



Just Gold Policies



2025

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Scope & Applicability

This handbook applies to all staff, contractors, consultants, interns, and associates engaged by Just Gold, regardless of employment type or location. It is a reference document for how we operate as a values-led enterprise. Where discrepancies exist between this handbook and specific client, project or contractual obligations, the CEO must be consulted.

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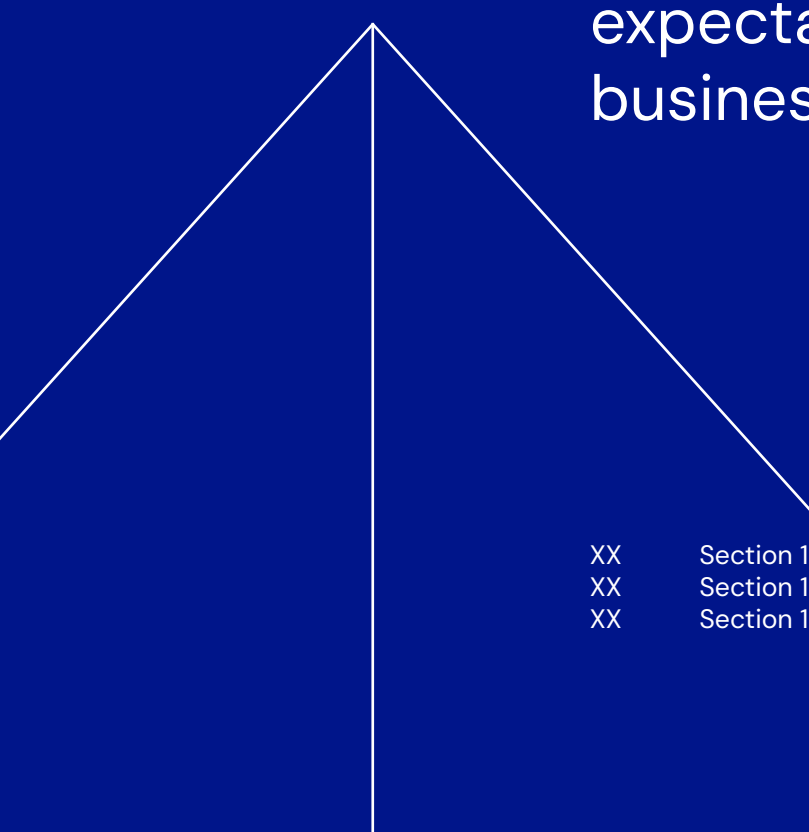
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Foundations

01

Purpose

→ This section defines the ethical and strategic DNA of Just Gold. It sets the cultural and operational foundation for how we work, make decisions, and interact with clients, partners, and each other. These principles guide our conduct, relationships, and leadership expectations across the business.



XX Section 1.1 → Our Values
XX Section 1.2 → Code of Conduct & Ethics
XX Section 1.3 → Roles & Accountability

Our Values

Policy Statement

At Just Gold, our values are not words on a wall—they’re embedded in every decision, every partnership, and every person we engage. This policy outlines how our values guide conduct, communication, collaboration, and strategy across the organisation. They are the foundation for accountability, alignment, and integrity at every level.

Domain	Statement
How we belong	We are uncompromising about people. We look after each other and we embrace diversity.
How we work	We think big and take intelligent risks. We are bold, creative and innovative.
How we communicate	We are open, honest and constructive. Integrity is at the core of our system.
How we manage our enterprise	We are generous and impact focused.

Our Values

How These Values Show Up in Practice

- We choose clients, suppliers, and collaborators who reflect these principles.
- We build project teams that centre lived experience and cultural safety.
- We challenge behaviours, systems or narratives that contradict dignity, equity or inclusion.
- We turn down work that causes harm to people or the planet—even when it pays well.

Non-Negotiables

The following are considered breaches of Just Gold's values and will trigger internal review:

- Undermining safety or inclusion for staff, clients or community members.
- Engaging in disrespectful, exploitative, or dishonest behaviour—whether in person or online.
- Participating in or enabling practices that perpetuate systemic harm (e.g. racism, ableism, greenwashing).
- Refusing to declare a conflict of interest that may impact ethical delivery.

Accountability and Response

All people engaged by Just Gold are responsible for upholding these values. Where conduct misaligns, responses may include coaching, formal review, redirection of project involvement, or contract termination—depending on risk, impact and intent. These values are monitored by the CEO and applied in consultation with relevant project or program leads.

Application

This policy applies to all employees, contractors, interns, board members, and collaborators. It also informs our procurement, partnerships, content, and public representation.

Code of Conduct and Ethics

Policy Statement

Our Code reflects how we turn values into action. It guides how we work together, with others, and on behalf of the communities we serve. Everyone we engage must act with integrity, accountability, and care—for people, communities, and the planet.

Conduct Expectations

Everyone at Just Gold must:

- Act with honesty and fairness in all professional dealings
- Respect people's lived experience, culture, identity and autonomy
- Think beyond self—prioritise community impact, social value, and cultural safety
- Raise issues, risks, or mistakes without fear of punishment or retaliation
- Declare conflicts of interest as soon as they arise
- Share knowledge constructively and challenge decisions respectfully
- Protect human dignity, privacy, and safety at all times
- Refuse work that causes harm or contradicts our values
- Only engage with clients, suppliers, or partners who reflect ethical and inclusive practices

What This Means in Practice

- We will turn down contracts if they involve greenwashing, discrimination, unpaid labour, or cultural appropriation

- We will step away from campaigns or strategies that rely on fear, deficit, or misinformation
- We will not work with organisations that exploit people, erode community trust, or breach human rights—regardless of fee or profile

Enterprise Alignment

As a certified social enterprise, Just Gold commits to:

- Prioritising impact over profit
- Partnering only with entities that advance justice, equity, and sustainability
- Enforcing high ethical standards across every supply chain we influence
- Terminating relationships where suppliers, clients, or collaborators fail to meet those standards

Misconduct and Consequences

Breaches of this Code—whether direct or enabling—may trigger:

- Values-aligned coaching or clarification
- Formal incident review by the CEO or nominated delegate, with outcomes documented and stored

in the internal compliance register

- Temporary removal from projects, partnerships, or public-facing roles
- Termination of contract, employment, or collaboration

Low-risk breaches will be addressed through discussion or redirection. Serious or repeated breaches will escalate. In cases involving executive or board-level conduct, an external advisor or independent governance contact may be engaged.

