



Office of Fair Trading Qld Incorporated Association AI60060 Blue Card Registered Organisation ID 1030694

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ADMINISTRATOR IS A REGISTERED NDTF TRAINER ASSESSOR NO 06791

PAWSOME ASSISTANCE DOGS INC
HUMAN RESOURCES ORGANISATIONAL POLICY AND PROCEDURE
HANDLER'S MANUAL

This Manual provides a comprehensive guide to the PAD Association Handler Policies and Procedures

The Manual is to be read in conjunction with the PAD

1. Code of Conduct
2. Responsible Persons Declaration
3. Handler Agreements
4. Public Access Standards Assessment and Certification
5. Recommended Breeds Policy
6. Compliance and Validation Policy Part B – Handlers
7. PAD By-Laws
8. Other such Policies and documents that are developed as required and form part of the Implied Policies.
9. All other Administrative or Procedural documents that may be deemed necessary from time to time.

The ACNC's five Governance Standards are the basis of all PAD Policies: -

STANDARD 1 Purposes and not-for-profit nature

STANDARD 2 Accountability to members

STANDARD 3 Compliance with Australian laws

STANDARD 4 Suitability of Responsible Persons

STANDARD 5 Duties of Responsible Persons.

These are defined in the CODE OF CONDUCT

In addition, PAD applies the following policies:-

1.PRIVACY AND CONFIDENTIALITY

PAD adheres to the 13 Australian Privacy Principles (AAPs) as specified by the ACNC. An opts in as an APP entity.

The following principles are adopted as the Privacy and Confidentiality Policy of PAD.

APP 1: Open and transparent management of personal information	PAD agrees to manage Association Handler's personal information in an open and transparent way. This includes having this clearly expressed and up to date APP privacy policy.
APP 2: Anonymity and pseudonymity	PAD gives Handlers the option of not publicly identifying themselves, and of using a pseudonym. Limited exceptions apply, such as when legal names are required by governing agencies.
APP 3: Collection of solicited personal information	PAD collects and records only the personal information that is solicited. It applies higher standards to the collection of 'sensitive' information, and ensures extra levels of protection for this information. In particular, in relation to Minors and other Vulnerable Persons.
APP 4: Dealing with unsolicited personal information	PAD does not in general terms, record or retain unsolicited personal information. The exception may be in relation to a Grievance, Complaint or breach of the Code of Conduct, Responsible Persons Policy, or having criminal charges or convictions brought to their attention.
APP 5: Notification of the collection of personal information	PAD has guidelines and policies that outline when and in what circumstances PAD collects personal information, and has clear documentation in regard to what the standard information is, and how it is collected and stored. PAD will notify an individual of certain matters relating to storage of non-standard data.
APP 6: Use or disclosure of personal information	PAD will advise an individual when it may use or disclose personal information that it holds, specific to their own circumstances.
APP 7: Direct marketing	PAD may only use or disclose personal information for marketing and promotional purposes if certain conditions are met. Written permission is required prior publication of personal stories or other similar information. Personal photos are not published without

			prior permission.
APP 8:	Cross-entity disclosure of personal information		PAD agrees to protect personal information, and take all reasonable steps to verify the third person authority requesting the information before it is disclosed.
APP 9:	Adoption, use or disclosure of identifiers		<p>PAD has limited circumstances when it may adopt an identifier for an individual, to protect disclosure of their identity in public documents.</p> <p>An identifier is a number, letter or symbol, or a combination of any or these things, that is used to identify the individual or to verify the of the individual.</p> <p>This APP does not override legal and governance requirements.</p>
APP 10:	Quality of personal information		<p>PAD will take reasonable steps to ensure the personal information it collects is accurate, up to date and complete.</p> <p>PAD takes all reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.</p>
APP 11:	Security of personal information		<p>PAD commits to take reasonable steps to protect the personal information it holds from misuse, interference, and loss, and from unauthorised access, modification, or disclosure.</p> <p>PAD has obligations to destroy or de-identify personal information in certain circumstances.</p>
APP 12:	Access to personal information		<p>PAD has clearly defined obligations when an individual requests to be given access to personal information held about them.</p> <p>This includes a requirement to provide access to their standard data Records, but not Association records or Assessor training notes, unless a specific exception applies. PAD can identify what information is held in relation to a Handler, but is not obliged or responsible, for returning copies of documents held on behalf of the Handler. All documents provided become and remain the property of PAD.</p>
APP 13:	Correction of personal information		PAD acknowledges its obligation in relation to correcting the personal information it holds about individuals.

