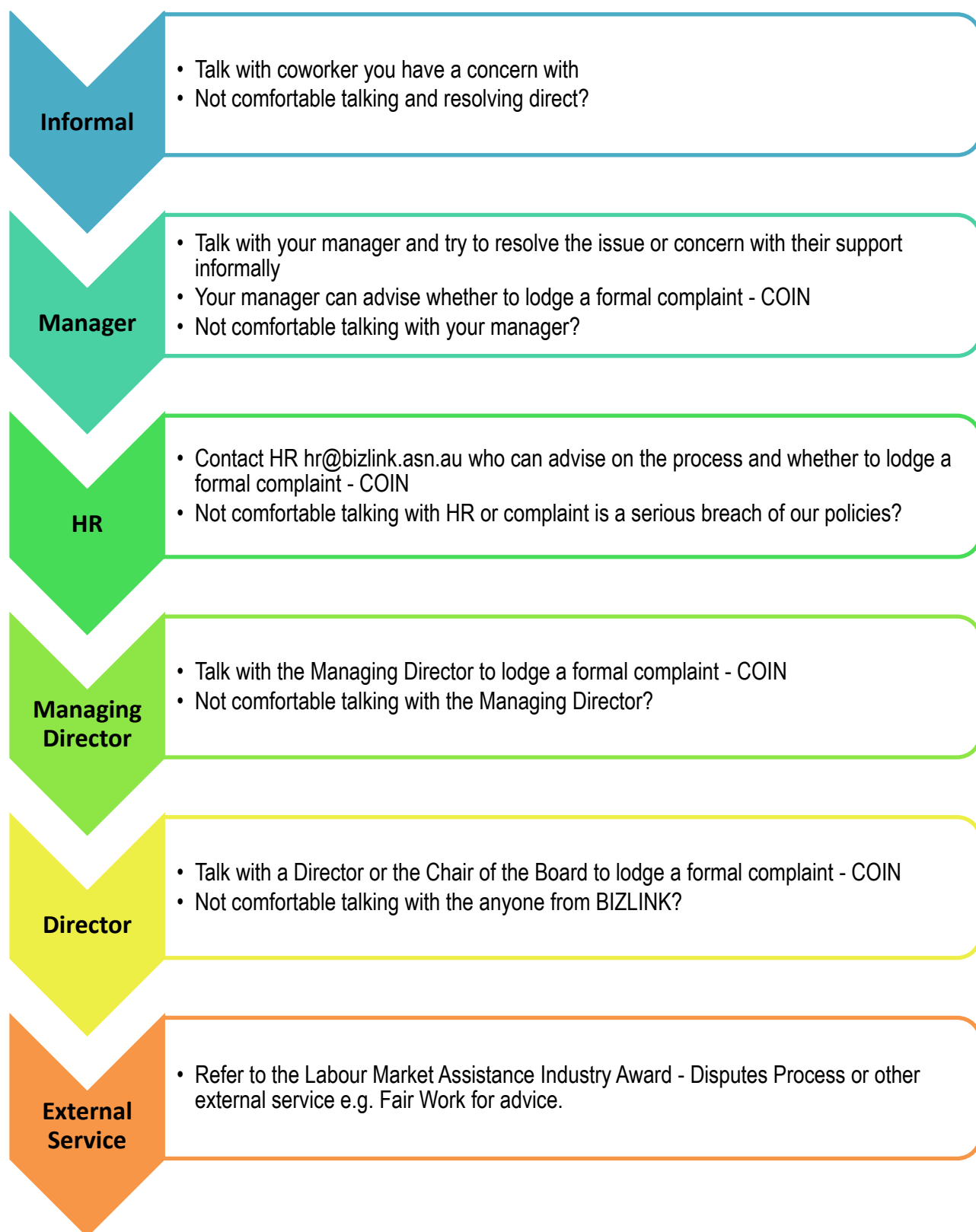
Australian Unions [Contact Australian Unions - Australian Unions](#)

Respect@Work [Respect@Work \(respectatwork.gov.au\)](#)

Safe Work Australia [Bullying | Safe Work Australia](#)

Employment Assistance Program [G:\E Library\HR Employee Info\Employee Assistance Program EAP](#)

Complaints Process Flow Chart



Policy 5.0 Service Access

1. Policy Summary

Who	BIZLINK employees, clients, prospective clients and client's support networks. ('Client' same meaning as 'participant').
What	Entry (registration), exit (de-registration) and suspension activities. To set out the circumstances and conditions people can access and maintain a service and exit from, or no longer have access to a service with BIZLINK.
How	By establishing guidelines for entry and exit criteria that are consistent with contractual obligations with the Department of Social Services, the NDIS Practice Standards and Quality Indicators and with the purpose of our service. Applying entry and exit procedures in a fair, equitable and consistent manner. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police.
Resources	NSDS 5 Service Access NDIS Practice Standard 3 Provision of Supports Disability Services Act 1986 (Cth), School Education Act 1999 (WA), Electronic Transactions Act 1999 (Cth) Department of Social Services Funding Deed and Guidelines BIZLINK Policy on: Rights, Prevention of Violence and Aggression, Positive Behaviour Management
Approved	14/08/2023

2. Policy Statement

BIZLINK employees will take reasonable steps to apply non-discriminatory procedures in respect of age, gender identity, culture, heritage, language, faith, sexual orientation (LGBTIQ+), relationship status or disability. People with disability who are seeking a service will have access to BIZLINK based on relative need and available resources.

3. Eligibility Criteria

3.1 Disability Employment Service (DES)

To be eligible or maintain eligibility for BIZLINK services DES clients must:

- Have completed school to the end of the year they turn 17 years or comply with the school leaving age requirements. Students undertaking an approved school to work transition program are exempt from this requirement.
- Be able to work a minimum of 8 hours per week and/or their benchmark hours as defined by the Department of Social Services.
- Live in the BIZLINK Employment Service Area (ESA) or if they live outside of this area have made an informed choice and it is reasonably practical and within the resources of BIZLINK to provide a service.

- d) Have or be willing to undertake, a Job Capacity Assessment (JCA) and/or an Employment Services Assessment (ESAt) as required.
- e) Meet the target group defined in this policy.
- f) Agree to follow BIZLINK policies especially the Policy on Prevention of Violence and Abuse and those in the Policy Summary Manual.
- g) Be supported by their support network, where involved with the client's consent, to secure and maintain open employment and where a support network is involved, they are considerate of relevant BIZLINK policies.
- h) Be willing to provide personal information, including income details, to BIZLINK and other government departments as required from time-to-time.
- i) Be motivated to work and/or to develop skills to become work ready.
- j) Cooperate with BIZLINK employees in agreed employment preparation, job search and job support activities including activities detailed in their Job Plan.
- k) Be able to travel to work independent of BIZLINK, following transport training provided by BIZLINK or another service if required.
- l) Live in stable accommodation arrangements with access to a telephone, or other agreed method, to maintain regular communication with BIZLINK.
- m) Not be in receipt of services from another Disability Employment Service or private case management service upon acceptance by BIZLINK.
- n) Understand and observe the circumstances where BIZLINK will suspend or exit clients from its service as detailed in this policy, including what BIZLINK considers 'Unacceptable Behaviour'.
- o) **Target Group** - DES Service eligibility is set by the Disability Services Act 1986 (Cth), which defines the target group as a person with disability that:
 - i. is attributable to an intellectual, psychiatric, sensory or physical impairment or a combination of such impairments
 - ii. is permanent or likely to be permanent and
 - iii. results in a substantially reduced capacity of the person for communication, learning or mobility, and the need for ongoing support services.

3.2 NDIS

To be eligible or maintain eligibility for BIZLINK services NDIS clients must:

- a) Have completed the access request and be eligible for NDIA funding under Capacity Building Finding and Keeping a Job, that is, School Leaver Employment Support or Employment Support. Are able to provide proof of current plan and funding eligibility, that is, full NDIS plan or part of plan in relation to relevant funding.
- b) Inform BIZLINK as soon as possible if there are any changes to their plan including funding or date changes.
- c) Live within the Perth Metro Area or if they live outside of this area have made an informed choice and it is reasonably practical and within the resources of BIZLINK to provide a service. Travel time will be arranged and agreed upon and charged through the individual client's NDIS funding.
- d) Agree to follow BIZLINK policies especially the Policy on Prevention of Violence and Abuse and those in the NDIS Participant Manual.

- e) Be supported by their support network, where involved with the client's consent, to engage in support to build capacity toward securing open employment and where a support network is involved, they are considerate of relevant BIZLINK policies.
- f) Be willing to provide personal information to BIZLINK and other government departments as required from time-to-time.
- g) Be motivated to work and/or to develop skills to become work ready.
- h) Cooperate with BIZLINK employees in agreed capacity building preparation, volunteering and support activities including activities detailed in the client's Goal Plan.
- i) Be able to travel to support and or volunteering independent of BIZLINK, following transport training provided by BIZLINK or another service if required.
- j) Live in stable accommodation arrangements with access to a telephone, or other agreed method, to maintain regular communication with BIZLINK.
- k) Understand and observe the circumstances where BIZLINK will suspend or exit participants from its service as detailed in this policy, including what BIZLINK considers 'Unacceptable Behaviour'.
- l) Meet NDIS eligibility as set by the National Disability Insurance Agency, which defines the target group as a person with disability that:
 - i. Is under 65 years of age
 - ii. Lives in Australia, are Australian citizens or Permanent Visa holders or Protected Special Category Visa holders
 - iii. Who has a permanent and significant disability
 - iv. Meets any other eligibility criteria as required by the NDIA at the time of applying for NDIS funding and as reviewed from time-to-time

4. Unacceptable Behaviour

Each of the following apply to BIZLINK, its offices, vehicles and employees, the client's employer, whether employed or undertaking vocational development, and other sites or places of agreed activity:

- a) Challenging Behaviours as detailed in the Policy on Positive Behaviour Management.
- b) Theft from offices, vehicles, employees or other persons.
- c) Wilful damage to property.
- d) Violence, intimidation, threats, aggression, yelling, swearing, damage, verbal abuse, sexual harassment, physical assault.
- e) Endangering others through acts or omissions considered deliberate or intentional.
- f) Refusing to cooperate or participate in agreed activities.
- g) Not attending scheduled appointments or work without a valid reason, and where requested, evidence for that reason e.g. Medical Certificate.
- h) Leaving work during work hours without the employer's knowledge and permission.
- i) Refusing to follow lawful instructions from supervisors.
- j) Refusing to accept agreed BIZLINK support and assistance.
- k) Resigning from a position secured and supported by BIZLINK without first discussing with their Coordinator.

- l) Declining a job that is within the range of jobs agreed to and documented in the Job Plan. For clients with Mutual Obligation Requirements not accepting such job offers may mean income support payments are stopped.

5. Entry Procedures

5.1 General Procedures

- a) Entry procedures aim to be in accordance with the Department of Social Services Guidelines and the National Standards for Disability Services for DES and the NDIS Practice Standards for NDIS participants.
- b) BIZLINK will aim to ensure clients access the most appropriate service, which may include referral to another service.
- c) BIZLINK policies will apply to the client's support networks (family, carer, friend, advocate) if involved.
- d) Clients must meet the eligibility criteria detailed in this policy.
- e) BIZLINK has Zero Tolerance of Violence or Aggression as detailed in this policy.
- f) BIZLINK may reject the referral and/or will refer to a more appropriate service or if already registered, suspend or exit from BIZLINK in accordance with the Exit procedure in this policy, if a client's job readiness or employment support are affected by any of the following:
 - i. Unacceptable Behaviour as detailed in this policy.
 - ii. Unstable living arrangements.
 - iii. Getting to and from work or other appointments by their own means, following transport training.
 - iv. Medical fitness for work i.e. medical exemption.
 - v. Drugs or alcohol.
 - vi. Other barriers or circumstances that are beyond the scope and expertise of BIZLINK employees.

5.2 Zero Tolerance of Violence or Aggression

Our staff are here to help and have the right to be treated with respect. BIZLINK is committed to providing a safe, healthy and respectful workplace for our staff and visitors. We will not tolerate unacceptable behaviour as detailed in this policy, the Policy on Positive Behaviour Management and the Policy on Prevention of Violence and Aggression.

6. Exit Procedures

6.1 General Procedures

- a) Exit procedures aim to be in accordance with the Department of Social Services Guidelines and the National Standards for Disability Services for DES and the NDIS Practice Standards for NDIS participants.
- b) Clients will be advised of any exit reason in writing or other manner that meets their individual needs. Exit reasons not specified within this policy, such as those related to specific guidelines, will be provided in writing and/or explained on registration (entry) or when there is a change that will affect the client.

- c) Clients will have access to information regarding instances where they can voluntarily exit the service, for example, it is agreed and decided that:
 - i. Assistance to find or keep a job is no longer required.
 - ii. Participation requirements are removed or are “voluntary”.
 - iii. Needs have changed.
 - iv. Another service is more appropriate to meet individual needs.
- d) Clients must always meet the eligibility criteria in this policy. When they do not meet the criteria, they will have the opportunity to modify the behaviour or circumstance to maintain eligibility for services wherever practical provided the actions required are within the skills and resources of BIZLINK.
- e) Unacceptable behaviour detailed in this policy can result in suspension or exit.
- f) Clients can appeal or complain as per the Policy on Feedback and Complaints.

7. Responsibilities

7.1 Management

- a) Ensure policies are available to employees, clients, and other stakeholders.
- b) Monitor that eligible applicants are registered in accordance with this policy.
- c) Decide when referral to another service is required to meet individual needs.
- d) Decide when suspension or exits are required.
- e) Monitor that suspensions and exits are in accordance with this policy.
- f) Refer to the Policy on Positive Behaviour Management, Policy on Prevention of Violence and Aggression and Policy on Rights to support decisions.

7.2 Employees

When eligibility criteria is not met or for unacceptable behaviour:

- a) Complete appropriate investigations and take actions as required.
- b) Inform the Site Manager.
- c) Provide the client, and their support network, where involved with the client's consent, an opportunity to discuss changing the behaviour or circumstance to maintain eligibility or have suspension or exiting the service explained.

Policy 5.1 Positive Behaviour Management

1. Policy Summary

Who	BIZLINK employees, clients, prospective clients, client's support networks and stakeholders. ('Client' same meaning as 'participant').
What	To define Challenging Behaviours and provides guidance to employees on Positive Behaviour Management.
How	By providing guidance on how to deliver services to clients who may demonstrate challenging behaviours whilst minimising risk or harm to employees and others. Identifying and reporting challenging behaviours that clients may display. Specifying strategies and performance standards in the management of challenging behaviours.
	Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police. Anyone who is violent or aggressive to our staff or others may be suspended or exited. Police will be called if needed.
Resources	NSDS 1 Rights and 5 Service Access NDIS Practice Standards 1 Right and Responsibilities, 2 Provider Governance and Operational Management, 3 Provision of Supports, 4 Provision of Supports Environment Work Health and Safety Act 2020 (WA) Department of Social Services Deed and Guidelines BIZLINK Policy on: Rights, Prevention of Violence and Aggression, Service Access
Approved	14/08/2023

2. Policy Statement

BIZLINK employees have the responsibility to promptly and appropriately manage clients who exhibit challenging behaviours. This management is done while considering the human and legal rights of the client, the rights of any other individuals affected by the behaviour, and any duty of care obligations.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Immediately report all incidents (including near misses).
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Accident / Incident Report

4. Responsibilities

4.1 Management

- a) Ensure policies are available to employees, clients, and other stakeholders.
- b) Allocate sufficient resources that BIZLINK can practically provide or procure from other sources to implement the plan.

- c) Appoint an appropriate employee or external consultant, if the necessary expertise is not available within BIZLINK, to develop a plan.
- d) Consider risks and risk mitigation strategies.
- e) Suspend or exit the client where necessary in accordance with the Policy on Service Access and Policy on Prevention of Violence and Aggression.

4.2 Employees

- a) Promptly investigate reports of challenging behaviours.
- b) Involve the Managing Director in any matters as regards exposure to risk or hazards that may arise from the behaviour.
- c) Record the reported incident(s) including a description of the challenging behaviour, the time and place, and the antecedents (the events leading up to the behaviour that may have been possible triggers) and the consequences (the impact of the behaviour on the client and others). Record any future occurrences of the behaviour or other challenging behaviours.
- d) Involve the client, employee(s), support network, where involved with the client's consent, and behavioural consultants (where required) in the development of a plan. The plan should aim to improve or extinguish the challenging behaviour, including an analysis of the problem situation, an agreed strategy for intervening and measurable behavioural goals for the client.
- e) With the client's consent, provide a copy of the plan to all parties involved in its development.
- f) Employees or clients can contact the Complaints, Resolution and Referral Service (CRRS), the NDIS Quality and Safeguards Commission, or other appropriate government department or external service, for information to resolve or prevent a complaint.
- g) Take preventive action by assessing risks, analysing minor incidents and "near misses" and recording and implementing actions to minimise and control risks.
- h) Communicate to relevant employees and record details in the client's notes information regarding challenging behaviours and associated risk assessment.
- i) Avoid labelling clients as 'behaviour problems' or 'bad' as this is inappropriate and fails to recognise that people can be impacted by their environment, health, our actions or inactions and other factors that we may or may not be aware of. Implement effective management of challenging behaviour by developing an understanding of the person and their past and present experiences.
- j) Inform clients and other stakeholders that, in accordance with the Policy on Service Access, BIZLINK regards violence and aggression as "Unacceptable Behaviour" and this can result in suspension or exit from the service.
- k) Complete reporting requirements as per the Department of Social Services Guideline on Servicing Participants with Challenging Behaviours.

5. Definitions

Complaint: anything that the complainant perceives as unfair, makes them unhappy or dissatisfied with the service of BIZLINK.

Risk: the probability of injury or harm occurring.

Hazard: anything that may result in — (a) injury to the person; or (b) harm to the health of the person.

Challenging Behaviour:

- a) Behaviours demonstrated by a client which are of such intensity, frequency or duration that the physical safety or emotional wellbeing of the client or others is placed at risk. The behaviour limits the client's ability to participate or have access to usual settings, activities, services, and experiences. The behaviour may interfere with the acquisition of new skills and learning opportunities.
- b) Department of Social Services Guideline on Servicing Participants with Challenging Behaviours defines as: behaviour that any reasonable person would consider unacceptable or hostile, that creates an intimidating, frightening, offensive or physically dangerous situation in the workplace or other location.
- c) Challenging behaviours may include but are not limited to the following:
 - i. physical violence against a person such as hitting, kicking, punching, spitting on or throwing objects at a person
 - ii. acting in a way that would cause a person to have a reasonable belief that assault was intended or adopting a physical position or state and/or producing an object that a reasonable person would consider the action constitutes a serious and imminent threat of physical violence
 - iii. damaging, defacing or destroying property intentionally or through inappropriate and aggressive behaviour, such as throwing objects or punching and kicking property
 - iv. swearing; making offensive noises or gestures; inappropriate or suggestive comments or vilification; oral or written threats including email or social media, abuse or harassment, inappropriate touching or stalking
 - v. threatening suicide, or causing injury to oneself, e.g. cutting
 - vi. persistent refusal to follow necessary treatment procedures for medical conditions such as epilepsy, diabetes or other conditions that, if not treated, will further endanger the person's health
 - vii. persistent refusal to comply with psychiatric treatment including appropriate use of prescribed medicines that when not taken can lead to poor mental health including hospitalization
 - viii. persistent refusal to participate in agreed employment-related activities
 - ix. creating a nuisance in public, including begging, harassing, soliciting or engaging in criminal activities
 - x. extreme manipulative behaviour, including mischievous accusations against others, inappropriately engaging emergency support services or persistently over-using the services of BIZLINK
 - xi. any other behaviour that is deemed inappropriate and warrants an incident being recorded.