Application

This policy applies to all Just Gold staff, contractors, consultants, board members, and project collaborators. It also governs how we engage with funders, clients, suppliers, and the public.

Review Cycle

This Code is reviewed annually or in response to legal, operational, or ethical change.

Roles and Accountability

Policy Statement

Everyone at Just Gold has a role to play in impact. Clarity isn't control—it's how we respect time, energy, and trust. This policy outlines how responsibility, authority, and accountability operate at Just Gold. It ensures decision-making is distributed, ethical, and transparent across all levels of the organisation.

Responsibility Matrix

Role	Core Responsibilities
CEO	Holds final accountability for organisational conduct, compliance, public representation, and critical decision-making. Oversees policy ownership, incident review, risk governance, and supplier approval.
Managers & Leads	Ensure team alignment to policies and procedures. Implement training, monitor conduct, document issues, and escalate risks. Act as first-line response for wellbeing, conflict, or process breaches.
All Staff & Contractors	Comply with all policies. Maintain safe, respectful, and impact-aligned conduct. Report breaches, risks, or conflicts. Support others to uphold Just Gold's values in everyday work.
Board of Directors	Provide governance oversight. Ensure strategic alignment, risk management, and integrity of CEO performance. Engage in periodic reviews of organisational policies and enterprise risks.

Roles and Accountability

Decision Authority

Authority is delegated based on role, responsibility, and risk. Where ambiguity exists, decision-making must default to a higher authority or the CEO. No team member may unilaterally engage or approve work that contradicts Just Gold's policies, values, or legal obligations.

Collaborative Accountability

In cross-functional or project-based teams, responsibility is shared. Team members must clarify roles at project initiation and raise any ambiguity early. Accountability should reflect both lead roles and collaborative inputs.

Review and Escalation

All personnel are empowered to raise issues. Escalation should follow this pathway unless the matter relates directly to the person above:

1. Direct Supervisor or Project Lead
2. Department Head or Program Manager
3. CEO
4. Chair of the Board (where the issue involves the CEO or executive conduct)

Breach of Responsibility

Failure to meet role expectations—whether due to negligence, misconduct, or ongoing non-compliance—will trigger values-based redirection, formal performance response, or disengagement depending on severity.

Application

This policy applies to all employees, contractors, volunteers, managers, and board members. It also supports project team formation, partner onboarding, and contractual negotiation.

Review Cycle

This policy is reviewed annually or after structural changes to leadership, governance, or operating model.

People, Safety & Wellbeing

02

Purpose

→ At Just Gold, people are the priority. This section outlines our commitments to safe, fair, inclusive and responsive working conditions. It applies to all staff, contractors, consultants and volunteers. Our aim is to embed cultural safety, wellbeing, and dignity into every part of the working experience.

XX	Section 2.1 → Working at Just Gold
XX	Section 2.2 → Flexible Work & Wellbeing
XX	Section 2.3 → Discrimination, Bullying & Harassment
XX	Section 2.4 → Family & Domestic Violence Support
XX	Section 2.5 → Parental Leave
XX	Section 2.6 → Diversity & Intersectionality

Working at Just Gold

Policy Statement

Just Gold is a values-led enterprise that places people at the centre of every decision. We believe that respectful, safe, and inclusive work environments are essential—not optional. This policy outlines the minimum conditions and cultural expectations that underpin the experience of working at Just Gold, including respect for personal boundaries, work-life balance, and collective care.

Workplace Principles

- We respect diverse working styles, capacities, and neurotypes.
- We prioritise psychological safety and create space for feedback.
- We honour people's time—no after-hours expectations, no unpaid labour.
- We celebrate culturally significant days and community contributions.

Expectations for Team Culture

- Model kindness and professionalism in all interactions.
- Take responsibility for your own impact on others.
- Support flexible work arrangements without stigma or gatekeeping.
- Participate in regular check-ins and team care processes.

Onboarding & Offboarding

All new staff, contractors, and interns will receive onboarding that includes:

- Orientation to values, policies, and role expectations.
- Access to resources on wellbeing, cultural safety, and support.
- Clarity on communication protocols, escalation pathways, and project tools.

When exiting Just Gold, all personnel will be offered an exit discussion to reflect on their experience and support knowledge transfer.

Application

This policy applies to all employees, contractors, interns, and volunteers. It also informs recruitment, team structures, and project planning.

Flexible Work & Wellbeing

Policy Statement

Flexibility is a right, not a reward. Just Gold supports hybrid, remote, and flexible work arrangements across all roles where feasible. Wellbeing is integrated into performance, not measured against it.

Flexible Work Principles

- Work-from-home is a standard option, not an exception.
- Part-time, compressed, or adjusted hours are welcomed.
- Teams are encouraged to co-design ways of working that suit collective and individual needs.
- Digital communication tools must support—not erode—boundaries.

Wellbeing Commitments

- Regular wellbeing check-ins with managers or project leads.
- Mental health days can be taken without justification or stigma.
- No expectation to work while unwell, including during COVID, menstruation, or burnout.
- Access to referrals for culturally safe external support if requested.

Application

Applies to all team members and is reviewed annually or when new workforce flexibility standards emerge.

Discrimination, Bullying & Harassment

Policy Statement

Just Gold does not tolerate discrimination, bullying, or harassment in any form—overt or subtle. We proactively build a culture of dignity, where interpersonal and systemic harm are addressed early, transparently, and without retaliation. Safety is not passive—it’s designed, modelled, and enforced.

Definitions

- **Discrimination:** Unfair treatment based on personal characteristics such as race, gender, disability, age, sexual orientation, or cultural identity.
- **Bullying:** Repeated, unreasonable behaviour that causes risk to health and safety.
- **Harassment:** Unwanted conduct that offends, humiliates, or intimidates, including sexual harassment.

