



Whistleblowing Policy

Details

Policy & Procedure Owner	ERFA Board	
Approved by	ERFA Board of Directors	
Date Approved	Date of Last Revision	Next Review
December 2019	December 2019	December 2021

Abbreviations

ACFID	Australian Council for International Development
DFAT	Department of Foreign Affairs and Trade
ERFA	Edmund Rice Foundation Australia

Definitions

Associates	Anyone in the community who interacts with ERFA Staff and Partners
ACFID Member	A not-for-profit organisation that has obtained accreditation with ACFID
Beneficiary	Children and adults who participate in and benefit from ERFA-funded programs
Donation	A voluntary contribution or gift, whether in cash or in kind. Donations must be made voluntary and by way of benefaction
Donor	Members of the public who contribute to ERFA in cash or in kind
Partner	Any organisation which has an MOU / contract with / or receives funding from ERFA
Program	Programs are overarching development approaches and initiatives that set priorities and guide project outcomes, results and activities. Programs can comprise ministries or entities
Projects	Projects are the development activities of a Program supported by ERFA
Project Beneficiaries	Children and adults who participate in and benefit from ERFA-funded programs
Staff	Employees, contractors, subcontractors, outworkers, apprentices and trainees, work experience students, volunteers, employers and any other person who performs work for ERFA or ERFK

Contact information

Chief Executive Officer	Bren Arkinstall - barkinstall@edmundrice.org
Programs Director	Emily Faller – ejfaller@edmundrice.org
ERFA Board Chair	Paul Gallagher – chair@erf.org.au
ERFA	www.erf.org.au or +61 7 3621 9649
ACFID	http://www.acfid.asn.au or +61 6 02 6285 1816

Attached documents

- ERFA Whistleblowing Report

Related policies and tools

- ERFA Anti-Corruption & Anti-Fraud Policy
- ERFA Child Protection Policy
- ERFA Code of Conduct
- ERFA Complaints Handling Policy
- ERFA Conflict of Interest Policy
- ERFA Prevention of Sexual Exploitation, Abuse & Harassment Policy
- ERFA Risk Management Framework

Compliance

This policy applies to all staff and associates that act for, represent or visit ERFA and ERFA's implementing partners. Failure of ERFA implementing partners to fully comply with this policy could result in termination of agreements including, but not limited to, MOUs, partnerships agreements and funding contracts.

Organisational overview

Edmund Rice Foundation Australia (ERFA) believes education is the key to sustainable change. We are an international development organisation that focuses on sustainable and transformational education. We operate in some of the poorest communities in the world, including in Africa, East Timor, the Philippines, and Papua New Guinea. We also partner with domestic programs in Australia. ERFA's goal is to design and implement high impact education programs that will enable our beneficiaries to stand independently and break free from the cycle of poverty. ERFA-funded education programs range from kindergartens to advanced microfinance projects and are designed with the needs of the community at their core.

Legal definitions

Edmund Rice Foundation (Australia) is a company limited by guarantee. The objects of the company are set out in clause 3 of ERFA's constitution. Clause 3 (f) reads as follows:

To develop partnerships with overseas aid agencies or formal arrangements with other delivery agents related to the Company but resident in Developing Countries for the implementation of the objects in paragraph (a).

One of ERFA's roles is to act as trustee of the Edmund Rice Overseas Aid Fund.

Throughout its policies and official documentation ERFA uses the term **Partners** for those organisations with which it has formed alliances in developing countries for the receipt of overseas aid funding for the in-country delivery of education programs. Whilst ERFA has an active, engaged and qualitative role with these programs, working to build capacity and maximise the impact of best practice development outcomes, these are not partnerships in the legal sense. Rather they are alliances that ERFA has formed with in-country organisations with whom ERFA has communicated its vision, mission, values, policies and expectations with respect to sustainable development and whose own vision, mission, values, policies and development goals are congruent with those of ERFA. The in-country organisations implement the programs and ERFA supports them.

Contents Page

Section	Page
1.0 Policy overview	4
2.0 ACFID context	4
3.0 Obligations under Corporations Act	4
4.0 Definitions	5
5.0 Policy	6
6.0 Reporting and investigation framework	6
7.0 Whistleblower protection	10
Attached documents	
Whistleblowing Reporting Form	12-14

1.0 Policy overview

A Whistleblowing Policy is a critical element for internal control and governance. ERFA's Whistleblowing Policy is an articulation of ERFA's commitments to operating:

- legally, in accordance with applicable legislation and regulations;
- correctly, in accordance with its organisational constitution, policies and procedures;
- ethically, in accordance with the principles enunciated in its Code of Conduct.