Policy 5.2 Prevention of Violence and Aggression

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers, clients, prospective clients, client's support networks, visitors and stakeholders. ('Client' same meaning as 'participant').
What	BIZLINK has zero tolerance of workplace violence and aggression. BIZLINK is committed to providing a safe and healthy working environment free of violence or aggression.
How	By defining behaviour deemed as workplace violence and aggression and providing guidelines in the management of workplace violence and aggression. Consequences of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police. Anyone who is violent or aggressive to our staff or others may be suspended or exited.
Resources	NSDS 1 Rights and 5 Service Access NDIS Practice Standards 1 Right and Responsibilities, 2 Provider Governance and Operational Management, 3 Provision of Supports, 4 Provision of Supports Environment Work Health and Safety Act 2020 (WA) Department of Social Services Deed and Guidelines BIZLINK Policy on: Rights, Child Safety and Wellbeing, Challenging Behaviours, Service Access, Code of Conduct, Board Code of Conduct, Feedback and Complaints, Employee Complaints
Approved	14/08/2023

2. Policy Statement

BIZLINK employees have the right to a safe and healthy work environment free from violence and aggression. Violent and aggressive behaviour is a work health and safety issue, is unacceptable and is not tolerated. BIZLINK employees will not tolerate any form of workplace violence or aggression by any person, including clients, the client's support network, carers, friends, members of the public, members of other services/employers and work colleagues. BIZLINK management will take action to minimise any risks and ensure breaches of this policy result in action including criminal charges to protect our staff and stakeholders.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) During an incident:
 - Remain calm
 - Isolate the area and remove all unnecessary persons
 - Assess the situation, maintain safe distances and note the exits
 - Attempt to de-escalate the situation using verbal techniques where appropriate
 - Ensure safety and wellbeing of self and others
- b) Immediately report all incidents (including near misses)

- c) Report all security breaches, dangerous or potentially dangerous situations, incidents of violent or aggressive behaviour, any safety or security issues that come to their attention
- d) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Accident / Incident Report

4. Responsibilities

4.1 Management

- a) Ensure policies are available to employees, clients, and other stakeholders.
- b) Ensure, as reasonably practicable, a secure and safe work environment.
- c) Provide training on preventing and controlling risks of violence, and to respond to, de-escalate and defuse situations.
- d) Implement a process and procedure for risk assessment and response.
- e) Coordinate necessary response with relevant parties and authorities, with reference to relevant policies and Department or NDIS Guidelines to support decisions.

4.2 Employees

- a) Be familiar with relevant risk assessments and procedures and not put themselves at risk.
- b) Follow safe work practices and comply with health and safety instructions.
- c) Avoid working in isolation wherever possible. Where this is not possible, discuss risk mitigation strategies with a Manager.
- d) Ensure that contact appointments with clients, especially registrations or first contacts, take place at a BIZLINK site with at least two staff present.
- e) Document any incident or near miss as advised by management.

4.3 Stakeholders

Not put themselves at risk and follow safe work practices and comply with health and safety instructions.

5. Definitions

Workplace Violence and Aggression actions and incidents that may physically or psychologically harm another person. Violence and aggression are present in situations where employees and/or other people are threatened, attacked, or physically assaulted at work. Examples include, but are not limited to verbal, physical or psychological abuse; threats or other intimidating behaviours; physical attack, such as hitting, punching, pinching, biting, grabbing, pushing or scratching; aggravated assault; threats with a weapon or objects; throwing objects / furniture; sexual harassment, sexual assault and any form of indecent physical contact.

Hazard anything that may result in injury to a person or harm the health of a person.

Stakeholder means any interested party including clients, employers, funders, client's support network, referral sources, contractors, volunteers, community services, any person or organisation who engages with BIZLINK and directly or indirectly with our clients.

Risk is the probability of injury or harm occurring.

Near Miss an event that did not result in injury, illness, or damage but had the potential to do so.

Policy 6.0 Service Management and Quality

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers, clients, prospective clients, client's support networks and stakeholders. ('Client' same meaning as 'participant').
What	To continually improve the effectiveness of our quality and information security management system and achieve the highest standard of individualized service for people with disability.
How	By establishing guidelines for effective and accountable service management and leadership to maximize outcomes for individuals. Complying with the priorities and conditions within the current government funding agreement, government acts and standards. Consequence of Breach Breaches of this policy may result in disciplinary action, up to an including termination of employment, or other necessary response.
Resources	ISO 9001 Quality Management Systems, ISO 27001 Information Security Management, National Standards for Disability Services, NDIS Practice Standards and Quality Indicators, Disability Services Act 1986 (Cth), All Policies
Approved	14/08/2023

2. Policy Statement

BIZLINK management aims to maintain a level of service quality that meets or surpasses the expectations of our clients and other stakeholders. Employees are committed to this policy and continually improving the effectiveness of our quality management system.

3. Quality Objectives

- Satisfaction** maintain a high level of satisfaction with BIZLINK services
KPI: 70%+ overall survey satisfaction
- Quality** maintain industry relevant certifications
KPI: ISO 9001, ISO 27001, NSDS, and NDIS certification
- Safe** provide a safe and welcoming work environment
KPI: zero time-off safety incidents
- Integrity** operate with honesty and mitigate fraud
KPI: zero \$ loss | zero reputation impact | zero stakeholder impact from incidents of fraud
- Service Excellence** maintain high performance
KPI: 3 Stars+ for Disability Employment Services panel selection | match jobs to client skills, potential and informed choice | secure sustainable employment with quality employers | secure award level pay or match to productivity | meet the needs of the client and employer | be person-centred and respectful of privacy | look for opportunities to improve and respond to feedback for continuous improvement.

4. Information Security Objectives

- Confidentiality** treat information in accordance with the Policy on Privacy and only disclose with permission or ensure each individual has an understanding of the intended use of the information

KPI: 100% of clients have authorised Consent forms, COINs show that stakeholders are encouraged to report incidents or breaches with the aim of minimising risk through reporting, mitigation and responding with the aim of zero confidentiality breaches.

2. **Privacy** respect privacy and uphold each individual's right or expectation that personal information and other identifying information will not be disclosed.

KPI: COINs show that stakeholders are encouraged to report incidents or breaches with the aim of minimising risk through reporting, mitigation and responding with the aim of zero privacy breaches.

3. **Integrity** protect data and information against unauthorised alteration or destruction.

KPI: COINs show that stakeholders are encouraged to report incidents or breaches with the aim of minimising risk through reporting, mitigation and responding with the aim of zero breaches of unauthorised access to BIZLINK IT or unauthorised data destruction.

4. **Availability** provide authorised users with timely and reliable access to BIZLINK IT for authorised purposes.

KPI: COINs show that stakeholders are encouraged to report incidents with the aim of ensuring ready access to BIZLINK IT when needed.

5. **Respond** be capable of responding to a data breach and protect information and physical assets.

KPI: The Fraud Control Plan and Business Continuity Plan are current, COINs show that stakeholders are encouraged to report incidents or breaches with the aim of minimising risk through reporting, mitigation and responding with the aim of zero data breaches or damage/loss to information and physical assets.

6. **Continuous Improvement** understand our operational risks and implement adequate controls to prevent identified risks. Commit to continual improvement as cyber risks change and develop.

KPI: The Statement of Applicability SoA, shows continuous revision and updates to mitigate evolving security risks. COINs and ICANs show responses to incidents and breaches and actions taken.

5. Responsibilities

5.1 Managing Director

- a) Provide reports and advice for the Board of Directors to govern the service, monitor compliance, and assess performance in legal, contractual, financial, and quality aspects.
- b) Ensure BIZLINK maintains current:
 - i. National Standards for Disability Services, NDIS, ISO 9001 Quality Management System, ISO 27001 Information Security Management certification and Right Fit For Risk (RFFR) accreditation
 - ii. Strategic Plan
 - iii. Policy Manual and Policy Summary Manual
 - iv. Disability Employment Strategy and an Indigenous Employment Strategy
 - v. Business Continuity Plan and Fraud Control Plan

5.2 Quality Manager

- a) Document the Quality and Information Security Objectives in the 'Quality Policy Statement', this Policy and the 'Quality and ISM Manual'.
- b) Undertake or oversee audits and record the performance of our Quality Management System and continuous improvement initiatives.

- c) Provide access for all employees to the QRC meeting minutes, relevant Local, State and Commonwealth Government legislation, standards and regulations.

5.3 Managers

- a) Ensure policies are available to employees, clients, and other stakeholders.
- b) Provide opportunities for clients and other stakeholders to provide feedback on how BIZLINK is managed.
- c) Recruit employees with the relevant skills, values and training to assist people with disability to secure and maintain quality employment.
- d) Provide training opportunities for employees to meet our quality objectives and understand their obligations and responsibilities.
- e) Promote a culture that respects clients and stakeholders right to raise complaints and/or provide feedback, both positive and negative, regarding BIZLINK services. To use such feedback as a mechanism to improve service.

5.4 Employees

- a) Encourage clients and other stakeholders to participate in annual general meetings, satisfaction surveys, quality audits and other opportunities to give feedback on how BIZLINK is managed.
- b) Continuously improve personal skills and knowledge through training, performance management and relevant industry qualifications.
- c) Improve service to clients by responding to feedback, assisting auditors and proactively contributing to continuous improvement activities.

Policy 6.1 Board Code of Conduct

1. Policy Summary

Who	Directors upon filling a Board vacancy or elected to the Board of Directors.
What	Set of guidelines which outline expected behaviours and ethical standards for Directors. A framework to guide decision-making, establish professional conduct, and promote integrity and accountability. To ensure ethical behaviour and create a positive and respectful environment.
How	Provide guidelines for Directors to ensure they act in the best interests of BIZLINK and in accordance with their statutory and fiduciary obligations. Consequence of Breach Breaches of this policy may result in disciplinary action, up to an including dismissal from the Board, or other necessary response.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management BIZLINK Constitution, Associations Incorporation Act 2015 (WA), Disability Services Act 1986 (Cth) All policies
Approved	14/08/2023

2. Policy Statement

The Board is committed to the establishment and maintenance of an ethical culture and is proactive in the prevention of fraud, corruption or other illegal activities. The Board requires that Directors behave in an ethical manner and upholds each standard of behaviour and any other requirement of this Code of Conduct. At all times Directors will act in the best interests of BIZLINK and in accordance with their statutory and fiduciary duties. Directors will behave in an acceptable manner in all their dealings with any of the stakeholders of BIZLINK and the general community.

3. Incident Management

3.1 Directors, Management, Employees and, where applicable, Stakeholders must:

- a) Immediately report all incidents (including near misses)
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Accident / Incident Report

4. Code of Conduct Guidelines

4.1 Revenue raising / bidding for contracts

BIZLINK can access funds from Government grants and contracts as well as from donations and sponsorships. The bidding for, or acceptance of, any revenue source or the undertaking of any type of fund-raising will be considered by the Board in view of:

- a) The extent that funder requirements affect the priorities, objectives, values or any other matter the Board views as vital and whether such changes are worth accepting. Particularly as regards the capacity of BIZLINK to run its core business - securing and maintaining quality employment for people with disability.
- b) BIZLINK is a not-for-profit, Public Benevolent Institution (PBI) with charitable status as per the ACNC Charity Register. The Board will consider any potential impact on this status.

4.2 Financial accountability and solvency

The principles of good corporate governance apply in equal force to not-for-profits. Whilst Directors are volunteers, they are ultimately responsible for ensuring the effective governance of BIZLINK. As the Australian Government predominantly funds BIZLINK, it is important resources are managed prudently. Directors, regardless of their area of expertise, must take reasonable steps to prevent trading whilst insolvent or becoming insolvent.

4.3 Obligation to disclose fraud, corruption and other illegal activities

- a) Directors must disclose any suspected or actual fraud, corruption and other illegal activities.
- b) A Director charged with an offence, or convicted in court of any offence, must immediately report the fact and circumstances of the charge or conviction in writing to the Chairman.
- c) Where a Director wishes to withhold this information, allowable only in circumstances where BIZLINK is not affected by the charge or conviction, the Director is required to retire from the Board with immediate effect.
- d) The Chairman will make decisions regarding whether the charge or conviction is relevant to their role as a Director. The Chairman will take due disclosure and appropriate documentation whilst acting to preserve the right to privacy of the Director so charged or convicted.
- e) Directors will refer to Policy on Fraud and Corruption Control in relation to such matters.

4.4 Declarations of conflict of interest

- a) In contributing to decisions and actions taken by the Board, Directors will act honestly, in good faith and in the best interests of the Board, BIZLINK, clients and the community.
- b) Directors will not allow personal interests or the interests of any associated person to conflict with the interests of BIZLINK.
- c) An actual conflict of interest is distinguished by such an interest acting to favour a person or organisation where there is a private interest.
- d) The Board will resolve the conflict of interest. Depending on the nature and circumstances of the conflict, the Board may:
 - i. Take action to ensure that the relevant Director does not have access to BIZLINK information that is relevant to the conflict.
 - ii. Require the Director to remove themselves from discussions or decision-making relevant to the matter that is the subject of the conflict.
 - iii. Take steps to ensure that deliberations of the Board are not influenced by the conflict.
 - iv. Deem the Director's input is necessary to decision-making and so receive the Director's input while considering the declared conflict.
- e) Where declarations of a conflict of interest are made during a Board meeting, such declarations, discussions and decisions will be documented in the minutes.

- f) Declarations of a conflict of interest will otherwise be reported to the Chairman and documented.
- g) Directors are to consider whether other activities impose an ongoing conflict of interest that may interfere with their ability to participate in Board decision-making or their ability to prepare for and regularly attend Board meetings.

4.5 Promotion, marketing and other communication activities

- a) The Board will ensure that any commercial business or sponsorship that it authorises will maintain the reputation of BIZLINK and is commensurate with its objectives and values.
- b) Directors will ensure that comments to the media about BIZLINK are made through the Managing Director and/or Chairman. If this is not possible e.g. due to their availability, a Director who is knowledgeable on the matter may comment following consultation with the Managing Director. Directors must advise the Managing Director of any media comments as soon as practical.
- c) Directors must not make or authorise a statement to any media or entity or person, which, to their knowledge, is false or materially misleading.

4.6 Reporting and consequences of non-compliance

- a) Refer any issues or matters related to this Code of Conduct to the Chairman.
- b) The Chairman will initiate and facilitate discussion and arrive at the agreed actions with the Board or individual Directors on such matters and such actions will be with due consideration to relevant BIZLINK policies, procedures, constitution or other guidelines, regulations or legislation as appropriate.
- c) Where such matters require account, the decision and the decision-making process will be recorded. This may be minutes of meetings or other forms related to risk or quality management routinely used by BIZLINK.

5. Responsibilities

5.1 Directors

- a) Understand the roles and responsibilities of a Director and the core-business and strategic objectives of BIZLINK and the legislative and contractual framework in which it operates.
- b) Act as an ambassador in their public and private dealings with other persons or organisations and promote BIZLINK values, aims and objectives.
- c) Not making improper use of information gained through their position as a Director to gain, directly or indirectly, an advantage for themselves or any other person or entity, or cause detriment to BIZLINK.
- d) Prepare for Board meetings and attend as many Board meetings as possible and tender apologies in advance if unable to attend.
- e) Seek additional information, including expert and independent legal and financial advice, where necessary to make well-informed decisions.
- f) Accept tasks they are competent to perform and satisfactorily complete any tasks allotted to them by the Board within the agreed period.
- g) Ensure activities such as entertainment, functions and travel with its associated expenses are cost-justifiable in terms of appropriately promoting the interests of BIZLINK.
- h) Not seek any form of reward or remuneration for any work undertaken on behalf of BIZLINK. In relation to non-monetary gifts, a gift of any nature must not call into question the integrity of the

Board or Directors. A Director may accept a gift or benefit where it does not influence, or have the potential to influence, in such a way as to compromise or appear to compromise the Director's integrity and impartiality or to create a conflict of interest or perception of a conflict of interest.

- i) Monitor and review the current and future financial position to ensure the organisation is solvent.
- j) Apply the highest standards of personal conduct and integrity in their dealings with any stakeholder, BIZLINK employees, volunteers, clients, client support networks, advocates, employers, funder and fellow Directors.
- k) Not verbally, physically or emotionally abuse, threaten or harass any stakeholder of BIZLINK, not have sexual relationships with any client.
- l) Support zero tolerance of child abuse and that child safety is everyone's responsibility.
- m) Support zero tolerance of any form of workplace bullying and that Work Health and Safety is everyone's responsibility.
- n) Take reasonable steps to ensure their own safety and health and to act in ways that protect the safety and health of others.
- o) Observe the BIZLINK policies related to avoiding all discriminatory practices and the upholding of human and legal rights and equal employment opportunity.
- p) Observe any confidentiality guidelines established by the Board. Not improperly disclose or allow disclosure of any confidential information received during Board duties unless that disclosure has been authorised. Confidential information received by Directors during Board duties remains the property of BIZLINK. Take reasonable steps to ensure the confidentiality of information stored or transmitted in any form.

5.2 Managing Director

In addition to the responsibilities of a Director:

- a) Ensure Directors can access information e.g. legislation, contracts, standards, constitution and policies relevant to their duties as a Director.
- b) Provide new Directors with an induction package.
- c) Provide timely and accurate financial data, information and reports as required to enable Directors to make informed decisions regarding finances and performance and/or to seek further analysis or explanations of any matter.
- d) Maintain records of all Board meetings.
- e) Maintain records of relevant business, financial, family, political or personal interests of Directors that could conflict with BIZLINK interests.
- f) Monitor and actively manage any risks posed by conflicts of interest.
- g) Actively look for and consider potential conflicts of interest, which may be concealed, as part of our Fraud Control Plan revision process.
- h) Treat a failure to disclose or properly manage a conflict of interest as a potential disciplinary matter for the attention of the Chairman.
- i) Maintain a record of and monitor gifts, hospitality, donations and similar benefits.

Policy 6.2 Code of Conduct

1. Policy Summary

Who	Employees, volunteers and contractors.
What	To set guidelines that outline expected behaviours and ethical standards. To always act in the best interests of BIZLINK and in accordance with the obligations of their role and job description. To ensure ethical behaviour and create a positive and respectful environment.
How	Provide guidelines for employee, volunteer and contractor performance of their duties, behaviours and responsibilities. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management Disability Services Act 1986 (Cth) AS 8001:2021 Fraud and Corruption Control Fraud Control Plan All policies
Approved	14/08/2023

2. Policy Statement

BIZLINK directors, management and employees are committed to the establishment and maintenance of an ethical culture and are proactive in the prevention of fraud, corruption or other illegal activities. BIZLINK management requires employees, volunteers and contractors to behave in an ethical manner and uphold any other requirement of this Code of Conduct. To act in the best interests of BIZLINK and in accordance with their job description, contract, policies and procedures. To behave in an acceptable manner in all their dealings with any stakeholder of BIZLINK and the general community.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Immediately report all incidents (including near misses)
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Accident / Incident Report

4. Code of Conduct Guidelines

4.1 Obligation to disclose fraud, corruption and other illegal activities

- a) Employees, volunteers and contractors must report any suspected or actual fraud, corruption and other illegal activities.

- b) An employee, volunteer or contractor charged with an offence, or convicted in court of any offence, must immediately report the fact and circumstances of the charge or conviction in writing to the Managing Director.
- c) The Managing Director will make decisions regarding if the charge or conviction is relevant to the ongoing engagement of the employee, volunteer or contractor. The Managing Director will act in accordance with relevant policies and contracts whilst acting to preserve the right to privacy of the employee, volunteer or contractor so charged or convicted.
- d) Refer to the Policy on Fraud and Corruption Control for such matters.

4.2 Declarations of conflict of interest

- a) Employees, volunteers and contractors will act honestly, in good faith and in the best interests of BIZLINK, clients and the community and will not allow personal interests or the interests of any associated person to conflict with the interests of BIZLINK.
- b) An actual conflict of interest is distinguished by such an interest acting to favour a person or organisation where there is a private interest. Conflicts of interest can include, but are not limited to:
 - i. **Nepotism:** where someone hires, promotes or otherwise provides special treatment in the workplace to a family member or close friend. The family member or friend may appear to receive advantages they don't necessarily qualify for.
 - ii. **Self-dealing:** is when an individual in a financial role uses their knowledge of organisation finances or their access to funds to benefit themselves over the objectives of the organisation.
 - iii. **Gifts, Hospitality, Donations and other Benefits:** occurs when a director, employee, volunteer or contractor accepts or gives gifts, hospitality, donations and other benefits from/to a client, supplier, or another person they have a business relationship with.
 - iv. **Insider trading:** is when a director, employee, volunteer, or contractor has access to confidential information and uses that knowledge to further themselves or others they know. For BIZLINK this may be an issue with tenders or new business opportunities.
- c) The Managing Director will resolve the conflict of interest. Depending on the nature and circumstances of the conflict, the Managing Director may:
 - i. Take action to ensure that the relevant employee, volunteer, or contractor does not have access to BIZLINK information that is relevant to the conflict.
 - ii. Require the employee, volunteer or contractor to remove themselves from discussions or decision-making relevant to the matter that is the subject of the conflict.
 - iii. Take steps to ensure that deliberations of the BIZLINK Board or management are not influenced by the conflict.
 - iv. Deem the employee, volunteer or contractor input is necessary to decision-making and so receive the employee, volunteer or contractor input while considering the declared conflict.
 - v. Conflicts of interest concerning the Managing Director are managed in accordance with the Board Code of Conduct.
- d) Where declarations of an employee, volunteer or contractor conflict of interest are made during a Board or management meeting, such declarations, discussions and decisions will be documented in the minutes.