2. BULLYING and HARASSMENT POLICY

PAD adopts the following in relation to bullying and harassment

DEFINITION:

Bullying or Harassment is repeated acts of unreasonable behaviour directed towards an individual or a group, that poses a risk to health and safety of an individual.

Unreasonable behaviour includes:

- Victimising behaviour.
- Humiliating an individual or group.
- Displaying intimidating gestures or behaviour.
- Or threatening language or behaviour.

The Association's Handler Bullying and Harassment Policy is a policy committed to providing a respectful environment for Association Members, and Handlers, that is completely free of bullying and harassment within the parameters of its operation and function.

Bullying and harassment is can be a huge risk to health and safety of Association Members and Handlers and can have lasting effects on their mental and physical health.

- As a volunteer-based Association, PAD has an obligation under the [Work Health and Safety Act 2011](#) to ensure the health and safety of all Association Members and Handlers, within the scope of its operations. This Policy prohibits any person within the PAD environment from engaging in discriminatory conduct of any description.
- It is also important to note that Executive action, in relation to Association members or Handlers, such as delivering instructions or addressing performance issues, does not count as bullying. However, only if that behaviour is carried out fairly. If Executive action is unreasonable, it may constitute bullying as well.
- PAD is committed to preventing bullying or harassment as part of providing a safe and healthy environment, in conjunction with the PAD Safeguarding Persons Policy.
- The standard of behaviour expected from Handlers and Association members is defined in the Safeguarding Persons Policy and the Code of Conduct, which all Handlers and Association Members are required to sign acceptance of, and commitment to compliance with.
- This policy extends to communication through email, text messaging and social media.
- The process for reporting and responding to incidents of unreasonable behaviour is outlined in the Grievance Resolution Policy, and the Constitution.
- Reporting and assessment of individual cases, is handled by the Executive Committee in accordance with the Constitution, and Grievance and Safeguarding Persons Policies.
- The consequences of non-compliance are outlined in the Constitution, and the Handler or Association Member Agreement.

This Policy is to be read in conjunction with the Safeguarding Persons Policy, the Constitution, and the Handler and Association Member Agreements.

3. ANTI-DISCRIMINATION POLICY

DEFINITION:

Discrimination is the act of making unjustified distinctions between human beings based on the groups, classes, or other categories to which they are perceived to belong.

Discrimination may occur based on race, gender, age, or sexual orientation, as well as other categories.

PAD Anti-Discrimination Policy embraces the following legislation: -

- Sex Discrimination Act 1984 (Cwth)
- Racial Discrimination Act 1975 (Cwth)
- Disability Discrimination Act 1992 (Cwth)
- Age Discrimination Act 2004 (Cwth)
- Australian Human Rights Commission Act 1986 (Cwth)

PAD commits to ensuring standards of behaviour outlined in the Code of Conduct and Safeguarding Persons Policy are upheld in relation to this policy.

4. SEXUAL HARASSMENT

DEFINITION:

PAD deems Sexual harassment as a specific and serious form of harassment.

It is unwelcome sexual behaviour, which could be expected to make a person feel offended, humiliated, or intimidated. Sexual harassment can be physical, spoken or written.

In the context of this PAD Policy and the PAD environment, it may include:

- Comments about a person's private life or the way they look.
- Sexually suggestive behaviour, such as leering or staring.
- Brushing up against someone, touching, fondling, or hugging.
- Sexually suggestive comments or jokes.
- Displaying or sharing offensive screen savers, photos, calendars, or objects.
- Repeated unwanted requests to go date.
- Requests for sex.
- Sexually explicit posts on PAD social networking platforms.
- Insults or taunts of a sexual nature.
- Intrusive questions or statements about a person's private life.
- Sending sexually explicit emails or text messages.
- Inappropriate advances on PAD social networking platforms.
- Behaviour that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications, or grooming.

