



CODE OF CONDUCT POLICY

Policy Number	HR02
Version	V2
Date	01/05/2019
Review Date	01/05/2021

1 Purpose

The *Code of Conduct Policy*, in conjunction with the *Cultural Charter* represents the organisational culture that Access 2 Place Housing (A2P) strives to have; 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 5.5.1 for more information) and the National Disability Insurance Scheme (NDIS) (refer to section 5.5.2 for more information).

3 Scope

This policy applies to all A2P staff members, student placements or volunteers providing services for A2P.

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

5.1 General

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.

5.2 Conduct

Staff are required to demonstrate behaviours that are in alignment with the *Code of Conduct Policy*, the *Cultural Charter* and other related organisational policies. In section 8.3 there are a list of



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organisational policies that cover a range of related areas such as bullying, discrimination, sexual harassment, tenant engagement, duty of care, work health and safety, conflicts of interest, confidentiality, gifting, privacy, tenant wellbeing, whistleblowing and complaints.

The policies listed under section 8.3 are not exhaustive and staff are required to make sure they are aware of all organisational policies relevant to their position.

There may be times when staff are concerned about whether their 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.

5.3 Acknowledging Excellent Conduct

Staff 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.

5.4 Cultural Charter

The *Cultural Charter* in conjunction with the A2P service 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.

5.5 Regulatory requirements

5.5.1 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:

- Code of Governance
- Code of Conduct
- Probity policies
 - Whistle-blowing
 - Conflict of interest
 - Gifts and hospitality
 - Procurement



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- Notifying the primary Registrar of any incident related to it's operations (and it's response) that damages or has the potential to damage the reputation of the community housing sector.

5.5.2 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.

5.6 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 may lead to disciplinary action or termination of employment.

In the first instance, staff 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.

Staff can raise a breach of conduct in a more formal way through following the steps outlined in the *Grievance Resolution Policy*.

A breach of the law will be referred to the police or relevant legal authority under A2P's legal obligations.

Staff can also approach an external agency in relation to a complaint about conduct. For more information go to the Australian Human Rights Commission at <https://www.humanrights.gov.au/> or the Fair Work Commission at <https://www.fwc.gov.au/>



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5.7 Responsibilities

<p>Managers</p>	<ul style="list-style-type: none"> • Demonstrate accountable and ethical leadership. <ul style="list-style-type: none"> ▪ ensure staff are familiar with the <i>Code of Conduct Policy</i>, the <i>Cultural Charter</i> and other related policies. ▪ ensure staff sign a <i>Code of Conduct Policy</i> and <i>Cultural Charter</i> 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 <i>Code of Conduct Policy</i> and <i>Cultural Charter</i>. ▪ 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 <i>Code of Conduct Policy</i> 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. <ul style="list-style-type: none"> ▪ 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. ▪ Protect with appropriate confidentiality, information that staff provide them with under this <i>Code of Conduct Policy</i>.
<p>All Staff</p>	<ul style="list-style-type: none"> • are responsible for their behaviour • must sign and comply with the <i>Code of Conduct Policy</i>, <i>Cultural Charter</i> and related policies. • attend relevant training as recommended and/or provided by A2P.
<p>Administration</p>	<ul style="list-style-type: none"> • 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.
<p>The Board</p>	<ul style="list-style-type: none"> • act in accordance with the A2P Board Policies, which includes a <i>Code of Conduct</i>, and <i>Board Charter</i>. • approve the <i>Code of Conduct Policy</i> and any subsequent updates.



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6 Procedure

There is no procedure associated with this policy.

7 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.

8 Reference Documents and Links

8.1 Directive Documents

UN Convention on the Rights of Persons with Disabilities

Work Health and Safety Act 2012 (SA)

Fair Work Act 2009 (SA)

Equal Opportunity Act 1984 (SA)

NRSCH Evidence Guidelines.

NDIS Code of Conduct

8.2 Supporting Documents

NDIS Code of Conduct: Guidance for NDIS Providers

NDIS Code of Conduct: Guidance for NDIS Workers

8.3 Related Documents and Resources

Cultural Charter

B202 Board Charter

B203 Board Policies

G102 Service Charter

G402 Grievance Resolution Policy

G405 Bullying Policy

G302 Dealing with Complaints Policy

G304 Procurement Policy

G313 Tenant Wellbeing and Reporting Policy

G301 Conflict of Interest Policy

G406 Whistle Blower Policy

G407 Gifting Policy

S410 Sexual Harassment Policy

HR03 Equal Employment Opportunity Policy

HR04 Privacy and Confidentiality Policy

HR06 Performance Appraisal Policy

HR08 Leave Policy

HR10 Vehicle Use Policy

HR11 Travel Expenses Reimbursement Policy

HR12 Formal Counselling and Discipline Policy

Work Health & Safety Policy

Social Media Policy

Gift Register



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10 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:

11 Policy Approval

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

12 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.