- e) Declarations of a conflict of interest will otherwise be reported to the Managing Director and documented.
- f) To avoid doubt, if unsure whether a conflict of interest exists, discuss with the Managing Director for guidance. Such discussions should be documented as evidence of probity.

4.3 Gifts, Hospitality, Donations and other Benefits

- a) Occasionally in the course of work gifts, hospitality, donations, and other benefits may be offered by or to suppliers, clients, other employees, organisations, or government entities. These may be offered out of gratitude and goodwill for a job well done or acknowledgement of a successful partnership. They can also be offered to create a favourable impression or to gain preferential treatment. Regardless of why they are offered, accepting gifts, hospitality, donations, and other benefits may create a sense of obligation that could compromise integrity in decision making or service being provided. Acceptance or giving of any gifts, hospitality, donations, and other benefits may also impact the public perception of the integrity of BIZLINK and its staff, and in some instances could be viewed as corrupt conduct.
- b) BIZLINK employees, volunteers and contractors must ensure, and be able to demonstrate, that any gifts, hospitality, donations, and other benefits do not influence the performance of their duties, or call into question the integrity of BIZLINK, its directors or staff.
- c) Management must also consider this policy when offering staff gifts, benefits and hospitality on behalf of BIZLINK, including to external parties e.g. employers, clients and other stakeholders, internal and external hospitality.
- d) Gifts, hospitality, donations, and other benefits are considered a personal benefit if retained by an employee, volunteer, or contractor. For probity, follow these principles:
 - i. Never seek or solicit gifts, hospitality, donations, and other benefits.
 - ii. Never give, or accept, gifts, hospitality, donations, and other benefits in any situation that may lead to an actual, potential, or perceived, conflict of interest.
 - iii. Where there is doubt, discuss the gifts, hospitality, donations, and other benefits with the Finance Manager to ensure there is no conflict of interest.
 - iv. Provide a record of gifts, hospitality, donations, and other benefits you provide or receive to the Finance Manager. Where an employee is paid an incentive, or an award as part of the BIZLINK incentive program this does not need to be reported as it is documented.
 - v. Gifts, hospitality, donations, and other benefits provided on behalf of BIZLINK must have Managing Director approval, be included in the budget, and be appropriate to the values and objects of BIZLINK.

4.4 Promotion, marketing and other communication activities

- a) Any commercial business or sponsorship must be authorised by the Managing Director and must be commensurate with the objectives and values of BIZLINK.
- b) Employees, volunteers and contractors must ensure comments to the media about BIZLINK matters are made through the Managing Director. If this is not possible e.g. due to their availability, an employee who is knowledgeable on the matter may comment following consultation with the Managing Director. The Managing Director must be advised of any media comments as soon as practical.
- c) Employees, volunteers and contractors must not make or authorise a statement to any media or entity or person, which, to their knowledge, is false or materially misleading.

- d) Email communication will be in accordance with the Policy on Information Security Management and the Policy on Information Technology and Cyber Safety. BIZLINK email is BIZLINK intellectual property. The Managing Director can authorise content to be checked or monitored at any time.

5. Responsibilities

5.1 Management

- a) Ensure employees, volunteers and contractors can access information e.g. guidelines, standards, policies and procedures relevant to their duties.
- b) Provide an induction for new employees and volunteers.
- c) Maintain records of relevant business, financial, family, political or personal interests of employees, volunteers or contractors that could conflict with BIZLINK interests.
- d) Monitor and actively manage any risks posed by conflicts of interest.
- e) Actively look for and consider potential conflicts of interest, which may be concealed, as part of our Fraud Control Plan revision process.
- f) Treat a failure to disclose or properly manage a conflict of interest as a potential disciplinary matter or breach of contract.
- g) Maintain a record of and monitor gifts, hospitality, donations and similar benefits.

5.2 Employees, Volunteers and Contractors

- a) Acquire levels of knowledge about the core-business and strategic objectives of BIZLINK and the legislative and contractual framework in which it operates as this relates to individual job requirements and contracts.
- b) Act in accordance with the charter, values, procedures, policies, job description and contract including understanding of individual role and responsibilities.
- c) Cooperate with management, employees, volunteers and other services to promote and deliver quality services to clients.
- d) Act as a representative of BIZLINK in their dealings with other persons or organisations and promote BIZLINK values, aims and objectives.
- e) Not make improper use of their position or information gained through their employment to gain, directly or indirectly, an advantage for themselves or any other person or entity, or cause detriment to BIZLINK.
- f) Not expose BIZLINK to adverse consequences e.g. legal action and/or insurance claims, due to their actions or inactions.
- g) Report any suspected or actual fraud, corruption and other illegal activities committed by themselves, other employees, volunteers, contractors or any stakeholder that may affect BIZLINK.
- h) Only accept tasks they are competent to perform and satisfactorily complete any task allocated to them by BIZLINK or their manager within the agreed period.
- i) Demonstrate integrity and humanity and observe the BIZLINK policies related to avoiding all discriminatory practices including those relating to workplace bullying, the upholding of human and legal rights and equal employment opportunity.
- j) Present themselves in a manner that is appropriate to the duties undertaken and that will not cast clients or BIZLINK in a negative light.

- k) Not smoke except in designated smoking areas and at appropriate break times.
- l) Not consume or be under the influence of alcohol*; take or be under the influence of illegal drugs or legal drugs that may similarly impair performance and/or judgement, whilst undertaking BIZLINK business or otherwise representing BIZLINK.

*Functions that allow the consumption of alcohol, whether during or after business hours, where the employee, volunteer or contractor, is or could be viewed as a BIZLINK representative, must meet this Code of Conduct.
- m) Complete the Policy Acknowledgement form to signify agreement to comply.
- n) Apply the highest standards of personal conduct and integrity in their dealings with any stakeholder, BIZLINK employees, volunteers, clients, client support networks, advocates, employers, funders and Directors.
- o) Not verbally, physically or emotionally abuse, threaten or harass any stakeholder of BIZLINK, not have sexual relationships with any client.
- p) Support zero tolerance of child abuse and that child safety is everyone's responsibility.
- q) Support zero tolerance of any form of workplace bullying and that Work Health and Safety is everyone's responsibility.
- r) Take reasonable steps to ensure their own safety and health and to act in ways that protect the safety and health of others.
- s) Encourage clients and other stakeholders to raise issues or concerns and seek to resolve them in a non-threatening, non-defensive manner.
- t) Ensure activities such as entertainment, functions and travel with its associated expenses are cost-justifiable in terms of promoting the interests of BIZLINK.
- u) Process costs incurred whilst undertaking BIZLINK business in accordance with any Quality Procedures and the Policy on Financial Management.
- v) Only use BIZLINK premises, vehicles, equipment or other resources as required to fulfil employment obligations and in accordance with any associated policies.
- w) Adhere to the Policy on Privacy and not improperly disclose or allow disclosure of any confidential information received during employment unless that disclosure has been authorised by BIZLINK. Confidential information received during employment remains the property of BIZLINK. Take reasonable steps to ensure the confidentiality of information stored or transmitted in any form.
- x) Complete the Information Security Declaration form to signify agreement to comply.

Policy 6.3 Employee Recruitment and Selection

1. Policy Summary

Who	BIZLINK employees, volunteers and prospective employees and volunteers.
What	To set out the recruitment and selection procedures and ensure BIZLINK employs the best people to provide our service and meet our legal obligations.
How	By providing guidelines on recruitment and selection to assess prospective employees against Selection Criteria, Job Descriptions and formal Police and Reference Check procedures. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management Equal Opportunity Act 1984 (WA), Disability Discrimination Act 1992 (Cth), Sex Discrimination Act 1984 (Cth), Racial Discrimination Act 1975 (Cth), Australian Human Rights Commission Act 1986 (Cth), Minimum Conditions of Employment Act 1993(WA), Fair Work Act 2009 (Cth), Privacy Act 1988 (Cth), Electronic Transactions Act 1999 (Cth), National Employment Standards, Labour Market Assistance Industry Award 2020 Department of Social Services Deed and Guidelines Indigenous Employment Strategy, Disability Employment Strategy. BIZLINK Policy on: Code of Conduct, Equal Employment Opportunity, Employee Screening Checks, Employee Training and Appraisal, Privacy, Employee Complaints
Approved	14/08/2023

2. Policy Statement

The Board and management of BIZLINK are committed to recruiting the best employees. We use a fair, open, merit-based recruitment and selection system that assesses prospective employees against a Selection Criteria and Job Description and formal Police and Reference Check procedures.

3. Responsibilities

3.1 Management

- a) Ensure policies and information related to the recruitment process are available to prospective employees and other stakeholders.
- b) Maintain an Employment Contract, Job Description, Selection Criteria and Interview Questions for each position.
- c) Maintain advertising and recruitment procedures.
- d) Maintain information for prospective applicants including advice on how to apply, an Application for Employment form, salary information including advice on the provision of mobile phone, computer, motor vehicle as applicable to the position, Charter and Values of BIZLINK.
- e) Maintain an Employee Reference Check Report.

- f) Maintain a conditional offer of employment package. This will include a Contract of Employment, Job Description and letter. The letter will include: start date, salary, location and a request to provide the required screening checks as per the Policy on Employee Screening Checks.
- g) The Managing Director will appoint employees based on operational need and determine the most appropriate form and level of advertisement for each vacancy as it arises. The Managing Director will decide whether to:
 - i. Advertise internally and/or externally.
 - ii. Appoint a suitable current employee to the position.
 - iii. Appoint a suitable external applicant to the position e.g. approaching potential applicants, “head hunt” or be approached by experienced and/or qualified applicants.
 - iv. Consider job sharing, job creation or modification of job descriptions to facilitate the employment of a person with disability or Aboriginal or Torres Strait Islander person as appropriate.
 - v. Use a recruitment service e.g. for positions such as Accounting, Management or Administration.
- h) The Managing Director will ensure that applicants complete Reference Checks, Employee Screening Checks and an Application for Employment in accordance with this policy.
- i) The Managing Director will choose the selection panel, which will ordinarily consist of the relevant Site Manager, Department Manager, and/or the Operations Manager and other senior staff as required.
- j) The Managing Director will make the final decision on which applicant to appoint. If no applicant meets the required standards, the position may be re-advertised.
- k) The Managing Director may select the next best applicant from the interviewed applicants when the Reference Check Reports or Screening Checks are unsatisfactory. If no applicant meets the required standards, the position may be re-advertised.

3.2 Employees involved in recruitment process

- a) Adhere to Policies on: Equal Employment Opportunity, Employee Screening Checks, Privacy; the Indigenous Employment Strategy and the Disability Employment Strategy.
- b) Maintain a record of applicants.
- c) Offer an interview to applicants who meet the Essential Selection Criteria. The selection panel may further reduce the short-list to those who have also met the Desirable Criteria if the number and calibre of applicants suggests this is appropriate.
- d) Advise applicants as required regarding outcome of applications and offers for interviews.
- e) Conduct interviews with the selection panel in an appropriate setting and, as far as practical, on the same day or consecutive days. Take notes on applicant’s responses to questions to assist in comparative analysis of applicants.
- f) Consider short-listed applicants’ responses to the interview questions and recommend to the Managing Director the applicant who best meets the selection criteria for the position.
- g) Contact at least two of the recommended applicants’ referees. The referees’ assessment of the applicant should be with respect to fulfilling the duties of the position and verifying the applicant’s claims against the selection criteria.

- h) Complete a Reference Check Report as regards the applicant's suitability for the position and discuss the report with the selection panel.
- i) Ensure the successful applicant returns a signed copy of the Contract of Employment and Job Description and supplies any required Police Checks to signify acceptance of the offer of employment.
- j) Respond to unsuccessful applicants as required regarding the recruitment process and refer to the Policy on Feedback and Complaints, Policy on Employee Complaints, Policy on Equal Opportunity Employment and this Policy as required.
- k) Unsuccessful applicants will have two working days to raise any concerns following receipt of advice regarding the outcome of the selection process. This is to avoid undue delay in appointing the successful applicant.
- l) Destroy documentation related to unsuccessful applicants confidentially, six months after the successful applicant has commenced.

Policy 6.4 Equal Employment Opportunity

1. Policy Summary

Who	BIZLINK employees, directors, contractors and volunteers, prospective employees and volunteers.
What	To ensure that employee selection, training and promotion practices are based on merit. As BIZLINK assists people with disability to secure positions in open employment and provides services to a cross section of people from diverse social and cultural backgrounds, we aspire to recognise and benefit from the differences in experience and perspectives that our employees can bring.
How	By providing guidelines for employment recruitment, selection, training, promotion, performance management and termination practices particularly as relates to the prevention of discrimination. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management Workplace Gender Equality Act 2012 (Cth), Equal Opportunity Act 1984 (WA), Disability Discrimination Act 1992 (Cth), Sex Discrimination Act 1984 (Cth), Racial Discrimination Act 1975 (Cth), Australian Human Rights Commission Act 1986 (Cth), Minimum Conditions of Employment Act 1993 (WA), Fair Work Act 2009 (Cth) Labour Market Assistance Industry Award 2020 Disability Employment Strategy, Indigenous Employment Strategy BIZLINK Policy on: Employee Recruitment and Selection, Employee Complaints, Feedback and Complaints
Approved	14/08/2023

2. Policy Statement

BIZLINK management will ensure that prospective and current employees are not discriminated against on the grounds of sex (gender identity), relationship status, pregnancy, sexual orientation (LGBTIQ+), family responsibility or family status, culture, heritage, language, religious or political conviction, impairment, disability, age or any other extraneous factors. Equal opportunity principles will be incorporated into employee recruitment, selection, training, promotion, performance management and termination practices.

3. Responsibilities

3.1 Management

- a) Ensure policies and information related to recruitment, selection, training, promotion, performance management and termination are available to employees and other stakeholders.
- b) Ensure decisions related to recruitment, selection, training, promotion, performance management and termination are made without regard to any matters, other than the individual's inherent ability to carry out the requirements of the position as detailed in the Selection Criteria, Job Description and Performance Appraisals.

- c) Maintain policies and procedures that create a work environment that upholds an ethical culture proactive in the prevention of discrimination in any form.
- d) Ensure the Policy on Code of Conduct details the expected behaviours and responsibilities of employees and volunteers.
- e) Maintain Job Descriptions, Selection Criteria and Performance Appraisal templates that reflect the competencies required for successful job performance.
- f) Address any matter that does not comply with the principles of Equal Employment Opportunity in accordance with the Policy on Employee Complaints and/or the Policy on Feedback and Complaints.
 - i. Take immediate and appropriate steps to minimise or eliminate unlawful harassment, discrimination, and bullying in the workplace.
 - ii. Encourage feedback and facilitate complaints regarding Equal Employment Opportunity concerns.
- g) Ensure BIZLINK offices are physically accessible, where possible to Australian Standards 1428 Design for Access and Mobility.
- h) Implement workplace modifications and/or assistive equipment as required for individual employee needs with consideration of the available resources of BIZLINK.
- i) Maintain and implement an Indigenous Employment Strategy and Disability Employment Strategy.
 - i. Consider the engagement of people with disability and Aboriginal or Torres Strait Islander persons, including from our own register of clients, as vacancies become available.
 - ii. Create flexible work arrangements to facilitate engagement.

3.2 Employees

- a) Complete the Policy Acknowledgement form to signify commitment to comply with listed policies.
- b) Understand and commit to the principles and legislation relating to equal opportunity and applying it in the workplace.
- c) Comply with this policy and treat all colleagues, clients and stakeholders of BIZLINK with respect and professionalism without regard to non-relevant criteria or distinctions.
- d) Refrain from engaging in discriminatory or harassing behaviour.
- e) Report to management if they believe that they or someone else has been treated unfairly.
- f) Undertake training in disability, cultural and LGBTIQ+ inclusion, sexual harassment.

4. Definitions

Discrimination occurs if a person treats, or proposes to treat, a person with an attribute unfavourably because of that attribute. It can also occur if a person imposes, or proposes to impose, a requirement, condition or practice that has, or is likely to have, the effect of disadvantaging persons with an attribute; and that is not reasonable.

Equal Employment Opportunity consists of ensuring that all employees are given equal access to training, promotion, appointment or any other employment related issue without regard to any factor not related to their competency and ability to perform their duties.

Gender A social and emotional construct that forms part of a person's internal sense of self, including their experience of masculinity and femininity, as well as how we want to be related to by others. Some people

have a clear experience of gender while others do not. It is important to note that gender is separate from biological sex and sexual attraction, however they are often incorrectly conflated as the same.

LGBTIQ+ LGBTIQ+ stands for Lesbian, Gay, Bisexual, Transgender, Intersex, Queer, Questioning and anyone else who is diverse in sex, gender or sexuality. There are many different variations of the acronym (LGBTI+, LGBT, GLBT, LGBTIQA+, etc.) but they are all intended to encompass anyone who is diverse in their sex, sexuality and/or gender.

Misgendering the use of words, pronouns or forms of address that do not correctly reflect a person's gender. This can include calling someone male when they identify as female, or using 'he/him' pronouns when the person prefers 'she/her' pronouns. It can also include not using a person's preferred name and instead using the name they were given at birth (this is referred to as 'deadnaming' in the trans community).

Pronouns Words that take the place of nouns; we use them to talk about someone when they are not around or in place of their name. Examples of pronouns are: 'she/her/hers', 'he/him/his', 'they/them/theirs'. Pronouns can indicate a lot about a person's gender identity. Everyone gets to choose their own pronouns and to decide how they want to be referred to by others.

Stereotyping Preconceived ideas and notions about a person or group that are not based on reason or actual experience. Stereotypes are mistaken ideas or beliefs based on external characteristics, such as appearances and behaviours.

Victimisation means subjecting, or threatening to subject, a person to any detriment because they have: asserted their rights under equal opportunity law; made a complaint; helped someone else make a complaint; refused to do something because it would be discrimination, sexual harassment or victimisation.

Workplace Bullying is repeated unreasonable behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by a person or persons against another or others in the course of employment that creates a risk to health and safety. It includes behaviour that harms, threatens, victimises, intimidates, offends, degrades or humiliates a worker, possibly in front of co-workers, clients or customers.

Ref: [Bullying - Overview | Safe Work Australia](#)

[Bullying in the workplace - Fair Work Ombudsman](#)

Policy 6.5 Employee Screening Checks

1. Policy Summary

Who	BIZLINK employees and volunteers and prospective employees and volunteers
What	To safeguard BIZLINK and its clients against recruiting employees or volunteers who have any Screening Check that would raise reasonable doubts about their suitability to work with and support people with disability or who pose an unacceptable risk as regards the prevention of fraud, corruption or other illegal activities.
How	By providing guidelines to ensure employees and volunteers have Screening Checks as required to minimize risk or harm. Recognising the legal and moral duty of care obligations to clients, employers and the broader community. Providing information about the requirements and processing of Screening Checks. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 6 Service Management NDIS Practice Standards 1 Right and Responsibilities, 2 Provider Governance and Operational Management Department of Social Services Deed and Guidelines, National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018, National Disability Insurance Scheme (Worker Screening) Act 2020 (WA), National Disability Insurance Scheme Act 2013 (Cth), Working with Children (Criminal Record Checking) Act 2004 (WA), Spent Convictions Act 1988 (WA), Fair Work Act 2009 (Cth), Electronic Transactions Act 1999 (Cth) BIZLINK Policy on: Rights, Prevention of Violence and Aggression, Child Safety and Wellbeing, Privacy, Feedback and Complaints, Employee Complaints
Approved	14/08/2023

2. Policy Statement

BIZLINK management is committed to ensuring clients are free from any form of abuse or neglect. We aim to protect BIZLINK and our stakeholders from unacceptable risks. This policy aims to minimise the risk of engaging or continuing the employment of employees or volunteers with a relevant criminal record or who are deemed unsuitable for the role.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Immediately report all incidents (including near misses).
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Accident / Incident Report

4. Screening Check Guidelines

4.1 Successful Applicants

BIZLINK requires applicants with satisfactory reference checks to supply Screening Checks at their own expense. This requirement will be in writing as per the Offer of Employment letter or letter regarding an offer for volunteer work. Applicants must satisfactorily pass the National Police Certificate, NDIS Screening Check, Working with Children Check and International Police Checks if applicable to the risk assessment for their role as deemed by the Managing Director, prior to commencing employment or volunteering.

4.2 International Police Checks

- a) Successful applicants who have resided overseas for 12 months or more in the last ten years should contact the relevant overseas police service to obtain a Police Check. Some countries will not release information regarding an individual for personal or third-party purposes.
- b) Where an International Police Check cannot be attained:
 - i. The NDIS Worker Screening Check may cover this requirement.
 - ii. The Manager will conduct at least two referee checks with individuals who personally knew the applicant while they were residing in the other country.
 - iii. The Manager will ask referees whether they have knowledge or information, which would adversely affect the applicant from performing the job, including any relevant criminal offences.
 - iv. The Manager will verify referee credentials.
 - v. Such applicants should not commence employment until this process is satisfactorily completed.
 - vi. The currency of such checks will be at the discretion of the Managing Director.

