# **Guide Dogs.**

# **Code of Conduct**

# **Version History**

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Owner Board

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# **Table of Contents**

V	ersion History	1
1	Overview & Introduction	3
2	Scope and Audience	3
3	Code Expectations and Standards	3
R	Responsible Use of Assets	4
	Performance of Duties	4
	Confidentiality and Disclosure of Information	4
	Conflict of Interest	4
	Employment Outside of GDN	5
	Professional Relationships with Our Clients	5
	National Disability Insurance Scheme (NDIS) Code of Conduct	6
	Professional Relationships with Our Donors	6
	Selection of Suppliers	7
	Receipt of Gifts, Benefits and Hospitality	7
	Non-Compliance with Code of Conduct	8
	Reporting Breaches of Code of Conduct	8
	Employee Assistance Program	8
4	Roles and Responsibilities	9
	CEO or Chair	9
	ELT	9
	People Leaders	9
	Workers and Volunteers	9
	Board	10
5	Definitions	10
R	Polated Legislation and Documents	11

## 1 Overview & Introduction

GDN 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 our people and Workers, on the ethical standards of behaviour required at GDN. These ethical standards are in line with the general values and behaviours of the organisation and aim to maintain the reputation of the GDN brand as a trusted and professional organisation.

#### GDN's values are:

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

GDN'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 our people and Workers.

This code applies while working for and/or representing GDN 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 GDN'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 GDN, 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, Workers and/or equipment within their control are used effectively and respectfully for the purposes of GDN's business. No person shall use the services of our Workers or facilities for private purposes, unless permission has been granted by the Chief Executive Officer (CEO) 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 GDN. They are expected to act honestly in all of their duties in accordance with GDN'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 GDN, while on our premises or on GDN's time.

## **Confidentiality and Disclosure of Information**

Our people may via the conduct of their duties have access to Personal Information or commercial information relating to the operations of GDN.

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

Confidential, Personal Information or Sensitive Information relating to GDN 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 GDN. Personal Information must never be disclosed to third parties outside of GDN (including consultants, suppliers and contractors) without ELT approval.

### **Conflict of Interest**

GDN 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. Our people are required to comply with the Conflict of Interest Policy.

## **Employment Outside of GDN**

No 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 GDN. Breach of this condition is a risk to the reputation of GDN and will be treated in a serious manner.

Our people must not during the course of their employment or engagement with GDN, without the prior written approval of the CEO (or the Chair in the case of the Board), undertake any appointment, position or work that:

- 1. Competes with the work of GDN;
- 2. Purports to be connected to the work that GDN does;
- 3. Generates income from the clients, Volunteers, donors, or sponsors of GDN;
- 4. Otherwise adversely affects GDN; or
- 5. Hinders the performance of their duties with GDN.

Provided that there is no conflict with the ethics and values of GDN, 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 GDN, 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**

GDN is committed to upholding professional standards consistent with the Orientation and Mobility Association of Australasia's 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.

GDN 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.

GDN 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 Protection 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 GDN.

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 GDN.

# 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.

All Workers must follow the NDIS Code of Conduct, specifically:

- act with respect for individual rights to freedom of expression, selfdetermination, 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**

GDN 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 Personal Information (including financial information or other details) of our donors and/or beneficiaries must be disclosed without the prior written permission of the CEO 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 GDN.

## **Selection of Suppliers**

GDN awards its business strictly based on suitability and price and in accordance with the Delegations of Authority Policy and the Delegations Matrix. Any person who is involved in buying goods and services on behalf of GDN 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 ELT member or the CEO (or the Chair in the case of the Board). 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, Benefits and Hospitality

The giving and receiving of modest gifts, benefits and the provision and acceptance of hospitality are part of normal business practice. Material gifts, such as restaurant lunches and dinners, the provision of alcohol, tickets to the theatre or sporting events etc. must be disclosed and approved prior to acceptance.

All material gifts, benefits and hospitality received by Our people should be accounted for and declared by completing the Record of Gift form which is available on the intranet. Their immediate People Leader or ELT member will authorise the Record of Gift form. If there is any confusion surrounding whether or not a gift, benefit or hospitality is material, or where there is a possibility that receipt of a gift, benefit or hospitality will place Our People in a position where they are (or may be perceived to be) compromised or influenced by acceptance of the gifts, benefits or hospitality, the Chief People Officer should be consulted.

