



CODE OF CONDUCT POLICY

Policy Number	HR02
Version	V3
Date	October 2021
Review Date	October 2023

1 Purpose

The *Code of Conduct Policy*, in conjunction with the *Cultural Charter* and NDIS Code of Conduct outlines the organisational culture that Access 2 Place Housing (A2P) strives to maintain; and provides a shared understanding and expectation of the way A2P staff behave as individuals: towards the people we work with, our tenants and the people who access our services.

The *Code of Conduct Policy* represents a broad framework of ethical conduct that all A2P staff have an obligation to uphold. It also provides the basis for disciplinary action for those who do not meet their obligations.

2 Context

The *Code of Conduct Policy* supplements legal obligations in areas such as Work, Health and Safety, Equal Opportunity and Privacy.

A2P is also subject to regulatory requirements under the National Regulatory System Community Housing (NRSCH) around standards of probity (refer to section 5.4.1 for more information) and the National Disability Insurance Scheme (NDIS) (refer to section 5.4.2 for more information).

3 Scope

This policy applies to all A2P staff members, student placements or volunteers providing services for A2P. Members of the A2P Tenant Advisory Group (TAG) are exempt from this; however, they are required to abide by the TAG *Terms of Reference* (TOR). Where a person is both an A2P staff member and a TAG member, their status as staff member will require them to abide by this *Code of Conduct Policy*.

4 Risk


The absence of a *Code of Conduct Policy* would mean that A2P would not be compliant with NRSCH and NDIS regulatory requirements; it would increase the risk of staff being unclear about what conduct is expected of them as an A2P employee; and it would place A2P at risk of not being able to appropriately manage incidences where staff do not act in accordance with organisational values and/or the public interest.

5 Policy Detail

All staff are required to be familiar with and act in accordance with the A2P *Code of Conduct Policy* and the *NDIS Code of Conduct*.

Staff are required to sign a copy of the *Code of Conduct Policy* on commencing employment, and upon subsequent updates.

A2P will ensure that all staff have access to an up-to-date [NDIS Code of Conduct: Guidance for Workers](#).

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5.1 Conduct

Employees are required to demonstrate behaviours that are in alignment with the *Code of Conduct Policy*, the *Cultural Charter* and other related organisational policies at all times in their workplace.

A2P expects the highest standard of behaviour from its employees and this includes a requirement for all employees to be aware of how their behaviour can impact others. To achieve this standard, it is the general expectation that all employees, including others who may be working on behalf of A2P, will behave in an acceptable manner - treating others with courtesy, respect and consideration – and conducting themselves professionally when interacting with clients and anyone in the course of their daily duties. We are fully committed to creating and sustaining a positive and mutually supportive working environment where staff can work collaboratively and productively together, and where staff are equally valued and respected.

Your obligation requires that you:

- Comply with prevailing community standards of equity, justice, fairness and compassion in dealing with others within and beyond A2P.
- Perform duties in a responsible and professional manner, with due regard for company policies and other legal requirements and obligations
- Exert responsible stewardship of A2P resources
- Promote and protect A2P’s reputation in the wider community
- Act appropriately when a conflict arises between our self-interest and our duty to A2P

Cultural Charter

The *Cultural Charter* in conjunction with the *Tenant Charter* represents the organisational culture that A2P strives to have and provides a shared understanding and expectation of the way we behave as individuals, towards the people we work with, our tenants and the people who access our services.

All staff are required to be familiar with and act in accordance with the *Cultural Charter*.

Staff are required to sign a copy of the *Cultural Charter* on commencing employment, and upon subsequent updates.

Behaviour

We recognise that personalities, characters, and management styles are all different, but the expectation is that the way we approach our working life, must always be acceptable to others through applying principles that include:

All employees are expected to:



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- Treat everyone with courtesy, respect, kindness, consideration, and sensitivity to their rights
- Refrain from all forms of harassment and discrimination based on gender, race, religious belief, political affiliation, pregnancy, disability, sexual orientation or illness
- Always act honestly, in good faith, and be respectful of the trust placed in us
- Respect each individual's rights to privacy and keep personal information in confidence
- Consider the impact of our decisions and behaviour on the well-being of others
- Refrain from acting in any way that would unfairly harm the reputation and career prospects of other employees
- Refrain from allowing personal relationships to affect professional relationships
- Seek advice from a manager where a colleague's behaviour is perceived to be in breach of the Code, and report any suspected corrupt, criminal or unethical conduct to the CEO.