4.3 Reimbursement of Check Costs

- a) Where an applicant provides existing checks that are deemed current and satisfactory, BIZLINK will not reimburse the costs of these checks, as these costs were incurred prior to a request by BIZLINK.
- b) BIZLINK will reimburse the cost of any required Screening Checks only if:
 - i. the applicant is appointed as an employee or volunteer
 - ii. an existing employee is updating their checks as per a BIZLINK request or statutory requirement
 - iii. the expense was incurred because of the request by BIZLINK
 - iv. existing checks were not deemed current
 - v. the Managing Director deems the checks to be satisfactory and current. For clarity, current for:
 - National Police Certificate will be accepted if dated up to one month prior to the offer of employment.
 - NDIS Check clearance is valid for five years, subject to ongoing monitoring. It is transferable between risk assessed roles, including paid and unpaid, and NDIS providers across Australia.
 - WWCC may be up to three years old, and BIZLINK can check validity online.

4.4 Assessing Screening Checks

- a) The relevant screening units for NDIS and WWC will provide an assessment for suitability to work in a risk assessed role. Once an NDIS Check is finalised by the Screening Unit, a worker will be:
 - i. granted a clearance – permitting work with people with disability in a risk assessed role for a registered NDIS provider, or
 - ii. issued with an exclusion – prohibiting work with people with disability in a risk assessed role for a registered NDIS provider.
- b) The Managing Director will further determine whether Screening Checks are satisfactory and will assess the employee or volunteer's ongoing suitability for the position following disclosed charges, fines or convictions with regard to the potential risk to the operations of BIZLINK and/or the safety and minimisation of harm to our clients.
- c) The Managing Director will refer to any relevant policy or guideline in assessing such matters.
- d) An applicant, employee or volunteer should not automatically be precluded from a job or placement because of their Screening Check reports. The Managing Director will manage the assessment process to determine suitability for (ongoing) employment or placement. As such, the Managing Director will ensure that:
 - i. The applicant, employee or volunteer confirms that the details of the disclosed record are correct.
 - ii. Assessment of the disclosed record of the applicant, employee or volunteer is made in accordance with the assessment criteria detailed at 4.5.
 - iii. The Managing Director may seek additional advice before employment or placement is formally offered, declined or terminated (relevant Board Directors, peak organisations, CCIWA, lawyer, NDIS Commission, Dpt of Communities Screening Unit).
 - iv. Following advice, as required, the Managing Director, will confirm the outcome to either place, employ, not employ or terminate employment / placement of the individual (with or without reference to the details of the disclosed record), and
 - v. Ensure that any decision made for or against a person can be justified and is documented.
- e) Where the Managing Director determines that the Screening Checks of successful applicants reveal no disclosed court outcomes, outstanding charges or other matters the appointment may be confirmed, and the applicant can commence as per the offer of employment or placement.
- f) Where the Managing Director determines that the Screening Checks of existing employees or volunteers reveal no disclosed court outcomes, outstanding charges or other matters, employment or volunteering will continue and no written confirmation will be required.

4.5 The Managing Director will refer to the following assessment criteria:

- a) The relevance of the criminal offence, in relation to the job or placement.
- b) The nature of the offence and the relationship of the offence to the job or placement for which the applicant is being considered or that the existing employee or volunteer undertakes.
- c) The length of time since the offence took place.
- d) Whether the person was convicted or found guilty and placed on a bond.
- e) Whether there is evidence of an extended police record.

- f) The number of offences committed which may establish a pattern of behaviour which makes the applicant unsuitable.
- g) Whether the offence was committed as an adult or a juvenile.
- h) The severity of punishment imposed.
- i) Whether the offence is still a crime, that is, has the offence now been decriminalised.
- j) Whether there are other factors that may be relevant for consideration, and
- k) The person's general character since the offence was committed.
- l) Determinations for suitability by the Screening Unit to work in risk assessed roles will override any discretion of the Managing Director.

4.6 Unsuccessful Screening Check:

- a) Where an applicant, volunteer or employee with a disclosed record is not cleared by the Managing Director to be engaged or to continue employment or volunteering, the Managing Director will:
 - i. Inform the individual of the decision and its rationale.
 - ii. Provide an opportunity for the individual to discuss the results, and
 - iii. Inform the individual of the opportunity for the decision to be reviewed in accordance with the Policy on Employee Complaints.

5. Responsibilities

5.1 Management

- a) Ensure employees, volunteers and applicants have access to BIZLINK Policies.
- b) Implement policies that reiterate the importance of risk management and consider risks and risk mitigation strategies.
- c) Respond to any reports of incidents involving breaches with reference to the Policy on Employee Complaints. Report serious offences to the relevant Government Department, Screening Units, NDIS Commission, and/or police and pursue laying of charges and prosecutions against offenders where appropriate.
- d) Authorise payments to reimburse the cost of Screening Checks in accordance with this Policy.
- e) Check the validity of any successful applicants existing NDIS Check (requires access to the access to the NDIS Worker Screening Database [NDIS Quality and Safeguards Commission](#))
- f) Check the validity of any successful applicants existing WWCC via [Card Validation](#)
- g) Advise prospective applicants of the requirement to provide a satisfactory NDIS Check, National Police Certificate and Working with Children Check if applicable prior to commencing employment or volunteering.
- h) Maintain a central record to document the currency of all applicable Screening Checks and advise individuals when they need to be updated.
- i) Store and use Screening Check documentation in accordance with the Policy on Privacy, Policy on Information Security Management and any contractual requirements with the NDIS and Department of Social Services.

5.2 Employees and Volunteers

- a) Refer to this policy and the current Department of Social Services guidelines regarding “Criminal Records Checks Guidelines” for further procedural and compliance advice regarding Screening Checks.
- b) Must supply a current* or apply for an NDIS Worker Screening Check as advised in the letter of offer or as per subsequent advice as per a risk assessed role.
 - i. *Current will be as per the expiry date of the supplied NDIS Worker Screening Unit letter.
 - ii. Must allow BIZLINK to check the validity of the NDIS Check.
 - iii. Volunteers in Administration and cleaners will not ordinarily require an NDIS Check, due to the nature of their roles and that contact with NDIS participants would ordinarily be incidental. The Screening Unit can provide additional advice and where there is any doubt, an NDIS Check will be required.
- c) Must supply a current WWCC and/or receipt of same, at their own expense as advised in the letter of offer or as per subsequent advice as per a risk assessed role:
 - i. If required by legislation and will be working directly with children in an unsupervised environment and/or who will go into schools or childcare centres to provide presentations or other direct service provision.
 - ii. Managers, Administration and cleaners will not ordinarily require a WWCC, the Working with Children Screening Unit can provide advice.
 - iii. *Current will be as per the expiry date of the WWCC card.
 - iv. Must allow BIZLINK to check the validity of the WWCC card.
- d) Must supply a National Police Certificate and/or receipt of same, at their own expense as advised in the letter of offer or as per subsequent advice as per a risk assessed role. The NDIS Check may override the need for this check.
 - i. *Current will mean the supplied original National Police Certificate is dated no more than one month prior to the offer of employment or is no more than 3 years old if already employed by BIZLINK.
- e) Must allow management to check the validity of their driver licence and the status of demerit points in accordance with the Policy on Motor Vehicle Use where an employee or volunteer is required to drive a motor vehicle for work purposes using either a private vehicle or a vehicle supplied by BIZLINK.
- f) Provide new Screening Checks, at their own expense when due for renewal.
- g) Apply for reimbursement of Screening Checks in accordance with this Policy and relevant procedures.
- h) Notify the NDIS and/or WWCC Screening Unit, of any relevant change in your criminal record and any relevant change in your particulars (such as if you change employers or contact details, including your address).
- i) Report to the Managing Director immediately any charges, fines or convictions. Any breach of this clause will be treated as ‘misconduct’ or ‘serious misconduct’, depending upon the seriousness of the offence, and the Managing Director will take appropriate action in accordance with the employee’s contract of employment which may include suspension (with or without pay) or dismissal. Volunteers may be requested to stand down from their position as volunteer.

6. References

Working with Children Check [Working with Children Check \(www.wa.gov.au\)](http://www.wa.gov.au)

NDIS Worker Screening Check [NDIS Worker Screening Check \(www.wa.gov.au\)](http://www.wa.gov.au)

National Police Certificates [National Police Certificates | Western Australia Police Force](#)

Spent Convictions [FAQ | Western Australia Police Force](#)

7. Definitions

Screening Check includes NDIS Worker Screening Check, Criminal Record Check, National Police Certificate, National Police Check for Volunteers, State Traffic Certificate, the Working with Children Check, International Police Checks or any other check required for the role. Screening checks assist with determining whether a person is suited to the role. One check cannot substitute for another.

Activities that require Screening Checks include those:

- a) Subject to industry accreditation requirements, industry standards, or a legal requirement that the activity can only be done by people who have not been convicted of certain crimes.
- b) Specified by the Department of Social Services as requiring criminal records checks.
- c) With regular or unsupervised contact with children, elderly, or other classes of vulnerable people.

NDIS Worker Screening Check (NDIS Check) a screening process for NDIS workers to determine that applicants do not present an unacceptable risk of harm to people with disability.

- a) The NDIS Check is a national tool that helps NDIS providers determine that individuals seeking to work (or already working) in certain NDIS roles do not present an unacceptable risk of harm to people with disability.
- b) In WA, the NDIS Check is completed by the NDIS Worker Screening Unit (Screening Unit) within the Department of Communities.
- c) BIZLINK will advise if a role requires an NDIS Check. If required, it is an offence to work without a valid NDIS Check or without having applied for one, and penalties apply.

Working with Children Check (WWCC) a comprehensive criminal record check for people working with children in Western Australia. The WWC Check aims to protect children by:

- a) deterring people from applying to work with children where they have a relevant charge or conviction on their criminal record that indicates they may harm a child
- b) detecting new charges and convictions of those people who hold a current WWC Card and preventing them from continuing to engage in child-related work where their criminal record and behaviour indicates they may harm a child, and
- c) protecting children by creating awareness that child safety is a whole of community responsibility.

Spent Conviction having a conviction declared spent effectively limits the disclosure of that conviction. For example, a conviction that has been spent is not listed on a National Police Certificate. However, certain government departments, licensing bodies as well as the Police and Courts of Law have exemptions under the Spent Convictions Act 1988 (WA) and have access to convictions that have been spent.

Applicant may include an applicant for a paid employment vacancy or an applicant for a volunteer position e.g. student placement or unpaid position e.g. work experience.

Policy 6.6 Employee Training and Appraisal

1. Policy Summary

Who	BIZLINK employees and volunteers.
What	To support our employees to provide the best possible service through our employee supervision, performance appraisals and training.
How	Provide guidelines to ensure employees are supervised, appraised and provided with access to training. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management BIZLINK Policy on Financial Management Workplace Gender Equality Act 2012 (Cth), Electronic Transactions Act 1999 (Cth)
Approved	14/08/2023

2. Policy Statement

BIZLINK management will ensure that employees are appropriately supervised and appraised, and that training achieves the objectives of BIZLINK and supports employee career development goals. Formal supervision will link to agreed training and development goals.

3. Responsibilities

3.1 Management

- a) Provide equitable access to training and development for all employees. Ensuring that the Workplace Gender Equality Act 2012 is considered as regards the awarding of increments, career progression and training.
- b) Set an appropriate budget for employee training, incentives and increment progression.
- c) Ensure new employees complete a formal induction during their probationary period and preferably within one month of commencing.
- d) Use the 'Employee Manual', 'Quality and ISM Manual' and 'Policy Manual' as key induction materials for new employees.
- e) Ensure employees complete the 'Information Security Declaration' and 'Policy Acknowledgement' form to signify commitment to comply with obligations, listed policies and documents.
- f) Maintain a current Key Position Requirements (KPR) and Training Record for each employee.
- g) Complete probationary employee's performance appraisals prior to the expiry of three-months.
- h) The Managing Director may offer an extended probationary period or may elect not to offer permanent employment.
- i) Complete an annual performance appraisal for each employee.
- j) Provide employees with sufficient notice of performance appraisals to prepare and identify training needs and goals.

- k) Complete an Annual Performance Appraisal which documents employee strengths and areas for improvement and recommendations for further training and development.
- l) Award incremental progression following an appraisal where the employee can demonstrate performance and contribution to BIZLINK goals. Increments are not automatic i.e. increments are not simply tenure based. Where a Manager proposes an increment, they must detail in writing to the Managing Director, the reasons why an increment would be justified.
- m) Provide employees directed to improve their performance or modify a work-related behaviour with advice in writing and provide a reasonable period to improve or change the behaviour as required.
- n) Identify internal or external training to meet each employee's agreed training and development needs or goals.
- o) Ensure training paid for by BIZLINK directly benefits BIZLINK. Provide approval for training in consultation with the Managing Director and relevant Quality Procedures to determine whether BIZLINK will:
 - i. pay the full cost
 - ii. require the employee to contribute
 - iii. require the employee to pay the costs in full
 - iv. allow training to be undertaken during work hours
 - v. pay the employee whilst undertaking training
- p) Consider the needs of BIZLINK and the value returned to BIZLINK. Provide feedback when a training request is denied e.g. relative need, budget restrictions, lack of context to the needs of BIZLINK or other substantiated circumstances.

3.2 Employees

- a) Complete appraisals before the due date for manager comment.
- b) Identify and share training and development ideas, opportunities and experiences.
- c) Request training as required to improve service performance.
- d) Obtain relevant certificates to demonstrate attainment and maintain certificates as per procedure.
- e) Repay costs as required when agreed training obligations are not met or as otherwise required.
- f) Use industry provided training and conference opportunities wherever relevant and feasible.
- g) Report any concerns regarding induction, training or appraisal in accordance with relevant Quality Procedures and the Policy on Employee Complaints.

Policy 6.7 Work Health and Safety

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers, clients, prospective clients, client's support networks and stakeholders. ('Client' same meaning as 'participant').
What	To maximise the safety and health of BIZLINK employees, clients and visitors.
How	Provide guidelines for the identification of potential risks and hazards to minimise work-related accidents, injuries or illness. Outline process for investigation and documentation of work-related accidents or near misses for risk minimisation. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management Work Health and Safety Act 2020 (WA), Work Health and Safety (General) Regulations 2022 (WA) BIZLINK Policy on: Employee Complaints, Financial Management, Risk Management
Approved	14/08/2023

2. Policy Statement

BIZLINK management aims to minimise the risk of illness, accident or injury whilst working by promoting Work Health and Safety practices that are consistent with legislative and regulatory requirements.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Immediately report all incidents (including near misses)
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Accident / Incident Report

4. Responsibilities

4.1 Management

- a) Provide employees with information about Work Health and Safety responsibilities and practices, including the Act, Regulations, Codes of Practice and BIZLINK Employee Manual.
- b) Assess risks and develop mitigation strategies for hazardous tasks, work-practices, work-environments or any other matters that may give rise to injury or illness.
- c) Understand that workplace bullying is a threat to the health and wellbeing of employees, volunteers and clients and aim to mitigate all forms of workplace bullying by maintaining a culture of openness, support, and accountability.
- d) Document work-related accidents, injuries, illnesses, complaints or concerns regarding Work Health and Safety. Investigate all work-related accidents, injuries and illnesses and take appropriate

action to minimise future occurrences i.e. Complaint or Incident Notice (COIN), Improvement Corrective Action Notice (ICAN), Accident / Incident Report (AIR).

- e) Maintain comprehensive insurance as per the Policy on Financial Management.
- f) Encourage employees to undertake work-related preventative care and reimburse costs in accordance with the Policy on Financial Management:
 - i. Maintain an Employee Assistance Program (EAP).
 - ii. Reimburse the out-of-pocket expense for work-related vaccinations not covered by Medicare e.g. cost of vaccine.
 - iii. Reimburse the cost of First Aid Certificates.
 - iv. Supply or reimburse the cost of PPC&E where there is a demonstrated need and where such items are required for the purposes of the workplace.
- g) Ensure the Employee Manual includes Work Health and Safety matters in further detail, including Security Procedures, Communicable Diseases, General Safety Guidelines, Workplace Bullying and Universal Hygiene Procedures.
- h) Ensure BIZLINK offices have appropriate smoke detection and safety equipment and emergency or evacuation procedures.
- i) Monitor employees use of time to ensure appropriate hours, breaks and time-off-in-lieu are taken to minimise the effects of fatigue.
- j) Provide employees with safe and reliable vehicles, as per the Policy on Motor Vehicle Use, with consideration of comparative ANCAP (Australasian New Car Assessment Program) safety ratings.

4.2 Employees

- a) Must take reasonable care of their own health and safety and the health and safety of others in the workplace. This includes cooperating with Managers and co-workers in complying with any applicable Work Health and Safety Standard and/or Code of Practice and/or any lawful instructions, information and training provided in relation to such matters.
- b) Take reasonable steps to assess work site hazards and report and/or mitigate any risk of illness, accident or injury at work.
- c) Report immediately any risks that pose a threat or concern to the operations of BIZLINK or the Work Health and Safety of any stakeholder to the Site Manager for response and management.
- d) Access the Employee Assistance Program (EAP) as required.
- e) Have voluntarily vaccinations against viral diseases e.g. Hepatitis, Seasonal Influenza, H1N1, tetanus, COVID-19 or any others that a GP considers a work-related risk.
- f) Maintain a current First Aid Certificate as per their role. All staff are given equal access to training.
- g) Comply with any manual handling procedure or practice required to reduce the risk of injury.
- h) Attend workplace inductions with the client wherever practical and appropriate for instruction in the manual handling that relates to the position.
- i) Identify potential risks and request or use available PPC&E.
- j) Report any issues or concerns related to work hours to their Manager. Take leave and time-off-in-lieu as per the employment contract and as arranged by mutual agreement with the Manager.
- k) Use Motor Vehicles as per the Policy on Motor Vehicle Use, including what to do if involved in an accident.

4.3 Stakeholders

Follow safe work practices and comply with health and safety instructions.

5. Definitions

Hazard in relation to a person, means anything that may result in injury to the person; or harm to the health of the person.

Risk in relation to any injury or harm, means the probability of that injury or harm occurring.

Employee Assistance Program (EAP) provides an independent, confidential and professional counselling service to employees and their immediate families. The program provides short to medium term assistance and there is a limit on the number of sessions available. The EAP is an employee benefit provided by BIZLINK and there is no cost to employees or their immediate families.

Personal Protective Clothing and Equipment (PPC&E or PPE): may include eye protection, hearing protection, steel-capped safety boots, slip resistant shoes, overalls, gloves, masks or as otherwise required by the workplace.

Workplace Bullying is repeated unreasonable behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by a person or persons against another or others in the course of employment that creates a risk to health and safety. It includes behaviour that harms, threatens, victimises, intimidates, offends, degrades or humiliates a worker, possibly in front of co-workers, clients or customers.

Ref: [Bullying - Overview | Safe Work Australia](#)

[Bullying in the workplace - Fair Work Ombudsman](#)

Policy 6.8 Financial Management

1. Policy Summary

Who	BIZLINK employees, directors and volunteers.
What	To ensure BIZLINK operates within a responsible, sustainable financial framework and has adequate resources to provide our service. To operate with integrity and meet our legal and contractual obligations.
How	Provide guidelines for the standards of practice for accounting, investing, purchasing, delegations and insurance activities of BIZLINK. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management Department of Social Services Deed and Guidelines, Electronic Transactions Act 1999 (Cth) BIZLINK Policy on: Risk Management, Fraud and Corruption Control Quality Procedures, Fraud Control Plan, Investment Plan, Delegation of Authority, Delegation Schedule
Approved	14/08/2023

2. Policy Statement

This policy supports BIZLINK employees and Directors by providing the parameters for undertaking accounting, investing, purchasing, delegation and insurance activities. In addition, this policy aims to ensure that Directors, employees, and unpaid persons e.g. volunteers, work experience participants and clients engaged in vocational development activities, are appropriately insured and indemnified.

BIZLINK is a charity registered with the Australian Charities and Not-for-Profit Commission (ACNC) and operates as a not-for-profit. A not-for-profit is an organisation that does not operate for the profit, personal gain or other benefit of people such as members, employees, boards or their friends or relatives. The definition of not-for-profit applies both while the charity is operating and if it ends operations. The Board must ensure that:

- Finances are managed responsibly,
- BIZLINK does not operate while it is insolvent, and
- BIZLINK meets its ACNC obligations, including continuing to work towards its charitable purposes and remaining not-for-profit.

