

# Catholic Healthcare Limited Code of Conduct

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## Code Purpose

This Code of Conduct (the Code) lays out in simple and easy to understand terms the standards of professional workplace behaviour expected from all Catholic Healthcare Limited (CHL) employees. These standards help CHL to maintain essential levels of care and service and to build a strong, positive reputation as an employer and aged care service provider.

The Code reflects and complements employee rights and obligations under legislation and is supported by a comprehensive library of other CHL policies.

CHL reviews this Code on a biennial basis to ensure that the guidance provided in it, remains relevant and up to date.

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## Scope & Applicability

This Code applies to all CHL employees and volunteers whilst in the workplace and when representing the organisation at a work-related event or function. It also applies to all people who may be engaged by CHL to deliver services into the organisation for any length of time, including contractors and consultants.

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# Catholic Healthcare’s responsibilities under this Code

## To our People

CHL is committed to fostering a work environment that:

- is safe and fully compliant with all workplace health and safety and other applicable employment laws and regulations;
- does not tolerate bullying or harassment in any form;
- promotes equal opportunity for all employees at all levels of CHL irrespective of colour, race, gender, age, ethnicity, marital status, disability, sexual orientation, or religious beliefs;
- compensates all employees in a fair and equitable manner; and
- demonstrates an active commitment to ongoing education and development through the provision of meaningful learning opportunities.

## To our Residents, Clients & Patients

CHL is committed to providing a high-quality care and service environment for its Residents, Clients and Patients where:

- our care and service policies, practices, processes, and programs comply with all relevant industry standards and regulations.

## To our Board & Regulators

CHL is committed to fostering strong, productive Board and Regulator relationships where:

- trust, candour, quality, accuracy, and consistency feature in all our interactions and reporting.

## To our Service Providers & Suppliers

CHL is committed to maintaining positive service provider and supplier relationships where:

- honesty, fairness, transparency, reliability, and mutual respect are features of our interactions and business relationships.

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## Responsibilities of CHL Team Members under this Code

Every CHL team member has a responsibility to:

- Respect and comply with all Federal and State Laws, regulations and guidelines that relate to CHL while undertaking their daily duties;
- Treat all people with dignity, respect, compassion, and courtesy in a welcoming and supportive manner;
- Perform their duties with the highest levels of care and professionalism;
- Always apply safe work practices and behaviours;
- Act in accordance with this Code as well as all CHL policies, procedures, guidelines and delegations;
- Always behave in a way that upholds CHL's Values and reputation;
- Comply with all reasonable directions and requests made by Managers or Supervisors;
- Maintain the confidentiality of all information made available to them during their employment;
- Not engage in any form of conduct which causes or is likely to cause, their or our reputation within the community to be viewed negatively. This includes inappropriate posts on social or other media about CHL or any of its employees, Residents, Clients or Patients;
- Not seek, ask for or accept gifts or monetary rewards from Residents, Clients, Patients, their family members, or suppliers;
- Disclose and take responsible steps to avoid conflicts between their personal interests and those of the organisation (conflict of interest);
- Be a good steward of CHL resources and to use them in appropriate, efficient, and approved ways;
- Ensure that their standard of workplace attire and presentation are appropriate for their job function and role;
- Ensure consent has been obtained to take photos and videos required for clinical purposes except where impractical and collection is necessary to lessen or prevent a serious threat to health and safety. For all other purposes consent of the Resident, Client or Patient, must be obtained
- Not set up a business in competition to CHL.

## Responsibilities of CHL People Leaders under this Code

Further, every CHL people leader has a responsibility to:

- Ensure that their team members are aware of the Code and that they are managed in accordance with it;
- Appropriately deal with Code breaches as they arise; and
- Ensure that all department specific Policies are composed in consideration of this Code.

