

Title	Code of Conduct
Policy Category	Human Resources
Policy Type	Mandatory
NQF Standard	NQS: Quality Area 4
Related Legislation	See legislation map

Background and Context

Glen Education is committed to ensuring that its services are delivered in accordance with its statutory obligations and with the highest level of integrity, ethical standards, and professionalism. Code of Conduct ('the Code') establishes a professional and ethical standard of conduct and behaviour required of all Representatives (see Definition) that reflects the philosophy, beliefs and values of Glen Education, and ethical principles of mutual respect, equity and fairness.

All Representatives have a duty of care to:

- act in accordance with the Code
- provide a physical and psychologically safe environment to all, including relational safety by ensuring interactions and relationships are professional, respectful, honest, kind, courteous, sensitive and considerate
- be aware of and comply with the law relevant to their role with Glen Education
- comply with any other relevant professional code(s) of practice (in addition to this Code).

The following general principles apply to all Representatives:

- A high standard of personal honesty and integrity is expected. Representatives must not open themselves to suspicion of dishonesty in any form, including deceit, false accounting, fraud or corruption.
- Conduct and behaviour are aligned with Glen Education's values.
- Representatives are responsible for the care of clients and have a duty to ensure that they are treated with respect and consistent with Glen Education's values.
- Representatives should be courteous in their behaviour whilst on duty and avoid any action that might bring their conduct into question.
- Representatives must treat clients, members of the public, stakeholders and other Representatives fairly and reasonably without discrimination.
- Representatives must not abuse or exploit their position for personal gain.
- While on or off duty, Representatives must not conduct themselves in a manner that adversely affects their ability to attend the workplace and perform their work, or otherwise discredit Glen Education's public profile.
- Representatives must behave discreetly in matters of public and political controversy.
- Representative must not disclose without the CEO's explicit permission, information that they acquire in the course of their work and must protect information that is held in confidence.
- Representatives must comply with the privacy principles outlined in the various commonwealth and state legislation which regulates the collection, holding, use and disclosure of personal information.

All Representatives will have access to the Code before commencing paid and unpaid work and are required to comply with its intent and contents at all times.

Scope

This policy applies to all staff, volunteers (including the Board of Directors and the Volunteer Parent Advisory Groups) and students on work placement.

The Code of Conduct defines how Representatives are expected to behave and interact with a broad range of people including those referenced above, as well as clients and stakeholders such as third-party individuals from other community agencies, government, supply companies and the general public.

This policy includes expected standards of conduct both within and outside the workplace and work hours, including for example, work lunches, conferences, Christmas parties, client functions and on social media.

Glen Education has a positive duty to all employees, volunteers and contractors to ensure that they are safe within the workplace. In the event that an incident has occurred where a complaint has been submitted that contains unlawful behaviour, such as sexual harassment, violence, bullying or drug use, Glen Education is required to act.

Definitions

In this Policy references to:

Client: means a person who is a current or potential user of Glen Education services, including children and their families/guardian(s).

Manager/Supervisor: means Glen Education's managers, supervisors, leaders, team leaders (whichever are relevant) and all Representatives with supervisory responsibilities.

Duty of care: refers to the responsibilities of organisations to provide people with an adequate level of protection against harm and all reasonable foreseeable risk of injury.

Representative: refers to paid staff, volunteers (including the Board of Directors and Volunteer PAG members), and contractors, and student placements.

Service: means work carried out directly to or on behalf of a child and/or their family/guardian with the goal of providing high-quality, innovative Early Years Education and fostering a lifelong love of learning.

Stakeholder: mean a person with an interest or concern in Glen Education including but not limited to governments, suppliers, other agencies and the general public.

Visitors: Visitors to Glen Education includes:

- Clients (children and families)
- Work experience students
- Members of the public in the work places
- Community sector agency Representatives
- Representatives of funding bodies; and
- Any other individual encountered as part of the delivery of services.

Workplace: refers to the place of employment and includes any place where a person attends for the purpose of carrying out any function in relation to his or her employment with Glen Education (e.g. client's home, work function or business trip).

Policy

Glen Education Policies and Procedures

Representatives must comply with the Glen Education's policies and procedures which may change from time to time at Glen Education's discretion.

