

 <b>ACCESS 2 PLACE HOUSING</b>	<b>CODE OF CONDUCT POLICY</b>	Policy Number   HR02 Version   V5 Date   October 2025 Review Date   October 2027
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## 1 Purpose

The Code of Conduct Policy, in conjunction with the Cultural Charter and NDIS Code of Conduct defines the organisational culture that Access 2 Place Housing (A2P) strives to maintain. It provides a shared understanding and clear expectations of the way A2P staff behave as individuals, towards colleagues, tenants and all of the people who access our services. This policy establishes a broad framework of ethical conduct that all A2P staff are required to uphold and provides the basis for disciplinary action where obligations are not met.

## 2 Context

This policy supplements staff's legal obligations, including but not limited to Work, Health and Safety, Equal Opportunity, and Privacy.

A2P is also subject to regulatory requirements under the National Regulatory System Community Housing (NRSCH), including standards of probity (see section 5.3.1) and the National Disability Insurance Scheme (NDIS), including compliance with the NDIS Code of Conduct (see section 5.3.2 for more information).

## 3 Scope

This policy applies to all A2P staff members, Board Members, student placements, or volunteers providing services on behalf of A2P. Members of the A2P Community Housing Advisory Group (CHAG) are exempt but must comply with the CHAG Terms of Reference (TOR). Where a person is both an A2P staff member and a CHAG member, their staff status takes precedence and requires compliance with this Policy.

## 4 Risk

The absence of a Code of Conduct Policy would result in:

- Non-compliance with NRSCH and NDIS requirements
- Uncertainty among staff regarding expected standards of behaviour
- Reduced ability for A2P to manage misconduct or breaches of organisational values
- Reputational and regulatory risks for A2P

## 5 Policy Detail

All staff must:

- Be familiar with and act in accordance with this Policy, the Cultural Charter, and the NDIS Code of Conduct.
- Sign this Policy upon commencement of employment, and when updated.
- Have access to an up-to-date NDIS Code of Conduct: Guidance for Workers.

### 5.1 Conduct

Staff are required to demonstrate behaviours that align with the Code of Conduct Policy, the Cultural Charter, and other organisational policies at all times.

A2P expects the highest standard of behaviour from its staff. This includes staff being mindful of how individual actions and behaviour can impact others.

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To achieve this, all staff and others working on behalf of A2P must:

Behave in an acceptable, professional manner at all times.

- Treat others with courtesy, respect, and consideration.
- Conduct themselves appropriately when interacting with tenants, colleagues, and the wider community.

A2P is committed to creating and sustaining a positive and supportive working environment where staff collaboratively and productively, and where every individual is equally valued and respected.

Your obligation requires you to:

- Comply with prevailing community standards of equity, justice, fairness, and compassion.
- Perform duties in a responsible and professional manner, with due regard for company policies, laws, and obligations.
- Exercise responsible stewardship of A2P resources.
- Promote and protect A2P's reputation in the wider community.
- Act appropriately when a conflict arises between personal interest and duty to A2P.

### **Cultural Charter**

The Cultural Charter together with the Tenant Charter, represents the organisational culture A2P strives to uphold. It sets out shared principles, values and behaviours that shape how we engage with colleagues, tenants and the people who access our services.

All staff are required to be familiar with and act in accordance with the Cultural Charter, and must sign it on commencement and following updates.

### **Behavioural Expectations**

While personalities, characters, and management styles may differ, all staff are expected to apply consistent professional principles, ensuring their approach is respectful, fair, and acceptable to others.

All staff must:

- Treat everyone with courtesy, respect, kindness, consideration, and sensitivity to their rights.
- Refrain from harassment, bullying or discrimination based on gender, race, religious belief, political belief, pregnancy, disability, sexual orientation, or illness,
- Act honestly, in good faith, and uphold the trust placed in them.
- Respect privacy and maintain confidentiality of personal information.
- Consider the impact of our decisions and behaviour on the wellbeing of others.
- Avoid actions that could unfairly harm the reputation or career of another staff
- Separate personal relationships from professional relationships/duties.
- Seek advice from a manager where behaviour is perceived to breach this Code, and report any suspected corrupt, criminal, or unethical conduct to the CEO.

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## Professional Standards

All staff must:

- Perform duties diligently, impartially, conscientiously, and with integrity.
- Take responsibility for the health and safety of themselves and others.
- Keep knowledge and skills current in their area of expertise.
- Strive to always achieve the highest product, service, and professional standards.
- Comply with relevant legislative, industrial, and administrative requirements including A2P policies and procedures.
- Promote teamwork and collaboration, recognising and crediting the contributions of others.
- Maintain adequate records to support decisions.
- Avoid improper advantage from official information gained through employment.
- Refrain from allowing personal political views and/or affiliations or other personal interests to influence the performance of duties or professional responsibilities.

Staff are encouraged to recognise and acknowledge excellent conduct, either directly to the person or via their manager.

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 Policy, they are encouraged to discuss the matter with their manager or the CEO.

### 5.2 Conflicts of Interest

All staff must comply with the A2P Conflict of Interest Policy and associated procedures.