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# Code of Professional Conduct

## 1. Mutual Respect

*At CHL, demonstrating mutual respect in all workplace relationships is a key foundational element in the development and maintenance of an engaging and positive workplace culture built around high standards of care and service excellence. These expectations extend to all workplace relationships including those involving Residents, Clients, Patients, Families and Colleagues.*

In the course of their daily duties every CHL employee has a responsibility to:

- Promote the principles of trust, respect, fairness, and teamwork while fulfilling their day to day responsibilities;
- Wholly refrain from any bullying or harassment type behavior and to be active in the reporting of such if witnessed in the workplace;
- Respect the functions, authority, and roles that other employees and teams fulfill within the organisation; and
- Not coerce, influence, or instruct their colleagues to act in a manner that is unlawful, inappropriate, or contrary to the interests of CHL.

## 2. Professional Standards & Code Compliance

*At CHL, we maintain the highest level of integrity and professional standards in all of our business practices.*

At all times, CHL employees are required to act with due skill, care, and diligence in the delivery of their role responsibilities, and in a manner that fosters the trust and confidence of their colleagues, managers, and customers.

**To assist employees in meeting these obligations CHL ensures that all employees have:**

- Access to, and an understanding of, the CHL Code of Conduct; and
- The skills, education, and experience necessary to competently fulfil their role and responsibilities.

**To support the organisation in consistently applying this Code, CHL ensures that:**

- All employees are clearly aware of its intent, requirements, and their reporting obligations;

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- Appropriate training opportunities are offered to employees covering the application of this Code;
- All new people and business policies are developed and maintained in accordance with this Code; and
- Up to date Employee Grievance and Whistleblowing Policies are in place that allow employees to report Code breaches without fear or favour.

### 3. Conflicts of Interest and Personal Gain

*At CHL, employees should actively avoid taking actions, making decisions, or becoming involved in circumstances that may present a real or potential conflict of interest.*

In the course of their daily duties every CHL employee has a responsibility to:

- Avoid situations that present a direct or indirect conflict, or perceived conflict, between their personal interests and those of CHL;
- Not accept gifts or personal favours from Residents, Clients, Patients (and their families) or Service Providers;
- In the rare event where employees receive unexpected and unsolicited gifts or bequests, they must be disclosed to their manager who will decide on the appropriate management.
- Not use his or her position within CHL for personal gain, or for the gain of family members or close friends;
- Take particular care to ensure that their personal financial dealings, or those of relatives or close friends, do not result in a conflict of interest with CHL;
- Decline becoming a Beneficiary in the Will of a Resident, Client or Patient; and
- Ensure that any business conducted between CHL and a client or entity in which an employee has a direct or indirect interest, is disclosed to their manager, and exclude themselves from decision making.

#### Wills

Any employee who is made aware that a Resident, Client or Patient intends to make, or has made them a beneficiary of their Will, should under this Code decline such a benefit and disclose this to their manager. Instead, the employee may suggest to the Resident, Client or Patient the option of making a gift to CHL or to a suitable Charity of the employee’s choice.

#### Disclosures

- Where gifts or personal favours are offered to an employee, they must be reported immediately and fully to the employee’s manager.

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- Any relationship that could give rise to an actual, potential or perceived conflict of interest (that is a situation in which a person is in a position to derive personal benefit from actions or decisions made in their work capacity), must be immediately and fully disclosed to the employee’s manager;
- Employees serving as Directors or Officers of another organisation that is involved currently or potentially in business dealing with CHL, must immediately disclose this to all parties and exclude themselves from all CHL related decision-making; and
- When in any doubt about a conflict of interest, employees should seek guidance from their manager.

## 4. Reporting & Record Keeping

***At CHL, every employee is required to recognise the importance of accurate record keeping and reporting in accordance with this Code, CHL Policy and all statutory and regulatory requirements.***

In the course of their daily duties every CHL employee has a responsibility to:

- Immediately report any suspected breaches of this Code, CHL Policy, Law or Regulation;
- Ensure that all entries made in CHL financial, business, or other people systems and records are accurate and truthful;
- Record financial transactions in a manner that complies with prevailing accounting principles and applicable accounting standards;
- Ensure that every CHL financial transaction is approved by a person with the appropriate delegated authority considering the transaction type and its value;
- Ensure that all entries made in Resident, Client or Patient records are accurate and truthful;
- Personally, act on, escalate or refer for resolution, any reporting or record keeping errors or omissions discovered in the course of their daily duties;
- Provide accurate and timely responses to requests for information from Regulators; and
- Provide accurate and timely responses to requests for information as part of regular financial or business reporting systems and processes.

