

# Code of Conduct

## Policy

### 1 Purpose

This Code of Conduct has been produced for all Southern Cross Care Housing employees and provides guidance on how they should behave in their day-to-day work. It governs the way all employees must behave towards customers, clients, suppliers, and their families, co-workers, company management and the general public. It should be read in conjunction with any laws, company policies, procedures, rules, regulations, and contracts that also applies.

Our success is based on a reputation as an ethical company. We take our responsibilities to our employees, clients, and other stakeholders seriously and strive to work to the highest standards.

### 2 Scope

All employees of Southern Cross Housing including the Board Directors, contractors, and volunteers.

### 3 Policy Statement

This Code of Conduct outlines the standard of behaviour expected of all Southern Cross Housing employees

### 4 Code of Conduct

All SCH employees are expected to conduct themselves according to the following guiding principles:

Provide services and support in line with SCH Mission Statement and Core Values:

**Mission** We are committed to providing compassionate, just and equitable services to the whole community, reflecting the moral and ethical principles of the Catholic Church

**Core Values** Respect, Integrity, Compassion and Excellence

- Always work in a safe and competent manner and take reasonable care to avoid causing harm to yourself and others
- Act impartially and in the public and organisation's interest
- Comply with SCH policies and procedures and seek clarification as needed
- Treat all people, whether it is those receiving our services or our colleagues, equally and fairly
- Act openly and promptly to help resolve concerns
- Work collaboratively with colleagues to achieve our common goals
- Use due care, skill and diligence in the performance of all duties and responsibilities

### 5 Additional Relevant Information

#### 5.1 Confidentiality and Privacy

Information relating to residents/clients, the activities of SCH, employees and volunteers is to be regarded as confidential until such time as the resident/client, the employee or volunteer and a senior staff member give permission for the information to be released to any third party.

Information relating to SCH residents/clients must not be released in writing, verbally or by other means, to any third parties unless the release of such information is necessary in the performance of duty by an employee or volunteer. Only appointed representatives, advisors or consultants of the resident/client may be given such information, and only then with the expressed consent of the person involved. Employees are also reminded that in order to protect the privacy of SCH residents/clients and employees, photographs are not to be taken or published without the written authorisation of the employee, volunteer, resident/client or family member concerned.

## 5.2 Exclusive Service

Employees who are engaged in permanent employment with SCH, either full-time or part-time, are to seek written consent from the relevant line manager prior to undertaking employment (paid or unpaid) or consulting work outside of the organisation. Consideration will be given to whether any conflict of interest exists between the employee's organisational responsibilities and the proposed outside employment and on any impact, it may have on the performance of the employee's duties.

For volunteers, consent does not need to be sought but consideration should be given to the impact the volunteer's organisational responsibilities and any outside employment may have on the performance of the volunteer's duties.

## 5.3 Use of Company Information, Property and Resources

An employee should not disclose or use any information or documents acquired in the course of their employment, other than as required by law or where proper authority has been given. Employees are required to take care to maintain the integrity and security of organisational information, which includes, but is not limited to, residents/clients, residents'/clients' families, other employees, and business information.

Employees must refrain from using any circumstances or information connected to employment for personal benefit.

Organisational facilities and equipment are not to be used by employees for personal purposes unless permission is granted by the relevant line manager. Employees will not use the skills or working time of other employees for their personal benefit unless permission is granted by the relevant line manager or the assistance is provided out of working hours. Staff should take all possible care in the use of SCH property, goods, services and information and ensure they are used efficiently, carefully and honestly.

Employees must only access information from SCH business systems that is in strict accordance with their role and duties.

Employees must abide by the Electronic Communication Guidelines Procedure when using the electronic communication system of SCH. Electronic communications include, but are not limited to, all internet and electronic mail activities and/or communications and all related applications.

## 5.4 Professional Relationships

SCH employees will conduct themselves in a competent and professional manner at all times. This includes being aware of and maintaining a set of professional boundaries that guide the relationship between employees and SCH service users and the way in which the service is delivered.

Employees must not develop a relationship with any SCH service users that is, or can be perceived or construed as having a personal rather than a professional caring basis. Where a pre-existing personal relationship, such as a family relationship or close friendship exists between an employee and a service user, the employee must report this relationship to their supervisor so that it can be managed appropriately.