Zero-Tolerance Boundaries

The following behaviours are considered serious breaches:

- Verbal abuse, slurs, or demeaning comments.

- Exclusion or isolation based on identity.
- Sexualised jokes, innuendo, or unwanted advances.
- Misgendering or disrespecting pronouns.
- Retaliation against a person who raises a concern.

What We Expect

- Speak up when harm occurs, even if it’s uncomfortable.
- Use inclusive language and frameworks.
- Respect boundaries—physical, emotional, and digital.
- Listen to feedback about your own behaviour without defensiveness.

Response Pathways

- Incidents can be reported to a manager, the CEO, or anonymously via the internal portal.
- Initial response will focus on safety, impact, and support—not intent.
- All reports are taken seriously and logged in a secure register.
- External advisors may be engaged for impartiality in serious cases.

Application

This policy applies across all settings—physical, digital, project-based, and event-based—and to all personnel and partners.

Family & Domestic Violence Support

Policy Statement

Just Gold recognises family and domestic violence as a workplace issue. We stand with victim-survivors and provide confidential, flexible, and non-punitive support. Safety, autonomy, and dignity guide every response.

Support Available

- Up to 10 days paid family violence leave (in line with NES).
- Additional unpaid leave or flexible hours as needed.
- Access to external support services and safety planning resources.
- Relocation or workload adjustments without explanation required.
- Confidential handling—no mandatory disclosure of details to colleagues.

Manager Expectations

- Respond with belief, discretion, and respect.
- Do not pressure staff to disclose or report unless they choose to.
- Prioritise safety planning and practical support, not bureaucracy.
- Never make work conditional on formal reporting to police or authorities.

Application

Applies to all employees and contractors. Managers and team leads will receive training on appropriate, trauma-informed response.

Parental Leave

Policy Statement

We support all types of families and parenting journeys. Just Gold provides inclusive parental leave for birth, adoption, surrogacy, and kinship care, regardless of gender identity, carer status, or family structure.

Entitlements	• 12 weeks paid primary carer leave (available after 6 months continuous service). • 2 weeks paid partner leave. • Flexibility to extend or transition using unpaid leave or reduced hours. • Superannuation paid during unpaid primary carer leave (where legally feasible).
Inclusive Principles	• Leave can be taken flexibly—consecutively or in blocks. • All carers, including non-birth and non-biological parents, are eligible. • Staff may return part-time without career penalty or exclusion from leadership.
Application	This applies to all eligible employees, including full-time and part-time staff. Contractors will be supported with equivalent flexibility where legally permitted.

Diversity & Intersectionality

Policy Statement

Diversity without equity is performative. Just Gold takes an intersectional approach to workplace inclusion, recognising how power, privilege, and systems of exclusion interact across race, gender, disability, class, sexuality, and more. Representation is important—but structural change is essential.

Our Commitments

- Prioritise lived experience in hiring, partnerships, and decision-making.
- Build accessible, culturally safe workplaces where people can show up fully.
- Embed equity in project scoping, budgets, and client engagement.
- Conduct regular audits of inclusion barriers and implement corrective actions.

Examples in Practice

- Hosting targeted internships for neurodivergent and under-represented communities.
- Translating internal documents and onboarding tools.
- Embedding access costs (Auslan, captioning, mobility access) in project budgets.
- Applying trauma-informed, culturally responsive practices to recruitment and team development.

Application

This applies to all areas of operation—including HR, project design, procurement, recruitment, and leadership development.

Integrity, Privacy & Security

03

Purpose

→ Trust is essential to our work. This section governs how we manage information, declare interests, and use resources. It sets out the ethical boundaries for professional integrity, including how we protect private data and public confidence in Just Gold's brand.

XX Section 3.1 → Privacy (Internal & External)
XX Section 3.2 → Conflict of Interest
XX Section 3.3 → Credit Card Use

Privacy (Internal & External)

Policy Statement

Privacy is not just a compliance issue—it's a matter of dignity. Just Gold protects the personal, cultural, and sensitive information of staff, clients, partners, and communities. We align with Australian privacy law, but our standards often exceed legal minimums.

Our Commitments

- Collect only what we need—and explain why.
- Store information securely, with access limited to authorised personnel.
- Seek informed, specific consent for data collection, storage, and use.
- Anonymise or de-identify personal data wherever possible.
- Delete or return data once no longer required.

Types of Information Covered

- Staff and contractor records
- Client and community data
- Research or impact evaluation responses
- Media assets (photos, interviews, transcripts)
- Cultural or community knowledge shared in confidence

Digital Platforms

- We use encrypted platforms and secure project management tools.
- Access levels are role-based, reviewed quarterly, and revoked upon exit.
- Personal or confidential information is not to be stored on unapproved devices or personal accounts.

Breach Response

- Suspected breaches must be reported to the CEO within 24 hours.
- A preliminary review will determine severity, impact, and any external reporting obligations.
- Individuals affected by the breach will be notified promptly and respectfully.

Application

This policy applies to all projects, platforms, and interactions involving data. It also guides procurement of any digital tools or software with access to sensitive information.

Conflict of Interest

Policy Statement

Integrity means acting in the best interest of community—not personal gain. All individuals engaged with Just Gold must declare any actual, potential, or perceived conflicts of interest. We do not tolerate hidden agendas or divided loyalties.

Examples of Conflicts	• Working with or for a competitor while engaged by Just Gold. • Receiving gifts, payment, or favours from clients, suppliers, or partners. • Participating in decisions that affect a family member or close associate. • Using Just Gold information or resources for personal or financial benefit.
Declaration Process	• All team members must complete a Declaration of Interest form annually. • New conflicts must be disclosed immediately via the staff portal or to the CEO. • Disclosures are reviewed by the CEO and recorded in a confidential register.
Management	• Where a conflict is minor, a management plan will be created (e.g. recusal from decisions). • Significant or unresolved conflicts may result in role change, exclusion from specific work, or disengagement from the enterprise.
Application	Applies to staff, contractors, board members, interns, and collaborators. It also informs procurement decisions and subcontracting.