## 5. Confidential Information

***At CHL, employees will encounter information of a confidential nature in the course of their daily duties. This information may relate to Residents, Clients, Patients, Employees and CHL financial results. Maintaining confidentiality is an essential and integral part of good business practice and a requirement of employment and is therefore an expectation of every CHL employee.***

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In the course of their daily duties every CHL employee has a responsibility to:

- Fully meet the confidentiality obligations detailed in their employment agreement and CHL Policy;
- Apply confidentiality principles to all work activities;
- Maintain the privacy of Residents, Clients, Patients and Colleagues in accordance with the requirements of the Privacy Act 1988 and applicable State or Territory legislation regulating the management of health information;
- Keep sensitive or confidential information in a secure and safe location;
- Minimise the opportunity for colleagues to access confidential information electronically by protecting computer system and network passwords;
- Print and collect hard copy documents in a careful manner; and
- Reserve confidential discussions for private spaces only.

**Definition**

Confidential information includes but is not limited to:

- All information that relates to Residents, Clients and Patients including any personal information and information recorded in Care Plans;
- All information regarding Catholic Healthcare employees including remuneration or personal details;
- All information regarding Catholic Healthcare financial & business plans;
- All information that is found in CHL manuals or policies; and
- All information that would be of a commercial value to a competitor.

**Disclosure Guidelines**

Confidential information may be disclosed by CHL employees to Regulators, Government departments and Legal bodies if disclosure is required by law, if the information concerns illegal activity or if the information is already in the public domain. Confidential information may also be disclosed by employees to advisers of CHL who need to know that information to perform a particular service function.

**Resident, Client or Patient Information**

If a court or other official government agency subpoenas or requests for the release of Resident, Client or Patient information, employees should contact the CHL Legal department immediately. Legal Counsel will then manage the disclosure process, including deciding whether to comply with the request or subpoena and what information must or should be released.

**Employee Information**

If a court or other official government agency subpoenas or requests for the release of employee information, employees should contact the CHL Human Resources department immediately. Human Resources will then manage the disclosure process, in consultation with Legal as required, when deciding whether to comply with the request or subpoena and what information must or should be released.

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## 6. Provider Relationships

*At CHL, maintaining appropriate relationships with other Aged Care Providers is important for the purpose of helping to create a cohesive and professional aged care sector.*

In the course of their daily duties every CHL employee has a responsibility to:

- Maintain the required levels of confidentiality between CHL and other Providers; and
- Meet all confidentiality obligations of their employment agreements if they leave CHL to work for another employer.
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## 7. Care of CHL Property – Good Financial Stewardship

*At CHL, every employee is entrusted with equipment and resources to enable them to fulfill the responsibilities of their roles, meet performance requirements and deliver the required standards of care and service.*

In the course of their daily duties every CHL employee has a responsibility to:

- Take due care in the use of CHL property, equipment, systems and consumables (supplies);
- Only use CHL property, equipment, systems and consumables for work purposes;
- Follow policy regarding CHL property, equipment and systems security, and storage;
- Report damaged CHL property, equipment, or hazards;
- Only purchase equipment and consumables for use in the workplace in accordance with published procurement policies; and
- Actively seek and identify ways to make the most efficient use of CHL property, equipment, and systems.

## 8. Electronic Communication and Record Systems

*At CHL, every employee is provided with access to a range of business communication and record keeping systems including those managed via computer and phone networks. The efficient and professional use of these systems plays a key role in delivering and maintaining high levels of care and service.*

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In the course of their daily duties every CHL employee has a responsibility to:

- Ensure that all written and voice communications are honest and accurate and are free of misstatements, inaccurate claims, extreme and insensitive personal views, and defamatory or obscene comments or images;
- Safeguard the confidentiality of their CHL network and system passwords in accordance with the CHL Electronic Use Policy;
- Exercise due diligence to help protect all computer and communication equipment, software, documentation and data from loss, damage, or theft;
- Reasonable personal use of CHL communication systems only (phone, email, and internet);
- Ensure that when composing emails or voicemails that they can be clearly identified as the author and originator of the information;
- Ensure that their communications meet all confidentiality, Equal Employment Opportunity and privacy standards;
- Respect all copyrights as permitted by the copyright owner; and
- Report business system faults in a timely manner.