Professional Conduct

All employees are expected to:

- Perform duties diligently, impartially, conscientiously, with integrity, and to the best of their ability
- Take responsibility for the health and safety of themselves and others when carrying out their duties
- Keep up to date with advances and changes in the body of knowledge and the professional and ethical standards relevant to their area of expertise
- Strive to always achieve the highest product, service and professional standards
- Comply with any relevant legislative, industrial and administrative requirements including observance of internal policies and procedures
- Foster teamwork and collegiality among all employees, and always give due credit to the contributions of others
- Maintain adequate documentation to support any decisions made
- Take no improper advantage of any official information gained in the course of their employment
- Refrain from allowing personal political views and/or affiliations or other personal interests to influence the performance of duties or the exercising of responsibilities.



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Employees are encouraged to recognise and acknowledge appropriate and excellent conduct either by letting the person know directly and/or letting their manager know that they value the conduct and behaviour displayed.

These behaviours are not exhaustive and are detailed to encourage reflection on the impact that our behaviour has on relationships and our contribution to building a positive work environment.

There may be times when staff are concerned about whether their own or other people's conduct is appropriate. If staff are uncertain about whether their actions or the actions of others are in accordance with this *Code of Conduct Policy*, they are encouraged to discuss the matter with their manager.

5.2 Dealing with Conflicts of Interest

All employees are expected to be familiar with and comply with the *A2P Conflict of Interest Policy* and associated procedures.

As an NDIS Registered Provider, A2P must act in the best interests of participants, ensuring that participants are informed, empowered and able to maximise choice and control. A2P must not (by act or omission) constrain, influence or direct decision making by a person with a disability and/or their family so as to limit that person's access to information, opportunities and choice and control.

A conflict of interest, whether it be real, potential or perceived, occurs when there is a conflict between professional duties and private interests. Conflicts can occur in a variety of ways but fundamentally it is where an individual's private interests could improperly influence their decisions and the performance of their professional duties and responsibilities. To effectively manage the risk that conflicts of interest can generate, A2P requires all real, potential or perceived conflict to be disclosed, to ensure they can be appropriately managed.

Directors and employees must be aware of the potential for a conflict of interest to arise and should always act in the best interests and in good faith towards A2P. This is critical to maintaining community and stakeholder confidence, the integrity and reputation of the organisation and ensures transparency through its procurement and other key business processes.

Directors and employees should aim to avoid being put in a situation where there may be a conflict between the interests of A2P and their own personal or professional interests, or those of relatives or friends. Where such a conflict occurs (or could be perceived to have occurred), full disclosure enables the risk to be objectively assessed and the interests of the business will be balanced against the interests of the individual and, unless exceptional circumstances exist, resolved in favour of A2P.

Directors and employees are not to allow personal relationships to influence work behaviours. It could be a conflict of interest if an employee acts on the basis of personal friendship or personal animosity to advantage or disadvantage a fellow employee, supplier, service provider, applicant or tenant.



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5.3 Regulatory requirements

5.3.1 National Regulatory System Community Housing (NRSCH)

A2P has regulatory requirements under NRSCH performance outcome 5 to maintain high standards of probity that includes specific performance requirements in relation to establishing and administering a code of conduct; and maintaining the reputation of the community housing sector.

A2P will ensure that it continues to meet ongoing NRSCH probity requirements as specified in the NRSCH Evidence Guidelines. In particular, ensuring high standards in relation to:

- Board Charter
- Code of Conduct
- Probity policies
 - *Internal Complaints and Grievances Policy*, incorporating whistleblowing
 - *Conflict of Interest Policy*, incorporating gifting
 - *Procurement Policy*
- Notifying the primary Registrar of any incident related to its operations (and its response) that damages or has the potential to damage the reputation of the community housing sector.

5.3.2 National Disability Insurance Scheme (NDIS)

As an NDIS registered service provider, A2P is required to comply with the NDIS Code of Conduct (NDIS Code). A2P will take all reasonable steps to assist and support workers in meeting their obligations under the NDIS Code.

The NDIS Code is designed to work alongside other elements of the quality and safeguarding arrangements to promote a safe and skilled workforce within the NDIS. Providing quality supports involves not only the right capabilities but also the right attitudes. Workers and providers need to be familiar with the principles underpinning the NDIS, respect the rights of people with disability, aim to prevent harm and respond appropriately if harm occurs.

