Code of Conduct

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# 1. Overview/Introduction

Guide Dogs NSW/ACT is committed to high standards of professional and ethical workplace behaviour in line with our values and behaviours.

The purpose of this Code of Conduct is to provide principles for employees, contractors, temporary workers, volunteers, Customer Advisory Panel and Guide Dogs NSW / ACT Board, referred to as ‘Our People’, on the ethical standards of behaviour required at Guide Dogs NSW/ACT. These ethical standards are in line with the general values and behaviours of the organisation and aim to maintain the reputation of the Guide Dogs NSW/ACT brand as a trusted and professional organisation.

Guide Dogs NSW/ACT’s values are:

* + Lead with Head and Heart;
	+ Never Stop Exploring;
	+ Lift Each Other; and
	+ Walk the Talk

Guide Dogs NSW/ACT’s Code of Conduct embodies these values. These principles underpin the professional relationships that Our People have with each other, our clients and the broader community in the conduct of their work.

# 2. Scope and Audience

This code applies to all Guide Dogs NSW/ACT employees, contractors, temporary workers, work integrated learning students, volunteers, Customer Advisory Panel and Guide Dogs NSW / ACT Board referred to as Our People.

This code applies while working for and/or representing Guide Dogs NSW/ACT at any time, for any activity or event, on and/or off site including, but not limited to, training, conferences, professional development, social functions and social media interaction. This code also applies to work carried out at any other location including home office, community event, conferences, suppliers or any other organisation and inside or outside of ordinary hours.

# 3. Code Expectations and Standards

Our People must maintain a work environment which abides by Guide Dogs NSW/ACT’s values and behaviours, and that is free of discrimination, harassment and bullying.

Our People are required to uphold our Mission and policies and procedures adopted by Guide Dogs NSW/ACT, including this Code of Conduct.

Our People are required to treat each other and members of the public with respect, fairness, courtesy, compassion and sensitivity with due regard for their needs, dignity and aspirations.

Our People at all times, have a responsibility to each other, especially when in a leadership role, to work safely and collaboratively together and assess work performance fairly, impartially and objectively, whilst respecting the dignity, rights, and entitlements of others.

## Responsible Use of Assets

Our People must ensure that resources, funds, employees, contractors, temporary workers, volunteers and/or equipment within their control are used effectively and respectfully for the purposes of Guide Dogs NSW/ACT’s business. No person shall use the services of our employees, contractors, temporary workers, volunteers or facilities for private purposes, unless permission has been granted by the Chief Executive Officer in writing.

## Performance of Duties

Our People are required to undertake their duties in a professional, and ethical manner, and to act diligently in the best interests of Guide Dogs NSW/ACT. They are expected to act honestly in all of their duties in accordance with Guide Dogs NSW/ACT’s values and behaviours.

Our People must comply with reasonable and lawful instructions given to them, and they should not perform work or solicit business not related to Guide Dogs NSW/ACT, while on our premises or on Guide Dogs NSW/ACT’s time.

## Confidentiality

Our People may via the conduct of their duties have access to personal or commercial information relating to the operations of Guide Dogs NSW/ACT.

This information is to be used for Guide Dogs NSW/ACT’s purposes only and should remain secure and confidential. It is important that the community has confidence in the information that is maintained by Guide Dogs NSW/ACT, and that it is used only for the stated purpose for which it was collected.

Confidential or sensitive information relating to Guide Dogs NSW/ACT or its operations must not be disclosed or released to any person inside or outside of the organisation, unless the person is duly authorised. This obligation extends beyond a person’s employment or engagement with Guide Dogs NSW/ACT.

## Conflict of Interest

Guide Dogs NSW/ACT expects Our People to act in a manner that will avoid actual, potential or perceived conflicts of interest that could compromise the performance of their duties. Any actual, potential or perceived conflicts of interest must be disclosed immediately to the person’s Executive Leadership Team Member. In the case of volunteers and Customer Advisory Panel to their Guide Dogs NSW / ACT key contact, and be escalated to the relevant People Leader. In the case of a Board Director to the Chairperson, Guide Dogs NSW / ACT Board.