Just because someone does not object to inappropriate behaviour in the PAD environment at the time, it does not mean that they are consenting to the behaviour.

Sexual harassment is covered by this PAD Policy when it happens in the PAD environment, in relation to Association Members or Handlers, or third parties participating in PAD related events.

- All Association Members and Handlers have the same rights and responsibilities in relation to sexual harassment.
- A single incident is enough to constitute sexual harassment – it does not have to be repeated.
- All incidents of sexual harassment – no matter how large or small or who is involved – require PAD, Association Members and Handlers, to respond quickly and appropriately.
- PAD recognises that comments and behaviour that do not offend one person can offend another. This policy requires all Association Members and Handlers to respect other people's limits.

PAD commits to ensuring standards of behaviour outlined in the Code of Conduct and Safeguarding Persons Policy are upheld in relation to this policy.

5. VICTIMISATION

DEFINITION:

Victimisation is subjecting or threatening to subject someone to a detriment because they: -

- Asserted their rights under Equal Opportunity Law or DDA 1992
- Made a complaint, helped someone else make a complaint, or refused to do something because it would be discrimination, sexual harassment, or victimisation.
- May be involved in investigating or reporting a concern or complaint.

Victimisation is against the law.

Victimisation is a very serious breach of the Code of Conduct and Safeguarding Persons Policy and is likely (depending on the severity and circumstances) to result in formal discipline against the perpetrator.

PAD has a zero-tolerance approach to victimisation.

PAD commits to ensuring standards of behaviour outlined in the Code of Conduct and Safeguarding Persons Policy are upheld in relation to this policy.

6. GRIEVANCE POLICY

DEFINITION:

PAD defines a Grievance as any complaint, problem or concern of an Association Member or Handler towards the Association, a Member or Handler. It may also be a problem or concern the Association has towards a Member or Handler.

Processes for lodgement of complaints and/or grievances are defined in detail, in the Safeguarding Persons, Code of Conduct, and Constitution.

- Grievances and Complaints must be in writing, with verifiable evidence, emailed or mailed to the Administrator, and forwarded to the Executive Committee.
- The Executive Committee has a responsibility for timely and confidential response to all complaints and grievances.
- The Constitution outlines when and why there may be no appeal process.

The Association, Members, and Handlers can file grievances for any of the following reasons:

- Harassment or Discrimination.
- Breaches of the Code of Conduct.
- Breaches to the Public Access Standards.
- Breaches of the Association Member or Handler Agreements.
- Criminal acts, charges, or convictions.
- Breaches to the Responsible Persons Declaration.
- Breaches of any and all Policies, Procedures and Rules.
- Health and safety matters.
- Behaviour of Members, Handlers, Assessors, Trainers or Volunteers, and third-party attendees at PAD events and functions.

PAD is committed to:

- A formal grievance procedure and Policy.
- Communicate the procedure to all parties.
- Investigate all grievances promptly.
- Treat all parties who file grievances equally.
- Preserve confidentiality at any stage of the process.
- Resolve all grievances when possible.
- Respect and commit to a no-retaliation policy when parties file grievances with the PAD or external agencies.

Parties who file grievances can:

- Reach out to the Administrator, Executive Committee, or local representative.
- File a grievance in writing, explaining the situation in detail.
- Refuse to attend formal meetings on their own.
- Appeal on any formal decision, except where it contravenes the Constitution.

Parties who face allegation have the right to

- Receive a copy of the allegations against them.
- Respond to the allegations.
- Appeal on any formal decision, except where it contravenes the Constitution.

PAD is obliged to:

- Have a formal grievance procedure in place.
- Communicate the procedure.
- Investigate all grievances promptly.
- Treat all Parties who file grievances equally.
- Preserve confidentiality at any stage of the process.
- Resolve all grievances when possible.
- Comply with the limitations set down in the Constitution.

