

# Code of Conduct Policy

## 1. Purpose

The object of the Code is to provide a framework for conducting business and interacting with clients, colleagues, stakeholders and others which is to:

- act with the utmost integrity, honesty, transparency, and professionalism and be scrupulous in the proper use of Home in Place Group information, funds, equipment, and facilities; and
- exercise objectivity, fairness, equality, proper courtesy, consideration, and sensitivity in dealing with clients, colleagues, and other stakeholders; and
- identify and manage any conflicts of interest appropriately; and
- promote the safety and well-being of all children accessing its services and programs, in particular to minimise the risk of abuse of children; and
- respect individual rights to freedom of expression, self-determination and decision-making to exercise choice and control over their own lives: and
- prevent and respond to all forms of violence against, and exploitation, neglect, and abuse of people with disability and vulnerable people.

## 2. Scope

This Code of Conduct Policy (the **Code**) applies to all workers, directors, and members of governance committees and advisory panels of the Home in Place Group.

All workers, directors, and members of governance committees and advisory panels of the Home in Place Group are required to:

- a. represent the Home in Place Group's 'best interests and value the Home in Place Groups' reputation;
- b. demonstrate conduct and behaviour that reflects the Home in Place Group's values honesty and integrity;
- c. to treat others with respect and value individual differences;
- d. use appropriate language which does not discriminate, upset, or offend others;
- e. perform their duties with skill, care, and diligence;
- f. maintain a safe working environment and report anything which could be unsafe;
- g. report any instance where the Code may be breached;
- h. to take all reasonable precautions to ensure a child safe environment is maintained and protect children from harms and abuses in performing their role for Home in Place;
- i. act to prevent violence, neglect, exploitation, or abuse of vulnerable persons including children and people with a disability;
- j. respect and maintain privacy and confidentiality; and
- k. use any delegated authority in fair and equitable manner.

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The Code may apply when a worker, director, or member of a governance committee or advisory panel is performing duties or engaging in behaviour outside of the usual workplace location or their usual working hours for example whilst attending meetings and conferences or engaging with the community as a representative of the Home in Place Group.

In addition to Home in Place Code of Conduct as an NRAS Approved Participant Home in Place has an obligation to comply with the NRAS Approved Participant Code of Conduct and all Home in Place workers are expected to comply with this Code of Conduct relating to management of investor properties which are subject to and must comply with NRAS legislation and regulations.

## 3. Policy Statement

### Guiding Principles

#### *The interests of the Home in Place Group*

Each worker, director, or member of a governance committee or advisory panel has the ability, through their conduct and behaviour, to either enhance and maintain or harm and undermine the trusted and respected reputation of the Home in Place Group.

The expectation is that each worker, director, or member of a governance committee or advisory panel:

- acts professionally and ethically;
- undertakes his or her duties with diligence and care;
- is accountable for the decisions he or she makes and the actions he or she takes;
- deals fairly and equitably with others;
- provides advice which is within the delegation of his or her role and for which he or she is authorised to provide;
- helps protect clients and other stakeholders against potential fraud, theft, discrimination, violence, exploitation, neglect, and abuse including child abuse;
- never entertains clients or stakeholders or participates in activities or functions in a way which may damage Home in Place' reputation; and
- uses organisational equipment and systems of work appropriately, for their proper purpose and in accordance with the relevant policies and procedures.

Further, in providing supports or services to people with disability, each worker, director, or member of a governance committee or advisory panel must comply with the requirements of the NDIS Code of Conduct and:

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

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For worker, director, or member of a governance committee or advisory panel who have contact with or work directly or indirectly with children, particularly in Home in Place' international development programs, must comply with the requirements of the Additional Code of Conduct (Safeguarding of Children) Commitments in Appendix 1 and the Five (5) Guiding Principles of DFAT Child Protection Policy in Appendix 1 of Home in Place Child Safeguarding Policy. The Additional Code of Conduct (Safeguarding of Children) commitments forms part of the Home in Place Code of Conduct Policy.

For further information, please refer to Appendix 1 - Additional Code of Conduct (Safeguarding of children) commitments.