Representatives must:

- routinely review and act in accordance with the requirements of Glen Education's policies and procedures at all times;
- conduct themselves in a manner consistent with Glen Education's values of Respect, Authenticity, Integrity, Community and Celebration.

Interactions

Glen Education maintains an ethical conduct and professional engagement culture. Representatives must perform their duties in a manner that meets all legal, industrial and funding obligations and requirements and the moral requirements of their position as set out in the Position Description. This ensures that relationships with clients and external stakeholders have clear and appropriate boundaries that serve to protect both parties from misunderstandings, misperceptions or violations of the professional relationship.

Representatives must:

- deliver services to all clients without discrimination prohibited by law and treat all people with respect and dignity, recognising and respecting the ethnic, cultural, gender and sexual orientation, religious or political beliefs and personal life circumstances of Representatives, clients or external stakeholders
- use respectful and unbiased language in all letters, minutes and other verbal and written communication to clients, Representatives and external stakeholders
- promote cultural competence and demonstrate a commitment to the delivery of respectful and appropriate services ensuring cultural safety is upheld
- treat clients in a way that preserves their dignity, recognising their right to decision making and the personal dignity of risk
- not enter into any social, physical, sexual or intimate contact or relationship with any current or past clients; particularly if the past client might re-enter the service, been disengaged for less than 6 months.
- ensure any outside of work contact with clients is, wherever possible, discussed beforehand with the Representative's manager to ensure the potential contact is transparent and managed within the spirit of this code of conduct
- ensure that, when prior advice to the Representatives manager was not possible, any contact (including that set out below) is reported to the Manager/supervisor as soon as possible
- declare any potential conflicts of interest with the Representative's manager as soon as possible to ensure transparency. This may include social, physical, financial, contractual arrangements/relationships
- not have contact with, engage with or discuss children and families outside of any official Glen Education social media networks (e.g. Facebook, Twitter, etc.);

Ethical and Respectful Behaviour

Glen Education maintains an inclusive and respectful workplace culture at all times. Glen Education does not tolerate violent, threatening or unsafe behaviour in the workplace. This includes acts of physical violence, aggressive behaviour, harassment, bullying, verbal threats or abuse directed at another Representative or

to/from a client or visitor. All forms of unlawful discrimination, harassment, sexual harassment, bullying and occupational violence are in breach of the code and will not be tolerated by Glen Education.

Representatives must:

- not use offensive language, threaten or engage in demeaning or derogatory dialogue or comment when communicating with other Representatives, clients or other external stakeholders. This extends to comments made outside the workplace and/or outside work hours, and includes comments published on social media networks
- not act in any way that could cause harm to the reputation, stakeholder relationships or funding for Glen Education during or outside of working hours.
- not provide comment, opinion or information to the media relating to the business of Glen Education, clients or Representatives of Glen Education or concerning employment with Glen Education, without authorisation from the CEO
- not comment or share information on social media that could be construed to be related to Glen Education without disclosing their professional relationship with Glen Education and providing a clear disclaimer that their views are their own and in no way represent those of Glen Education
- be punctual and reliable in their attendance and adhere to their prescribed and authorised hours of duty, and record their attendance in the manner required by Glen Education
- not engage in any activity involving, or that could be perceived as being an endorsement of any product, service or supplier by Glen Education without the prior approval of the CEO
- maintain appropriate workplace etiquette and self-care
- ensure any contact by Representatives with the Glen Education Board of Directors is made through the CEO in the first instance, unless the matter relates specifically to the CEO.
- not break the law

Privacy and Rights

Glen Education respects everyone's right to privacy and will maintain the privacy and confidentiality of Representatives, clients, supporters, donors and other stakeholders at all times. Representatives acknowledge that the unauthorised release of information held by Glen Education will be regarded as serious misconduct which could result in disciplinary action including termination of employment. Exceptions arise when, Glen Education has specific legislated obligations to disclose certain information under certain circumstances, which are:

- in the course of normal service delivery
- with the informed consent of the client, supporter, donor or other stakeholder provided that the client, supporter, donor or other stakeholder has the legal capacity to provide that consent
- with the written consent of the delegate of the Secretary to the Victorian Department of Health and Human Services, when the Department has a statutory responsibility for the client
- with the consent of the child's parent or guardian (if a minor).
- if required to do so by law – e.g. when complying with mandatory reporting requirements or when providing evidence in legal proceedings.