The NDIS Code applies to any provider or worker supporting a person who is participating in the NDIS and related services. NDIS providers for the purposes of the NDIS Code includes:

- Registered NDIS providers
- Unregistered NDIS providers
- Providers delivering Commonwealth Continuity of Support (CoS) Programme services (to be prescribed by the rules to be NDIS providers)
- A person or entity prescribed by the NDIS Rules to be an NDIS provider.



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5.4 Code of Conduct Breaches

A2P treats breaches of this Code of Conduct seriously. All staff have a responsibility to act consistently with the behaviours of this Code of Conduct. Failure to comply with the expectations set out in this Code of Conduct and related policies, may lead to disciplinary action or termination of employment.

Employees are encouraged to raise any concerns over a perceived breach of the Code of Conduct informally with the person/s concerned, where this is appropriate, or with their manager. If the breach concerns a staff member's direct manager, staff should raise the matter with the CEO.

Employees should raise perceived breaches of conduct, including alleged illegal conduct, by following the steps outlined in the *Internal Complaints and Grievances Policy*, which incorporates whistleblowing.

Employees may elect to approach external agencies in relation to a complaint of conduct. These include the Australian Human Rights Commission at <https://www.humanrights.gov.au/> or the Fair Work Commission at <https://www.fwc.gov.au/>

5.5 Responsibilities

Managers

- Demonstrate accountable and ethical leadership.
 - Ensure staff are familiar with the *Code of Conduct Policy*, the *Cultural Charter* and other related policies.
 - Ensure staff sign a *Code of Conduct Policy* and *Cultural Charter* on commencing employment, and upon subsequent updates of either document
 - Provide leadership, information, resources, training and policies to assist staff to reach their required level of performance in a fair manner, and to meet the standards required in the *Code of Conduct Policy* and *Cultural Charter*.
 - Demonstrate an accountability for their own performance and behaviour as well as their direct reports.
 - Practice and encourage open communication.
 - Respond to breaches of the *Code of Conduct Policy* and any other company policies and procedures as soon as practicable and report them via the appropriate channels where required.
 - Manage change as an ongoing, continual and positive aspect of the work environment.
- Create and maintain a safe working environment.
 - Take all necessary steps to prevent harassment, discrimination and bullying in the workplace, and respond immediately to any incidents.
 - Encourage staff to report any incident of wrongdoing they identify and support them in doing so.



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- Protect with appropriate confidentiality, information that staff provide them with under this *Code of Conduct Policy*.

All Staff

- Are responsible for their behaviour
- Must sign and comply with the *Code of Conduct Policy*, *Cultural Charter* and related policies.
- Attend relevant training as recommended and/or provided by A2P.

Administration

- Ensure a signed up-to-date *Code of Conduct Policy* and *Cultural Charter* is kept in each employees' file and staff are given a copy.

The Board

- Act in accordance with the A2P Board Policies, which includes a *Code of Conduct* and *Board Charter*.
- Approve the *Code of Conduct Policy* and any subsequent updates.

6 Definitions

Code of Conduct is an agreement on rules of behaviour for a group or organization

Cultural Charter outlines principles, values and behaviours that set the cultural and professional standards all staff commit to and expect other employees to demonstrate.

7 Reference Documents and Links

Directive & Supporting Documents

- NDIS Code of Conduct
 - NDIS Code of Conduct: Guidance for NDIS Providers
 - NDIS Code of Conduct: Guidance for NDIS Workers

Related Documents and Resources

- Cultural Charter
- Board Charter
- Tenant Charter
- TAG Terms of Reference
- Conflict of Interest Policy
- Internal Complaints and Grievances Policy
- Conflict of Interest Policy
- Procurement Policy



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8 Staff Acceptance

I confirm that I have read, understood and accepted the terms and conditions of this document. I understand that failure to comply with the *Code of Conduct Policy* will constitute misbehaviour and may give rise to disciplinary action.

Staff name (print):

Staff signature:

Date:

9 Policy Approval

Content Author:	Board Authority	
Date: May 2019	Date approval in Board minutes 1 st May 2018	
Name: Rebecca Chapman Position: Policy Consultant		

10 Revision History

Date	Version	Author / Amended By	Comments / Review History
May 2016	1	Lyndi Gepp	Original Content (G103 Code of Ethical Conduct)
May 2019	2	Rebecca Chapman	Review -content simplified and reduced, inclusion of NDIS Code information, inclusion of NRS information and reformatting to policy standardised template. Development of Cultural Charter. Contractors removed from scope.
October 2021	3	The Engaged Space	Review content. Incorporate behavioural expectations and conflict of interest.