Our People must not allow a family or personal relationship with a colleague to influence their conduct as it may be an actual, potential or perceived conflict of interest. Should there be a working relationship with family member or is personal in nature, a signed written disclosure is required to be submitted to their People Leader, Executive Leadership Team member or a member of the People and Culture team, or as a Board Director of the Guide Dogs NSW / ACT Board to the Chairperson.

No person shall participate in a financial transaction or business dealing undertaken by, in the name of, or on behalf of Guide Dogs NSW/ACT where there is involvement of and benefit to a personal or family relationship.

Whether any conflict of interest is a material issue will be subject to the sole determination of the Chief Executive Officer and any ongoing involvement of that person in the related matter will be at the Chief Executive Officer’s discretion (or the Chairperson in any conflicts relating to Board Directors). The Chief Executive Officer (or the Chairperson in the case of Board Directors) may give approval in writing for continued involvement, and may impose any relevant conditions as seen fit, such as the person’s removal from any decision-making process.

## Employment Outside of Guide Dogs NSW/ACT

No employee, contractor or temporary worker should engage in any outside employment, volunteer work or in the conduct of any business, trade or profession which may conflict with the ethics and values of Guide Dogs NSW/ACT. Breach of this condition is a risk to the reputation of Guide Dogs NSW/ACT and will be treated in a serious manner.

Our People must not during the course of their employment or engagement with Guide Dogs NSW/ACT, without the prior written approval of the Chief Executive Officer (or the Chairperson in the case of Board Directors), undertake any appointment, position or work that:

1. Competes with the work of Guide Dogs NSW/ACT;
2. Purports to be connected to the work that Guide Dogs NSW/ACT does;
3. Generates income from the clients, volunteers, donors, or sponsors of Guide Dogs NSW/ACT;
4. Otherwise adversely affects Guide Dogs NSW/ACT; or
5. Hinders the performance of their duties with Guide Dogs NSW/ACT.

Provided that there is no conflict with the ethics and values of Guide Dogs NSW/ACT, and all other criteria as outlined above are adhered to, it is accepted that volunteers may have commercial and employment relationships in existence with donors, sponsors, and other volunteers while they are volunteering with Guide Dogs NSW/ACT, as part of their normal freedom of trade. However, any conflicts of interest must be declared immediately in accordance with this Code of Conduct.

## Professional Relationships with Our Clients

Guide Dogs NSW/ACT is committed to upholding professional standards consistent with the Orientation and Mobility Association of Australasia Code of Ethics, Australian Occupational Therapy Competency Standards, Australian Orthoptics Board Standards, International Guide Dog Federation Standards and the Guide Dogs Australia Guide Dog Mobility Standards.

Guide Dogs NSW/ACT respects the rights of our clients (including culturally and linguistically diverse and Aboriginal and Torres Strait Islander clients), and the delivery of service that is culturally sensitive to the client’s needs.

Our People are expected to maintain proper boundaries with the clients that we work with and trust is inherent in our client relationships. Our People must observe the rights of our clients to respect, dignity and privacy.

Guide Dogs NSW/ACT is committed to the delivery of services that are free from neglect and abuse, and Our People are required to work within the limits of professional employee and client relations.

Our People must take reasonable care with our clients to prevent harm and injury in the delivery of our services. This includes freedom from physical, emotional and sexual abuse. Our People must act in accordance with our Child Safe Policy for all interactions with children accessing our services.

Economic or sexual relationships between Our People and a client or a member of the client’s family are unacceptable. This applies to both current and former clients. If an existing relationship exists between a client and one of Our People this must be disclosed, and the client reallocated within Guide Dogs NSW / ACT.

This does not preclude a spouse / partner or family member of a client from becoming an employee, contractor, temporary worker, student on work integrated learning with a non- conflicting supervisor or volunteering with Guide Dogs NSW/ACT.

## National Disability Insurance Scheme (NDIS) Code of Conduct

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.