This policy will be made available to all individuals working within ERFA via an employee induction pack, staff policy folder and website access, as well as to those outside ERFA via website access.

The purpose of this policy is to:

- encourage more disclosures of wrongdoing;
- deter wrongdoing;
- apprise staff, volunteers, contractors and partners of their responsibility to disclose serious wrongdoing that may cause harm to individuals, financial or non-financial loss to ERFA or damage to its reputation;
- strengthen ERFA's core values, as articulated in ERFA's Code of Conduct, by empowering all ERFA personnel and others within and outside ERFA to disclose any wrongful acts if they have objectively reasonable grounds for suspecting wrongdoing;
- provide reporting mechanisms and the means through which all individuals, regardless of their position and location, can report alleged or suspected wrongful acts and can do so in safely, securely and with confidence that they will be protected and supported;
- provide transparency regarding ERFA's framework for receiving, handling and investigating disclosures;
- enable ERFA to deal with disclosures from whistleblowers in a manner that will protect the whistleblower against any internal or external reprisal and ensure secure storage of information disclosed;
- ensure disclosures are dealt with appropriately and in a timely way;
- ensure that ERFA maintains the highest standards of ethical behaviour and integrity.

2.0 ACFID context

The ACFID Code of Conduct requires that member organisations must have in place a Whistleblowing Policy that has the following components as a minimum:

- a clear statement that staff, volunteers, contractors and partners who are aware of possible wrongdoing have a responsibility to disclose that information;
- a guarantee that staff and volunteers who in good faith disclose perceived wrongdoing, will be protected from adverse employment consequences;
- the establishment of a fair and impartial investigative process;
- provides protection for whistleblowers.

3.0 Obligations under Corporations Act

As a company limited by guarantee under the Corporations Act, ERFA is a public company and therefore required to have a whistleblower policy in place which meets the requirements of the Whistleblower Protection Regime.

Whistleblowers, which can include people outside ERFA, are in certain circumstances afforded additional special protections under the Corporations Act in relation to reports made regarding corporate misconduct and the Taxation Administration Act in relation to breaches of tax law.

In addition to ERFA's internal policy, Annexure A sets out the matters required under the Corporations Act and the protections available to whistleblowers under the Corporations Act and the circumstances in which those protections will apply in addition to those afforded by ERFA under this policy, and Annexure B sets out the protections available to whistleblowers under the TAA.

Individuals should read the first section of this policy and then read Annexures A and B as applying in addition to the contents of ERFA's internal policy.

4.0 Definitions

- **AFP** means the Australian Federal Police.
- **APRA** means the Australian Prudential Regulation Authority.
- **ASIC** means the Australian Securities & Investments Commission.
- **Journalist** means a person who is working in a professional capacity as a journalist for any of the following:
 - newspaper or magazine;
 - a radio or television broadcasting service;
 - an electronic service (including a service provided through the internet) that:
 - is operated on a commercial basis, or operated by a body that provides a national broadcasting service (within the meaning of the *Broadcasting Services Act 1992*); and
 - is similar to a newspaper, magazine or radio or television broadcast;
- **Officer** has the same meaning as defined in the Corporations Act and includes a director or secretary of ERFA;
- **Personal Work Grievance** has the same meaning as personal work-related grievance as defined in the Corporations Act and means information disclosed relating to the discloser if:
 - the information concerns a grievance about any matter in relation to the discloser's employment, or former employment, having (or tending to have) implications for the discloser personally; and
 - the information:
 - does not have significant implications for ERFA; and
 - does not concern Reportable Conduct;
- **Public Interest Disclosure** means a disclosure within the meaning of clause 4 of Annexure A.
- **Reportable Conduct** has the meaning given by section 9.2.
- **Taxation Administration Act** means the *Taxation Administration Act 1953* (Cth).
- **Whistleblower Protection Regime** means the regime contained in Part 9.4AAA of the Corporations Act and Part IVD of the Taxation Administration Act, as context requires.
- **Whistleblower** means any person who makes a report in connection with a wrongful act under this policy and who wishes to avail themselves of the protection offered by this policy.
- **Whistleblowing** means the deliberate, voluntary disclosure of individual or organizational wrongdoing by a person who has access to data, events or information about an actual, suspected or anticipated wrongdoing within the organisation.