## 9. Promotion and Representation

*At CHL, maintaining a strong, trusted, and respected brand as an Aged Care Provider is a priority.*

In the course of their daily duties every CHL employee has a responsibility to:

- Ensure that their personal behaviour, both inside and outside of the workplace, does not in any way bring CHL into disrepute or damage our reputation in the community;
- Ensure that any advertisements, promotions, and collateral published for CHL services fully comply with legal and regulatory requirements and meet all professional and ethical standards;
- Ensure that CHL credentials such as titles, business cards and stationery (letterhead) are used for CHL business purposes only; and
- Ensure that any references provided for former employees are provided purely on a personal basis only and never in writing on CHL letterhead.

## 10. Professional Standards of Personal Appearance

*At CHL, maintaining appropriate standards of personal appearance in the workplace is a key element in the development and maintenance of a professional workplace culture.*

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In the course of their daily duties every CHL employee has a responsibility to:

- Always dress appropriately and professionally for their job function, and in accordance with workplace health and safety, cultural and community sensitivities and standards;
- Wear a CHL uniform where and as required; and
- Always use personal protective equipment (PPE) or clothing in accordance with safe work practices, policies, and procedures.

## 11. Secondary Employment

***At CHL, the CHL roles and responsibilities of each employee will always take priority over any other external employment commitment.***

In the course of their daily duties every CHL employee has a responsibility to:

- Ensure that all secondary employment commitments outside of CHL are disclosed to their manager for approval in writing before taking up, or continuing, with such commitments;
- Ensure that any secondary employment commitments do not compromise their ability to fully meet their obligations as a CHL employee;
- Ensure that all CHL Confidentiality and Privacy obligations continue to be met when engaging in secondary employment; and
- Immediately disclose any matters relating to another employer that may represent a safety risk to CHL (e.g an Outbreak or other risk).

## 12. Compliance with this Code, CHL Policy and other Regulations

***At CHL, every employee is expected to comply with this Code, CHL Policy and other Regulations to help regulate and ensure the efficiency of all CHL operations.***

In the course of their daily duties every CHL employee has a responsibility to:

- Fully comply with this Code;
- Fully comply with related codes of professional conduct determined by recognised professional bodies such as those covering clinical care and accounting standards;
- Fully comply with all legislative and regulatory requirements applicable to CHL's business operations; and
- Interact with Auditors and Regulators in an open and co-operative manner and keep them informed of relevant matters concerning CHL's operations as required.

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## 13. Code Breaches and Issues Resolution

All CHL employees are encouraged to raise any issues or concerns that they may have about the conduct of others in the workplace. Genuine Code breaches should be raised with immediate Managers or Human Resources as appropriate, and all matters raised will be assessed, investigated where required and resolved fairly and confidentially.

Very serious matters such as suspected corrupt conduct or criminal activity in the workplace should be reported in accordance with the CHL Whistleblower Policy.

### Reporting Guidelines

- Any employee who becomes aware of a breach or suspected breach of this Code should immediately report it to their manager or lodge a report in accordance with the CHL Whistleblower Policy.
- CHL will support and protect from any adverse action any person who, in good faith, reports a breach or suspected breach of this Code.
- All material breaches of this Code will be reported to the Chief Executive Officer who will then make disclosures to the Board as appropriate.
- Breaches of this Code may lead to disciplinary procedures as per the CHL Managing for Performance Policy, which in more serious situations, may include dismissal and where required, the lodgment of a Police Report.

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## Code of Conduct

At Catholic Healthcare we are committed to creating professional, collegial workplaces that support and inspire all our people to deliver the very best service and care to our clients, residents, patients, and each other.

### OUR MISSION

To promote life in all its fullness by providing health, aged and community services inspired by the Catholic tradition.

### OUR VALUES

- Compassion
- Excellence
- Honesty
- Hospitality
- Respect

### PURPOSE OF THE CODE

Focused firmly on our Mission, Values and responsibilities as an Australian employer, our Code of Conduct (the Code) lays out in simple and easy to understand terms the standards of professional workplace behaviour that we expect from you and your colleagues.