Credit Card Use

Policy Statement

Enterprise resources must be used ethically, transparently, and in alignment with our values. This policy outlines acceptable use of company credit cards and financial delegation principles.

Authorised Use

- Pre-approved business expenses only (e.g. travel, client hosting, software tools, accessibility costs).
- No personal use—regardless of intention to repay.
- Itemised receipts must be uploaded to the finance system within five business days.

Unacceptable Use

- Cash advances
- Alcohol (unless explicitly part of a cultural or hosting context)
- Gifts without prior approval
- Exceeding agreed budget limits without authorisation

Oversight

- Credit card statements are reconciled monthly.
- Expenditure is reviewed by the finance lead and CEO.
- Misuse may result in repayment, removal of privileges, or disciplinary action.

Application

Applies to anyone issued a Just Gold credit card. Contractors must seek pre-approval for reimbursable expenses.

Ethics & Governance

04

Purpose

→ We don't just meet standards—we help define them. This section sets the tone for ethical governance, community accountability, and our content responsibilities as a public-facing agency. We listen, respond, and lead with transparency in every interaction.

- XX Section 4.1 → Complaints & Feedback
- XX Section 4.2 → Code of Conduct & Ethics
- XX Section 4.3 → Editorial & Content Standards
- XX Section 4.4 → Social Media Use

Complaints & Feedback

Policy Statement

At Just Gold, feedback is a form of care. Complaints are opportunities—not threats. We take all concerns seriously, and we treat people with respect, whether they’re raising issues or receiving them. This includes clients, communities, and internal team members.

What We Commit To

- Acknowledging complaints within 5 business days.
- Investigating concerns impartially and confidentially.
- Ensuring complainants are not punished or excluded for speaking up.
- Keeping people informed about how their concern is being handled.
- Offering culturally safe, trauma-informed response options.

Feedback Mechanisms

- Anonymous online form (linked via staff portal and website)
- Email, phone, or face-to-face submission to any manager or project lead
- Exit interviews and impact evaluations
- Stakeholder consultations and engagement debriefs

Complaint Resolution

- Minor concerns may be resolved through discussion or mediation.
- Serious complaints trigger a formal review by the CEO or a delegated officer.
- If the complaint involves the CEO or a Board member, an independent reviewer will be engaged.
- Outcomes are documented in the internal compliance register, and systemic issues inform policy updates.

Application

This policy applies to internal team dynamics, external stakeholder feedback, and all public-facing services or events.

Whistleblower Policy

Policy Statement

Whistleblowing protects organisations from hidden harm. Just Gold encourages staff, contractors, and collaborators to report serious wrongdoing—confidentially and without fear of reprisal.

What Can Be Reported

- Fraud, theft, or misuse of organisational resources
- Serious misconduct, including abuse, discrimination, or harassment
- Unlawful activity or breaches of contract
- Cover-ups or suppression of material risks

How to Report

- Email the CEO or Chair of the Board directly.
- Use the encrypted reporting form on the staff portal.
- For external whistleblowers, contact details are listed on our public website.

Protections

- Whistleblowers are protected under Australian law and internal policy.
- Reports can be made anonymously.
- Retaliation—direct or indirect—is a serious breach and will trigger immediate investigation.

Review Process

- All reports are assessed within 7 business days.
- An external investigator may be appointed for complex or high-risk cases.
- Findings are shared with relevant governance leads and documented for audit purposes.

Application

Applies to all current and former employees, contractors, board members, interns, and suppliers.

Editorial & Content Standards

Policy Statement

Our content shapes public understanding. Whether we're producing reports, media, campaigns or internal training tools, Just Gold applies high ethical standards to ensure accuracy, dignity, and representation.

Editorial Commitments

- Ensure consent, especially when publishing lived experience.
- Respect cultural protocols and attribution.
- Avoid narratives based on fear, pity, or trauma voyeurism.
- Use strengths-based, inclusive, and accessible language.
- Disclose funding sources or partnerships that may influence content.

Content Review

- All external content is reviewed by at least one manager and one content specialist.
- First Nations, LGBTIQ+, disability or cultural content must be reviewed by someone with relevant lived experience or knowledge.

Corrections & Retractions

- Factual errors will be corrected transparently within 48 hours of confirmation.
- Harmful or inaccurate content may be taken down immediately pending review.

Application

Applies to all written, visual, or multimedia content produced by or for Just Gold, including social campaigns, client deliverables, and digital platforms.

Social Media Use

Policy Statement

Social media is part of our public footprint. This policy protects our integrity, safety, and relationships online. Whether representing the brand or engaging personally, staff and collaborators are expected to act with respect and alignment to our values.

When Posting on Behalf of Just Gold

- Only authorised personnel may post from official accounts.
- Posts must be accessible, fact-checked, and impact-driven.
- Media featuring clients or community must have documented consent.
- All content must align with our tone: respectful, bold, and inclusive.

Personal Use

- You are free to share your identity, views, and work—but must not imply official Just Gold endorsement unless authorised.
- Avoid posting internal, sensitive, or confidential information.
- Be mindful that public commentary—especially on political or social issues—can be associated with your professional role.

Safety & Moderation

- We do not tolerate online abuse or harassment—towards us or from us.
- Community guidelines will be published on our social channels.
- Harmful or disrespectful comments will be removed and reported if needed.

Breach Response

- Minor issues may be handled through education or redirection.
- Serious or repeated breaches will be referred to the CEO and may lead to disengagement.

Application

This policy applies to all staff, contractors, collaborators, and interns using Just Gold's digital channels or referencing the organisation publicly.

Risk, Crisis & Compliance

05

Purpose

→ When things go wrong, our values matter most. This section outlines how we assess risks, respond to crises, and ensure legal and ethical compliance. It helps protect our people, partners, and purpose under pressure.