5.0 Policy

5.1 Policy

At all times ERFA is committed to conducting its activities professionally, honestly and with integrity.

However, ERFA is aware that in all organisations there can be the possibility for unprofessional conduct, criminal behaviour or mismanagement. Therefore, ERFA accepts responsibility for:

- having in place established procedures for enabling such situations to be identified and disclosed; and
- taking appropriate action to remedy such situations

ERFA is committed to:

- ensuring that all ERFA personnel are aware of their obligation to disclose wrongdoing
- fostering a culture where ERFA personnel are encouraged to raise concerns about wrongdoing and unethical conduct and can do so in a safe environment

5.2 Policy Principles

- All ERFA personnel have an obligation to report wrongful acts or suspected wrongful acts in accordance with this policy.
- All ERFA personnel have the right to speak freely and honestly to report wrongful acts in a safe environment without fear of retaliation or reprisal.
- ERFA will respond in a timely, respectful and confidential manner to all disclosures of wrongful acts as set out in this policy.
- ERFA will take steps to protect its personnel from detrimental treatment or dismissal if they have reasonably objective grounds for suspecting and reporting wrongful acts and comply with this policy.

6.0 Reporting and investigation framework

6.1 Clarification

This Whistleblowing Policy is intended to cover serious breaches that have the capacity for a significant actual or potential detrimental impact on ERFA. In that respect, the serious breaches, which are the focus of this policy, are to be differentiated from the issues and grievances which are the subject of ERFA's Complaints Handling Policy.

6.2 What types of breaches should be reported?

Serious breaches that should be reported under ERFA's Whistleblowing Policy include but are not limited to:

- criminal offences / illegal acts
- actual or suspected corrupt behaviour, theft, fraud, embezzlement, incorrect financial reporting, questionable accounting and auditing matters
- activities such as and including the above, potentially damaging to ERFA's reputation or that could result in serious financial or non-financial loss for ERFA
- breaches of legal obligations including negligence, breaches of employment or other contracts or procurement procedures
- unethical behaviour such as acting dishonestly, altering organisational records, wilfully making false entries in official records
- serious abuse of authority
- serious conflicts of interests
- serious breaches of ERFA policy, ERFA Code of Conduct or the ACFID Code of Conduct

- serious disregard for work health or safety of staff, volunteers, program participants and the general public
- actual or potential harm or threats to an individual’s safety or health
- physical, psychological, emotional or sexual abuse of ERFA personnel or program participants
- harassment, unlawful discrimination and bullying
- actual or threatened retaliation against a whistleblower who has made a disclosure of wrongdoing
- serious actual or potential environmental damage
- the concealment of any of the above

The above is defined in this policy as **Reportable Conduct**.

[Note: All of the above would also constitute breaches of the ACFID Code of Conduct, to which ERFA is a signatory.]

6.3 Lodging a report

Where a person has objectively reasonable grounds for suspecting that an individual has engaged in Reportable Conduct, as defined by this policy, that person must report their concern. The following avenues are available for reporting:

- ERFA CEO
- ERFA Board Chair (if it is believed that the CEO or a Board Member may be complicit in a breach)
- Where a whistleblower is of the view that an exceptionally serious issue warrants reporting to an external body independent of ERFA management and governance, the disclosure can be made to:
 - Carroll & O’Dea Lawyers (ERFA appointed external legal firm)
 - the ACFID Code of Conduct Committee

(ERFA Disclosure Recipients)

- Where a breach of general law is alleged, the duly constituted legal authorities responsible for enforcement of the law in the relevant geographical area must be notified.

ERFA recommends strongly that in making a report, a Whistleblower first follow the procedures in this policy to provide ERFA with the opportunity to investigate and respond to the subject of the report. If considering making an external report, Whistleblowers should be aware of their duty of confidentiality and that they will only be protected from disclosures made to a third party as set out in Annexures A and B.

6.4 Contact Information for recipients of Whistleblowing Reporting Forms

The Whistleblowing Reporting Form can be lodged through different avenues, tabulated below.