Guide Dogs NSW/ACT employees, contractors and temporary workers must follow the NDIS Code of Conduct, specifically:

1. act with respect for individual rights to freedom of expression, self-determination, and decision-making in accordance with relevant laws and conventions
2. respect the privacy of people with disability
3. provide supports and services in a safe and competent manner with care and skill
4. act with integrity, honesty, and transparency
5. promptly take steps to raise and act on concerns about matters that might have an impact on the quality and safety of supports provided to people with disability
6. take all reasonable steps to prevent and respond to all forms of violence, exploitation, neglect, and abuse of people with disability
7. take all reasonable steps to prevent and respond to sexual misconduct

## Professional Relationships with Our Donors

Guide Dogs NSW/ACT is committed to the Fundraising Institute of Australia’s Code of Ethics in the conduct of our fundraising efforts. This means that Our People must act:

* Honestly and truthfully so that public trust is protected and our donors and beneficiaries are not misled;
* With respect and dignity to our donors and beneficiaries with consideration to their privacy;
* Openly and with regard to their responsibility in maintaining the trust of the public; and
* With transparency in the way donations are managed and disbursed.

No financial information or details of our donors and/or beneficiaries must be disclosed without the prior written permission of the Chief Executive Officer and the donor and/or beneficiaries. Where a donor or bequestor has expressly denied permission to do so; Our People must not disclose the identity of that donor or bequestor to any member of the public.

Donors must not be subjected to undue influence, harassment, intimidation or coercion in our fundraising activities, and Our People must comply with any donor’s requests to refuse or limit their donations, or requests to not receive printed material or phone contact by Guide Dogs NSW/ACT.

## Selection of Suppliers

Guide Dogs NSW/ACT awards its business strictly based on suitability and price and in accordance with the Delegations of Authority. Any person who is involved in buying goods and services on behalf of Guide Dogs NSW/ACT must avoid any relationship, financial or otherwise, with suppliers that could be seen as inappropriate.

Any person who is participating in, or who has any influence in, the making of a decision about the use of goods or services in which the person, or a member of their family or a close friend has a personal interest, must immediately disclose that interest to the person’s Executive Leadership Team Member or the Chief Executive Officer (or the Chairperson in the case of Board Directors). That person will be excluded from any involvement in the selection process for determining the supplier and for the payment of those goods and services.

## Receipt of Gifts and Hospitality

The giving and receiving of gifts and the provision and acceptance of hospitality are part of normal business practice. All gifts and hospitality received by an employee, contractor or temporary worker should be accounted for and declared by completing the Record of Gift form which is found in the [Personal Gifts and Acceptance Policy](https://guidedogs-explorer.com.au/public/resource/view/?id=7919). Their immediate People Leader will authorise the Record of Gift form.

There are times when gifts and hospitality are not acceptable and could compromise the reputation of Guide Dogs NSW/ACT. Gifts or hospitality should not be received that could:

* Compromise a person’s judgement;
* Be or appear to be a conflict of interest;
* Damage relationships with others; or
* Indicate any favouritism or prejudice.

## Non-Compliance with Code of Conduct

Any person who fails to comply with Guide Dogs NSW/ACT’s Code of Conduct may be subject to disciplinary action. Depending on the seriousness of the breach, this could result in disciplinary action, including the termination of the person’s employment or engagement with Guide Dogs NSW/ACT.

## Reporting Breaches of Code of Conduct

Guide Dogs NSW/ACT expects its people and stakeholders to report any breaches or suspected breaches of its Code of Conduct promptly and in good faith. Breaches can be reported in line with Guide Dogs NSW/ACT’s Grievance Policy, Whistleblowing Policy or alternatively reported directly to the Head of People and Culture or the Chief Executive Officer.

Where this is not an appropriate avenue for resolution, a breach or suspected breach can be reported to Guide Dogs NSW/ACT’s Appointed External Whistleblower Investigations Officer - Your Call Contact Details:

* Website: <https://www.yourcall.com.au/report>
Availability: 24/7
* Telephone: 1300 790 228 relevant number
Opening Hours: 9am and 12am, recognised business days, AEST
* National Relay Service

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method at [www.relayservice.gov.au](http://www.relayservice.gov.au/) and request Your Call’s hotline 1300 790 228

If you have difficulty speaking or understanding English, contact Your Call through the [Translating and Interpreting Service](https://www.tisnational.gov.au/) (TIS) [131 450](http://www.aacqa.gov.au/contact-us/tel%3A131450) and ask for Your Call on 1300 790 228.