XX
XX

Section 5.1 → Crisis Response
Section 5.2 → Risk Management

Crisis Response

Policy Statement

Crises test our integrity. Whether the issue is reputational, operational, or interpersonal, Just Gold is committed to timely, transparent, and values-led crisis response. We prioritise human safety, community trust, and clarity of action.

Definition of Crisis

A crisis may involve:

- Physical danger or harm (e.g. incident at event or office)
- Public relations risk (e.g. backlash, misinformation, legal threat)
- Reputational or brand damage
- Breach of legal or contractual obligations
- Systemic failure in service delivery or governance

Response Principles

- Act fast, with care and accuracy
- Prioritise impacted people first, before public narratives
- Communicate clearly, internally and externally
- Avoid defensiveness—own what happened and what will change

Response Process

1. **Alert:** Any staff member may raise the alarm. Urgent issues must be escalated to the CEO immediately.
2. **Assessment:** CEO and relevant leads conduct an initial risk and impact analysis.
3. **Containment:** Activate any necessary legal, safety or media protocols.
4. **Communication:** Identify affected stakeholders and communicate transparently.
5. **Review:** Conduct post-crisis debrief and implement systemic changes.

Crisis Team

The CEO may convene a temporary crisis team including operations, communications, legal, and community safety advisors as needed.

Application

This policy applies to all projects, partners, and personnel across physical, digital, and public spaces.

Risk Management

Policy Statement

Risk is part of innovation—but unmanaged risk is negligence. This policy outlines how Just Gold anticipates, documents, and mitigates risk across people, projects, systems, and reputation.

Risk Types Covered

- **Strategic:** Client alignment, project scope, market positioning
- **Operational:** IT failure, delays, system outages
- **Financial:** Budget overrun, supplier issues, funding withdrawal
- **Legal & Compliance:** Contract breaches, regulatory violations
- **People & Safety:** Team conflict, burnout, discrimination, unsafe conditions
- **Reputational:** Online backlash, public misrepresentation, media exposure

Risk Management Process

- Risk is assessed during project scoping, procurement, and governance reviews.
- All significant projects require a risk register with ratings and controls.
- Emerging risks are discussed in weekly leads meetings or escalated to the CEO.
- High-risk suppliers or partnerships must be approved by the CEO.

Documentation

- All projects over \$50,000 or involving public representation must have a live risk register.
- Serious risks or incidents must be logged in the central risk and compliance register.
- Annual enterprise risk reviews are tabled with the Board.

Application

Applies across all operations, partnerships, and programs. Risk documentation tools are available in the Appendices.

Sustainability & Social Impact

06

Purpose

→ We don't deliver impact—we are impact. This section formalises our commitment to sustainable operations, ethical partnerships, and social change. It reflects our identity as a certified social enterprise and our alignment to the UN Sustainable Development Goals.

Modern Slavery

Policy Statement

Just Gold takes a proactive stance against all forms of modern slavery—including forced labour, child labour, deceptive recruitment, and exploitation through coercion or abuse of vulnerability. We commit to identifying and eliminating modern slavery risks in our operations and supply chain.

Key Principles

- Prevention is not optional—it is a due diligence and moral responsibility.
- Lived experience must inform how risks are identified and mitigated.
- Transparency, not perfection, is the standard we hold ourselves and others to.

Our Commitments

- Conduct supplier assessments and request modern slavery declarations.
- Refuse or terminate relationships with suppliers who exploit labour or breach human rights.
- Train staff in identifying modern slavery indicators and red flags.
- Publish a modern slavery statement annually where legally or ethically appropriate.

Due Diligence Steps

- Pre-engagement screening for suppliers, consultants, and subcontractors.
- Annual supplier declarations for high-risk or overseas vendors.
- Spot audits where justified by risk or spend.
- Use of the Modern Slavery Due Diligence Checklist (see Appendices).

Application

Applies to all procurement, hiring, partnerships, and supply chain engagements, regardless of scale.

Environmental Policy

Policy Statement

Environmental sustainability is integral to our social impact. Just Gold commits to reducing our ecological footprint, sourcing responsibly, and supporting clients and partners to do the same. This is not greenwashing—it’s daily operational practice.

Core Focus Areas

- Carbon footprint reduction across travel, energy use, and digital operations.
- Ethical procurement of materials, technology, and merchandise.
- Waste reduction through re-use, digital-first practices, and responsible disposal.
- Integration of climate justice frameworks into client work and strategy.

What We Do

- Prioritise public transport, bike use, and remote meetings over air travel.
- Choose suppliers with environmental credentials or low-impact operations.
- Host zero-waste or low-waste events with accessibility embedded.
- Avoid unnecessary printing, plastic packaging, or single-use items.
- Partner with initiatives or organisations that address environmental justice.

Reporting & Accountability

- Internal environmental audits conducted annually.
- Environmental impacts considered in project scoping, budgets, and procurement.
- Just Gold may publish an Environmental Impact Snapshot to inform stakeholders and clients.

Application

Applies to all team members, contractors, and operational decisions including travel, merchandise, technology, and event delivery.

Procurement & Ethical Supply Chain

07

Purpose

→ As a certified social enterprise, Just Gold is committed to ethical, inclusive, and sustainable procurement. This section outlines our procurement standards, supplier engagement principles, and expectations around social value and compliance with relevant legislation.

XX	Section 7.1 → Supplier Screening & Selection
XX	Section 7.2 → Ethical Procurement Principles
XX	Section 7.3 → Social Procurement & Local Sourcing
XX	Section 7.4 → Supply Chain Transparency & Risk

Supplier Screening & Selection

Policy Statement

We choose who we pay with the same integrity as how we behave. Just Gold screens suppliers based on ethics, inclusion, environmental responsibility, and alignment with our values—not just price or speed.

Minimum Expectations

- Compliance with anti-discrimination, labour, and safety laws
- No history or evidence of modern slavery, wage theft, or unethical recruitment
- Respect for cultural and intellectual property
- Active efforts to reduce environmental harm

Preferred Supplier Attributes

- Certified social enterprises, Aboriginal-owned, disability-led, or LGBTQIA+ businesses
- Local suppliers who create community jobs or build regional capability
- Transparent, open-source, or circular business models
- Demonstrated commitment to intersectionality and social justice

Assessment Tools

- Supplier Questionnaire (used for contracts over \$10,000)
- Modern Slavery and Risk Checklists (see Appendices)
- Public records and reputation checks where relevant

Application

Applies to all new supplier relationships and any renewals or renegotiations. Exemptions must be approved by the CEO and recorded in the procurement register.

