



2.7 Staff Code of Conduct and Ethics

Overview

St George Community Housing (SGCH) aims to consistently enhance the interests of its tenants and applicants and is committed to operating according to the highest professional standards. This code of conduct details the minimum standards of behaviour expected of all employees and is designed to ensure employees understand their responsibilities and obligations, as well as providing guidance to employees faced with an ethical dilemma or conflict of interest. SGCH is committed to supporting each employee's progress in achieving a high standard of service as part of his/her professional and personal development.

Who the code applies to

The Code of Conduct and Ethics applies to anyone employed by SGCH on a full time, part time, temporary or contract basis. This includes individuals, agencies, contractors or organisations who are engaged to provide services, information, products or advice to SGCH.

Our values and behaviour

Our organisational values set the standard for our behaviour. We use our corporate values to make decisions that align with our purpose – Better lives, stronger communities through affordable quality housing.

Our values are:

Support – supportive environment

A business environment that is caring and provides support and encouragement to everyone involved in managing, delivering and using our services

Accountability – accountable people and practices

Being transparent and accountable to our stakeholders for our actions and decisions, and being collectively and individually professional in the way we conduct business

Respect – respect for staff, partners and clients

For the unique contribution of our staff and partners, and for clients, whatever their circumstances. Willingness to listen to and gain understanding of others and to work together

Integrity – integrity in our communications and meeting our responsibilities

Being honest, open and appropriate in our communications with others. Understanding and meeting our governance and management responsibilities.

It is expected that all employees behave in a values aligned manner. Employees are required to act with integrity, honesty, fairness and respect in all dealings with tenants, applicants, co-workers, management, all other stakeholders and the



St George Community Housing

Policies and Procedures Section 2 — Human Resources

general public. At all times employees should recognise that their behaviour is a direct reflection upon the reputation and public image of SGCH.

Our Code

1. Professional conduct

SGCH employees are expected to act appropriately in all situations and not engage in any corrupt conduct. Examples of corrupt conduct may include:

- Providing a contractor with work in return for personal benefit
- Theft or misappropriation of SGCH material or financial resources
- Offering or accepting money to provide unfair advantage
- Accepting a personal gift or benefit from a tenant, applicant or contractor in return for providing services
- Fraud and attempts at fraud
- Forgery, and making false or fraudulent claims e.g. time sheets, expenses, vehicle usage log and creating false evidence
- Misuse or unauthorised disclosure

Employees must not engage in any action or inaction of a serious nature that is contrary to law, unreasonable, unjust, oppressive, improperly discriminatory or based on improper motives. Examples of this inappropriate behaviour may include:

- Approving allowances for employees that they are not entitled to
- Unauthorised disclosures of confidential information
- Making decisions without authority
- Serious delays in making a decision or taking action
- Applying a policy inflexibly without regard to the merits of an individual case
- Decisions or actions that are not justified by any evidence or that are unreasonable
- Abuses of power, intimidation or harassment
- Inconsistent application of a law, policy or practices when there is no reasonable, justifiable or appropriate reason to do so

2. Company policies & procedures

All employees are required to comply with SGCH policies and procedures. These policies and procedures comprise part of your contractual arrangements with the company. A full policy list and copies of a number of key policies are included in your induction pack.



St George Community Housing

Policies and Procedures Section 2 — Human Resources

3. Acting in the interests of SGCH

Employees are required to act at all times in the interest of SGCH. This includes supporting on a professional level all formal decisions of the Board and the management team.

4. SGCH Assets

Employees should respect the company's ownership of all company funds, equipment and property and should use and maintain these resources with due care. SGCH allows reasonable personal use of the telephone, photocopier, printer, email and the internet. Use of SGCH letterhead for personal purposes is not allowed. SGCH pool car/s must only be used for business unless CEO approval has been given for private use.

Our resources must never be used for:

- Private commercial activity or financial gain
- Any activities including jokes or pranks that might be inappropriate or offensive
- Transmitting material that may damage our reputation
- Accessing or transmitting information that could be misleading, deceptive or illegal
- Gambling
- Subscribing to or accessing fee based services for personal use
- Purposes which will adversely affect the performance of our networks, email system or other operations

5. Conflicts of Interest

A conflict of interest exists when a personal interest (financial or otherwise) interferes or could be perceived to interfere with an employee's ability to complete work impartially for SGCH. Conflicts of interest are most likely to arise where staff members have a close family or personal relationship with each other or with clients/tenants/applicants. Examples where conflicts may occur include:

- An employee's relative is doing business with SGCH
- An employee is also a tenant and involved in managing their own tenancy
- An employee finds that a tenant in their portfolio is someone with whom they have had legal disputes with in the past, or is a member of their family
- An employee is supervising a member of their own family
- An employee is operating or associated with a business or has a second job that could benefit from his/her access to SGCH business information

Conflicts of interest should be avoided. However, where these are unavoidable they should be disclosed. Conflicts of interest should be reported to your manager, General Manager or to the CEO as soon as possible. Senior Executives may declare their conflict of interest to the CEO or the Chairman of



St George Community Housing

Policies and Procedures Section 2 — Human Resources

the Board. As soon as the conflict has been declared, the manager and the person concerned must agree a strategy to manage the situation immediately. Actions and decisions must be recorded appropriately. Strategies may include:

- No action, as the risk of an actual conflict is remote and any effect would be minor
- Removing the employee from certain duties related to the conflicting interest and/or involving other employees in certain aspects of their duties
- Restricting access to certain information
- Relinquishing the conflicting interest