The Code reflects and complements your rights and obligations within legislation and is also supported by our organisation's policies, procedures, guidelines and quality management system.

### PEOPLE COVERED BY THE CODE

The Code applies to all Catholic Healthcare employees and volunteers whilst in the workplace or when representing the organisation at a work-related event or function. It also applies to all people who may be engaged to deliver services into the organisation for any period, including contractors and consultants.

## Your responsibilities under the Code

Every Catholic Healthcare team member covered by this Code is expected to:

- respect and comply with all Federal and State Laws, regulations and guidelines that relate to Catholic Healthcare;
- act in accordance with this Code as well as all Catholic Healthcare policies, procedures, guidelines and delegations;
- behave in a way that upholds Catholic Healthcare's Values and reputation;
- comply with all reasonable directions and requests made of you by Managers or Supervisors;
- treat all people with dignity, respect, compassion, and courtesy in a welcoming and supportive manner;
- perform your duties with care, professionalism, honesty and to the level of performance expected of you:



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- maintain the confidentiality of all information made available to you in the course of your employment;
- ensure written content has been obtained to take photos and videos for clinical purposes and for all other purposes;
- not engage in any form of conduct which causes or is likely to cause, your or our reputation within the community to be viewed negatively. This includes inappropriate posts about Catholic Healthcare or any of its employees, residents, clients or patients on social or other media;
- disclose and take responsible steps to avoid conflicts between your personal interests and those of the organisation (conflict of interest);
- not seek, ask or accept gifts or monetary rewards from clients, residents, patients, their family members or suppliers;
- be a good steward of Catholic Healthcare resources and to use them in appropriate, efficient, and approved ways; and
- ensure that your standard of dress and presentation is appropriate to your function and job role.

#### REPORTING A CODE BREACH

As a Catholic Healthcare employee, you're encouraged to raise any issues or concerns that you may have about the conduct of others in the workplace. If you have a genuine code breach to report, then you should raise this with your immediate Manager, Supervisor or Human Resources as appropriate.

Very serious matters such as suspected corruption or criminal activity in the workplace should be reported in accordance with the Catholic Healthcare Whistle-blower Policy.

## Our Code in Action

### CONFIDENTIALITY

Amanda is a Care Worker. She loves her job and would like to take photos of herself with her clients and share them on social media. Amanda recalls the Code of Conduct and realises that this would be a breach of her client's privacy and so she decides not to take the photos or post any images of her clients on social media.

### COMPASSION AND RESPECT

Anika is present when some work colleagues begin gossiping about another colleague. Anika recalls the Code and reminds her colleagues that, gossiping constitutes bullying, and she then respectfully requests that they stop. In her mind she notes that she'll need to report the behaviour if she hears it again.

### PROFESSIONAL BOUNDARIES AND GIFTS

Client Edith knows that her home carer Bruce is having a problem paying for his kids' school shoes, so Edith offers to pay for the shoes herself. Bruce becomes embarrassed knowing that he shouldn't have disclosed his personal financial position to Edith. It's hard for Bruce to refuse the money, but he does because he understands that it would be a breach of the Code.

### ENSURING SAFE BEHAVIOUR

Sahil is attempting to manually lift a resident from a chair to a bed even though the Care Plan clearly states that a lifter should be used. A colleague sees Sahil, asks him to stop, and gets a lifter. Together they use the lifter to transfer the resident.

### PROFESSIONAL APPEARANCE

Lisa has been busy lately and hasn't really had time to wash her uniform. It's been a week and the uniform is looking somewhat crumpled and unpresentable. Lisa didn't think that it was an issue however her supervisor noticed and commented. Lisa washed her uniform that night and continued to ensure that her uniform was always clean and professional looking.



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## Review History

July 2020	Comprehensively Revised Policy Code
Nov 2021	Revised

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## Related Policies & Documents

CHL Whistle blower Policy  
Social Media Policy  
Grievance Management Policy  
Managing for Performance Policy & Practice Guide  
Workplace Respect Policy

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## Key words for search

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