Ethical Procurement Principles

Policy Statement

Procurement is a form of power. Just Gold applies ethical and social justice principles to every dollar we spend. This includes applying an intersectional equity lens, even where public procurement rules do not formally require it.

Core Principles

- Buy from those doing good—not those doing harm.
- Consider lifecycle impact, not just upfront cost.
- Centre marginalised suppliers in every procurement decision.
- Ask who is excluded and redesign the process accordingly.

Implementation Examples

- Embedding diversity criteria into all RFQs or tenders
- Weighting evaluation toward social and cultural value—not just financial quotes
- Paying above minimum for freelancers or artists from under-represented groups
- Avoiding suppliers who undercut through unpaid labour or exploitative models

Application

Applies to all procurement and budgeting decisions, including outsourced work, marketing materials, digital tools, events, and consultants.

Social Procurement & Local Sourcing

Policy Statement

Where possible, we spend locally and for impact. Social procurement is not an add-on—it is embedded in how Just Gold delivers projects and chooses suppliers.

Social Procurement Priorities

- Aboriginal and Torres Strait Islander businesses
- Disability-led businesses and supported employment enterprises
- LGBTIQA+ owned and inclusive businesses
- Women-led and migrant-owned SMEs
- Enterprises that employ people with lived experience of marginalisation

Local Sourcing Commitments

- Prioritise sourcing from the region in which a project is based
- Commission local artists, caterers, interpreters, and venue providers
- Support regional economic development through long-term engagement, not once-off tokenism

Tracking Impact

- Maintain a supplier impact register
- Report annually on social procurement spend
- Include social impact metrics in project evaluation

Application

Applies to all projects, events, campaigns, and retained supplier contracts over \$5,000.

Supply Chain Transparency & Risk

Policy Statement

Ethical procurement requires more than good intentions. Just Gold takes a transparent, risk-informed approach to managing its supply chain—including indirect risks.

Expectations of Suppliers

- Disclose subcontracting arrangements
- Share policies or procedures that relate to inclusion, safety, and sustainability
- Cooperate with audits or spot checks where risk is identified
- Report incidents, breaches, or legal actions relevant to our values

Red Flags

- Use of unpaid interns or ‘volunteers’ for core business functions
- Repeated underpayment or misclassification of workers
- Lack of transparency in ownership or employment practices
- Poor reviews from workers or community stakeholders

Response to Risk

- Suppliers may be placed on probation or removed if risks are not addressed.
- Just Gold reserves the right to terminate contracts without penalty where there is evidence of harm to people or planet.
- Support may be offered to micro or community suppliers to build their capacity to meet compliance expectations.

Application

Applies to all current and future suppliers, including those engaged through partnerships, referrals, or subcontracting.

Accessibility & Inclusive Practice

08

Purpose

→ Inclusion is more than a value—it is a requirement. This section outlines how we ensure accessibility in our operations, communications, service design, and staffing. It affirms our commitment to intersectional practice, cultural safety, and the active dismantling of systemic barriers.

- XX Section 8.1 → Accessible Communication Formats
- XX Section 8.2 → Inclusive Events & Service Design
- XX Section 8.3 → Reasonable Adjustments & Accommodations
- XX Section 8.4 → Language, Translation & Community Reach

Accessible Communication Formats

Policy Statement

Everyone deserves access to information, not just those who process it easily. Just Gold ensures that all internal and external communication is available in accessible, adaptable, and inclusive formats.

Minimum Standards

- All digital content must meet WCAG 2.1 AA accessibility standards.
- Provide plain language versions of key policies, guides, and public-facing content.
- Caption all video and spoken content. Where possible, provide transcripts and visual summaries.
- Avoid dense formatting, small fonts, and colour palettes that reduce legibility.

**Adaptable Formats
(on request or by default)**

- Easy English versions
- Audio recordings
- Large print and dyslexia-friendly versions
- Auslan-interpreted content or summaries
- Screen-reader compatible documents

Application

Applies to all content created for staff, clients, community, and public use. Accessible formatting must be budgeted into project planning.

Inclusive Events & Service Design

Policy Statement

Inclusion is designed—not assumed. Just Gold commits to delivering events, services, and experiences that are safe, dignified, and usable by all. This includes digital, in-person, and hybrid environments.

Event Accessibility Requirements

- Step-free venue access and accessible toilets
- Auslan interpretation and/or live captioning where relevant
- Quiet spaces, sensory guides, or visual schedules for neurodivergent access
- Pronoun stickers and inclusive registration forms
- Clear signage, visual supports, and multilingual options where appropriate

Service Design Principles Requirements

- Co-design with users with lived experience of disability or marginalisation
- Integrate universal design from the outset—not as an afterthought
- Prioritise cultural safety, including diverse representation in facilitation
- Remove unnecessary forms, jargon, or gatekeeping barriers

Application

Applies to all events hosted, co-hosted, or sponsored by Just Gold. It also applies to toolkits, resources, and program design across the organisation.

Reasonable Adjustments & Accommodations

Policy Statement

We don't ask people to 'fit in'. Just Gold provides adjustments to ensure team members can thrive—not just survive—at work. Adjustments are proactive, ongoing, and not conditional on disclosure or diagnosis.

Examples of Adjustments

- Flexible hours or meeting-free days
- Quiet workspaces, noise-cancelling tools, or sensory supports
- Task modification or role adjustments
- Support with written communications, executive function, or transitions
- Hybrid or remote work as standard

Process

- Team members can request adjustments via a direct conversation with their manager, or by emailing the CEO.
- No documentation or explanation is required unless the person chooses to provide it.
- Adjustments will be reviewed regularly and adapted as needed.