PAD will follow the procedure below:

1. Receive a grievance in writing, with full details, documentation, and evidence.
2. Initiate a primary investigation into the details and validity of the grievance.
3. Advise the Handler that a grievance has been received and is being investigated.
4. Talk with the grievance applicant, to ensure the matter is understood completely, and advise them of the process that will be followed.
5. Identify if the grievance applicant is requesting the complaint be made in confidence, and if such request is a result of feeling threatened or vulnerable.
6. Where appropriate, provide the Handler who faces the allegations with a copy of the grievance.
7. Refer the matter to the Executive Committee for management investigation, and resolution.
8. Where appropriate keep parties informed throughout the process.
9. Communicate the formal decision to all parties involved.
10. Take actions to ensure the formal decision is adhered to.
11. Keep accurate records.

PAD commits to ensuring standards of behaviour outlined in the Code of Conduct and Safeguarding Persons Policy are upheld in relation to this policy.

7. IT, INTERNET, EMAIL AND SOCIAL MEDIA, AND DATA RETENTION AND ACCESS

- Only the Executive, Administrator, Administrator and approved committee members are permitted to access and store, private and confidential information in regard to Association Handlers.
- Information shared or accessed through the social media platforms remains confidential and private to the Group and cannot be used for any purpose, other than acceptable and respectful contact with other Handlers on PAD related matters.

- Use or Abuse of confidential information, by a Handler will result in immediate expulsion or / and deregistration.
- Emails contents may not be forwarded, or disseminated in any form, to non-Handlers.

PAD commits to ensuring standards of behaviour outlined in the Code of Conduct and Safeguarding Persons Policy are upheld in relation to this policy.

8. PERFORMANCE MANAGEMENT

- A Handler proven not to be complying with all standards, policies and procedures governing being Registered and Affiliated with PAD will be deregistered without refund of any relevant fees or financial agreements. Non-compliance may result in immediate de-registration without appeal or explanation.
- The Executive holds the right and option to performance counsel Handlers, if it believes the issue is one which can be addressed with lesser consequences than suspension or deregistration. The authority lies with the Executive to choose the most acceptable response.

PAD commits to ensuring standards of behaviour outlined in the Code of Conduct, Safeguarding Persons Policy, Responsible Persons Declaration and Association or Handler Agreements, and all other policies and procedures, including the by-laws, are upheld in relation to this policy.

9. RESPONSIBLE PERSONS STANDARDS POLICIES

The ACNC set downs the Duties of a Responsible Person in Standard 5, PAD complies with this standard, in relation to this Policy for Association Members and requires Registered Handlers to do the same.

Standard 5 requires Handlers to take reasonable steps to make sure that the following apply in relation to the Responsible Persons Agreement

- to act with reasonable care and diligence.
- to act honestly and fairly in the best interests of the Association and of other Handler Teams.
- not to misuse their position or information they gain as a Handler, in accordance with the PAD Policies and Procedures.
- to disclose conflicts of interest, with other Handlers, or with involvement with other Associations or organisations.
- to ensure that the financial responsibilities to the Association are met by paying all fees and outstanding monies in a timely manner
- To not cause financial hardship to the Association by being derelict in payment of outstanding monies, damaging equipment provided, or causing legal issues for the association.

- Generally, the Handler should act with standards of integrity and common sense.
- All Adult Registered Handlers are required to be eligible to apply for a WWCC, and are encouraged to gain an appropriate WWCC authority for their state.
- Adult Registered Handlers may be requested by the Association to apply for, or have, a WWCC.
- PAD is willing to sponsor the voluntary version of the WWCC, for individual Handlers.
- All Applicants/Registered Handlers are required to disclose any charges or convictions which are current or less than five years old.
- Such charges or convictions do not automatically disqualify registered Handlers from PAD, but depending on the type, it may disqualify or restrict the application.
- **Charges or Convictions in relation to child or sexual offences, harassment or bullying, discrimination, violence, or that would be in breach of the Safeguarding Persons and Responsible Persons Policies will disqualify the Handler from a relationship with PAD.**
- As a Duty of Care, PAD requires confidential notification of any current charges, convictions, or court processes, particularly where it may cause harm to an individual or bring the association or others into disrepute.