Representatives must:

- maintain the confidentiality of internal Glen Education affairs, including details of current and past Representatives, clients, supporters, donors and other stakeholders
- articulate to clients, supporters, donors and other stakeholders that they have the right to privacy and that Glen Education will respect and uphold this right
- ensure that all personal information gathered is handled, stored, used and disclosed in accordance with all relevant state and federal legislation, Glen Education privacy and record management policies and various industry standards

- advise clients, supporters, donors and other stakeholders that under certain circumstances, private or confidential information may be disclosed to a third person
- inform clients, supporters, donors and other stakeholders of their rights pertaining to accessing their records of service
- inform clients of their rights and responsibilities when accessing Glen Education's services.

Lawful Behaviour

Representatives are bound by the relevant commonwealth and state laws and regulations. Representatives are to comply with lawful instructions or requests given by management or the CEO. If a Representative believes that a request or direction is unlawful or unsafe, then the concern should be raised immediately with their direct manager or relevant senior manager.

Representatives must:

- act in a manner commensurate with all applicable Australian laws;
- formally advise their direct manager/supervisor within 24 hours or the next business day if they are charged, are under investigation, or have been convicted of a criminal offence.

Occupational Health and Safety

Glen Education is committed to a proactive safety and wellbeing workplace culture.

Representatives must:

- take reasonable care of themselves and others when performing duties at a Glen Education workplace and off-site
- follow all health and safety policies and procedures, report any observed hazards or injuries, and participate in the management of health and safety risks in line with Glen Education policy
- comply with any special clothing or personal protective equipment requirements specific to Glen Education's workplaces
- at all times wear and have visible their employee identification (if supplied) when working (provided it does not create an OH&S risk to the Representatives)
- comply with Glen Education's commitment to being a smoke-free workplace - smoking is prohibited in the workplace

Dangerous Weapons

Employees are not permitted to carry or bring any dangerous weapons into Glen Education's premises or vehicles. This includes knives and firearms of any description.

Dress

Glen Education requires representatives to present themselves in a neat and professional manner.

Representatives must:

- wear clothes appropriate to their position in the workplace, taking into account occupational health and safety obligations.
- Comply with any special clothing or personal protective equipment requirements specific to Glen Education's workplaces.

Use of Property

Glen Education provides Representatives with a range of property for use whilst on duty.

Representatives must:

- carefully and correctly use and preserve property provided by Glen Education
- only use any property of Glen Education in the pursuance of official duties of Glen Education or as otherwise duly authorised
- ensure that electronic media for personal use whilst on duty must be reasonable, and the use of Glen Education internet, email software or personal devices must be in accordance with organisational policy.

Intellectual Property

Glen Education will secure and retain all rights to intellectual property and assets that relate to Glen Education business including patents, design, formulae and processes.

Representatives must:

- agree to inform Glen Education about any discovery made, secret process, business method, procedure or improvement that the Representative makes, discovers or develops as part of their employment with Glen Education.
- execute all necessary documents and take all reasonable steps at the request of Glen Education to ensure that the rights in any such intellectual property are secured for and vested with Glen Education.

Child Safety

Glen Education has a zero-tolerance for child abuse or misconduct and is committed to maintaining child - safe and child-friendly environments. Glen Education is commitment to the care, protection and safety of all children.

Representatives must:

- maintain requirements in accordance with the Child Safe Environment Policy;
- adhere to all policies, requirements, standards and laws pertaining to the rights of children and young people
- report all allegations of misconduct, abuse or harm involving children to Glen Education
- adhere to the reporting requirements of all relevant government initiatives and industry schemes aimed at promoting and protecting children from harm.

Police and Working with Children Checks

Glen Education requires all Representatives to maintain a current Working with Children Card at all times.

If during the course of employment, a Representative has been charged, is under investigation, or has been convicted of an offence, the Representative must immediately raise the matter with the relevant General Manager or the CEO.