3. Responsibilities

3.1 Board

a) Investment

With reference to the ACNC, a not-for-profit, such as BIZLINK, can make a surplus, providing it is used to further its purpose. Generating a surplus is generally considered good practice. A surplus

is important for financial viability and can help account for expected and unexpected future expenses. There may be times when a not-for-profit has a deficit. A planned deficit, as part of financial management and overall operations, may in fact be helpful for long term success. For instance, a deficit to deliver services and retain staff during a disaster e.g. pandemic.

There are several ways that a surplus can be used, depending on the not-for-profits purposes and any relevant requirements in its policies or the law. For example:

- implementing a new project or service
 - acquiring property, plant or equipment
 - keeping cash in reserve
 - making a loan payment
 - acquiring investments e.g. invest its funds by purchasing bonds or term deposits
 - donating funds to another charity with a similar charitable purpose
- i. Directors will determine future financial planning strategies to ensure BIZLINK is able to maintain its operating budget and create growth while observing its charitable status and purpose.
 - ii. Directors will ensure that the cash assets of BIZLINK provide for its long-term financial viability. Any cash assets not required for the current operating budget will be invested in accordance with the Investment Plan.
 - iii. Investment Plan will detail the management of cash assets not required for current operating expenses to maximise earnings, while retaining security, minimising risks, and observing the charitable status and purpose of BIZLINK.
 - iv. Directors will review the Investment Plan along with the Annual Budget, and as otherwise required by the Board to ensure that:
 - Interest and other earnings from investments are part of the annual operating budget.
 - Funds are utilised to achieve a balanced operating budget.
 - Capital growth is achieved to generate income.
 - There is access to cash to cover current liabilities; to establish new projects; for unforeseen expenses.
 - It aligns with the objectives of the Strategic Plan.
 - Investments are made with low to medium risk. Investments provide for security of capital over the medium to long term.
 - BIZLINK invests with reputable, established, financial institutions and with organisations whose operations are socially responsible and compatible with the values of BIZLINK.
 - Delegation Schedule is current and reflects the objectives of the Investment Plan and Annual Budget.

b) Contracts

- i. Board will approve to affix the Common Seal to formal legal contracts at its discretion or where otherwise required by the other party to a contract.
- ii. If the Common Seal is affixed, the Board will approve the Managing Director or Directors to sign it. Where two signatures are required, one will preferably be the Chairman.

c) Delegation of Authority

- i. Provides a framework for delegating Board authority. It is a key element in effective governance and provides formal authority to employees to commit the current or future assets of BIZLINK.
- ii. Must be signed by employees who have delegated authority to act on behalf of BIZLINK.
- iii. Aims to ensure that appropriate employees have the level of authority necessary to discharge their responsibilities and to ensure internal controls are effective.
- iv. References the Delegation Schedule for specific parameters based on employee position.

d) Delegation Schedule

- i. Must be approved by the Board and reviewed from time to time as required to meet the objectives of the Investment Plan, Strategic Plan and Annual Budget.
- ii. Document the employees position e.g. Managing Director, Finance Manager, and will detail the activity, conditions and spending parameters.

e) Budgets

- i. Managing Director must prepare an annual Budget for Board approval prior to 30 June each year.
- ii. The Board must approve a Budget for each financial year that forms the parameters for purchasing.
- iii. Managing Director will engage appropriately qualified accounting employees to undertake the accounting requirements of BIZLINK.

3.2 Financial Management

- a) Managing Director will present financial reports to the Board of Directors on the preceding month and/or quarter of activity including an Income Statement and Balance Sheet.
- b) Managing Director has authorisation to make purchases on behalf of BIZLINK in accordance with the signed and current Delegation of Authority.
- c) Prior to any activity that is outside the Delegation of Authority, the Managing Director will consult with the Chairman and other Directors as required. The Managing Director may then proceed if approved by the Chairman or resolved by the Board (as required).
- d) Board of Directors must select a suitably qualified and independent auditor to be elected by the membership at each Annual General Meeting as per the Constitution.
- e) Managing Director must ensure that an independent auditor, as elected at each Annual General Meeting, undertakes an annual financial audit.
- f) Managing Director will table the financial audit at the Annual General Meeting.
- g) Managing Director will maintain Annual Reports and the Minutes of the Annual General Meetings as per the Document Register.

3.3 Management

- a) Managing Director will prepare an Investment Plan, as part of the annual Budget and with reference to the Strategic Plan. The Investment Plan must align with the principles of this Policy.
- b) Quality Manager will ensure that Quality Procedure 6 - Administration, Promotion and Purchasing, includes detail on the following: selection and register of suppliers, approval of purchases and quotes, manner of payment, fraud control and prevention.

- c) Quality Manager will maintain a Fraud Control Plan that is reviewed by the QRC every six months as required by the Department of Social Services.
- d) Finance Manager will ensure that payments are made in accordance with the Delegation Schedule, Delegation of Authority and considers mitigation of fraud, corruption or other illegal activities.
- e) Finance Manager will prepare finance reports detailing the revenue and expenditure as required by the Board and Managing Director.
- f) The Finance Manager will assist the Financial Auditor to complete the annual audit.
- g) Managers have authorization to make purchases on behalf of BIZLINK as per the Delegation Schedule, this Policy, relevant Quality Procedures and the Policy on Fraud and Corruption Control.
- h) Managing Director or delegate will approve invoices prior to payment.
- i) Finance Manager will ensure that electronic fund transfers are protected with appropriate security measures and limits that require a second manager to authorise as per the Fraud Control Plan.
- j) Managing Director will ensure that BIZLINK maintains current and comprehensive insurance cover in accordance with any funding contracts or other legal requirement or obligation to do so.
- k) Finance Manager will forward the relevant sections of any contracts or other documents from time-to-time as required e.g. when new or amended, to our insurer and/or insurance broker to ensure that appropriate and adequate coverage is maintained at all times including:
 - Directors and officers liability insurance for Directors and employees.
 - Journey accident insurance for Directors and employees travelling on BIZLINK business.
 - Professional indemnity insurance for Directors and employees.
 - Workers' compensation for employees.
 - Comprehensive motor vehicle insurance for all BIZLINK vehicles.
 - Public liability insurance.
 - Building and contents insurance that will include electrical equipment protection insurance and coverage for laptop computers used outside of BIZLINK offices.
 - Group Accident Insurance for work experience students and voluntary workers, including travel to and from work.
 - Cyber insurance to cover business liability for a data breach.

3.4 Employees

- a) Adhere to relevant Quality Procedures, Policy on Fraud and Corruption Control, Fraud Control Plan and the Policy on Risk Management.
- b) Obtain approval from their Manager prior to making purchases on behalf of BIZLINK. This clause should not prevent BIZLINK employees from acting in the best interests of BIZLINK or its clients.
- c) Obtain a receipt for any payment made on behalf of BIZLINK or for the purposes of providing client related services.

Policy 6.9 Risk Management

1. Policy Summary

Who	BIZLINK employees, directors, contractors, and volunteers.
What	To establish standards of practice for the identification and management of risk. To minimise risks to our organisation, employees, volunteers, clients or the general public.
How	Provide guidelines to identify risks and procedures to mitigate risks. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police.
Resources	NSDS 6 Service Management NDIS Practice Standards 2 Provider Governance and Operational Management, 3 Provision of Supports, Provision of Supports Environment Work Health and Safety Act 2020 (WA), Work Health and Safety (General) Regulations 2022 BIZLINK Policy on: Work Health and Safety, Fraud and Corruption Control, Feedback and Complaints, Employee Complaints Fraud Control Plan, Business Continuity Plan, Quality Procedures
Approved	14/08/2023

2. Policy Statement

BIZLINK employees and Directors will aim to identify and manage risks that could adversely affect BIZLINK assets, functions, objectives, operations and any of its stakeholders. Risk management will form part of strategic, operational and management responsibilities and will integrate with operational, strategic and planning processes.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Immediately report all incidents (including near misses)
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Accident / Incident Report
 - iv. Business Continuity Plan
 - v. Fraud Control Plan

4. Responsibilities

4.1 Management

- a) Use the Plan Do Check Act (PDCA) cycle as per the 'Quality and ISM Manual' and detailed in ISO 9001 and reflect the PDCA in our COIN and ICAN system for reporting risks and implementing mitigation strategies.

- b) Engage consultants to advise and assist in the risk management process, or management of specific risks or categories of risk as appropriate.
- c) The Quality Review Committee will analyse, plan, action and monitor any strategic and organisational risks identified through the review of COINs, ICANs and AIRs.
- d) The risk management focus of BIZLINK will align with strategic planning, governance, quality management, continuous improvement and financial management.
- e) Maintain and update as required a Business Continuity Plan and Fraud Control Plan to minimise or mitigate key risks that would significantly affect business operations.

4.2 Employees

- a) Refer to the 'Quality and ISM Manual' for reporting risks and implementing mitigation strategies e.g. for NDIS participants complete the 'Safety Plan NDIS'.
- b) Complete a Risk Assessment whenever there is a concern regarding employee safety or the safety of others e.g. children, vulnerable people and document in client notes accordingly.
- c) Use the Complaint or Incident Notice (COIN), Improvement Corrective Action Notice (ICAN) and/or Accident/Incident Report (AIR) as the key tools for reporting and recording risk.
- d) Be aware of and take a proactive role in risk management. This includes identifying and reporting potential or actual hazards or risks and being involved in the process to develop strategies to mitigate the hazard or risk e.g. the Business Continuity Plan and Fraud Control Plan.
- e) Report to the Managing Director for immediate response and management any risks that pose an imminent threat to the operations of BIZLINK or Work Health and Safety of clients or any stakeholder or any such matter with a severe consequence.

5. Definitions

Risk is the probability that an occasion will arise that presents a danger to our organisation, employees, volunteers, clients or the general public. It includes, but is not limited to, physical, financial, reputational or legal hazards.

Hazard means anything that may result in injury or harm to a person or cause detriment to an organisation.

Plan-Do-Check-Act Cycle (PDCA)

Plan establish the objectives of the system and its processes, and the resources needed to deliver results in accordance with stakeholders requirements and the organisations policies, and identify and address risks and opportunities

Do implement what was planned

Check monitor and (where applicable) measure processes and the resulting services against policies, objectives, requirements and planned activities, and report the results

Act take actions to improve performance, as necessary.

Policy 6.10 Fraud and Corruption Control

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers and stakeholders.
What	To establish standards of practice for the prevention and management of fraud, corruption and other illegal activities. To operate with integrity and meet our legal and contractual obligations.
How	Provide guidelines to prevent fraud, corruption and other illegal activities. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police. As BIZLINK is funded by the Australian Government it is important to note that The Criminal Code Act 1995 (Cth) provides that offences involving fraudulent conduct against the Commonwealth are punishable by penalties including imprisonment.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management Crimes Act 1914 (Cth), Criminal Code Act 1995 (Cth), Electronic Transactions Act 1999 (Cth), ISO 27001 Information Security Management Systems, AS 8001 Fraud and Corruption Control, AS ISO 31000 Risk Management-Guidelines Fraud Control Plan, Business Continuity Plan, Statement of Applicability (SoA) BIZLINK Policy on: Financial Management, Risk Management, Feedback and Complaints, Feedback and Complaints, Employee Complaints
Approved	14/08/2023

2. Policy Statement

BIZLINK management is committed to preventing fraud, corruption, and other illegal activities. Our risk management and ethical governance approach ensures that employees and Directors proactively identify and address such activities. Any concerns or suspicions regarding fraud, corruption, or illegal conduct will be promptly reported, and whistleblower protection will be provided by management.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Immediately report all incidents (including near misses)
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Fraud Control Plan
 - iv. Business Continuity Plan

4. Responsibilities

4.1 Management

- a) Ensure policies are available to employees and other stakeholders.

- b) Review the Fraud Control Plan as required.
- c) Minimise or mitigate the opportunity for fraud, corruption and other illegal activities or events.
- d) Document and secure all data, information, or evidence of suspected or actual fraud, corruption and other illegal activities or events, make available to police and/or other authorities as required.
- e) Report fraud, corruption, and other illegal activities, as per the Fraud Control Plan and the Policy on Employee Complaints with respect to the protection of whistleblowers.
- f) Undertake risk assessments regarding fraud, corruption, and other illegal activities as per the Policy on Risk Management.
- g) Maintain Policies on Codes of Conduct that cover every person engaged by BIZLINK either as a paid employee, Director, volunteer, or contractor.
- h) Support whistleblowers to report any concerns or suspicions of any reportable conduct. Handle reports to preserve whistleblower privacy, dignity, and confidentiality, with respect to the duty of care of BIZLINK and disclosure which may be required in matters of a serious nature. Inform whistleblowers of progress regarding the reported matter.
- i) Take precautions not to employ, engage or elect any person who would have a role in BIZLINK governance, management, financial administration, or the conduct of the service, if there is any actual or possible concern relating to bankruptcy, fraud, corruption, or other illegal activity deemed as improper conduct.
- j) Complete Screening checks as part of the recruitment process of all employees and volunteers in accordance with the Policy on Employee Screening Checks.

4.2 Employees

- a) Complete the Policy Acknowledgement form to indicate compliance commitment.
- b) Uphold the Code of Conduct.
- c) Cooperate in audits or investigations conducted by or on behalf of the Commonwealth.
- d) Review the Fraud Control Plan, understand fraud avenues, consequences, and mitigation strategies. Share improvement suggestions with management.
- e) Complete Fraud Control training as required.
- f) Report fraud, corruption, and other illegal activities, as per the Fraud Control Plan and the Policy on Employee Complaints with respect to the protection of whistleblowers.
- g) Develop awareness of organisational systems, policies, and procedures related to fraud, corruption, and illegal activities based on role and responsibility. For example, the Finance Manager should be knowledgeable in accounting and financial fraud prevention systems.

4.3 Stakeholders

Report any concerns or suspicions of any reportable conduct as per the Fraud Control Plan and the Policy on Feedback and Complaints.

5. Definitions

Corruption: dishonest activity in which a person associated with an organisation (e.g., director, executive, manager, employee or contractor) acts contrary to the interests of the organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation. This can also involve corrupt conduct by the organisation, or a person purporting to act on behalf of and in the interests

of the organisation, to secure some form of improper advantage for the organisation either directly or indirectly. Note: while conduct must be dishonest for it to meet the definition of corruption, the conduct does not necessarily represent a breach of the law.

Fraud: dishonest activity causing actual or potential gain or loss to any person or organisation including theft of moneys or other property by persons internal and/or external to the organisation and/or where deception is used at the time, immediately before or immediately following the activity.

Reportable Conduct is conduct by a person or persons connected with BIZLINK that, in the view of any person acting in good faith, is:

- a) Dishonest, fraudulent, corrupt
- b) Illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property)
- c) In breach of Commonwealth or state legislation or local authority by-laws
- d) Unethical (either representing a breach of any of the BIZLINK Codes of Conduct or the National Standards for Disability Services, NDIS Standards, or Human Rights, or Contractual Compliance or generally)
- e) Serious and substantial waste of BIZLINK resources
- f) Repeated instances of breaching quality or administrative procedures
- g) An unsafe work-practice
- h) Any other conduct which may cause financial or non-financial loss to BIZLINK or be otherwise detrimental to the interests of BIZLINK.

Risk effect of uncertainty on objectives. An effect is a deviation from the expected, it can be positive, negative or both, and can address, create or result in opportunities and threats.

Whistleblower: person who reports wrongdoing.

Ref: AS 8001 – 2021: Fraud and Corruption Control

Policy 6.11 Client Training and Support

1. Policy Summary

Who	BIZLINK employees, volunteers, clients and client's support networks. ('Client' same meaning as 'participant').
What	To optimise client employment opportunities through access to activities such as training, and support, relevant to their employment goals. To ensure that client training and support achieve individual outcomes whilst promoting participation and inclusion.
How	Provide guidelines for employees about client training and support to achieve individual outcomes, participation and inclusion. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 1 Rights, 2 Participation and Inclusion, 3 Individual Outcomes and 6 Service Management NDIS Practice Standards 1 Right and Responsibilities, 2 Provider Governance and Operational Management, 3 Provision of Supports, 4 Provision of Supports Environment BIZLINK Policy on: Financial Management, Participation and Inclusion, Individual Outcomes Electronic Transactions Act 1999 (Cth) Department Guidelines related to DES Activities
Approved	14/08/2023

2. Policy Statement

BIZLINK employees will provide clients with the training and services they need to support the achievement of their employment goals and take advantage of employment opportunities based on relative need and available resources.

3. Responsibilities

3.1 Management

- a) Provide clients with assistance to pay for or reimburse the successful completion of education, courses, training or other associated fees or costs for employment related activities based on relative need and available resources, as per the Policy on Financial Management and that:
 - Directly relates to the achievement of an employment goal detailed in the client's Job Plan or Goal Plan and/or as otherwise agreed with BIZLINK.
 - Is not funded by another source or the employer.
 - Provides a tax invoice and "value for money".
 - Results in a certificate or tangible outcome that directly relates to increasing the opportunity of securing or retaining employment.
- b) The Managing Director may approve payment for courses or training not completed, with consideration of satisfying the objectives of this policy.

3.2 Employees

- a) Provide clients with advice and counselling on employment options, career choices, and the types of training available to assist in achieving career goals.
- b) Assist clients to prepare and update individualised Job Plans or Goal Plans, involving their support network if involved with the client's consent, as per the Policy on Individual Outcomes.
- c) Liaise with the Manager as regards funding any relevant training courses to enhance the client's skills to secure or retain employment as detailed in the Job Plan or Goal Plan agreed with the client.
- d) Provide clients with individualised support and participation in work preparation, job sampling, work experience, skills training, and personal development as per the Job Plan or Goal Plan, individual needs and employment goals.
- e) Provide clients with job search assistance that matches with their skills and facilitates their independence or involvement as practical and appropriate e.g. groups or one-on-one, access to computers for internet searches and job applications or on-line inductions, contacting employers and interviews.
- f) Access government subsidies and initiatives e.g. the Employment Assistance Fund for workplace modifications, Auslan interpreting, to reduce or remove barriers to employment participation.
- g) Provide flexible support strategies including on and off-site support. Provide training and support in a manner that is considerate of the client's individual needs and the requirements of the employer.
- h) Provide training to the client's co-workers, wherever practical and appropriate, to work more effectively with people with disability. Engaging natural workplace supports reduces reliance on BIZLINK support, thereby promoting independence and achieving inclusion.
- i) Gather information about the client's individual support needs for the completion of the Ongoing Support Assessment (OSA). This information ensures the appropriate level of support funding.
- j) Provide training to use public transport to/from vocational development and employment commitments as required.
- k) Use the Supported Wage System (SWS) for workers who are unable to achieve award productivity. Work with clients using SWS to retain and develop their employment skills and competencies. Ensure support and training is aimed at maintaining, or wherever possible, improving productivity, increasing independence and achieving the client's career goals.
- l) Access Traineeship and Apprenticeship opportunities, wherever practical and appropriate, with the aim of advancing career opportunities and achieving sustainable quality employment.

Policy 6.12 Client Employment Conditions

1. Policy Summary

Who	BIZLINK employees, clients and client's support networks. ('Client' same meaning as 'participant').
What	To ensure clients are paid correctly and that employment conditions are consistent with general workplace standards.
How	By providing guidelines and strategies to ensure clients are paid an appropriate wage and employment conditions match the role. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 1 Rights and 6 Service Management NDIS Practice Standards 1 Right and Responsibilities, 2 Provider Governance and Operational Management, 3 Provision of Supports, 4 Provision of Supports Environment Department of Social Services Deed and Guidelines BIZLINK Policy on: Feedback and Complaints, Rights Quality Procedures Electronic Transactions Act 1999 (Cth)
Approved	14/08/2023

2. Policy Statement

BIZLINK employees will ensure that clients receive the appropriate wage for the work undertaken. Where a person is unable to achieve full productivity BIZLINK employees will only use the Supported Wage System to determine the pro-rata wage.

3. Responsibilities

3.1 Management

- a) Maintain a standard letter for clients and employers regarding job start details.
- b) Scrutinise the client's BIZLINK Job Description pay rate and classification to ensure a fair and legitimate wage is paid and that any 'self-employment' meets the Department of Social Services definition as per any guideline.

3.2 Employees

- a) Advise clients so they can make an informed choice about their employment options e.g. types of jobs, location, conditions, pay, hours, employer expectations, qualifications, skills, experience, Traineeships or Apprenticeships, Supported Wage System. For self-employment, include information on commercial risk, viability and insurances.
- b) Detail the client's employment choice on the Job Plan or Goal Plan and update whenever there is a change.
- c) Ensure the client is paid a fair and legitimate wage and obtain a copy of the relevant award, agreement, contract, payslip or other evidence that details the pay and classification.