PAD commits to ensuring standards of behaviour outlined in the Code of Conduct, Safeguarding Persons Policy, Responsible Persons Declaration and Handler Agreements, are upheld in relation to this policy.

12. CONFLICT OF INTEREST

The purpose of this policy is to help Handlers, to effectively identify, disclose and manage any actual, potential, or perceived conflicts of interest in order to protect the integrity of PAD and manage risk.

- A conflict of interest occurs when a person's personal interests' conflict with their responsibility to act in the best interests of the Association or other Registered Teams.
- Personal interests include direct interests, as well as those of family, friends, or other organisations a person may be involved with or have an interest in.
- It also includes a conflict between a Handler's duty to PAD and another duty that the Handler has (for example, to belonging to another AD association or being involved in banned activities such as Competitions). **A conflict of interest may be actual, potential or perceived and may be financial or non-financial.**
- These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of PAD or other Registered Teams. Therefore, these situations must be managed accordingly.

Conflict of interest are common, and they do not need to present a problem to PAD as long as they are openly and effectively managed.

PAD will manage conflicts of interest by requiring Registered Handlers to:

- avoid conflicts of interest where possible.
- identify and disclose any conflicts of interest.
- carefully manage any conflicts of interest, and
- follow this policy and respond to any breaches.

The Association is responsible for:

- establishing a system for identifying, disclosing, and managing conflicts of interest
- monitoring compliance with this policy, and
- reviewing this policy on an annual basis to ensure that the policy is operating effectively.

The Association commits to ensuring that Handlers are aware of the ACNC governance standards, particularly Governance Standard 5, Duties of Responsible Persons and that they disclose any actual or perceived material conflicts of interests as required by Governance Standard 5.

Handler Responsibilities are:-

- Identification and disclosure of conflicts of interest to the Committee.

Once an actual, potential, or perceived conflict of interest is identified, it must be entered into the Handler's file, as well as being raised with the Executive for determination and resolution.

12. FUNDRAISING, DONATIONS AND FINANCIAL DELEGATIONS

FINANCIAL DELEGATIONS

A not-for-profit can make a profit, but any profit made must be used for its purposes.

- Handlers have no financial authority or responsibility for the operations of the Association.
- Any Handler collecting money on behalf of the Association must have written authority of the Executive and/ or be monitored by an Executive Member or their representative.

FUNDRAISING and DONATIONS

- All fundraising must be authorised by the Executive.
- All fundraising, whether directly or indirectly must be accountable, transparent, ethical, responsible, and specific.
- All money raised, and all expenses incurred must be appropriately accounted for and recorded.
- The Treasurer has the responsibility and authority to have oversight of all fundraising events.
- Third Party fundraising events must provide PAD with a full account of all funds raised on behalf of PAD.
- Third Parties may not use the PAD name to raise funds, if the perception is given that the fundraising event is being managed by PAD, rather than on behalf of PAD.
- Third Party fundraisers will be required to have the person with the financial delegation for the funds, sign the PAD Responsible Persons Declaration.
- Donations are not fundraising. Donations must be accounted for separately and banked to a separate Donation account.
- Donations must be applied to the achievement of the Mission Statement and Objects of the Association.
- Fundraising may be used for whatever purpose the Executive authorises, which upholds the standards and purpose of the Association. Fundraising may be used to support Administrative costs.
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13. REFUND POLICY

In general terms, PAD has a no refund policy.

- If a Handler is de-registered, there is no refund of fees or promotional products.
- If a Handler leaves the Association, there is no refund of fees or promotional products.
- If an Associate fails to proceed through to registration, either for personal reasons, or because the Executive rejects the application, there is no refund.
- If an application is rejected, the Executive has the authority to refund a portion of the Application fee but is not compelled to.
- If a Handler leaves or is de-registered, there is no refund of Public Access Assessment fees.

14. EVENTS AND HOSTING POLICY

- All Events both formal and informal, hosted in PAD's name, are under the control and authority of the Executive Committee.
- Only the Executive Committee or its representatives can host an Event.
- Unauthorised Events cannot be presented as PAD Events.
- The Code of Conduct, Safeguarding Persons and Responsible Persons Policies, as well as the Health and Safety of Assistance Dogs Policy, apply to all events. As does the Handler Agreement.