Manager Responsibilities

- Respond without judgement or delay.
- Ensure no one is penalised or excluded due to adjustment needs.
- Normalise conversations about access—not pathologise them.

Application

Applies to all staff, interns, and contractors. Also informs recruitment, performance conversations, and team planning.

Language, Translation & Community Reach

Policy Statement

Language is power. Just Gold ensures that content, engagement, and services are linguistically and culturally accessible. This includes translation, interpretation, and design that reflects the diversity of the people we work with and for.

Key Commitments

- Translate core documents into community languages where projects involve culturally and linguistically diverse (CALD) communities.
- Work with NAATI-accredited or culturally competent translators/interpreters.
- Use inclusive, non-stigmatising language that aligns with identity-first and community-led terminology.
- Respect community terms of reference (e.g. "mob", "neurodivergent", "elders", "chosen family").

Application

Applies to communications, campaigns, outreach programs, and client work. Also informs training, public resources, and brand guidelines.

Professional Boundaries & Safeguarding

09

Purpose

→ Boundaries protect both people and the integrity of our work. This section sets out expectations for professional conduct, client interaction, and safeguarding protocols—particularly when working with vulnerable groups or in community-facing roles.

- XX Section 9.1 → Conduct in Client & Community Settings
- XX Section 9.2 → Working with Children, Young People & Vulnerable Groups
- XX Section 9.3 → Consent, Privacy & Representation
- XX Section 9.4 → Escalation of Concerns & Incidents

Conduct in Client & Community Settings

Policy Statement

Everyone we engage deserves dignity, safety, and consistency. Just Gold maintains clear boundaries in all professional relationships, particularly where trust and power dynamics are involved.

What's Expected

- Be respectful, consistent, and culturally aware in all interactions.
- Keep relationships professional—don't blur personal and professional lines.
- Avoid sharing sensitive personal information unless clearly relevant and safe.
- Honour commitments, show up on time, and respect people's time and space.

What's Not Acceptable

- Forming romantic or sexual relationships with clients or community participants.
- Using community spaces or events to promote personal business or beliefs.
- Breaching confidentiality through casual or 'off-record' conversations.
- Social media contact that creates confusion about professional roles.

Application

Applies to all Just Gold staff, interns, contractors, and project collaborators in any setting involving community, clients, or stakeholders.

Working with Children, Young People & Vulnerable Groups

Policy Statement

Children, young people, and individuals experiencing structural vulnerability have the right to safety, agency, and respect. Just Gold follows child-safe and trauma-informed principles in every engagement.

Minimum Requirements	• All personnel working directly with children must hold a valid Working with Children Check or equivalent clearance. • Projects involving vulnerable people must be scoped with specific safeguarding measures from the outset. • Do not touch, photograph, or publish stories involving vulnerable individuals without formal consent and safeguarding review.
Safeguarding Principles	• Assume nothing—always ask what people need to feel safe. • Prioritise consent, communication, and cultural safety. • Avoid deficit narratives or content that evokes pity or disempowerment. • Treat young people as co-designers and contributors, not subjects.
Escalation	Concerns about harm, risk, or misconduct involving vulnerable groups must be reported immediately to a manager or the CEO. If the risk is imminent, contact emergency services before reporting internally.
Application	Applies to all programs, content, research, and events involving children, youth, or marginalised groups. Also informs partnership and subcontractor obligations.

Consent, Privacy & Representation

Policy Statement

We don't speak over people. We centre lived experience, protect people's stories, and seek informed consent—not just legal permission—before representing others.

What Informed Consent Means

- Explaining what will happen with people's information, image, or contribution
- Offering alternatives, opt-outs, and ways to stay anonymous
- Using plain language and checking for understanding
- Allowing people to withdraw consent without consequence

Representation Guidelines

- Do not edit or publish someone's story in a way that changes its meaning
- Use respectful, person-led language when describing identity, experience, or culture
- Credit contributors appropriately—especially artists, community leaders, and knowledge holders

Application

Applies to all interviews, testimonials, visuals, social media, reporting, and creative content. Consent protocols must be documented and accessible.

Escalation of Concerns & Incidents

Policy Statement

Silence enables harm. All staff and collaborators are responsible for raising concerns, whether they witness misconduct, feel unsafe, or observe signs of abuse or exploitation.

What to Report

- Breaches of professional boundaries
- Any form of abuse, grooming, coercion, or exploitation
- Unsafe work conditions or risk of harm to self or others
- Misuse of authority or breach of safeguarding protocols

How to Report

- Raise the concern with your direct manager, the CEO, or the Chair of the Board (if the issue involves leadership)
- Use the encrypted incident report form on the staff portal
- Seek peer support, union advocacy, or an external advisor as needed

Response Timeline

- Immediate risks will be triaged and addressed within 24 hours.
- Non-urgent matters will be acknowledged within 3 business days and investigated within 10.
- All reports are logged in the secure internal incident register and inform continuous policy review.

Application

Applies to all personnel and settings. This policy supports early reporting, restorative practices, and firm accountability depending on the nature of the issue.

Legislative & Compliance Frameworks

10

Purpose

→ Our policies are underpinned by legal obligations and regulatory standards. This section outlines key frameworks we align with and how compliance is monitored, reviewed, and embedded across the organisation.

- XX Section 10.1 → Linked Acts & Legal Standards
- XX Section 10.2 → Compliance Roles & Responsibilities
- XX Section 10.3 → Monitoring & Reporting Obligations
- XX Section 10.4 → Policy Review & Continuous Improvement

Linked Acts & Legal Standards

Policy Statement

Just Gold complies with relevant Australian legislation and international human rights instruments. Where laws are outdated or misaligned with best practice, we apply higher ethical standards guided by community, not just compliance.

Core Legislation We Align With

- Fair Work Act 2009 (Cth)
- Work Health and Safety Acts (jurisdiction-specific)
- Privacy Act 1988 (Cth)
- Modern Slavery Act 2018 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Sex Discrimination Act 1984 (Cth)
- Australian Consumer Law
- Relevant State/Territory Working with Children legislation
- Charter of Human Rights and Responsibilities Act 2006 (VIC)

International Frameworks Referenced

- United Nations Sustainable Development Goals (SDGs)
- UN Declaration on the Rights of Indigenous Peoples
- International Labour Organisation (ILO) conventions
- UN Guiding Principles on Business and Human Rights

Application

Applies across all business functions, programs, hiring, procurement, and public engagements.

