

# Code of Conduct

## Contents

Purpose ..... 1

Coverage ..... 1

Responsibilities ..... 1

Acting with honesty and integrity ..... 1

Acting with professionalism ..... 2

Working with children and young people ..... 2

Conflict of interest ..... 3

Respect, privacy, and misuse of information ..... 3

Complaints and grievances ..... 4

Breach or suspected breach of the Code of Conduct ..... 4

Document ID	Published	Revision	Approved By	Version	Page
C47DOC-1683875333-2035	1/10/2023	6/03/2022	Angela Abbott	Version: 7.0	Page 0 of 4

## Purpose

The objective of the Code of Conduct is to ensure that those covered understand their obligations and do not engage in breaches of Colony 47 practices, frameworks and the law.

This Code of Conduct provides a framework for those covered to make decisions and engage in behaviours that are ethical and appropriate for us and all people in the workplace.

There is a clear expectation that all people who work for or engage with us act with honesty and integrity.

## Coverage

This Code of Conduct applies to all employees, volunteers, board members, students and contractors. For the purpose of this framework, the above are collectively referred to as `employees` who recognise that they are ultimately responsible for their own behaviour including:

1. Behaviour in the workplace.
2. The performance of work or provision of services for or in connection with Colony 47.
3. Conduct outside the workplace or working hours if the acts or omissions:
4. Are likely to cause serious damage to working or professional relationships at Colony 47.
5. Are incompatible with Colony 47's values, relationship or engagement which could damage or are likely to damage Colony 47 interests or reputation.
6. All employees **must** comply with this Code of Conduct lawfully and not directly or indirectly engage in or aid, abet or encourage behaviour in breach of this framework.
7. Colony 47 Board, executive managers and coordinators are required to promote this framework within their area of responsibility and take reasonable steps to ensure that any breaches or potential breaches of the Code of Conduct are identified, taken seriously and acted upon appropriately.

## Responsibilities

The Code of Conduct is the responsibility of the Board, and its implementation is the accountability of the Chief Executive Officer and or their delegates.

## Acting with honesty and integrity

Acting with honesty and integrity **will** maintain respect and confidence in us. All employees **must**:

1. Treat everyone at the workplace with honesty, respect, and courtesy.
2. Not take improper advantage of your position in order to obtain a benefit for others or yourself.
3. Report dishonest, unethical, fraudulent, or corrupt behaviour or failure to follow our policies or the law by anyone in the workplace or that relates to work.
4. Not seek or accept any type of unauthorised compensation, fee, commission, or receive any financial gesture from a third party in connection with our operations.
5. Not offer or accept a gift that creates an obligation or may be reasonably construed as favouritism, discrimination, collusion, or other unacceptable practices.

Document ID	Published	Revision	Approved By	Version	Page
C47DOC-1683875333-2035	1/10/2023	22/09/2024	Angela Abbott	Version: 7.0	Page 1 of 4

6. Not make any bribes, kickbacks, inducements, or other illegal payments of any kind for the benefit of any person or party in connection with favourable treatment or for any other purpose in connection with our operations.
7. Encourage and support good faith reporting of breaches of this Code of Conduct without retribution.

### Acting with professionalism

The purpose of acting in a professional manner preserves reputations of individuals and that of Colony 47. To demonstrate professionalism employees **will**:

1. Not engage in or tolerate breaches of our practices, requirements, or the law.
2. Not undermine or bring our integrity or reputation into disrepute. This includes not publicly criticising the decisions of Colony 47 in an unlawful manner.
3. Work co-operatively as a team and treat all people working or visiting the workplace with respect and dignity.
4. Exercise care and diligence and use their best endeavours and sound judgment when carrying out duties or providing services.
5. Maintain a professional relationship with other people when engaged as an employee or contractor.
6. Provide levels of service you are competent and authorised to provide.
7. Not make unauthorised statements or commitments on our behalf.

### Working with children and young people

All employees are responsible for the safety and wellbeing of all children and young people who engage with our services, all employees **will**:

1. Promote the human rights, safety, and wellbeing of all children and young people. Prioritising the best interest of a child or young person.
2. Behave respectfully, courteously, and ethically towards children, young people, and their support networks regardless of their heritage, disability, gender identification, or their cultural and linguistic background.
3. Listen and respond to the views and concerns of a child or young person particularly if they do not feel safe.
4. Create and maintain an environment that welcomes children's input, and explain they have a right to be involved in decisions that have an impact on them.
5. Where appropriate, contribute to company discussions and reviews of the Child and Youth Safe Framework.
6. Identify and contribute to mitigating risks to a child or young person's safety and wellbeing.
7. Be familiar with the Child and Youth Safe Framework requirements including responding to complaints and the Reportable Conduct Scheme.

Additionally, all employees **must not**:

1. Work with children or young people while under the influence of alcohol or prohibited drugs.
2. Engage in unlawful activities that may have an impact on child safety.
3. Discriminate against children, young people, and their support networks regardless of their heritage, disability, gender identification, or their cultural and linguistic background.
4. Touch or hug a child or young person. Some situations may require touching such as administering first aid or physical intervention for personal safety. Consent should be sought but this may not always be practical.
5. Unnecessarily be alone with a child or young person.