### *The key values – Honesty and Integrity*

The values of the Home in Place Group underpin operations. It is recognised that the continued success of the Home in Place Group depends on each worker, director, or member of a governance committee or advisory panel demonstrating the values of honesty and integrity and thereby:

- a. use Home in Place assets and funds (including corporate credit cards) for proper use in accordance with relevant policies and procedures;
- b. keep true and accurate records of all transactions (including receipts) which make use of Home in Place funds;
- c. never amend records with the intention of disguising, concealing, or misrepresenting the true nature of the transaction or the involvement with a third party;
- d. ensure all transactions undertaken during your work are properly recorded;
- e. never assist a third party to break or evade the law;
- f. avoid any personal, financial, or other interest which may conflict with their employment and duties; and
- g. immediately report any suspicions of fraud, theft, or dishonesty.

### *Respect and Dignity*

Home in Place values difference and supports the development of a diverse and inclusive workforce and governance practice where respect and dignity oversee all interactions.

Discrimination, bullying, harassment, or offensive behaviour of any kind will not be tolerated.

Each worker, director, or member of a governance committee or advisory panel agrees to:

- a. makes decisions that are based on merit, in accordance with policy, procedure and their delegated authority;
- b. treat colleagues, clients, stakeholders and other parties with respect and empathy;
- c. support people with disability to make informed decisions to exercise choice and control over their lives;
- d. report criminal, inappropriate or offensive behaviour, abuse of children and people with a disability; and
- e. respect and support fundamental human rights<sup>1</sup>

<sup>1</sup> As set out in the [UN Universal Declaration of Human Rights](#).

## *Conflicts of Interest*

Acting honestly and with integrity requires each of us to manage conflicts of interest and avoid placing personal interests or the interests of another person before those of the Home in Place Group, our clients, or other stakeholders.

The perception of a conflict of interest can do as much damage to the reputation of the Home in Place Group as an actual conflict of interest. All workers, directors, and members of a governance committee or advisory panel must be conscious of when and how a conflict may be perceived by others and take appropriate and immediate action to either avoid or address this risk.

Any interest which may constitute a conflict of interest must be promptly disclosed in accordance with the POL-005-02 Conflict of Interest Policy and recorded in Home in Place' online Incident, Risk, Compliance and Information Platform.

## *Safety*

All workers, directors, and members of a governance committee or advisory panel are:

- a. prohibited from possessing or consuming alcohol and/or illegal drugs in the workplace and are prohibited from working under the influence of illegal drugs or alcohol.
- b. expected to perform their duties within the guidelines of Home in Place Work Health and Safety policies and procedures and will do all that is reasonably practicable to ensure their safety and the safety of others.
- c. report any concern about neglect, exploitation, abuse or other concern for the safety or well-being of children and people with a disability.

## *Privacy and Confidentiality*

All workers, directors, and members of a governance committee or advisory panel may come across private and confidential information relating to Home in Place, colleagues, clients, suppliers or third parties.

All workers, directors, and members of a governance committee or advisory panel must use any private or confidential information provided to them in line with the relevant Privacy and Confidentiality laws.

Misuse of confidential and private information can have severe commercial and reputational consequences for the Home in Place Group and can also negatively impact those whose information is misused.

Each worker, director, and member of a governance committee or advisory panel must:

- a. ensure information is secure and not share private or confidential information with colleagues unless they need it to perform their duties and their delegation allows them access to this information;
- b. only release information to third parties if the client (or person affected by the release of the information) has agreed in writing to the information being release or if required under the law;
- c. follow privacy procedures and requirement to protect information whenever personal details are supplied over the phone, by email or fax;
- d. follow all IT protocols and procedures for the maintenance of passwords and user profile setup;

- e. collect, use store, handle, update and destroy information, particularly personally identifiable information, in line with applicable policies and processes;
- f. never disclose any information about the Home in Place Group or any individual which is not already in the public domain without the proper authority to do so;
- g. never post inappropriate, false, or malicious comments or materials online relating to the Home in Place Group.

### *Standards of dress*

All workers, directors, and members of a governance committee or advisory panel must dress in a manner that upholds the professional image of the Home in Place Group and, where required, in an appropriate manner to ensure their work health and safety.

For further information, please refer to the following Home in Place documents:

- POL-028-13 Corporate Uniform Policy

### *How the Home in Place Group ensures compliance with the Code*

This Code sets the minimum expectations regarding the conduct and behaviour of each worker, director, and member of a governance committee or advisory panel with the understanding that no policy can cover every conceivable circumstance.