## Employee Assistance Program

Guide Dogs NSW/ACT is committed to providing well-being support to its employees and their immediate families. They may access a professional counselling service run by Access EAP. Sessions are confidential and provided over the phone. The prime purpose of intervention is initial, short term support and advice. Sessions can assist in identifying and clarifying issues, and developing effective resolution and coping strategies.

Contact Information:

* T: 1800 818 728
* W: [www.accesseap.com.au](http://www.accesseap.com.au)
* E: Info@accesseap.com.au

# 4. Roles and Responsibilities

**Employees** includes all permanent, fixed term and casual employees.

**Contractors** includes independent contractors.

**Temporary Workers** includes labour hire, work integrated learning students and contractors.

**Volunteers** includes all volunteers including Directors of the Board and members of the Customer Advisory Panel.

**Our People** refers to employees, contractors, temporary workers and volunteers.

**People Leaders** are leaders of teams or functions.

**Board Directors** are directors of Guide Dogs NSW / ACT Board.

## The Chief Executive Officer or Chairperson in the case of the Board Director is responsible for:

* Assessing any conflicts of interests and approve an ongoing involvement if a conflict is declared,
* Investigating and acting on any breaches of the Code of Conduct; and
* Interaction with the media is limited to the Chairperson or CEO, with the Chairperson’s approval, in respect of corporate and strategic issues. The CEO will handle media comment in relation to operational issues.

## **The Executive Leadership Team Member (ELT)** is responsible for:

* Communicating and reinforcing the Code of Conduct;
* Investigating any breaches of the Code of Conduct or referring matters to the appropriate internal resource; and
* Referring any conflicts of interest to the Chief Executive Officer.

## People Leaders are responsible for:

* Communicating and reinforcing the Code of Conduct;
* Investigating any breaches of the Code of Conduct or referring matters to the appropriate internal resource;
* Signing the Record of Gift form; and
* Monitoring adherence to the Code of Conduct.

## Employees, Contractors, Temporary Workers, work integrated learning students and Volunteers are responsible for:

* Adhering to the Code of Conduct;
* Reporting any breaches of the Code of Conduct to appropriate People Leaders;
* Completing the Record of Gift form when in the receipt of a gift; and
* Complete the disclosure of interests form.

## **The Board of Directors** are responsible for:

* Reviewing and approving the Code of Conduct,
* Adhering to Australian Charities and NFP Commission’s governance standards,
* Handling Board members dissent and disagreement with respect and ensuring that all decisions are appropriately recorded,
* Handling Board members conflicts of interest following the Board Conflicts of Interests policy
* Adhering to the Code of Conduct; and
* Maintaining confidentiality and discretion in all Board matters.

# 5. Related Legislations and Documents

* Child Protection Policy
* Delegations of Authority
* Fundraising Institute of Australia’s Code of Ethics
* Personal Gifts Acceptance Policy
* Record of Gift Form (part the Personal Gifts Acceptance Policy)
* Grievance Policy
* Grievance Form
* Social Media Policy
* Guide Dogs Australia Guide Dog Mobility Standards
* International Guide Dog Federation Standards
* NDIS Code of Conduct
* Orientation and Mobility Association of Australasia Code of Ethics
* Whistleblowing Policy
* Discipline, Termination and Redundancy Policy
* Client Complaint Management Policy
* Disclosure of Interest Policy

# 6. Version History

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| --- | --- |
| * + - * 1. Policy Version
 | V4 |
| * + - * 1. Author:
 | HR Business Partner |
| * + - * 1. Owner:
 | Head of People and Culture |
| * + - * 1. Authorised By:
 | Head of People and Culture |
| * + - * 1. Last Updated:
 | 10 November 2021 |
| * + - * 1. Next BOARD Review:
 | 1 May 2024 |