Contact	Contact avenue
Primary contact: ERFA CEO, Bren Arkininstall	Via email: CEO@erf.org.au
	Via telephone: +61 7 3621 9649
	Via post: Chief Executive Office, PO Box 130, Virginia BC, QLD, 4014
Secondary contact: ERFA Programs Director, Emily Faller	Via email: ejfaller@edmundrice.org
	Via telephone: +61 7 0400 882 812
Governance contact: ERFA Board of Directors Chair, Paul Gallagher	Via email: paul.gallagher@bdo.com.au
Alternative contact: Carroll & O’Dea Lawyers Partner, Josephine Heesh	Via email: Josephine_Heesh@codea.com.au
	Via telephone: +61 2 9291 7100

	Via post: Level 18, St James Centre, 111 Elizabeth Street, Sydney, NSW, Australia 2000
Alternative contact: If you are not completely satisfied with ERFA's response, please lodge a complaint externally to the Australian Council for International Development (ACFID).	Via online portal: https://acfid.asn.au/content/complaints
	Via telephone: +61 6 02 6285 1816
	Via post: C/- ACFID, Private Bag 3, Deakin, ACT, Australia 2600

6.5 Reporting procedures

- In contemplating the use of this policy, a potential whistleblower should consider whether the matter of concern would be more appropriately raised through ERFA's Complaints Handling Policy procedures.
- A report must be made only if the Whistleblower has objectively reasonable grounds for suspecting Reportable Conduct and the report should be as thorough as possible. False or malicious allegations made by personnel may result in disciplinary action.
- Individuals may make reports anonymously and/or confidentially and outside of ERFA's usual business hours.
- While whistleblowing reports may initially be made verbally and by telephone, because evidence to support the allegation(s), if it exists, should be provided as part of the report, it is preferred that reports be provided in writing and include details of:
 - The nature of the allegation(s)
 - Person or persons responsible
 - The substantiating facts on which the whistleblower has formed the view that the Reportable Conduct being reported did in fact occur and was committed by the person or persons named in the report
 - Nature and whereabouts of any further evidence that would substantiate the allegation(s)
- ERFA will need to assess each disclosure to determine whether:
 - it qualifies for protection under the Whistleblower Protection Regime; and
 - a formal, in-depth investigation is required.

[Note: The absence of evidence will be taken into account in considering whether to open an investigation. However, the absence of evidence is not an absolute bar to the activation of an investigation if the existence and nature of the concern is sufficient to trigger ERFA's investigative responsibilities.]

To facilitate the provision of written reports, ERFA Whistleblower Report template is available on ERFA website at <https://erf.org.au/about-erfa/contact-us/> (see below - Annexure C).

6.6 Anonymous Reports

Whilst ERFA encourages Whistleblowers to put their names to allegations in order to facilitate appropriate follow-up and investigation, ERFA will accept anonymous disclosures.

However, in the investigation of anonymous disclosures consideration will be given to the following:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegation from other sources

A Whistleblower who wishes to remain anonymous should maintain ongoing two-way communication with ERFA so that ERFA can follow up questions or provide feedback without knowing the Whistleblower's identity.

Where possible, ERFA will protect the anonymity of disclosers by:

- Communicating through an anonymous phone number or email address; and
- Allowing the discloser to adopt a pseudonym for the purpose of the disclosure.

Disclosures made anonymously will still be protected under the Corporations Act as set out in Annexures A and B.

[Note: The *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019* allows for anonymous disclosures – see below under ‘Relevant Australian Legislation’]