- d) Ensure that any “self-employment” arrangement is not actually disguising what would otherwise be an employee/employer relationship as self-employment to avoid paying award wages. Only define a position as “self-employment” where it can be reasonably determined that the client is engaged in genuine “self-employment” with reference to any definitions detailed by the Department of Social Services as per any guideline.
- e) Document the process and reasons for using the Supported Wage System, ensure SWS assessments are undertaken annually and/or as required by the system and retain wage assessments.
- f) Monitor that the working conditions and that Work Health and Safety are appropriate and comparable to those experienced by the general workforce.
- g) Monitor client’s pay rates and ensure increased pay rates are applied e.g. general wage case decisions, age-related increases, completion of training, incremental progression, SWS assessments.
- h) Inform clients about their wages and conditions by providing the standard letter on commencement and when any change in pay or conditions occur.
- i) Encourage clients to raise any concerns regarding pay, conditions or treatment at work as per the Policy on Feedback and Complaints and the Policy on Rights.

4. Definitions

Self-employment a person is self-employed if they are “undertaking work, other than under a contract of employment, with the primary aim of deriving a regular income”. Refer to the Department of Social Services Guidelines for current definitions of self-employment to avoid “non-payable” outcomes.

Supported Wage System (SWS) is the only pro-rata wage tool permitted for use by Disability Employment Services. Whilst many people with disability participate in open employment at full pay there are some people who are unable to find or keep a job at full wage rates due to the effect of disability on their workplace productivity. SWS is a process that allows employers to legally pay less by matching a person's productivity with a fair wage. Eligible people with disability can access SWS to determine fair pay for fair work. The Australian Government funds qualified assessors to determine a worker’s productivity, with the resulting wage paid by the employer. The assessment is at no cost to the employer, client or BIZLINK. Source: www.jobaccess.gov.au

Policy 6.13 Motor Vehicle Use

1. Policy Summary

Who	Employees or other people authorised to use a BIZLINK motor vehicle.
What	To ensure that BIZLINK motor vehicles are used safely, lawfully and cost-effectively.
How	Provide guidelines for employees and other persons authorised to use a BIZLINK motor vehicle and standards for fleet management. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management Electronic Transactions Act 1999 (Cth) BIZLINK Policy on: Financial Management, Risk Management, Fraud and Corruption Control, Work Health and Safety
Approved	14/08/2023

2. Policy Statement

BIZLINK employees will use BIZLINK motor vehicles primarily to discharge their employment obligations. Vehicle usage will be in accordance with the guidelines set out in this Policy.

3. Motor Vehicle Use Guidelines

3.1 Provision of Motor Vehicles

- a) The provision of motor vehicles to employees will be at the discretion of the Board.
- b) The needs of BIZLINK will be primary to that of the employee.
- c) The Managing Director will oversee fleet management and the Finance Manager will operationally manage the fleet.
- d) Employees will use motor vehicles primarily to discharge their employment obligations. Employees' private use of motor vehicles is secondary. The guidelines in this Policy detail how vehicles may be used.
- e) Employee-drivers must report any matter that may influence the provision of a motor vehicle or authorisation of a nominated-driver.
- f) The Managing Director will determine if use by the employee-driver or nominated-driver continues to be appropriate.

3.2 Persons Authorized to Drive Motor Vehicles

- a) Employee-drivers can elect a nominated-driver. The employee-driver must supply details, as per the 'Motor Vehicle Declaration' form, of the nominated-driver to the Finance Manager.
- b) The Managing Director will authorise nominated-drivers subject to the following guidelines:
 - i. Probationary and learner drivers should not be authorised
 - ii. One or more nominated-drivers may be authorised

- iii. BIZLINK needs will be primary to that of the employee
 - iv. Authority can be revoked for any employee-driver or nominated-driver at any time where the conditions of this policy are breached
 - v. The nominated-driver will only have access to the vehicle when it is not required for the purposes of the employee to perform their duties or as may otherwise be required by BIZLINK management.
- c) The employee-driver will ensure that no other person, other than the duly authorised nominated-driver(s) drives the motor vehicle at any time. The employee-driver is ultimately responsible for the BIZLINK motor vehicle.
- d) The nominated-driver must adhere to this Policy on Motor Vehicle Use.

3.3 Driver's Licence and Nominated-Driver

- a) Drivers must have a current motor vehicle driver's licence, valid in the State of Western Australia. The employee must notify the Finance Manager if they or a nominated-driver no longer have a current driver's licence.
- b) Where an employee-driver knowingly drives without a current licence or permits the nominated-driver to do the same, this is Serious Misconduct and discipline will be applied accordingly. It is the responsibility of the employee-driver to ensure the nominated-driver has a current licence.
- c) The 'Motor Vehicle Declaration' form will include authority by the employee-driver and any nominated-driver to allow the Finance Manager to check infringements and demerit point status as required.
- d) The employee-driver must advise the Finance Manager immediately of any driving infringements or convictions of the employee-driver or nominated-driver. The Finance Manager will advise the Managing Director as required to review provision of the motor vehicle.

3.4 Prohibited Use of Motor Vehicle

- a) Driving under the influence of either alcohol or drugs is Serious Misconduct and discipline will be applied accordingly.
- b) BIZLINK will seek legal action to recover all costs from any individual responsible when a BIZLINK motor vehicle is used in prohibited circumstances that causes vehicle or other property damage. Examples of prohibited use include (but are not limited to) being:
 - i. Driven illegally, unlawfully or for an improper purpose.
 - ii. Driven under the influence of alcohol or drugs - Drivers must not drive if their blood alcohol level is above the legal 0.05 limit (or 0.01 for probationary drivers). Drivers must not drive under the influence of (illegal) drugs and must be mindful to consider the potential impact of pharmaceutical medicines that may impair driving ability or cause drowsiness.
 - iii. Stolen and/or damaged due to a failure to lock the vehicle or take other reasonable steps to protect or safeguard the motor vehicle.
 - iv. Deliberately damaged or used to cause deliberate damage.
 - v. Used whilst in an unsafe or un-roadworthy condition.
 - vi. Modified in any way.
 - vii. Used to carry too many passengers, every passenger must have a seat belt.
 - viii. Used to transport dangerous goods.

- ix. Operated as a tool of trade.

3.5 Private Use of Motor Vehicles

- a) Private use of BIZLINK motor vehicles must be within the Perth Metropolitan Area, defined as the area bounded by the Shire of Gingin, the Shire of Chittering and the Shire of Toodyay in the north, the Shire of Northam, the Shire of York, the Shire of Beverley and the Shire of Wandering in the east, the eastern part of the Shire of Murray and the Shire of Waroona in the south, and the Indian Ocean in the west ref <https://profile.id.com.au/perth/about?WebID=230> The Finance Manager must approve non-BIZLINK related use outside of the Perth Metropolitan Area.
- b) Employees must complete the 'Application for Motor Vehicle Use' form for motor vehicle use outside the metropolitan area whether taking leave or not, e.g. using the motor vehicle over a weekend or public holiday.
- c) The Finance Manager will review applications and consider the needs of BIZLINK and the costs associated with wear and tear or increased mileage. The Finance Manager may transfer the vehicle to manage the mileage of the fleet or may choose not to authorise the use of the vehicle in the interests of BIZLINK. The Finance Manager may seek the Managing Director's authority in instances where the recommendation is to deny the application.

3.6 Employee Contribution

- a) Employee-drivers must pay an employee contribution.
- b) The Board will review and amend the employee contribution annually or as otherwise required.
- c) BIZLINK will collect the employee contribution from the employee's after-tax pay on a fortnightly basis, including during annual, long service, personal, bereavement and paid study leave. The employee provided with the motor vehicle pays the employee contribution. BIZLINK will only collect one employee contribution per vehicle.
- d) Employee-drivers must pay the employee contribution if their driver's licence is suspended until the motor vehicle is reallocated.
- e) The employee-driver must pay the employee contribution if granted vehicle use during unpaid leave. This may be deducted from future fortnightly pays, if required, as negotiated with the Finance Manager and approved by the Managing Director.
- f) Employees will complete the 'Motor Vehicle Use' section of the 'Payroll Deduction Authorities' form.

3.7 Use of Fuel Cards

- a) The Finance Manager will provide employee-drivers with a fuel card expressly for use with the supplied motor vehicle.
- b) Drivers will fill the fuel tank with standard grade fuel and provide the current odometer reading to the service station attendant as required.
- c) Drivers will only use service stations designated by the Fuel Card. Employee-drivers may be liable to reimburse BIZLINK for the difference between the costs of fuel where an alternative outlet is used.
- d) Fuel card use during leave periods is set out in Section 3.8.
- e) Misuse of fuel cards is Serious Misconduct and will result in disciplinary action.
- f) Employee-drivers must report lost or stolen fuel cards to the Finance Manager to cancel the fuel card as soon as possible.
- g) Fuel cards must be stored in a safe place and not left in an unattended vehicle.

- h) Employee-driver's may use the BIZLINK vehicle and the fuel card during periods of paid leave, BIZLINK management reserves the right to seek reimbursement of fuel costs if deemed excessive. Fuel card use during periods of leave is expected to be significantly less than during periods of work.
- i) Fuel purchased during exempt periods and/or for use outside the Perth Metropolitan, is at the employee-driver's expense and/or will be recovered from the employee-driver if a fuel card has been used for such purchases. Additionally, where a fuel card has been used during approved leave within the Perth Metropolitan Area and is considered by the Finance Manager to be excessive e.g. in comparison to the usual fuel costs of the employee, cost-recovery will be sort.
- j) The Finance Manager will advise the Managing Director of any fuel card purchases considered unreasonable and the Managing Director will determine if reimbursement and/or disciplinary action is required.

3.8 Periods of Leave and Motor Vehicle Use

- a) The Finance Manager will use the following guide to inform decisions related to the use of motor vehicles and fuel cards while an employee-driver is on leave:

Leave	Vehicle Use*	Fuel Card(s)
Unpaid leave (parental, adoption, study, personal, other)	No	No
Paid leave (annual, personal, study, long service, public holiday, bereavement)	Yes	Yes - except for use outside of metropolitan area as per 'Application for Leave - Motor Vehicle Use' form

* Includes payment of employee contribution

- b) Employee-drivers will not ordinarily be authorised vehicle use during extended periods of unpaid leave i.e. any period greater than five consecutive days.
- c) Vehicle use during an exempt period may otherwise be authorised in writing by the Managing Director provided the Policy guidelines continue to be met, with particular reference to section 3.1 'Provision of Motor Vehicles' and section 3.6 'Employee Contribution' in this Policy.

3.9 Transferring Vehicles and Recording Odometer

- a) The Finance Manager will direct and approve any transfer of motor vehicles between employees. Once approved, the Finance Manager will update the 'Motor Vehicle Inspection Report' form for both vehicles.
- b) Employee-drivers must provide monthly mileage readings as required by the Finance Manager. The Finance Manager, at the end of each month, will request an odometer reading from each employee-driver for depreciation purposes.

3.10 Motor Vehicle Maintenance

- a) BIZLINK will cover the costs of vehicle maintenance in its fleet e.g. registration, insurance, servicing and repairs.
- b) Employee-drivers must maintain the vehicle in good condition both mechanically and in appearance.
- c) Employee-drivers must notify the Finance Manager of any vehicle defects e.g. scratches or dents to the body, tears or stains to the upholstery, no matter how apparently minor, immediately for insurance purposes. When directed by the Finance Manager, have the fault corrected by the appropriate dealership as soon as possible.
- d) The Finance Manager will inspect vehicles as required.

- e) Employee-drivers must always keep motor vehicles internally and externally presentable. Motor vehicles must be thoroughly cleaned inside and out upon any transfer to another employee or upon return to the dealer. Where the Finance Manager deems that a vehicle needs professional cleaning the Finance Manager may recover the cost from the employee-driver.
- f) Smoking is strictly forbidden in any BIZLINK motor vehicle. If smoking is detected the employee-driver will be disciplined and the Finance Manager may recover the costs for professional cleaning from the employee-driver.
- g) When pets are transported, they must be prevented from causing any damage. This includes internal and external scratch marks, internal stains to upholstery and odours. Ensure that no damage, odour or hair remains in the motor vehicle. Where repair or cleaning costs arise because of transporting pets, the Finance Manager may recover costs from the employee-driver.
- h) Servicing:
 - i. Employee-drivers must service the motor vehicle in accordance with the manufacturer's recommendations.
 - ii. The Finance Manager must authorise any repairs additional to the standard service requirements.
 - iii. Employee-drivers should top-up oil only when necessary to avoid damage to the engine. Significant oil or water loss must be checked by the motor vehicle dealer and must be reported immediately to the Finance Manager.
 - iv. Employee-drivers should regularly check tyre pressure to avoid premature wear. Correct tyre pressure, as per the manufacturer's recommendation, aids the vehicle to achieve optimum fuel efficiency and braking. Wheels must be aligned at all times to avoid premature tyre wear and maintain safety.
- i) The Finance Manager will recover any costs from the employee-driver where such repair, servicing or cleaning is due to actions or inactions contrary to this policy. The Finance Manager will seek the Managing Director's authority for such recovery.

3.11 Insurance

- a) BIZLINK insures the motor vehicles on a fleet basis. Excess is payable before a claim will be settled by the insurance company. BIZLINK will pay the insurance excess on damaged vehicles whilst the fleet accident rate remains within reasonable limits. The Managing Director reserves the right to recover any insurance excess above the standard rate due to the age or other circumstances deemed by the insurer of the nominated-driver or employee-driver.
- b) Where there is any conflict between this Policy and the Fleet Insurance Policy, the Fleet Insurance Policy will take precedence.
- c) All claims will be in accordance with this Policy and the Fleet Insurance Policy. The Finance Manager can provide advice on the Fleet Insurance Policy claims procedure depending on the event e.g. accident, theft, other damage e.g. hail, dents, upholstery damage.
- d) Do not leave personal possessions of any value in the vehicle when unattended at any time. The vehicle must always be locked when unattended. The insurer may not cover loss that occurs due to a vehicle being unlocked e.g. theft. BIZLINK may seek to recover such loss from the employee-driver.
- e) In the event of personal loss from the vehicle e.g. theft or damage during an accident to the employee-driver's or nominated-driver's personal possessions, the Finance Manager will assess the claim and will determine if a claim can be justified in terms of insurance excess and impact on fleet

premiums. The decision will consider the overall benefit to BIZLINK, the Finance Manager may seek authority from the Managing Director.

- f) Insurance coverage excludes mobile phones, cash and claims less than the excess amount. There may be additional exclusions detailed in the Fleet Insurance Policy. BIZLINK is not obliged to recover any loss of personal items not covered by insurance.
- g) The Finance Manager may require a Police Report to make the claim assessment and may request any additional information as required.

3.12 Safe Driving

- a) Wear seat belts and obey all road traffic rules.
- b) Do not use mobile phones; it is illegal to use a hand-held mobile phone while driving. Employees are discouraged from using “hands-free” as still a distraction.
- c) Avoid eating, drinking, adjusting instruments or other devices due to distraction.

3.13 Parking fees and traffic infringements

- a) Employee-drivers are liable for traffic and parking infringements and for parking fees incurred at BIZLINK sites.
- b) BIZLINK may reimburse parking fees for work-related parking e.g. when providing support or job searching. Choose the least expensive parking option.
- c) Employee-drivers must provide a tax invoice to the Finance Manager with an Expenses Claim form for approval of reimbursement of eligible parking fees.
- d) Employee-drivers must ensure all traffic and parking fines incurred by the employee-driver or nominated-driver are paid.
- e) Employee-drivers must immediately report any traffic infringements or driving convictions of employee-drivers or nominated-drivers to the Finance Manager.

3.14 Motor Vehicle Accident Procedures

- a) The ‘Motor Vehicle Accident Report’ form details what to do when involved in a motor vehicle accident.
- b) Employee-drivers must review and retain a copy of the ‘Motor Vehicle Accident Report’ form within the motor vehicle for ready access and reference.
- c) The ‘Motor Vehicle Accident Report’ form will include the following information:
 - i. Advice on attending to injured persons, contacting police and / or ambulance and the legal responsibility to stop immediately after an accident and, as far as practical, assist any injured person.
 - ii. Information on when drivers are to complete a police report as per information obtained from the Western Australian Police website.
 - iii. Advice regarding contacting the Insurance Commission of Western Australia (ICWA) regarding Motor Vehicle Personal Injury, as per information obtained from the ICWA website, and that there is a legal obligation on the driver/owner of a WA licenced vehicle to report to ICWA a crash resulting in personal injury. Where ICWA provide a reference (claim) number, give this to the medical practitioner at the time of visit and to the Finance Manager.
 - iv. Out-of-pocket expenses related to the initial visit to the medical practitioner by the employee-driver and/or client-passengers may be reimbursed by BIZLINK, at the discretion of the

Managing Director. ICWA coverage, Medicare or private health insurance must be used where applicable.

- v. A statement that no admissions as to responsibility for the accident are to be made at the scene of the accident as this may prejudice Motor Vehicle insurance cover.
- vi. Advice that states the driver of the motor vehicle and their passengers should visit a medical practitioner as soon as practical following a motor vehicle accident, even if they do not consider they have been injured.
- vii. Advice to report the accident to the Finance Manager within 24 hours of the accident occurring so that appropriate arrangements can be made for the accident vehicle and for alternative transportation to be found. Where the motor vehicle cannot be driven and must be towed away, the name of the towing company and the location the motor vehicle is to be taken.
- viii. Details of the BIZLINK insurer and the insurance policy number.
- ix. Information to be collected on the Motor Vehicle Accident Report.

Policy 6.14 Information Technology and Cyber Safety

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers, clients, prospective clients, client's support networks and stakeholders. ('Client' same meaning as 'participant').
What	To ensure that users of BIZLINK IT behave responsibly online to keep themselves and others safe; to maintain privacy and meet our contractual obligations. BIZLINK IT includes, but is not limited to, all client, contract, service, operational, financial, HR and strategic information whether held as hard-copy or electronically in any form. All Information Technology devices, networks, databases, web or cloud-based applications, all associated files, folders and information storage and systems related to BIZLINK services.
How	Provide guidelines on the provision and use of BIZLINK IT. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management Department of Social Services Deed and Guidelines ISO 27001 Information Security Management, Statement of Applicability, Australian Government Information Security Manual BIZLINK Policy on: Code of Conduct, Board Code of Conduct, Rights, Child Safety and Wellbeing, Employee Complaints, Feedback and Complaints, Information Security Management Fraud Control Plan, Business Continuity Plan Electronic Transactions Act 1999 (Cth)
Approved	14/08/2023

2. Policy Statement

BIZLINK management is committed to ensuring we provide a safe physical and emotional environment for clients, employees and stakeholders and that BIZLINK IT is used in a responsible and safe way. Any person that accesses BIZLINK IT must comply with this policy. All users are responsible for protecting BIZLINK IT from unauthorised access, modification, destruction, or disclosure.

3. Incident Management

3.1 Management, employees and, where applicable, stakeholders must:

- a) Immediately report all incidents (including near misses) and send advice of incident to ithelp@bizlink.asn.au
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Business Continuity Plan – Data Breach Response Plan
 - iv. Fraud Control Plan

3.2 Reporting Breaches

- a) ithelp@bizlink.asn.au will include the Quality Manager, Compliance Manager, Finance Manager, Quality Officer and other managers as required. Emails to ithelp@bizlink.asn.au will adhere to the Policy on Employee Complaints for communication protocols, including reporting to the Managing Director, and/or QRC, and/or UCIT as required.
- b) Report to ithelp@bizlink.asn.au actions or online content that may breach this policy. Anything that makes a user feel uncomfortable or concerned should be reported to avoid doubt.

3.3 Responding to Breaches

- a) Management will respond to client breaches of this policy with verbal warnings, written warnings, contracts of acceptable behaviour, conditional visits, or restriction of access to sites and mode of contact e.g., telephone only service or withdrawal of service (exit) as per any relevant policy.
- b) Management will respond to stakeholder breaches of this policy with verbal warnings, written warnings, withdrawal of access, cancellation of contracts or other appropriate response as per the relationship of the stakeholder to BIZLINK.
- c) Management will respond to employee breaches of the policy in accordance with any relevant policy and contract of employment, including termination of employment.