## 5.5 Public Comment

Public comment includes public speaking engagements, comments, or photographs in any media, social media, expressing views in a letter to the press, in books or in notices, or where it is reasonably foreseeable that publication or circulation of the comment will flow to the community at large.

Except where required by law, or as formally authorised by the organisation, an employee shall not make public comment on organisational matters or claim to represent the views of the organisation. While employees, as members of the community, have a right to make public comment and enter into public debate on social issues in a personal capacity, there are some circumstances in which public comment is not appropriate. These include:

- Where a public comment could be perceived to be an official comment by the organisation or one of its employees, despite having been made in a private capacity;
- Where an employee is directly involved in advising on or directing the administration or implementation of organisational policy and the public comment would compromise their ability to continue to do so in an efficient, fair and professional manner; and
- Where public comment, regardless of the connection with an employee's normal duties, amounts to criticism sufficiently strong or persistent to give rise to the public perception that the employee is not prepared to administer or implement the policies of the organisation as they relate to the employee's duties.

## 5.6 Social Networking/Media

It is recognised by the organisation that employees are increasingly using social networking and media, micro-blogging, blogs, videos and photo sharing sites. To maintain productivity, ensure efficient use of resources, and to maintain its good

reputation, SCH seeks to limit the access to these sites during work hours and discourages employees and volunteers from using them to make public statements which refer, or could be perceived to refer, to the organisation.

While at work, employees can only use these sites during designated meal or tea breaks so that it does not impact on the performance of their duties. Employees need to be mindful that if they choose to identify themselves as employees of SCH, in a practical sense they become representatives of the organisation. For this reason, SCH seeks to strongly discourage employees from identifying themselves as SCH employees, as any shared posts or information have the potential to reflect on the organisation and its image. If employees do choose to declare their association with the organisation, they need to be aware of their responsibility to represent the organisation in a professional manner. Employees and volunteers are also reminded of the requirement to maintain professional boundaries and confidentiality and need to consider their applicability when using these sites.

SCH seeks to eliminate any actions which can be considered as bullying or harassment and so employees must consider the potential impact of their shared posts or information on others when interacting with or using social networking/media sites.

### 5.7 Personal Relationships in the Workplace

Personal relationships may involve staff, residents/clients, contractors, or members of the community who have dealings with the organisation. Such relationships should not influence or be seen to influence workplace practices. To avoid the risk of bias or nepotism within the workplace, SCH will not employ relatives on the same site except under special circumstances, subject to the approval of the Head of Human Resources. For the purposes of this policy 'relative' will include spouse, partner, child, parent, grandparent, grandchild, or sibling of the employee or of the employee's spouse/partner.

## 6 Conflicts of Interest

### 6.1 Overview

While offering and accepting gifts, benefits and hospitality is common in everyday life, there can be good reasons for employees to decline to accept such offers. Southern Cross Housing requires all employees to perform their duties impartially and with integrity. Occasionally employees may be offered gifts, benefits, or hospitality as a consequence of undertaking their duties. Usually these will be a token of appreciation and carry no expectation. However, in some cases accepting a gift, benefit or hospitality could give the impression an employee will favour a particular person or organisation when making decisions. This may not be the intention, but perceptions do matter.

### 6.2 What is a Benefit?

A Benefit means anything which provides the staff member with a direct or indirect personal gain or the potential for personal gain or gain to a third party.

Examples may include (but are not limited to):

- Tickets to sporting events or other entertainment;
- Corporate hospitality;
- Preferential treatment, such as queue jumping;
- Access to confidential or sensitive information;
- Discounted products for personal use;
- Frequent use of facilities such as a gymnasium or holiday home;
- Free or discounted travel, Frequent Flyer points and free training.

Such a gain does not need to be financial and could be a personal or non-financial gain. It includes the provision of material or facilities, support of individuals through the provision of benefits (e.g., travel, gifts, entertainment, accommodation, expenses, etc.) or a financial benefit.

### 6.3 What is a Conflict of Interest?

A conflict of interest means a situation where someone has competing professional or personal interests. Such competing interests can make it difficult to fulfil his or her duties impartially and can create an appearance of wrongdoing that can undermine confidence in the person.