6.7 Investigation Procedures

- All reports received by the CEO or Board Chair must be provided to the Board within 1 business day.
- If the Board reasonably believes the report to be unquestionably trivial or fanciful and dismisses the allegation, the person who made the allegation must be notified of the decision.
- If the Board reasonably believes that the report has substance, the Board must put in motion the following investigative process:
 - The CEO or Board Chair will ensure that an investigation of the allegations is established and adequately resourced
 - Terms of Reference for the investigation will be drawn up to clarify the issues to be investigated and the scale of the investigation in proportion to the seriousness of the allegation(s)
 - The investigation must commence within 1 business day of it being provided to the Board.
- Throughout the investigation:
 - All information obtained will be properly secured to prevent unauthorised access and disclosure in accordance with this policy
 - All relevant witnesses will be interviewed and documents examined
 - Notes will be made of all discussions, phone calls and interviews
 - The principles of procedural fairness (natural justice) will be observed. In particular, where adverse comment about a person is likely to be included in a report, the person affected will be given an opportunity to comment beforehand and any comments will be considered before the report is finalised.
 - The person or persons conducting the investigation will be as far as possible unbiased.
 - Without the Whistleblower’s consent, ERFA cannot disclose information that is likely to lead to the identification of the Whistleblower as part of its investigation process, unless:
 - the information does not include the Whistleblower’s identity;
 - ERFA removes information relating to the Whistleblower’s identity or other information that is likely to lead to the identification of the Whistleblower (e.g. name, position, title, other identifying details); and
 - it is reasonably necessary for investigation the issues raised in the disclosure.
- If the Whistleblower has provided contact details, ERFA will provide the Whistleblower with regular updates. The frequency and timeframe of such updates will vary depending on the subject matter of the disclosure.
- The Board will ensure the investigation is completed within a reasonable time depending on the circumstances and within no less than 90 days of the investigation commences, subject to extraordinary circumstances justifying extension beyond this time.

- A Whistleblower who makes an anonymous report may choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised.
 - Accordingly, a Whistleblower can refuse to answer questions that they feel could reveal their identity at any time.

ERFA's investigation process may be subject to some limitations, including that ERFA may not be able to undertake an investigation if it is not able to identify the Whistleblower, for example, if a disclosure is made anonymously and the Whistleblower has refused to provide or has not provided a means of contact for any further questions or follow up which ERFA may need as part of the investigation.

[Note: Natural Justice and procedural fairness do not require that the affected be informed of the identity of the person making the initial disclosure, unless that communication constitutes part of the evidence relied upon in making the eventual finding.]

6.8 Findings

A report will be prepared for the Board when the investigation is complete. The report will include:

- The allegation(s)
- A statement of all relevant findings of fact and the evidence gathered and upon which conclusions have been based
- The conclusions reached, including the damage caused, if any, and the impact on ERFA and any other affected parties
- Recommendations, based on the report's conclusions, to address any wrongdoing identified and any other matters that arose during the investigation

The Report will be provided to ERFA Board and to the Whistleblower (if possible) with, if necessary, any applicable confidential stipulations.

7.0 Whistleblower protection

7.1 Whistleblower protection

- ERFA encourages all Whistleblowers or people considering Whistleblowing to obtain independent legal advice.
- ERFA will not tolerate any form of harassment or retaliation against personnel who on objectively reasonable grounds report concerns regarding ERFA's operations.
- Any ERFA personnel who engage in retaliation or harassment of a Whistleblower will be subject to disciplinary action, which could result in termination.
- Any person who has made a whistleblowing report and who believes subsequently that they are the subject of retaliation of any kind by should immediately report that, utilising the appropriate avenue.
- Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality and consistent with a full and fair investigation and the party conducting the investigation will notify the whistleblower of the outcome of the investigation.

ERFA will protect the confidentiality of a Whistleblower's identity by:

- Reducing the risk that the Whistleblower will be identified from the information contained in the disclosure by:
 - redacting all personal information or reference to the identity of the Whistleblower witnessing an event;

- referring to the Whistleblower in gender-neutral terms;
- contacting the Whistleblower to help identify certain aspects of the disclosure that could inadvertently identify them; and
- ensuring that disclosures are handled and investigated by qualified individuals.
- Ensuring that record-keeping and information sharing processes protect the Whistleblower's identity, such as by:
 - storing all records securely;
 - ensuring access to all records and information relating to the disclosure is limited to those directly involved in managing and investigating the disclosure;
 - ensuring that only a restricted number of individuals directly involved in the handling and investigation of a disclosure will be aware of the Whistleblower's identity (subject to the Whistleblower's consent) or information which may identify the Whistleblower;
 - ensuring that material relating to the matter will not be sent to an email address or left in a situation (such as, at a communal printer) that can be accessed by other individuals; and
 - reminding all individuals involved in the handling and investigation of a matter are regularly reminded of their confidentiality requirements, including that in the circumstances set out in Annexures A and B, the unauthorised disclosure of an individual's identity may be a criminal offence.