Drugs, Alcohol and Medication

Representatives must not be adversely affected by alcohol and/or illicit drugs and/or prescribed drugs in the workplace at any time or under any circumstances. Compliance with Glen Education's Alcohol and Other Drug Policy is required by all Representatives.

Representatives must:

- not report for any duty at any time under the influence of illicit drugs, alcohol or medication, to the extent that it may impair their ability and the ability of their colleagues to safely and effectively perform their work requirements. This includes, but is not limited to, the ability to safely operate vehicles, items of plant and equipment and provide a service to clients of Glen Education;

- advise their direct manager in the event that prescription medication may affect their performance or capacity whilst at work.
- ensure that whilst at functions or events either hosted by Glen Education or where attendance is in the capacity of a delegate of Glen Education, that their conduct positively reflects the Glen Education brand, values and reputation.

Outside Employment or Activities

Glen Education allows participation on either a part-time or freelance basis, in any outside business (including a family business). It is expected that outside employment or activities will not impact on the Representative's primary employment within Glen Education. Examples of such impact may include, but not be limited to, increased absenteeism, fatigue, or an inability to perform the inherent requirements of their position.

Representatives must:

- not perform private paid work while performing duties for Glen Education or use Glen Education's resources or premises for such purposes
- not use the Glen Education name to gain an advantage of any kind in private dealings or arrangements
- ensure that any secondary employment or outside activities, whether paid or voluntary, do not create a conflict of interest and/or duty with their position within Glen Education. This includes sourcing referrals from existing clients of Glen Education's services. Representatives are required to discuss any potential or actual conflict of interest with the relevant senior manager and/or CEO as soon as they become aware of it.

Gifts and Benefits

Glen Education is committed to a culture of transparency, professionalism, diligence and probity. Compliance with Glen Education's Gifts and Benefits Policy is required at all times.

Representatives must:

- not demand or receive a fee, reward, commission, or benefit of any kind from any person or organisation for the initiation, conduct, omission or conclusion of any business, by any person or organisation with Glen Education
- not accept or provide gifts or entertainment that will obligate or appear to obligate the recipient as required by the Gifts and Benefits Policy. Occasional gifts and entertainment may only be accepted to promote appropriate working relationships and must be approved by the Representative's Direct Manager/supervisor
- not seek, solicit, or use their position with Glen Education to obtain gifts or benefits from external organisations or individuals for personal use
- ensure that a person, company or organisation is not placed in a position in which they feel obliged to offer gifts or hospitality to secure or retain Glen Education business;
- report any incidences where a bribe and/or cash is offered as well the receipt or offer of any gifts to the relevant senior manager or the CEO.

Performance of Duties and Compliance with Lawful Direction

Employees must perform the duties of their role as outlined in their Position Description to an adequate standard, as set by Glen Education.

Employees are required to comply with lawful instructions or requests given by their manager/supervisor and/or CEO. If an employee believes that a request or direction is unlawful or unsafe, then the concern should be raised immediately with the CEO.

Breaches of the Code of Conduct

Breaches of the Glen Education Code of Conduct may be considered to be misconduct and may be subject to disciplinary action, which may include termination of employment or suspension of duties. Where a breach of the code equates to an allegation of criminal conduct, the matter will be reported to the Police or the Commission for Children and Young People (CCYP), as per the Reportable Conduct Scheme <https://ccyp.vic.gov.au/>. Breaches of the code may result in the Representative being expected to undergo additional training in their obligations under this code. Grievances will be handled as per organisational policy, or via the dispute resolution clause of the relevant Award or industrial tool. Glen Education aims to ensure that all reasonable steps will be taken to protect Representatives when making any disclosures from any detrimental action in reprisal for making the disclosure.

Representatives must:

- report alleged breaches of the code to their direct manager/supervisor unless the breach pertains to that person. In such instances the breach should then be reported to a senior manager
- not make vexatious or unsubstantiated claims; such claims may also be subject to disciplinary action.

Approvals and Revision

Date	Version	Author	Revision Description
Q3 2012	1.00	Glen Education Management	New Policy
Q2 2022	6.00	Glen Education Management	Policy updated due to rebranding May 2022