As a NDIS Registered Provider, A2P must always act in the best interests of participants. This includes ensuring that participants are informed, empowered, and supported to maximise choice and control. A2P must not, whether by act or omission, constrain, influence or direct decision making of a person with disability and/or their family in ways that limit access to information, opportunities, or choice and control.

A conflict of interest, whether it be real, potential or perceived, arises when private interests conflict with professional duties. While conflicts can take many forms, at their core they occur where an individual's private interests could improperly influence their decisions and the performance of their professional responsibilities.

To effectively manage the risk that conflicts of interest can create, A2P requires all real, potential, or perceived conflicts to be disclosed, so they can be appropriately assessed and managed.

Directors and staff must remain alert to the potential for a conflict of interest and act at all times in the best interests of A2P and in good faith. This is critical to maintaining community and stakeholder confidence, protecting A2P's integrity and reputation, and ensures transparency across procurement and other key business processes.

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Directors and staff should avoid situations with their personal or professional interests—or those of relatives or friends—conflict with the interests of A2P. Where a conflict does arise, or may reasonably be perceived to arise, full disclosure is required. This enables the risk to be objectively assessed, with A2P's interests taking precedence unless exceptional circumstances exist.

Personal relationships must never be allowed to influence work behaviours. A conflict of interest may arise if a staff member acts out of personal friendship or animosity in a way that advantages or disadvantages another staff member, supplier, service provider, applicant, or tenant.

### 5.3 Regulatory Requirements

#### National Regulatory System Community Housing (NRSCH)

A2P has regulatory requirements under NRSCH Performance Outcome 5 to maintain high standards of probity.

This includes:

- A Board Charter
- A Code of Conduct.
- Policies on probity, conflicts of interest, procurement, and whistleblowing.
- Internal Complaints and Grievances Procedures.
- Notification to the Registrar of incidents that may damage the reputation of the sector.

#### National Disability Insurance Scheme (NDIS)

As a NDIS registered provider, A2P must comply with the NDIS Code of Conduct (NDIS Code). A2P will take all reasonable steps to assist and support staff in meeting these obligations.

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 support involves not only the right capabilities but also the right attitudes.

The NDIS Code requires all providers and staff to:

- Respect the rights of people with disability.
- Deliver services safely, ethically, and with integrity.
- Prevent harm and respond appropriately where harm occurs.

### 5.4 Code of Conduct Breaches

Breaches of this Code of Conduct are treated seriously. All staff have a responsibility to act consistently with the behaviours of this Code of Conduct. Failure to comply may result in disciplinary action, up to and including termination of employment. Breaches of the law will be referred to the appropriate authority.

Staff are encouraged to raise concerns over a perceived breach of the Code of Conduct informally with the person/s concerned, where this is appropriate. If unresolved, staff should escalate to their manager. If the breach involves a manager, staff should raise the matter with the CEO.

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Staff 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.

Staffs may also seek advice or lodge complaints with external agencies including the Australian Human Rights Commission (<https://www.humanrights.gov.au>) or the Fair Work Commission (<https://www.fwc.gov.au>)

## 6 Responsibilities

### Managers Must:

- Provide accountable and ethical leadership.
- Comply with this Policy, the Cultural Charter, and all related policies.
- Ensure staff are familiar with and sign this Policy, the Cultural Charter, and other organisational policies.
- Provide training leadership, information, and resources to support compliance.
- Foster open communication and model appropriate behaviour.
- Act promptly on breaches of conduct and report them to the CEO as required.
- Manage change as an ongoing, continual, and positive aspect of the work environment.
- Create a safe workplace, free of harassment, discrimination, and bullying.
- Protect with appropriate confidentiality, information that staff provide them with under this Code of Conduct Policy.

### All Staff must:

- Take responsibility for their own behaviour.
- Comply with this Policy, the Cultural Charter, and all related policies.
- Attend relevant training as required.

### Administration must:

- Ensure signed copies of the Code of Conduct and Cultural Charter are retained on all staff files, with a copy provided to the employee at the time of signing.

### The Board must:

- Comply with this Policy, the Cultural Charter, and all related policies.
- Comply with the A2P Board Charter.
- Provide accountable and ethical leadership.
- Approve this Policy and any future updates.

## 7 Definitions

**Code of Conduct:** An agreement on rules of behaviour for a group or organisation

**Cultural Charter:** A document outlining the principles, values, and behaviours that set cultural and professional standards for all staff.

**NDIS Code of Conduct:** The national standards of conduct for all NDIS workers and providers, designed to

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promote safe, ethical, and rights-based service delivery.

## 8 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
- CHAG Terms of Reference
- Conflict of Interest Policy
- Internal Complaints and Grievances Policy & Procedures
- Conflict of Interest Policy
- Procurement Policy

## 9 Staff Acceptance

I confirm that I have read, understood, and agree to comply with the Access 2 Place Code of Conduct Policy. I understand that failure to comply may constitute misconduct and could result in disciplinary action up to and including termination of employment.

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Print Full Name

Signature

Date

## 10 Policy Approval and Review

This policy will be periodically reviewed and updated as necessary to ensure compliance with legal requirements and alignment with A2P's objectives and values

Content Author/Reviewer:	Delegated Authority: Board
Date: 08/10/2025	Approval was granted at the board meeting held on
Name: Emma Calabro	22/10/2025 and has been documented in the meeting
Position: GMDH	minutes.