7.2 Whistleblower rights and obligations

Whistleblowers must be informed that as far as lies within the power of ERFA, a Whistleblower will not be disadvantaged or suffer adverse employment consequences for the act of making a Whistleblowing report where that report has been made on objectively reasonable grounds. However, reporting a breach does not necessarily absolve a Whistleblower from the consequences of any involvement they may have had in the Reportable Conduct being reported.

Where the Whistleblower wishes to remain anonymous, they should be informed of the following:

- ERFA will not disclose a Whistleblower's identity unless the whistleblower consents to the disclosure.
- Their wish will be honoured except insofar as it may be overridden by the due process of law.
- Subject to the circumstances outlined in Annexures A and B, the Whistleblower is required to maintain confidentiality regarding the breach(es) reported and to refrain from discussing them with any unauthorised third parties.



Whistleblowing Reporting Form

This form is to be used to formally report cases of wrongdoing having taken place internally within ERFA or within a Project supported by ERFA.

ERFA encourages all whistleblowers to read ERFA’s Whistleblowing Policy. ERFA will protect the confidentiality of a Whistleblower’s identity by:

- redacting all personal information or reference to the identity of the Whistleblower witnessing an event;
- contacting the Whistleblower to help identify certain aspects of the disclosure that could inadvertently identify them;
- ensuring that record-keeping and information sharing processes protect the Whistleblower’s identity

ERFA prioritises the rights, needs, wishes and empowerments of whistleblowers and will do all it can to protect your interests and wellbeing. By providing us with your contact details you will assist us in conducting an investigation. If you would prefer your name not to be used you have the right to remain anonymous.

Personal information

Date this report is being filled out	
Full name <i>(if you do not wish to remain anonymous)</i>	
ERFA position title	
Contact details: email and phone	

Details of wrongdoing

Describe the nature of the matter you wish to disclose and why you consider it a wrongful act	
How was this matter discovered?	
Over what period of time has the suspected activity occurred?	

<p>Description of the person(s) to whom allegations wrongdoing are being made</p> <ul style="list-style-type: none"> - name(s) - position descriptions - length of time spent working with Project 	
<p>Other persons involved in wrongdoing and how they are involved</p>	
<p>Are there any witnesses who are aware of the wrongdoing? (including Project Staff, volunteers, parents, beneficiaries etc.)</p>	
<p>Can you provide any supporting evidence of the wrongdoing?</p>	
<p>Is the evidence in danger of being lost or destroyed?</p>	
<p>How could this evidence be retrieved by a person investigating this matter?</p>	
<p>Have you disclosed this matter to any other person(s)?</p>	
<p>Do you have any concerns regarding reprisals or recriminatory action being taken against you?</p>	
<p>Do you have any personal involvement in this matter or could you be advantaged or disadvantaged by the outcome of an investigation?</p>	
<p>Please provide any other information you deem important to ERFA's handling of the case</p>	
<p>For office use: ensure this is logged in ERFA ICCR</p>	

Declaration

I state that in making this report, the information provided above is to the best of my knowledge true, accurate and correct	
Full name (if you do not wish to remain anonymous)	
Signature (if you wish to remain anonymous please write "I declare")	
Date	

Alternative avenues to file a whistleblowing report:

Contact	Contact avenue
Primary contact: ERFA CEO, Bren Arkinstall	Via email: CEO@erf.org.au
	Via telephone: +61 7 3621 9649
	Via post: Chief Executive Office, PO Box 130, Virginia BC, QLD, 4014
Secondary contact: ERFA Programs Director, Emily Faller	Via email: ejfaller@edmundrice.org
	Via telephone: +61 7 0400 882 812
Governance contact: ERFA Board of Directors Chair, Paul Gallagher	Via email: paul.gallagher@bdo.com.au
Alternative contact: Carroll & O'Dea Lawyers Partner, Josephine Heesh	Via email: Josephine.Heesh@codea.com.au
	Via telephone: +61 2 9291 7100
	Via post: Level 18, St James Centre, 111 Elizabeth Street, Sydney, NSW, Australia 2000
Alternative contact: If you are not completely satisfied with ERFA's response, please lodge a complaint externally to the Australian Council for International Development (ACFID).	Via online portal: https://acfid.asn.au/content/complaints
	Via telephone: +61 6 02 6285 1816
	Via post: C/- ACFID, Private Bag 3, Deakin, ACT, Australia 2600