4. Guidelines on the provision, access and use of devices

4.1 Provision and/or access to a device

- a) The Managing Director will authorise provision of a device to employees based on the need and interests of BIZLINK.
- b) BIZLINK will pay for any charges and service access fees up to any monthly limit. The monthly allowance will be set and reviewed at the discretion of the Managing Director. The allowance will meet typical business-related use.
- c) The Managing Director will select service providers, plans and equipment.
- d) Once authorised, the device will be set-up with access rights appropriate to the employee's role.
- e) Clients will have access to a device at the premises of BIZLINK to undertake job search, job-related training/education, or job support activities, with the assistance of a BIZLINK employee.
- f) Other users e.g., auditors, UCIT, Contract Managers, must be authorized by the Managing Director to access BIZLINK devices.
- g) Use by any person will be in accordance with this Policy.
- h) BIZLINK always retains ownership of devices and mobile phone numbers.
- i) The provision of, or access to a device, can be revoked or amended at the discretion of the Managing Director at any time. The Managing Director will advise the reason for any change in provision or access.
- j) Employees must not swap any devices (laptops, mobile phones, monitor etc) without approval. The assigned employee is responsible and liable for the device. Employees must contact ithelp@bizlink.asn.au for approval. The asset register of devices is maintained by the Finance Manager, which includes employee assigned, and is audited.
- k) Employees may be required to hand-over a device before going on leave or as otherwise directed by management.

- l) Employees must advise ithelp@bizlink.asn.au when going overseas for any period, and when taking leave for 30 days or more.
- m) Employee accounts will be suspended when overseas or on leave for 30 days or more.
- n) Employees must not take BIZLINK computer devices overseas e.g. laptop.
- o) Employees must not access BIZLINK information whilst overseas for example, but not limited to cloud, SharePoint, email, ESSWeb, JobReady, SupportAbility.
- p) Employees must be authorised by the Managing Director to take a BIZLINK mobile phone overseas. Strict protocols on mobile phone use and data sanitisation in accordance with the SoA must be adhered to.
- q) The Managing Director will authorise replacement of devices as per the budget, replacement schedules and purchasing procedures.

4.2 Communication Protocol for IT Support

- a) All staff must email ithelp@bizlink.asn.au most issues can be resolved in-house and are not urgent e.g. eSam, ESSWeb, JobReady, SupportAbility, folders, general queries, spam. ITHelp will forward onto UCIT only if a ticket needs to be generated.
- b) UCIT will advise employees of this protocol if they do receive any emails that do not come via ithelp@bizlink.asn.au or from a manager with an urgent request.
- c) For urgent assistance, employees may contact the Operations Manager or their Site Manager. The OM or SM has authority to contact UCIT (IT Support) directly if they deem necessary. The ithelp@bizlink.asn.au will be cc'd in on such emails sent direct to UCIT.

4.3 Costs and cost recovery

- a) Employees must reimburse BIZLINK for any amount that exceeds any allowance.
- b) Employees must complete an authorisation to directly debit their salary for any costs incurred excess to any allowance. Employees who exceed the allowance may request a copy of the account relevant to their use.
- c) Employees may be held responsible for any costs incurred for replacement, repair, or unauthorised use of any BIZLINK device.
- d) The Finance Manager will arrange insurance for all devices.

4.4 Login/password

- a) Employees must not provide their password to any other person. If the integrity of a password has been impaired, immediately change the password and report.
- b) Clients and other authorized external users must have a login that restricts permissions appropriate to the anticipated information needs e.g., links to required documents on SharePoint.

4.5 Protecting the device and information

- a) Employees must maintain devices in good working order and report damage, loss, or maintenance issues to ithelp@bizlink.asn.au
- b) Users are required to log-off and/or lock the device when finished or away from the device. Devices should be set so that after 5 to 15 minutes of inactivity the login screen appears.
- c) Users will ensure the privacy and confidentiality of information when using devices in public places by using them in a responsible manner including concealing the screen from public view, always

remaining in possession of the device, ensuring the screen is locked or logged off when not in use, ensuring the device is password protected.

- d) Employees must save all client information and BIZLINK related data to the cloud (G drive). Any information related to a BIZLINK purpose becomes and remains the property of BIZLINK and must be stored securely and backed-up.
- e) Employees must make their device available to UCIT as required.
- f) Employees will use the template email signature which includes the employees contact details and disclaimer as provided by management and modified from time-to-time.
- g) Employees should not use the template signature for any emails not directly related to BIZLINK. Such emails should not include any information that would imply the message was sent from, or on behalf of, BIZLINK.
- h) Users will carry, store and transport devices ensuring their security and avoid loss or damage including never leaving devices in vehicles, always remaining in possession of the device when used or transported in public places, storing devices securely in their home.

4.6 Installation of Programs or Software / Avoiding downloads of viruses:

- a) Unless approval has been obtained from ithelp@bizlink.asn.au, a user must not open any .exe (Executable programs), .scr (Source files) or .pif (Program Information File) files, regardless of the sender.
- b) Whilst user permissions should restrict functionality so that installation of programs or software is restricted to Administrators, for clarity, users are not authorised to load/download/install any program or software without authorisation. Such files will usually contain the “.exe” file extension.

4.7 Cyber Safety Guidelines for responsible use of BIZLINK IT

- a) Users must act responsibly, and every user is accountable for their use.
- b) UCIT will implement appropriate filters and protections to prevent (unintended) access to inappropriate content.
- c) The Managing Director will determine the access rights for each user, this will usually be in accordance with the role or access needs required. The Managing Director has the right to limit, restrict or extend user rights and access as deemed appropriate for that user.
- d) BIZLINK IT is for BIZLINK related purposes and cannot be used for commercial or non-BIZLINK related activities. Personal use is expected to be incidental, that is, personal email, internet use, phone use or any other use of BIZLINK IT must not interfere with the work an employee is expected to do or be wasteful of BIZLINK resources.
- e) Users must take reasonable and appropriate steps to ensure that all hardware and software license agreements are faithfully executed.
- f) Users should aim to work efficiently and avoid creating data congestion that could interfere with the work of others or the integrity of the system e.g., non-work emails and improper storage of files.
- g) Users should respect the rights and property of all others and are not permitted to improperly access, misappropriate, or misuse BIZLINK IT.
- h) Employees must ensure that the relevant authorities are obtained and/or attain permission to take a photograph or video of the subject or subject's premises or to use personal information/images for publications and promotions e.g., Bizzybodies Newsletter, Facebook, publications.

- i) Users must exercise care that no personal email correspondence or messages and comments appear to be an official communication of BIZLINK e.g., inappropriate use of BIZLINK template signature or disclose BIZLINK information or that of its employees or other stakeholders e.g., employers, funder, or clients.
- j) All email and internet use, whether for personal purposes or BIZLINK related purposes, is subject to potential review and monitoring by UCIT and management.
- k) Users are expected to be courteous and respectful in all their communications in accordance with this policy.
- l) Users are expected to be aware that comments made via social media are public. Users may use social media in their personal time, however, users are expected to recognise the potential for damage to be caused, either directly or indirectly, to BIZLINK in certain circumstances via personal use of social media when a user can be identified as a BIZLINK employee. Accordingly, users must comply with this policy to ensure that the risk of such damage is minimised. Users are personally responsible for the content published in a personal capacity on any form of social media.
- m) Users are to be aware that emails can have the same legal status as a letter or memo and, as such, can be called into evidence. That email, SMS and voice mail may be used as evidence for authorised investigations or audits.

4.8 Misuse of BIZLINK IT includes, but is not restricted to, the following:

- a) Attempting to modify or remove BIZLINK IT including computer equipment, data, software, or peripherals without proper authorisation.
- b) Accessing computers, computer software, computer data or information, or networks without proper authorisation.
- c) Circumventing or attempting to circumvent normal resource limits, logon procedures and security regulations.
- d) Using BIZLINK IT for purposes for which they were not intended or authorised.
- e) Accessing and/or using another user's email account or reading email without their permission.
- f) Sending fraudulent electronic transmissions, including but not limited to unauthorised requests for confidential information, unauthorised purchase requisitions or fraudulent authorisations.
- g) Violating any software license agreement or copyright, including copying, or redistributing copyrighted computer software, data, or reports without authorisation.
- h) Accessing, creating, or exchanging messages and/or images that are offensive, harassing, obscene, threatening, pornographic or criminal.
- i) Exchanging any confidential or sensitive information held by BIZLINK, unless authorised.
- j) Creating, storing, or exchanging information in violation of copyright laws including the uploading or downloading of commercial software, games, music, or movies.
- k) Undertaking internet-enabled activities such as gambling, gaming, conducting a business or illegal activity.
- l) Creating or exchanging advertisements, solicitations, chain letters or other unsolicited or bulk email.

5. Definitions

As per the Australian Government Information Security Manual "Glossary of cyber security terms"
www.cyber.gov.au

Information Technology (IT) / BIZLINK IT any hardware, software or storage device that enables the retrieval, storage or transmission of information including computer hardware / software / servers, cloud servers, notebooks, desktops, storage devices (e.g., USB, CD, DVD, tapes), data projectors, telephones (mobile and landline), mobile broadband, internet services (internet), electronic mail services (email).

User(s) any person that accesses BIZLINK IT including employees, clients and stakeholders.

Device any computer or telecommunication device e.g., computer, iPad, tablet, mobile phone, mobile broadband, laptop/notebook.

Cyber Safety the way in which users behave responsibly online to keep themselves and others safe. It incorporates the safe and desirable use of the internet, social media and Information Technology and devices, an awareness of our digital footprint and how to behave appropriately and respectfully.

Digital Footprint a user's traceable digital activities, actions, contributions, and communications generated by internet use or use of digital devices. On the World Wide Web, the information left behind from a user's web-browsing and cookies. A passive digital footprint is data collected without the owner knowing. Active digital footprints are created when personal data is released deliberately by a user to share information about oneself by means of websites or social media. Information may be intentionally or unintentionally left behind by the user, with it being either passively or actively collected by others. Depending on the amount of information left behind, it may be simple for other parties to gather large amounts of information on that individual using simple search engines.

Social Media forms of electronic communication, such as websites for social networking, through which users create online communities to share information, ideas, personal messages, and other content (photos and videos) e.g., Facebook, Twitter, LinkedIn, YouTube.

Policy 6.15 Policy Making

1. Policy Summary

Who	BIZLINK employees and Directors.
What	To ensure consistency in policy making.
How	Provide a framework for creating, amending, approving and implementing policies.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management
Approved	14/08/2023

2. Policy Statement

Policy documents will adhere to a standard policy development, approval and revision procedure.

3. Responsibilities

3.1 Management

- a) The Quality Review Committee (QRC) will discuss the policy need and if deemed necessary will identify an appropriate employee to draft the policy.
- b) The QRC will determine whether Board level approval is required, and if Board approval is not required, the QRC will approve the policy.
- c) Following approval, the Quality Manager will revise the Policy Manual and Policy Summary Manual and advise employees and other interested parties.
- d) The QRC will revise policies every three years or earlier if required.
- e) The Managing Director will advise the Board as required.

3.2 Employees

- a) Use the Complaint or Incident Notice (COIN) or Improvement / Corrective Action Notice (ICAN), as relevant, to detail the reason to amend or create a new policy.
- b) Detail policies on the standard template.
- c) Consult with relevant employees and other stakeholders and/or persons knowledgeable in the area and provide the draft to the QRC.

Policy Template

Policy X Policy Title

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers, clients, prospective clients, client's support networks and stakeholders. ('Client' same meaning as 'participant').
What	To
How	Provide guidelines Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	
Approved	

2. Policy Statement

X.

3. Incident Management

Management, Employees and, where applicable, Stakeholders must:

- a) Immediately report all incidents (including near misses)
- b) Refer to the following documents for incident management and reporting:
 - i. Complaint or Incident Notice (COIN)
 - ii. Improvement Corrective Action Notice (ICAN)
 - iii. Accident / Incident Report

4. Responsibilities

4.1 Management

- a) X

4.2 Employees

- a) X.

4.3 Stakeholders

- a) X

5. Definitions

X

Policy 6.16 Employee Leave

1. Policy Summary

Who	BIZLINK employees.
What	To provide clear information on employee leave entitlements and the procedure for requesting leave. To effectively manage leave to accommodate personal, family, work, and community commitments while ensuring business objectives are not compromised.
How	Provide guidelines on employees' leave entitlements and the procedure for requesting leave. In cases where there is a conflict between this policy and legislation, the provisions of the legislation will take precedence. Leave entitlements are governed by the National Employment Standards in the Fair Work Act 2009 (Cth), and additional entitlements may be granted through modern awards (such as the Labour Market Assistance Industry Award), enterprise agreements (such as Individual Flexibility Agreements), or State legislation (such as long service leave legislation). Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management Fair Work Act 2009 (Cth), Long Service Leave Act 1958 (WA), Electronic Transactions Act 1999 (Cth) Labour Market Assistance Industry Award, National Employment Standards, Contract of Employment / Individual Flexibility Agreement
Approved	14/08/2023

2. Policy Statement

This policy aims to state our commitment to providing employees with various types of leave as required by law and their employment contracts. Any obligations imposed on BIZLINK beyond those mandated by legislation are not contractual and do not establish contractual rights. Additionally, any benefits or entitlements described in this policy that go beyond legal requirements are discretionary and are not intended to be contractual. The specific terms and conditions of employment that are contractual in nature are outlined in each employee's employment contract.

3. Responsibilities

3.1 Management

Approve leave listed at section 4 which require approval for all employees who report directly to them, unless otherwise specified. The Manager is only approving the employee's absence from the workplace. In the case of paid leave, the Manager relies on the employee making a true and accurate application that they have sufficient entitlement to cover the eligible absence.

Leave entitlement will be detailed on payslips and the HR application, i.e. the accrued hours of leave for annual leave. Where there is any doubt Managers must liaise with HR (hr@bizlink.asn.au) to confirm any entitlement to leave and where there are any concerns regarding the required evidence for approval of leave. HR will consult the Managing Director as required. The Managing Director has discretion that is guided by this policy and the objects of BIZLINK.

3.2 Employees

Only submit a true and accurate application for eligible paid leave where they have sufficient accrued unused entitlement to cover the absence. To provide evidence as required by Management to confirm eligibility for leave as required.

4. Types of Leave

4.1 Annual Leave

- a) **Eligibility and Entitlement:** Permanent full-time and part-time employees are entitled to paid annual leave as per each employees Contract of Employment and Individual Flexibility Agreement per year. Annual Leave accrues progressively throughout the year according to an employee's ordinary hours of work and is cumulative from year to year. Casual employees are not entitled to paid annual leave.
- b) **Procedures for Requesting Annual Leave:** All requests for annual leave must be approved in advance by the employee's Manager. The employee's Manager will consider the employee's request in conjunction with the business and operational needs of BIZLINK. Employees must complete a request for annual leave, providing, where possible, two weeks' notice of their leave. An employee must have an accrued leave balance of at least the amount of leave the employee proposes to take.

Making a request for annual leave does not automatically entitle an employee to take such leave. Management may refuse to authorise a period of annual leave on the grounds of operational requirements or if the employee has provided insufficient notice. Management will not unreasonably refuse to approve a period of annual leave or deny an employee a period of annual leave which has already been authorised.

- c) **BIZLINK requiring employees to take annual leave:** Management may direct an employee to take annual leave in certain circumstances, which will be determined by the applicable industrial instrument (if any) covering the employee as per their Contract of Employment.
- d) **Entitlement on Termination of Employment:** An employee is entitled to receive payment for the balance of their accrued but untaken annual leave when they cease employment.

4.2 Time Off in Lieu TOIL

- a) **Eligibility and Entitlement:** Accrued time can be taken later as time-off-in-lieu. TOIL is to be taken at a time that is considerate of client and BIZLINK needs. Accrued TOIL should not exceed 20 hours. The regular taking of TOIL is preferred e.g. finishing early, starting late or taking longer lunch breaks, provided this fits in with client and BIZLINK needs.
- b) **Procedures for Requesting TOIL Leave:** All requests for TOIL must be approved in advance by the employee's Manager. The employee's Manager will consider the employee's request in conjunction with the business and operational needs of BIZLINK. An employee must have an accrued TOIL balance of at least the amount of TOIL the employee proposes to take.
- c) **BIZLINK requiring employees to take TOIL:** Management may direct an employee to take accrued TOIL in certain circumstances, which will be determined by the applicable industrial instrument (if any) covering the employee as per their Contract of Employment.
- d) **No Entitlement on Termination of Employment:** As per the BIZLINK Individual Flexibility Agreement (IFA) an employee is not entitled to receive payment for the balance of their accrued but untaken TOIL when they cease employment. Employees must manage their TOIL to ensure it is used regularly.

4.3 Personal / Carers Leave

- a) **Eligibility and Entitlement:** Personal/carer's leave refers to both sick and carer's leave. The entitlement to receive personal/carer's leave arises as follows:

- i. where an employee is unfit to work because of personal illness or injury; or
- ii. an employee is required to provide care or support to a member of their immediate family or household due personal illness, injury, or an emergency.

Full-time and part-time employees are entitled to paid personal/carer's leave as per their Contract of Employment and Individual Flexibility Agreement (IFA), at the base rate of pay, and as a minimum, as per the Fair Work Act. An employee's entitlement to personal/carer's leave accrues progressively throughout the year according to the number of ordinary hours that the employee works and is cumulative from year to year. Casual employees are not eligible for paid personal/carer's leave.

- b) **Procedural Requirements for Personal/Carer's Leave:** An employee must:

- i. Where practical, advise their Manager of their inability to attend work prior to work commencing and as far as possible the estimated period of absence.
- ii. Provide a medical certificate or other evidence deemed satisfactory by the Manager. Such evidence for personal/carer's leave is required for more than two (2) working days.

Management can request a medical certificate or other evidenced deemed satisfactory by the Manager, as otherwise required e.g., frequent, and regular absences. Attendance is a basic performance requirement and performance improvement action may be taken. Failure to provide satisfactory evidence can result in the employee's leave not being approved and/or paid.

- iii. On return to work complete a leave request, attaching any evidence as required. An employee must have accrued personal/carer's leave balance for leave taken.

- c) **No Entitlement on Termination of Employment:** An employee is not entitled to receive payment for the balance of their accrued but untaken paid personal leave when they cease employment.

4.4 Unpaid Carer's Leave

- a) **Eligibility and Entitlement:** In addition to the paid entitlements outlined above, casual employees and permanent employees (who have used all their paid personal/carer's leave) can access unpaid carer's leave entitlements to provide care or support to a member of their immediate family or household due personal illness, injury, or emergency.

Employees are entitled to a period of up to two (2) days unpaid carer's leave for each permissible occasion.

- b) **Procedural Requirements for Taking Unpaid Carer's Leave:** as per personal/carer's leave.

4.5 Paid Compassionate Leave

- a) **Eligibility and Entitlement:** The purpose of taking compassionate leave is for an employee to either spend time with an immediate family member who has sustained a life-threatening illness or injury, or to take the compassionate leave because of the death of an immediate family or household member.

Permanent employees are eligible to access two (2) days paid compassionate leave per occasion if a member of their immediate family or household:

- i. contracts a personal illness that poses a serious threat to their life; or

- ii. sustains a personal injury that poses a serious threat to their life; or
- iii. dies.

Permanent employees are entitled to payment at their base rate of pay for the employee's ordinary hours of work (as defined under the Fair Work Act) when taking compassionate leave.

Casual employees are not eligible to access paid compassionate leave. Casual employees are eligible to access two (2) days unpaid compassionate leave per occasion.

- b) **Procedural requirements for taking compassionate leave:** as per personal/carer's leave.
- c) **No Entitlement on Termination of Employment:** An employee is not entitled to receive payment for untaken paid compassionate leave when they cease employment.

4.6 Family and domestic violence leave

Provided for in the [NES](#) HR will provide advice on application and procedure.

4.7 Parental leave and related entitlements

Provided for in the [NES](#) HR will provide advice on application and procedure.

4.8 Taking other leave during parental leave

- a) An employee may take paid annual leave within the parental leave period (although this will not extend the period of parental leave). An employee cannot take paid personal/carer's leave or compassionate leave while taking a period of parental leave. An employee may be able to take long service leave within the parental leave subject to applicable State legislation.
- b) Continuity of service is not affected by taking parental leave. BIZLINK refers to State Legislation for employee entitlement calculations.

4.9 Community service

Provided for in the [NES](#) HR will provide advice on application and procedure.

4.10 Long Service Leave

Provided for in the [Long Service Leave Act 1958 \(WA\)](#) HR will provide advice on application and procedure.

4.11 COVID – Quarantine and Isolation

Provided for in the Labour Market Assistance Industry Award, Government Mandates and BIZLINK advice provided from time-to-time. Protocols can be changed without notice to meet any Government rule, change in circumstances or any other reason deemed necessary by BIZLINK. All employees will be kept informed by email of any updates or revision of any COVID related protocols.

5. Definitions

BIZLINK is the employer, with regards to this policy, where a decision is that of 'BIZLINK', this will be the Managing Director, or delegate.

'Immediate family' means a spouse, former spouse, de-facto partner, former de-facto partner, child, parent, grandparent, grandchild or sibling of the employee; or a child, parent, grandparent, grandchild or sibling of the spouse, de-facto partner or former de-facto partner of the employee.