Compliance Roles & Responsibilities

Policy Statement

Compliance is a shared responsibility—embedded in leadership, culture, and systems. This policy clarifies who holds what responsibilities to ensure compliance isn’t left to chance.

Compliance Responsibilities by Role

Role	Key Responsibilities
CEO	Ultimate accountability for compliance across Just Gold. Oversees audits, risk registers, and external reporting. Approves all major contracts, declarations, and legislative interpretations.
Managers & Leads	Ensure day-to-day compliance in teams and projects. Monitor, report, and respond to breaches. Embed training and practice standards.
Staff & Contractors	Know and follow relevant policies. Complete required declarations. Raise concerns, near misses, or potential breaches.
Board of Directors	Monitor governance and high-level risk. Ensure legal and ethical obligations are fulfilled. Review strategic compliance frameworks and CEO performance.
Application	Applies to all staff and operational settings, including contractors and external consultants engaged in project delivery.

Monitoring & Reporting Obligations

Policy Statement

Transparency and accountability require visibility. Just Gold tracks and reports compliance through internal registers, audits, and formal reporting mechanisms.

Monitoring Tools

- Risk and compliance registers
- Policy and training completion logs
- Incident and feedback logs
- Board review summaries
- Project-based compliance checklists

Reporting Triggers

- Annual internal audits
- Any serious incident or legal breach
- Whistleblower disclosures
- Breaches of external funding contracts or MoUs
- Procurement over \$50,000 requiring due diligence

Internal Reporting

- Monthly operations meetings include compliance updates.
- Serious incidents are reviewed by the CEO and may be escalated to the Board.
- Identified gaps inform training, restructuring, or policy revision.

Application

Applies to all projects and operational systems. Each program area must maintain localised compliance tracking aligned to enterprise-wide tools.

Policy Review & Continuous Improvement

Policy Statement

Policies are living documents. Just Gold reviews and evolves its frameworks to reflect new legislation, best practice, feedback, and lived experience.

Review Cycles

- All policies reviewed annually or following legal or operational changes.
- Interim reviews can be triggered by risk incidents, staff feedback, or stakeholder consultation.
- Major changes must be signed off by the CEO and tabled with the Board.

Improvement Practices

- Internal consultation across departments
- Inclusion of feedback from staff, interns, clients, and community
- External legal or governance advice where needed
- Version control and document history kept up to date

Application

Applies to this entire policy framework and any linked documents, toolkits, or governance resources.

Appendices



Purpose

→ Appendices contain detailed tools, templates and resources that operationalise our policies. These are updated regularly and are available on request or via the internal staff portal. These tools support compliance, planning, decision-making, and documentation across Just Gold's operations.

Glossary & Definitions

These definitions support understanding of key concepts across Just Gold's policy framework. They prioritise plain language and lived experience.

Glossary

A

Accessibility

The practice of ensuring everyone—regardless of ability, background, or circumstance—can access, use, and benefit from environments, services, and information.

C

Cultural Safety

A work environment or engagement space where individuals feel respected, heard, and safe to express their identity—without fear of discrimination or cultural invalidation.

D

Dignity

A baseline expectation of respect, agency, and worth for all people, regardless of role, identity, or circumstance.

Discrimination

Unfair or unequal treatment based on characteristics such as race, gender, age, disability, sexuality, cultural background, religion, or other forms of identity.

Diversity

The presence of differences in identity, experience, culture, or background—including race, gender, disability, sexuality, class, age, and more.

E

Equity

Fairness in access, opportunity, and support—recognising that different people have different needs. Not the same as equality.

I

Inclusion

Creating conditions where all people feel respected, valued, and able to fully participate—especially those historically excluded.

Intersectionality

The recognition that people experience oppression and privilege in complex, overlapping ways—for example, someone may face both racism and ableism simultaneously.

L

Lived Experience

Direct, personal experience of an issue—such as racism, disability, migration, poverty, or discrimination—that informs a person's insight and leadership.

M

Misconduct

Any behaviour that breaches Just Gold's values, policies, laws, or ethical standards—including dishonesty, discrimination, or abuse of power.

P

Psychological Safety

A team or workplace culture where people feel safe to speak up, take risks, and raise issues without fear of punishment or humiliation.

S

Safeguarding

Proactive measures to protect people—especially children, young people, or individuals at risk—from abuse, exploitation, or harm.

Systemic Harm

Injustice or exclusion that is built into laws, systems, institutions, or cultural norms—not just caused by individuals.

T

Trauma-Informed

An approach that recognises the impact of trauma on individuals and avoids practices that may retraumatise. It centres empathy, consent, and predictability.

W

Whistleblowing

The act of reporting serious wrongdoing—such as fraud, abuse, or illegal activity—within an organisation, with legal protections in place for the person reporting.

Definitions

A

Accessibility Checklist

Used for events, service design, and resource development.

C

Complaint & Feedback Form Template

Standardised form to document and respond to community, staff, or client feedback.

Crisis Communication Protocol

Roles, scripts, and notification processes for internal and external crises.

M

Modern Slavery Due Diligence Checklist

Used during supplier onboarding and annual review.

P

Procurement Evaluation Template

Comparative table with social, environmental, and ethical scoring criteria.

Privacy Impact Assessment Template

Used to assess data collection and usage for new projects or systems.

R

Risk Register Template

Risk identification, mitigation, and monitoring table used across projects.

S

Social Media Approval Flowchart

Required approvals and risk assessment for public-facing content.

Staff Declaration of Interest Form

Annual or ad hoc declaration tool for conflict of interest disclosure.

Supplier Code of Conduct

Standards suppliers must meet to engage with Just Gold.

W

Whistleblower Reporting Procedure

Step-by-step process, protections, and escalation flowchart.



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are
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