If a worker, director, and member of a governance committee or advisory panel has doubts about any aspect of this Code, including whether his or her conduct or the conduct of someone else is consistent with the Code, her or she may seek clarification from:

- a. their manager or a human resource representative if he or she is a worker of the Home in Place Group; or
- b. the Company Secretary or the Chair of the Parent Board if her or she is a director, or member of a governance committee and advisory panel of the Home in Place Group.

### *Breaches of the Code*

All workers, directors, and members of a governance committee or advisory panel have a duty to observe the Code and ensure that no breaches occur. Any breach of the Code requires immediate attention. All workers, directors, and members of a governance committee or advisory panel have a duty to report known or suspected breaches of the Code.

A complaint or disclosure about an alleged breach of the Code should be in writing and contain details about the date, time and nature of the alleged breach and include any available support material. All reports are to be lodged via the Incident, Risk, Compliance and Information platform using the Misconduct – Home in Place Worker or Suspected Fraud category and reports will be treated sensitively and impartially. The principles of procedural fairness and natural justice will be observed in any action taken in relation to the complaint or disclosure.

The Home in Place Group will protect any “whistle-blower” who reports a violation in good faith and on reasonable grounds and will comply with laws relating to “whistle-blower protection”.

The allegation should be made to:

- the worker's manager or a human resource representative if he or she is a worker of the Home in Place Group; or
- the Company Secretary or the Chair of the Parent Board if her or she is a director, or member of a governance committee and advisory panel of the Home in Place Group.

The complainant will be informed of the procedure for and outcome of the investigation. All workers, directors, and members of a governance committee or advisory panel are provided access to EAP services free of charge.

Any worker, director, and member of a governance committee or advisory panel may at any time discuss a matter or seek advice on how to proceed with a matter from a human resources representative, any other senior executive, the Chair of the Parent Board or the Company Secretary.

## How Does Home in Place Ensure the Code Remains Effective?

The Human Resources department is responsible for the ongoing review and development of the Code. On the commencement of employment, contractual service, or appointment and then annually thereafter, each worker, director, and member of a governance committee or advisory panel must review the Code and declare that they:

1. understand the principles of the Code;
2. have complied with the principles of the Code in the previous 12 months; and
3. agree to continue to comply with them.

It is a requirement that any breach of the Code will be recorded and reported in line with Home in Place' policies and procedures.

## Declaration

I \_\_\_\_\_ have read, understood, and will comply with the Home in Place Group Code of Conduct Policy.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_ Position: \_\_\_\_\_

## 4. Responsibilities

All HOME in PLACE workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of HOME in PLACE policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to HOME in PLACE clients,
- inform HOME in PLACE's clients of the impact of this policy on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this policy document and complete the relevant documentation to propose any amendments, and
- report breaches of HOME in PLACE's policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about HOME in PLACE Policies and Procedures,
- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and
- ensure appropriate processes and controls are implemented to enable breaches of approved HOME in PLACE's Policy and Procedures to be reported and managed.

## 5. Implementation and Review

This policy is listed on HOME in PLACE's Controlled Documents Register and is a controlled document requiring approval of any changes. It may not be amended or shared outside HOME in PLACE without approval. The policy is reviewed regularly and published on HOME in PLACE's SharePoint intranet once approved. Employees receive communications and training on new and reviewed policies and procedures.

HOME in PLACE complies with relevant contractual compliance obligations and jurisdictional laws and regulations when implementing this policy. Confirmation of internal compliance with this policy is undertaken regularly.

It is the responsibility of HOME in PLACE Group Executive Services to maintain and update the HOME in PLACE's Master Policy Document, Policy Directory and the Policy Review Register, administer the review and approval process and inform and distribute new and amended policies and procedures once approved (refer PROC-011 Policy and Procedure Development Approval).

HOME in PLACE Workers should refer to SharePoint Company Documents Policy and Procedure site for the latest version which takes precedent over any uncontrolled version. If this document is printed, downloaded, or saved elsewhere from this site it becomes an uncontrolled version.

For further information contact the Responsible Officer listed under Document Information.