'Family and domestic violence' means violent, threatening or other abusive behaviour by a close relative of the employee that seeks to coerce or control the employee and causes them harm or fear.

"Close relative" is a member of the employee's "immediate family" (as defined above) and those related to the employee according to Aboriginal or Torres Strait Islander kinship rules.

Policy 6.17 Workplace Discrimination and Harassment

1. Policy Summary

Who	BIZLINK employees, directors, contractors, volunteers.
What	Every employee, director, contractor, and volunteer is responsible for ensuring the workplace is free from discrimination, harassment bullying and victimisation and to report any observed or suspected incidences.
How	Define what constitutes discrimination or harassment and provide guidelines for employees in the reporting and management of incidents. Consequence of Breach Breaches of this policy may result in disciplinary action, up to and including termination of employment, or other necessary response, including reporting to the Police.
Resources	NSDS 6 Service Management NDIS Practice Standard 2 Provider Governance and Operational Management Fair Work Act 2009 (Cth), Sex Discrimination Act 1984 (Cth), Racial Discrimination Act 1975 (Cth), Disability Discrimination Act 1992 (Cth), Age Discrimination Act 2004 (Cth), Australian Human Rights Commission Act 1986 (Cth), Work Health and Safety Act 2020 (WA), Work Health and Safety (General) Regulations 2022 (WA), Electronic Transactions Act 1999 (Cth) Labour Market Assistance Industry Award, Contract of Employment, Individual Flexibility Agreement
Approved	14/08/2023

2. Policy Statement

BIZLINK management is committed to providing a safe, flexible, and respectful environment for our employees, free from all forms of discrimination, bullying and sexual harassment. All BIZLINK employees are required to treat others with dignity, courtesy, and respect. By effectively implementing our Policy on Workplace Discrimination and Harassment we will attract and retain talented employees and create a positive environment for employees and clients. Employees are entitled to:

- recruitment and selection decisions based on merit and not affected by irrelevant personal characteristics
- work free from discrimination, bullying and sexual harassment
- the right to raise issues or to make an enquiry or complaint in a reasonable and respectful manner
- reasonable flexibility in working arrangements, especially where needed to accommodate their family responsibilities, disability, religious beliefs, or culture.

BIZLINK encourages any employee who believes they have experienced discrimination, bullying or sexual harassment to take action by following the Policy on Employee Complaints. It is against the law to be treated unfairly because of a complaint or proposing to make a complaint.

BIZLINK employees are entitled to a limited number of free, professional counselling appointments from our Employee Assistance Program (EAP). EAP counselling is confidential, and nothing discussed with a counsellor will be communicated back to BIZLINK. EAP is available regardless of whether the issue is related to a workplace problem or some other issue.

3. Incident Management

3.1 Management, Employees and, where applicable, Stakeholders must:

- a) Report all incidents or any reasonable belief for concern.
- b) Ensure all disclosures and notifications are in accordance with advice from the Department for Child Protection (for people aged under 18 years), Department of Social Services, NDIS Quality and Safeguards Commission and / or NDIA or Police or a legal representative engaged by BIZLINK if involved.
- c) Refer to the following documents for incident management and reporting:
 - i. Client related - Policy on Rights and Policy on Feedback and Complaints
 - ii. Employee related - Policy on Employee Complaints
 - iii. QP04 Improvement in the Quality and ISM Manual
 - iv. Complaint or Incident Notice (COIN)
 - v. Improvement Corrective Action Notice (ICAN)
 - vi. Accident / Incident Report

4. Responsibilities

4.1 Management

- a) Ensure policies are available to employees, clients, and other stakeholders.
- b) Ensure policies and codes of conduct reiterate that BIZLINK has a zero tolerance of discrimination, harassment, violence, and aggression.
- c) Implement stringent recruitment, induction, training and supervision procedures and policies that consider risks and risk mitigation strategies.
- d) Understand the rights and entitlements of all employees to attend work and perform their duties, free from discrimination, bullying, sexual harassment, or victimisation.
- e) Understand what constitutes an act of discrimination, bullying, sexual harassment, or victimisation.
- f) Model appropriate workplace behaviour.
- g) Ensure employees and volunteers are aware of their obligations in relation to providing a workplace free from discrimination, bullying, sexual harassment, and victimisation.
- h) Treat all complaints seriously and confidentially and take immediate and appropriate corrective action when management become aware of any behaviour or incident.
- i) Promote training opportunities to educate employees of their obligations under this policy and the law.
- j) Support employees to resolve complaints and refer to the Policy on Employee Complaints.
- k) Ensure that recruitment decisions are based on merit and that no discriminatory requests for information are made, as per the Policy on Equal Employment Opportunity.
- l) Consider requests for flexible work arrangements to accommodate employee family responsibilities, disability, religious beliefs, or culture.

- m) Foster an organisational culture that supports employees to discuss any concerns about co-worker (including colleagues and managers) conduct, including supervision, team meetings and relevant training.
- n) Provide opportunities for employees, clients and support networks to give feedback on BIZLINK services and management, including Annual General Meetings, satisfaction surveys and quality audits.
- o) Ensure employees and volunteers have current Employee Screening Checks and those working directly with children have a current Working with Children Check.
- p) **Responding to Allegations of Discrimination or Harassment**
 - i. Management will determine whether an investigation, enquiry, grievance resolution or other process is required in relation to allegations of discrimination or harassment.
 - ii. If an investigation or other enquiry is determined appropriate, Management may suspend an employee on full pay while it is undertaken. Management may be required to notify Police in some circumstances.
 - iii. Management must seek independent advice e.g. CCIWA, legal as to whether it is appropriate to suspend an employee, and must document that advice.

4.2 Employees

- a) Familiarise yourself with this policy. Comply with this policy and related policies.
- b) Comply with applicable local laws and legislation regarding bullying, harassment, discrimination, and victimisation.
- c) Do not engage in bullying, harassment, discrimination, or victimisation in the workplace, at workplace activities outside the workplace, at sponsored workplace events, online or otherwise in connection with their work. Behaviours which constitute bullying, harassment (including sexual harassment), discrimination and victimisation are strictly prohibited.
- d) Maintain complete confidentiality if you are involved in an investigation, enquiry, grievance resolution or other process.
- e) If you, or someone else, is in immediate danger you should call the police on 000. If there is no immediate danger but you or someone else needs police assistance, phone 131 444. If the incident could involve criminal conduct, including actual or attempted sexual assault, employees are encouraged to report the matter to police.
- f) Offer support to people who experience discrimination, bullying or sexual harassment, including providing information about how to make a complaint.
- g) Adhere to the Policy on Code of Conduct, which outlines expectations for employee conduct.
- h) Speak positively and respectfully about employees and clients and avoid the use of labels, derogatory, disrespectful, or patronising language about age, gender identity, culture, heritage, language, faith, sexual orientation (LGBTIQ+), relationship status or disability.
- i) Foster a work-place culture that values human rights and the protection of employees and clients against any form of discrimination, harassment, abuse, neglect, violence, or aggression.
- j) Take immediate action if you experience discrimination, bullying or sexual harassment. If comfortable, raise the issue with the person directly to stop the behaviour instantly. Aim to identify the behaviour, explain that the behaviour is unwelcome and offensive and ask that the behaviour stop. Given the seriousness of discrimination, bullying and sexual harassment, any such incidents

should be reported to the line manager and/or HR, as the employee feels comfortable, to discuss further and determine if any other response is required.

- k) Reporting incidents in accordance with the Policy on Employee Complaints is encouraged. Any reports of discrimination, bullying or sexual harassment will be treated seriously, promptly and with sensitivity in accordance with the Policy on Employee Complaints. Keep a record of what happened, when and where it happened, who was involved, any witnesses to the behaviour, and anything else you think may be important (e.g., saving evidence like screen shots or emails).

5. References

Fair Work Commission [Fair Work Commission](#)

Human Rights Commission [Australian Human Rights Commission | Make a Complaint](#)

[What is bullying?: Violence, Harassment and Bullying Fact sheet | Australian Human Rights Commission](#)

Australian Unions [Contact Australian Unions - Australian Unions](#)

Respect@Work [Respect@Work \(respectatwork.gov.au\)](#)

Safe Work Australia [Bullying | Safe Work Australia](#)

Employment Assistance Program [G:\E Library\HR Employee Info\Employee Assistance Program EAP](#)

6. Definitions

Discrimination can occur in two forms – direct and indirect.

- Direct discrimination occurs when a person is treated less favourably than another person, in the same or similar circumstances, because of a protected attribute.
- Indirect discrimination occurs where a neutral rule, requirement or practice that appears to apply to everybody equally has the effect of disadvantaging more people with a particular protected attribute and is not reasonable in the circumstances.

In certain circumstances, it may not be unlawful for BIZLINK to discriminate against a person. The key exception is where the person's disability or impairment prevents them from performing the inherent requirements of their job.

Protected attributes include:

- sex
- sexuality
- gender identity
- lawful sexual activity
- pregnancy or breastfeeding
- relationship status (marital or domestic status)
- race, including colour, nationality, descent, national origin, ethnic origin and immigrant status
- religious belief or activity
- disability or impairment, including physical or mental disability or impairment
- family/carers responsibilities
- age
- physical features
- political opinion or activity
- employment activity
- trade, occupation or calling

- personal association with someone who has one of the attributes listed
- irrelevant medical or criminal records or spent criminal convictions

Sexual harassment is any unwelcome sexual advance, unwelcome request for sexual favours, or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated, or intimidated. Sexual harassment can be physical, spoken or written. Sexual harassment can be a one-off behaviour, a series or a pattern of behaviours or a repeat of the same behaviour. It may sometimes be subtle or implicit rather than obvious.

Whether sexual harassment has occurred will depend on the way the behaviour is perceived and experienced by the recipient, rather than the intention behind it. A person does not have to say 'no' or 'stop' to the perpetrator for the behaviour to be unacceptable.

Sexual harassment is unlawful under the Sex Discrimination Act in different areas of public life, including employment, service delivery, accommodation, and education. Some types of sexual harassment may also be criminal offences.

Ref: [Sexual Harassment | Australian Human Rights Commission](#)

Workplace Bullying is repeated unreasonable behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by a person or persons against another or others in the course of employment that creates a risk to health and safety. It includes behaviour that harms, threatens, victimises, intimidates, offends, degrades, or humiliates a worker, possibly in front of co-workers, clients or customers.

Reasonable management action that is carried out in a reasonable way is not bullying. An employer or manager can: make decisions about poor performance, take disciplinary action, direct, and control the way work is carried out. Management action that is not carried out in a reasonable way may be considered bullying.

Victimisation occurs when a person subjects or threatens to subject another person to any detriment because they have made a complaint or raised a grievance, they intend to make a complaint or raise a grievance, they helped another person to make a complaint or raise a grievance, or they witnessed and gave information in relation to a matter of bullying, harassment, discrimination, or other misconduct.

An employee will not be disadvantaged in their role for making a complaint, being a witness or being an informant to an inquiry or investigation of a complaint.

Terms and Definitions

In this document:

‘Must’ means that compliance is mandatory or is a requirement.

‘Should’ means that compliance represents best practice or a recommendation.

Career Development A client who is working, in PPS or OS, who has a goal of securing a new job with BIZLINK assistance. This is documented in a Job Plan and entered in JobReady as Career Development.

Client A person who participates in a BIZLINK Disability Employment Service. Also referred to (historically and by different programs) as an interested party, stakeholder, customer, consumer, registrant, service recipient, participant, job seeker or worker.

COIN - Complaint or Incident Notice Internal Quality Document used to report complaints about BIZLINK from any source e.g. clients, employers, BIZLINK employees. Also used to report incidents (including near misses) that pose a risk or identify a hazard, internal problems that are causing an impact on quality / service provision.

Confidentiality The treatment of information that an individual has disclosed in a relationship of trust and with the expectation that it will not be used or divulged to others in ways that are inconsistent with the understanding of the original disclosure, without permission. For instance, employees can only share information with a third party with client or participant consent or authority. This prevents the access of sensitive information from being public or released to unauthorised third parties.

Data Breach an incident in which personal, confidential, sensitive or commercial information is compromised, disclosed, copied, transmitted, accessed, removed, destroyed, stolen or used by unauthorised individuals, accidentally or intentionally.

Department - Department of Social Services (DSS) DES funder since 19/09/13, previously DEEWR. Commonly referred to as the “Department”. Department related matters are also known as the “program”.

DES - Disability Employment Service Programs of tailored assistance for people with disability, see DMS and ESS.

Direct Registration A registration not referred by Centrelink. Voluntary DES clients can Direct Register from adjacent ESA's if they choose BIZLINK.

DMS - Disability Management Service One of the two program types under DES. For clients with disability, injury or health condition who require assistance but are not expected to need long-term support in the workplace.

Employment Hero An online, Australian-based, human resource platform, combining HR and payroll / financial services. The mobile application is called SWAG.

ESA - Employment Service Area A geographical area within an LMR that corresponds to Centrelink Customer Service Centre boundaries. BIZLINK has a DES contract to service the Central & West and North ESAs in the Perth LMR.

ESAt - Employment Services Assessments completed by Centrelink to recommend the most appropriate employment service assistance based on an assessment of the client's: Barriers to finding and maintaining employment that may relate to the impact of disability, injury, illness, or other disadvantage, and work capacity in hour bandwidths.

ESS - Employment Support Service One of the two program types under the DES banner. BIZLINK provides a DES–ESS program. For clients with permanent disability with an assessed need for more long-term, ongoing support in the workplace.

ESSWeb - Department IT System The Department's secure internet-based IT system to receive referrals, manage caseloads, undertake web-based training and claim payments.

File Note (Note, Client Note) A record of activities, actions, strategies and outcomes, recorded in JobReady for DES and SupportAbility for NDIS.

File This may be paper copy or electronic copy. Whilst BIZLINK aims to be paper-free, records can be either form.

ICAN - Improvement/Corrective Action Notice Internal Quality Document used to report ideas for improvements from e.g. results of surveys, audits, observations or other reports / reviews.

Information / Data Includes, but is not limited to, all client, contract, service, operational, financial, HR and strategic information of BIZLINK whether held as hard-copy or electronically in any form. In this manual the terms 'data' and 'information' have been used interchangeably and should be taken to mean both data and information

Interested Party / Parties / Stakeholders Includes Client, Employer, Funder, Client's Support Network, and Referral sources. Whilst clients are the primary interested party and participant in BIZLINK services and programs, employers of clients, the client's support network, funder of our service and referral sources, e.g. schools, community services, are also interested parties. Procedures may address the needs of all interested parties or will list them as appropriate.

Internal Quality Document documents that are essential for operations and quality management. Internal Quality Documents are created or developed by BIZLINK e.g. forms, manuals, reports.

IT Systems All Information Technology devices, networks, external databases and systems related to BIZLINK providing its service, including, but not limited to: Department database (ESSWeb), Third Party database (JobReady/SupportAbility), NDIS database (PRODA/PACE), and any other application available via the BIZLINK Cloud and all associated files, folders and information storage.

JCA - Job Capacity Assessment Provides assessment of a DES client's participation level, work barriers, and the interventions and assistance needed to help improve their current and future work capacity.

JobReady - Third Party IT Provider Database Third party provided database that interacts with the Department Database (ESSWeb), includes management reports, alerts, File Notes, education, employment and wage histories.

LMR - Labour Market Region 19 Geographical areas that align with Centrelink Customer Service Centres further divided into ESAs. The BIZLINK LMR is Perth and our DES contracted ESA's are the Central & West and North.

NDIS Core Module covers: rights and responsibility for participants; governance and operational management; the provision of supports, and the support provision environment.

NDIS Practice Standards create a benchmark for providers to assess their performance, and to demonstrate how they provide high quality and safe supports and services to NDIS participants. Together with the NDIS Code of Conduct, the NDIS Practice Standards assist NDIS participants to be aware of what quality service provision they should expect from NDIS providers. The NDIS Practice Standards consist of a core module and several supplementary modules that apply according to the types of supports and services NDIS providers deliver. BIZLINK must meet the Core Module.

NSDS - National Standards for Disability Services guiding standards for the delivery of quality services. Six National Standards for Disability Services, supported by 40 Indicators of Practice that outline the Australian Government's expectations of service quality and link directly to core organisational processes and outcomes. For Australian Government funding, DES providers must be certified as complying with the standards.

Open Employment means DES Employment where an employee with a disability is engaged in the mainstream workforce, in a commercial setting, alongside employees without disability as specified in any Guidelines.

OSA - Ongoing Support Assessment Independent assessment of need for, and level of DES ongoing support assistance.

Participant A person who participates in BIZLINK NDIS services and programs. May also be referred to as a client, however, we have used client to differentiate to our DES program.

Privacy is when an individual is free from public interruption and intrusion. The word privacy is derived from the word 'private' which means the role of the public is limited, so the term privacy refers to a condition where a person is apart from public attention and observation. It is the right of every individual to be left alone in their personal matters because everybody has a personal life. A person can draw a boundary on the access of their information from the use of others. Privacy is a matter of choice of an individual they do not want to disclose to other people, e.g., setting privacy on social media account to limit the access of personal information like who can view posts etc.

PRODA (Provider Digital Access) An online identity verification and authentication system. Allows secure access to government online services, including the NDIS – being updated to PACE.

QRC - Quality Review Committee Internal Committee, made up of 'Top Management', the QRC oversees the Quality and Information Security Management System in accordance with the QRC Agenda.

Quality Degree to which requirements are met. "Quality" can have adjectives such as poor, good or excellent.

Record Any document, software, or other record that illustrates conformity to specified requirements and demonstrates the effectiveness of the quality and information security management system, e.g. strategic planning, service activities, complaints or incidents, corrective or preventive action, internal audits, training, checklists, File Notes, Job Plans (DES), Goal Plans (NDIS). They must be legible and stored so that they are accessible and prevented from damage, deterioration or loss.

Statement of Applicability (SoA) Details controls and policies applied by BIZLINK and provides benchmarks against the Annex A control of ISO 27001. Our SoA includes the Australian Government Information Security Manual (ISM).

Supplier An organisation or person that provides a product or service. In ISO also known as External Provider.

SupportAbility - Third Party IT Provider Database Third party provided database that has limited interaction with NDIS Database (PRODA/PACE), includes management reports, alerts, File Notes, goals, NDIS invoicing and claiming.

Support Network includes 'family, friends and carers' and recognises the importance of connection with family and friends, as well as the caring roles played by family, friends and carers.

SWS - Supported Wages System A process that enables employers to pay productivity-based wages to people whose work productivity is significantly reduced as a result of the effects of their disability.

Top Management This is an ISO reference, for BIZLINK it means the Managing Director, Quality Manager, Compliance Manager, Operations Manager and Finance Manager. This group represents the heads of departments within BIZLINK and so provides oversight for the organisation as representatives of the QRC.

Vocational Development / Voc Dev includes participation in work experience or work trials to explore interests, develop work readiness and to assist Coordinator to observe skills in a work environment. Also includes education or training to explore interests, develop work readiness and job related skills and, in some instances, gain qualifications to improve opportunities for securing or retaining employment or to enhance the prospect for promotion.

Cyber Security Definitions reference [Information Security Manual \(ISM\) | Cyber.gov.au](#)

Getting Information How You Need It

BIZLINK assists people with a range of abilities. Staff can read and explain this information or BIZLINK can provide the information in different ways; such as, in large print, another language or electronically; e.g. emailed to you as a word document, as needed. Discuss with your Coordinator or contact BIZLINK.

Social Media



BIZLINK has a Facebook and Instagram page. We use these as an extension of our Bizzybodies newsletter and to provide another avenue for clients to connect with us and stay informed. Our Social Media promotes our service, shares good news stories, provides relevant Department updates and shares information about BIZLINK services.

Website

Our website provides information about BIZLINK for job seekers, employers, schools and community organisations. We post our policies, reports and newsletters to the website. We have a feedback page, where you can complete a survey anytime.

www.bizlink.asn.au



BIZLINK acknowledges the support of the Australian Government Department of Social Services, which provides BIZLINK with Employment Support Services funding.

Need an Employment Service?

BIZLINK is a West Australian, not-for-profit, disability employment service and registered NDIS provider for Employment Supports. BIZLINK is dedicated to securing and supporting inclusive employment in the Perth suburbs and has done so since 1992. BIZLINK has the experience and results to provide the best employment support.

Choose BIZLINK for:

- A Free Disability Employment Service
- Convenience of 10 Offices across Perth
- Personalised job-matching
- Pre-employment skills development
- Individual one-to-one assistance
- On-site training support and advice
- Apprenticeship and Traineeship support

1300 780 789

To discuss how BIZLINK could be the
BEST provider for you



Tel: 1300 780 789

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