A conflict of interest exists even if no unethical or improper act results from it. Conflicts of interest can include, but are not limited to:

- Decisions regarding suppliers and other persons in respect of the selection and/or ongoing dealings with SCH
- Business or close personal relationships with competitors or businesses operating in the same area as SCH or one of its services
- Decisions regarding appointment, promotion or other decisions relating to staff members
- Decisions and dealings with potential staff members
- Holding directorships, executive positions, and shareholdings in, or ownership of, other companies, organisations or businesses
- Acceptance of benefits (gifts, entertainment, travel, accommodation expenses etc.)
- Acceptance of hospitality
- Ownership of intellectual property
- Membership of an organisation that comes into serious competition or conflict with SCH.

#### 6.4 Disclosure of Obligations

Southern Cross Housing. requires all staff to avoid any action, position or interest that may conflict with an interest of SCH.

All staff members shall declare any gifts or hospitality received from contractors, suppliers or any individual or organisation with an actual or potential commercial relationship with SCH. Gifts and corporate hospitality shall not be accepted by members of the Senior Management Group in any circumstances from contractors, suppliers or any individual or organisation without the prior written approval of the CEO.

Other staff members may accept gifts from tenants, clients and families at the approval Human Resources

Gifts and corporate hospitality shall not be accepted by any staff member from an actual or potential organisation or individual when a tender or other bidding process is open.

#### 6.5 Exceptions

Token gifts and benefits of a nominal value usually do not create a sense of obligation on the receiver and are unlikely to influence, or appear to influence, in the exercise of their official duties. Examples may include (but are not limited to) pens, stationary, hats, mobile phone accessories (e.g., power banks), coffees with prospective suppliers.

In the event of doubt the matter should be referred to the Head of HR.

#### 6.6 Witnessing of Wills and Enduring Powers of Attorney

Southern Cross Housing staff shall not under any circumstances act as a witness of a will or an enduring power of attorney. This strict rule applies to both documents being signed by clients or family members of a client.

In addition, SCH staff shall not in any circumstances accept the appointment as an attorney pursuant to an enduring power of attorney for a resident, unless the prior written approval by the Chief Executive Officer has been obtained.

If requested to sign a will or enduring power of attorney, then the staff member must politely decline and report the matter to their manager.

## 7 Roles and Responsibilities

Role	Responsible for:
Executive Management Committee	Endorse and ensures compliance with this policy Be familiar with legislative requirements of this policy
General Manager/Executive managers/Head of Department	Oversee compliance with this policy Support staff competence and compliance with this policy and ensures staff receive appropriate training and supervision to comply with this policy Report on collated information regarding policy scope and key performance indicators, to ensure operational decision making is informed by outcomes and this policy Support the review of this policy

Role	Responsible for:
Manager, Co-ordinators/Team Leaders	Manage and monitor compliance with this policy and facilitate access for staff to receive appropriate training, and supervision to comply with this policy Collate and escalate reported information as required Ensure operational decision making is informed by this policy
Staff	Comply with this policy Maintain knowledge of the current practices in relation to the subject of this policy, as applicable to their role Report any incidents as per organisational policy Participate in regular practice supervision

## 8 Legislation and Supporting Documents

### 8.1 Legislation and Standards

- The Aged Care Act 1997 and Aged Care Principles 1997
- The Residential Tenancy Act
- Disability Services Act 1993
- NDIS Practice Standard & Quality indicators
- National Mental Health Standards 2010
- Freedom of Information Act 1982
- NDIS code of Conduct
- Mental Health Bill (WA) 2013
- The Western Australian Mental Health Act (WA) 2014

### 8.2 Related SCCWA Policy and Procedures

- SCC-HUM-POL-0009 – Conflict of Interest Policy
- SCC-RIS-POL-0008 – Privacy Policy
- SCC-HUM-POL-0011 – Discipline Policy
- SCC-HUM-POL-0012 – Drug and alcohol Policy

## 9 Document Control

Rev	Owner	Sections Modified	Date Reviewed	Next Review Date
1.0	Head of HR	First release	14/01/2019	14/01/2020
2.0	Head of HR	Review to reflect requirements of the new Aged Care Standards	28/06/2019	28/06/2021
3.0	Head of HR approved by CEO	New Template, amended to reflect NDIS changes.	24/12/2021	28/6/24