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## 6. Resources and related documents

### *Related documents*

- POL-003-02 Child Safeguarding Policy
- POL-043 Procurement Policy
- POL-018-04 Credit Card Policy
- POL-005-02 Conflict of Interest Policy
- POL-028-13 Corporate Uniform Policy
- POL-046 Delegation of Authority Policy
- POL-038 ICT Electronic Messaging Policy
- POL-005-04 Fraud and Corruption Policy
- POL-039 ICT Mobile Device Policy
- POL-041 ICT Use Policy
- POL-014 Intellectual Property Policy
- POL-018-07 Motor Vehicle Policy
- POL-003-03 People with Disability Safeguarding Policy
- POL-019 Privacy Policy
- POL-018-11 Investment Policy
- POL-018-03 Petty Cash Policy
- POL-021 Reportable Gifts Policy
- POL-027-02 Return to Work Policy (DISPLAY VERSION)
- POL-006-01 Social Media User Policy
- POL-005-03 Whistleblower Policy
- POL-028 Workplace Relations Policy Manual
- POL-027 Work Health and Safety Management System-Aus NSS-MFQA
- Privacy and Confidentiality Statement
- Annexure 1 - Additional Code of Conduct (Safeguarding of children) commitments

### *Related legislation/standards*

#### *NATIONAL*

- [Australian Charities and Not for Profit Commission Act 2012](#)
- [Corporations Act 2001](#)

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## 7. Definitions

Please refer to Home in Place Glossary of Definitions for Policies and Procedures. Terms and definitions identified below are specific to this policy and are critical to its effectiveness:

Term	Definition
<b>Advisory Group</b>	An advisory group created by resolution of and reporting to the Parent Board in accordance with Home in Place Constitution Clause 6 (specifically 6.1, 6.6 & 6.7).
<b>Appeals</b>	A Community housing appeal is defined as ‘any expression of dissatisfaction with a decision made by a social housing provider to provide or not provide a service (such as housing, transfer or priority on the housing register) or, a decision relating to a tenant or service user’s dissatisfaction of a decision made by the organisation.’ An application for a decision to be reversed or overturned. Includes but is not limited to: • Allocation decisions; • Level of rent or rent subsidy; • Eligibility for a housing transfer; • Permission to undertake modifications; • Permission to keep pets; • Calculation of water charges;
<b>Committee</b>	A committee established by resolution of and reporting to the Parent Board in accordance with Home in Place Constitution Clause 6 (specifically 6.1, 6.8 – 6.16).
<b>Compass</b>	Compass Housing Services Co. Ltd. Trading as Home in Place and includes its related body corporate (as defined by section 9 of the <i>Corporations Act 2001</i> (Cth)) and as a charity with the <a href="#">Australian Charities and Not-for-profit Commission (ACNC)</a> .
<b>Complainant</b>	Person with a Complaint ongoing with Home in Place.
<b>Complaints</b>	An expression of dissatisfaction with an aspect of the services provided by [Organisation], where the complainant is unhappy with the standard or type of service. Types of Complaint include: <ul style="list-style-type: none"> <li>• Where Home in Place have failed to provide or there has been a delay or problem in providing a service;</li> <li>• Where Home in Place have failed to follow or have been unfair or inconsistent in applying our policies or procedures.</li> <li>• Where Home in Place have failed to keep Tenants informed, through lack of or insufficient information</li> <li>• Where there has been inappropriate behaviour or attitude from a Home in Place Employee or contractor.</li> </ul>
<b>Director</b>	Has the same meaning as defined in the <a href="#">Corporations Act 2001 Part 1.2 Division 1 Section 9 Dictionary</a> in Australia and as defined in the <a href="#">Companies Act 1993 Part 1 Section 2 Interpretation</a> .
<b>Employee</b>	A person engaged under an employment agreement or award by any company in the Home in Place Group.
<b>Executive Manager</b>	Many positions within Home in Place include the title “Executive Manager”. Regardless of whether an Executive Manager heads a Business Unit, the delegated authority of each Executive Manager depends on the functions and reporting relationship of the Business Unit for which the Executive Manager is responsible. Executive Managers should refer to the document Home in Place Organisational Chart in Terms of Levels of Delegated Authority for confirmation of the band of authority they hold.
<b>HOME in PLACE</b>	Compass Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the <i>Corporations Act 2001</i> (Cth)). This includes Compass Housing Services Co (Queensland) Ltd Trading as HOME in PLACE and Compass Housing Services Co (Victoria) Ltd Trading as HOME in PLACE both of which are a wholly owned subsidiary of Compass registered in Australia.

End of document.