There are times when gifts, benefits and hospitality are not acceptable and could compromise the reputation of GDN. Gifts, benefits 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 GDN'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 GDN.

## **Reporting Breaches of Code of Conduct**

We expect Our people, Workers 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 GDN's Grievance Resolution Policy, Whistleblowing Policy or alternatively reported directly to the Chief People Officer or the CEO.

Where this is not an appropriate avenue for resolution, a breach or suspected breach can be reported to GDN's Appointed External Whistleblower Investigations Officer – Your Call.

#### 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 and request Your Call's hotline 1300 790 228

#### **Translating and Interpreting Service**

If you have difficulty speaking or understanding English, contact Your Call through the Translating and Interpreting Service (TIS) 131 450 and ask for Your Call on 1300 790 228.

## **Employee Assistance Program**

GDN 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:**

Telephone: 1800 818 728

Website: www.accesseap.com.au Email: Info@accesseap.com.au

# 4 Roles and Responsibilities

### **CEO** or Chair

The CEO or Chair, in the case of the Board, 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 Chair or CEO, with the Chair's approval, in respect of corporate and strategic issues. The CEO will handle media comment in relation to operational issues.

### **ELT**

The 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 CEO.

## **People Leaders**

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.

#### **Workers and Volunteers**

Workers 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.

#### **Board**

The Board 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 Definitions

In this Code of Conduct, unless the context requires another meaning:

- 'Board member' means directors of the Guide Dogs NSW/ACT Board.
- 'Contractor' means any person or entity engaged by GDN under a contract for goods or services.
- 'ELT' means the Executive Leadership Team.
- **'Employee'** means a person employed by GDN (including full time, part time and casual employees).
- 'GDN' means, collectively and severally, Guide Dogs NSW/ACT and Related Bodies Corporate.
- **'GDN workplace'** means premises owned or occupied by GDN, but does not include a home office.
- 'our people' include Employees and Volunteers.
- 'People Leaders' include leaders of teams or functions, including the General Manager Team (GMT), Senior Leadership Team (SLT) or the People Leadership Team (PLT).
- 'Personal Information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable:
  - (a) whether the information or opinion is true or not; and
  - (b) whether the information or opinion is recorded in a material form or not.
- 'Related Bodies Corporate' has the meaning ascribed to that term in the Corporations Act 2001 (Cth).

#### 'Sensitive Information' means:

- (a) information or an opinion about an individual's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record (that is also personal information);
- (b) health information about an individual;
- (c) genetic information about an individual that is not otherwise health information;
- (d) biometric information that is used for the purpose of automated biometric verification or biometric identification; or
- (e) biometric templates.
- **'Student'** means an individual, enrolled in an educational institution, who is participating in vocational placement or work integrated learning on GDN premises or under Employee supervision.
- 'Volunteer' means an individual who offers their services, skills and experience of their own free will to perform agreed tasks for GDN without compensation or reward. Volunteers include Board members, committee members and advisory panel members.

'work' means any time at which an Employee or other Worker is:

- (a) carrying out, or acting in the course of their duties for, or with respect to, GDN:
- (b) at work functions (even if out of hours) such as team dinners, Christmas parties or client functions or any other function that GDN has facilitated or that take place in connection directly or indirectly with GDN's activities;
- (c) representing GDN, for example, at a conference (including after-hours behaviour at such conference), or entertaining clients on an informal basis; or
- (d) otherwise acting within the course of his or her employment (employees) or within the scope of his or her engagement (non-employees).

for the avoidance of doubt, the above incorporates events outside of working hours.

'Worker' means an individual performing work in any capacity for GDN, including as an Employee, a Contractor, a subcontractor, a labour hire worker, a Student, a Volunteer or a trainee.

# **Related Legislation and Documents**

- Child Protection Policy
- Client Complaint Management Policy

- Conflict of Interests Policy
- Delegations Policy
- Delegations of Authority & Delegations Matrix
- Discipline, Termination and Redundancy Guidelines
- Fundraising Institute of Australia's Code of Ethics
- Grievance Form
- Grievance Resolution 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
- Record of Gift Form
- Social Media Policy
- Whistleblowing Policy