Document ID	Published	Revision	Approved By	Version	Page
C47DOC-1683875333-2035	1/10/2023	22/09/2024	Angela Abbott	Version: 7.0	Page 2 of 4

6. Arrange personal contact outside of the scope of support.
7. Disclose personal or sensitive information regarding a child or young person.
8. Ignore any suspected or disclosed child abuse or harm.
9. Use inappropriate language or show inappropriate material to a child or young person.

## Conflict of interest

Conflicts of interest may arise which affect or can be seen to affect an employee's ability to exercise professional discretion and unbiased judgment. Conflict of interest, whether potential, perceived, or actual, can jeopardise confidence in us.

All employees **must** declare any real or perceived conflict to their coordinator or executive manager or other relevant stakeholder such as (but not limited to) another employee.

Conflicts of interest may include:

1. Having contact with active, consumers, participants, or members outside the workplace.
2. Working with active consumers, participants, or members whilst maintaining a personal relationship, or having had a relationship with that person before they became a client.
3. Working with someone with whom they have a relationship such as family relationship, financial or business relationship, or any other relationship for which a worker can gain from a client.
4. Taking on personal, business, financial or private interests that compete or conflict with our interests.
5. Taking up other employment or engagements outside of their position with or services provided to Colony 47 where they may create a conflict of interest, without approval.
6. Not declaring any conflict of interest that could occur through shareholdings, ownership of real estate or being the trustee or beneficiary of a trust.
7. Placing other people at or in the workplace in compromising or conflicted situations.
8. Taking advantage of any of our property or information belonging to us for personal benefit or for the benefit of any other person.
9. Not disclosing ownership of shares in a listed entity which deals with or competes with Colony 47.

Where a conflict of interest has been declared, it is the responsibility of the executive manager or coordinator to, wherever practical, remove the worker from working directly with the affected client or organisation or from a position where the worker may have any bearing at all on the outcome of services provided to the client or organisation.

## Respect, privacy, and misuse of information

All employees are bound by the requirements set out in the Australian Privacy Principles. Respecting privacy and not misusing information builds confidence in those who share information with Colony 47.

All employees **must**:

1. Not disclose confidential information to any person or entity without the prior written consent of the consumer, relevant manager, or authorised person.
2. Be vigilant and guard against inadvertent disclosure, including instances where discussions may be overheard by outside parties.
3. Not use confidential information for the purpose of directly or indirectly obtaining personal gain or another benefit.

Document ID	Published	Revision	Approved By	Version	Page
C47DOC-1683875333-2035	1/10/2023	22/09/2024	Angela Abbott	Version: 7.0	Page 3 of 4

4. Not copy or distribute any software unless expressly permitted to do so under the applicable license.
5. Not copy all or parts of articles, books, case notes or other publications if another individual owns a copyright on such materials, unless we have obtained a license to copy the materials.
6. Not use improper means to seek out, accept or use confidential information belonging to us.
7. Only access confidential information for authorised work-related tasks or in providing agreed services to Colony 47.
8. Not encourage others to disclose confidential information or sensitive information or privileged information.
9. Ensure the secure collection, storage and disposal of confidential information and sensitive information regardless of its medium.

<b>Complaints and grievances</b>
----------------------------------

Conflict can occur between one or more parties including employees, managers, participants, and stakeholders.

It is expected that most complaints and grievances **will** be resolved using the direct resolution guidelines found in the Compliant and Grievance section of the Feedback Framework.

Where a genuine attempt has been made to resolve the matter using direct resolution and an outcome has not been possible, or the matter is serious, the grievance is to be resolved using the formal process detailed in the Compliant and Grievance section of the Feedback Framework.

An employee raising a formal grievance should advise their coordinator in writing, stating the nature of the grievance. However, if the grievance is against the coordinator, the grievance should be directed to the relevant executive manager or the Chief Executive Officer as the direct line manager of the coordinator. Where the grievance is against the Chief Executive Officer, this will be forwarded to the Board Chair.

If you are not comfortable or able to report misconduct internally, you may report it to our external and independent Speak Up (whistleblowing) service provider. Refer to the Worker Behaviour Framework for details.

<b>Breach or suspected breach of the Code of Conduct</b>
--

Any breach of the Code of Conduct may result in disciplinary proceedings in accordance with the Disciplinary Action section of the Worker Behaviour Framework.

Any employee who becomes aware of a breach of this Code of Conduct **must** disclose this breach either to their manager or to the People, Culture & Capability team.

In extreme circumstances an individual may be concerned that a serious breach of this Code of Conduct has occurred but considers that it would be personally damaging to report it through normal channels, in such a case they should report it externally as instructed in the Speak Up section of the Worker Behaviour Framework.

Document ID	Published	Revision	Approved By	Version	Page
C47DOC-1683875333-2035	1/10/2023	22/09/2024	Angela Abbott	Version: 7.0	Page 4 of 4