Some employees may also be SGCH tenants or applicants. In these cases:

- The employee should not manage the portfolio that includes their tenancy
- The employee should declare their tenancy or application to their manager
- The employee should have no involvement with, or access to, information about other tenants in their local area, where practical and appropriate
- The rights of the employee must be respected, including rights to privacy and confidentiality as a tenant or applicant
- The manager of an employee who is a tenant should be kept completely separate from the management of the employee's tenancy.
- Any issues arising in one area should not affect the employee's situation in the other area

6. Professional interaction with all clients, tenants, applicants and partners

It is imperative that all interactions with stakeholders are conducted in a professional and customer focussed manner. Employees need to ensure that:

- Only work based mobile/phone numbers are communicated
- All communication is clear and timely, polite, courteous, respectful and professional
- They avoid social interaction with stakeholders via social media mechanisms such as Facebook
- Social interaction during work hours is kept to a minimum e.g. accepting a cup of coffee/tea or light refreshment, engaging in polite conversation
- Social interaction outside of work hours is avoided – in situations where this is not possible, then the employee agrees to disclose this to his/her manager
- We respond to all stakeholder contact within agreed timeframes
- We ensure that our response in every situation is considered from the customer's perspective

7. Disclosure of Gifts and Benefits

SGCH recognises that on occasions employees will receive gifts/benefits in the course of their work but intends to ensure that these do not place the employee



St George Community Housing

Policies and Procedures Section 2 — Human Resources

under any undue influence or obligation or give the appearance of an improper relationship with the organisation or individual.

Employees are therefore required to disclose any gift or benefit they receive above the value of \$100 to the Executive Administration Officer who maintains a register of such gifts/benefits. This information may be provided to the Board.

On occasions employees will be invited to speak at functions, conduct presentations, write articles or participate in committees. This raises the possibility of the acceptance of honorarium or other compensation for the particular service performed. If SGCH time, facilities or ideas are involved in the preparation or the presentation prior approval should be obtained. Any honorarium, compensation or gifts must be declared.

8. Alternative employment

Employees of SGCH should not undertake any employment with another organisation that is a supplier or competitor or any other employment that is in conflict with their position at SGCH. Any employee wishing to undertake additional employment i.e. a second job, should disclose this to his/her manager and discuss to ensure that this additional role does not impact on the individual's health and well being or work performance at SGCH. Employees must seek the permission of the CEO to accept a Directorship (other than a family company).

9. Influencing others

Employees should not exercise influence obtained from their positions within SGCH to obtain improper benefit for themselves or another.

10. Obeying the Law

SGCH takes seriously its obligations to comply with all federal, state and local government laws and regulations, as well as common law obligations and again requires all employees to do the same.

11. Information management and record keeping

SGCH's information must only be used for its intended work related purpose and not for personal benefit. SGCH information that has not been released to the public via our website, the annual report or media releases, should be considered confidential unless otherwise stated by the CEO. Confidential information can include paper files, physical and electronic records, electronic documents, internal reports and internal emails. You may not make or appear to make public comments on behalf of SGCH unless authorised to do so.

All SGCH employees have a responsibility to keep abreast of our current recordkeeping requirements and practices, to make and keep records, and to ensure they are accurately recorded in our record keeping systems



St George Community Housing

Policies and Procedures Section 2 — Human Resources

12. Use of the intranet

Employees must use the intranet in accordance with the Intranet Guidelines. All use of the intranet must be professional and not contravene any relevant legislation.

Breach of Code of Conduct

All employees are required to act in accordance with the letter and spirit of the code of conduct. SGCH recognises that there may be occasions when an employee believes that a co-worker may be in breach of the code. This may be in respect to unethical, fraudulent, deceptive, dishonest or corrupt behaviour or where it appears that a conflict of interest exists. Employees are encouraged to report such behaviour.

SGCH acknowledges the sensitivities involved in reporting another employee for breaching the code of conduct and endeavours to ensure that any concerns raised by an employee will be treated with the strictest confidence, without any fear of reprisal or detrimental action.

However, reports which are not made in good faith, or made in a frivolous or vexatious manner, will not enjoy the same protection. SGCH does not tolerate misconduct and is committed to addressing any inappropriate practices and ensuring that employees are not prejudiced for making a genuine report or complaint.

Who to Report to

The following is a list of the positions, which employees may contact to report matters concerning another employee's inappropriate or fraudulent behaviour or the failure to report a conflict of interest.

Chief Executive Officer, General Manager, HR Manager or the Chairman of the Board if the matter is concerning an Executive team member.

Investigation Process

Employees will be encouraged to provide a written summary of the complaint so that an appropriate investigation can take place. During the investigation an employee who is the subject of the report will be informed of the particulars of the allegation. SGCH reserves the right to suspend an employee for the duration of the investigation if not doing so would hinder the investigation process. The employee will be provided with the opportunity to refute the allegation or provide supporting documentation or other evidence to support their position.

Investigation Outcomes

At the conclusion of the investigation, factors such as the seriousness, repetition, duration and circumstances of the incident, previous history and employment of the individual and any mitigating circumstances will determine what action is warranted. An employee who is found after the investigation to have been in



St George Community Housing

Policies and Procedures Section 2 — Human Resources

breach of the code of conduct may have one or more of the following actions taken against them; no action, an official warning, disciplinary action or dismissal.

The outcome of the investigation will be confirmed back to the employee making the report.