- Attendance at a PAD event requires the Handler to be responsible for all third-party persons attending in their company or at their invitation, to ensure compliance with all relevant PAD Policies and Standards.

15. DRESS CODE POLICY

- It is a condition of Membership and/or Registration and continued affiliation, that the Handler and all Assistance Dogs are suitably groomed, hygienic, and presentable when displaying the identifiers of PAD ASSISTANCE DOGS INC.
- If a PAD shirt is being worn, the Handler must be mindful of public perception of behaviour, presentation, and language, and represent PAD in a favourable and professional manner.
- With due regard to the Safeguarding Persons Policy, Handlers, when attending PAD events, both formal and informal are to be appropriately dressed for an environment involving Children, Youth and Vulnerable Persons. This includes, but is not limited to, not wearing attire displaying offensive, violent, or suggestive wording or pictures, and not wearing clothing that the general public would perceive as inappropriate in the presence of Children, Youth or Vulnerable Persons.

PAD commits to ensuring standards of behaviour outlined in the Code of Conduct are upheld in relation to this policy.

16. EQUALITY AND EQUITY FOR PUBLIC ACCESS

PAD recognises that each Handler is an individual and adaptations to the Public Access standards may be required to accommodate a disability.

PAD Public Access Standards Assessment may be adapted to accommodate special circumstances and needs of each Handler Team.

17. HEALTH AND SAFETY OF ASSISTANCE DOGS

Handlers are to ensure compliance with all standards and requirements of the DDA 1992, in addition to all PAD policies

- **Handlers are to ensure their dogs are maintained in a healthy, well-groomed state, with regular health checks, Vaccinations and Treatments, consistent training, and care for their wellbeing.**

- **Handlers must advise the Committee, in writing, if there are ANY CIRCUMSTANCES preventing or inhibiting the dog working as an Assistance Dog. If the dog is ill for longer than 7 days, if the dog has been placed on long term medication or treatment, or has any medical, emotional or training issue that prevents it from working, or is absent from the Handler, for a period of more than 7 days, the Committee MUST BE ADVISED IN WRITING BY EMAIL.**
- Dogs are to be kept under strict control and meet and maintain Public Access standards for the benefit of the Handler, Dog and General Public.
- Assistance Dogs may not be used in a dual role as Therapy Dogs. The training for each is not compatible and may cause risk and hazard to the Handler, the Dog, and members of the public.
- **Unless for exceptional circumstances, Handlers are not permitted to have two Assistance Dogs. A Transition Assistance Dog, or a dog that is required to be working in essence 24/7 would be the exceptions to this rule that the Executive would give consideration to. A Handler is not to use their dog as an Assistance Dog for multiple persons.** PAD recognises that ADs will naturally “work” with close members of the same household, but the bond with the primary Handler must be maintained and safe guarded.
- Handlers are discouraged from involving their dog, in situations or environments where the dog may experience sensory overload, may be subjected to forced and unsafe interactions with the public, or may be placed under stress by not being able to fulfil its role and commitment to the Handler.
- **Handlers are to maintain PAD Public Etiquette in relation to contact with other Assistance Dogs, said contact being either dog to dog, or Handler and Dog.** Further information in relation to this is found in the Handler Policies. Dogs are to be kept under control, on a traffic lead, and not allowed to invade the space of another dog.
- It is inappropriate for dogs to be fed, or given treats, by another Handler or third party, without the express permission of the Handler, and for a specific purpose. Assistance Dogs are trained to respond to their own Handler and must not be fed or respond to a third party whilst working, unless there is a specific and approved reason (eg a Minor with an Adult Handler, an incapacitated Handler with a support worker, a Handler who has an approved Second/Alternate Handler).
- **Dogs are not to be fed in designated Public Access areas, e.g., Cafes, Restaurants, Food Halls, or shopping centres.** If for some reason a dog requires a meal, this is to be done in areas that the general public would have access to with a domestic dog.
- Training treats are the exception to this standard.