

Code of Conduct

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1. Code of Conduct

We believe everyone should have equal opportunity to access good quality, affordable and sustainable housing. The continued growth and success of the Building Communities (Vic) Ltd (BCVL) requires the commitment of all employees and directors to the highest business and ethical standards.

The Code of Conduct provides us with a set of values or principles to guide us in our work. These values are outlined below:

EVERYONE MATTERS

Everyone belongs and is an essential part of the CHL Group

Around here:

- Everyone's role is important, and their opinions valued
- We are kind and inclusive of everyone
- We acknowledge and celebrate our differences
- We support everyone to reach their potential and growth
- We are equally responsible for achieving our mission and vision
- We are all champions regardless of our role, we are all equally important

SERVICE EXCELLENCE

We deliver personalised, respectful service to our customers

Around here:

- We value our customers and treat them equally, with respect and without judgement
- Our customers come first, and we strive to deliver the best outcomes for them
- We take pride in our customer service
- Our business decisions are made with the customer in mind
- We are always looking for new ways to improve
- We take our customer's feedback seriously
- We empower our customers to improve their circumstances

TEAMWORK

We work towards a common goal by collaborating and supporting one another

Around here:

- We all work towards a common goal
- We recognise and appreciate other teams and their contribution, collaborating where we can
- Everyone has a voice, and their voice is heard
- We share the workload and support each other
- We acknowledge the unity of the team and how we all play an active role in completing tasks and achieving goals
- We communicate with each other openly and respectfully
- We understand how our work impacts others and we aren't afraid to ask for help when we need it

INTEGRITY

We are united in our commitment to our mission, professionalism and accountability

Around here:

- We are accountable for our work and take ownership of our successes and our mistakes
- We are honest, reliable and dependable
- We are trusted to do our roles to the best of our abilities
- We are open and transparent with our colleagues and customers
- We advocate for our colleagues and customers
- We call out inappropriate behaviour when we see it

BCVL has policies and procedures that address specific requirements and expected conduct on the part of our employees. Our efforts to conduct our business honestly and in the best interests of those we seek to serve are based on the values that form our Code of Conduct.

2. Scope

This policy applies to Building Communities (Vic) Limited its directors, managers, staff, service providers and contractors whilst in the workplace and when representing the organisation at a work-related event or function.

3. Workplace Diversity and Equal Opportunities

BCVL is committed to providing an environment that fosters and promotes diversity and equal opportunity. We acknowledge and appreciate that ***Everyone Matters*** and value the differences amongst our staff members, customers and anyone we interact with in our work.

BCVL will not tolerate bullying, harassment, sexual harassment, discrimination or any other inappropriate behaviour in the workplace. All parties will:

- a. Treat everyone they interact with in the course of their employment with dignity, courtesy and respect;
- b. Contribute positively to an environment where they and those they interact with can work without the distress or interference caused by workplace bullying, unlawful discrimination, harassment or sexual harassment;
- c. Not unlawfully discriminate against people on prohibited grounds such as age, gender, sexuality, race, disability, religion, pregnancy etc. in relation to providing our services or in any aspect of employment from recruitment activities through to internal job opportunities and termination of employment; and
- d. Not make any disparaging or untruthful remarks about other staff members, customers, customer's family members, service providers, contractors or suppliers.

4. Workplace Safety and Employee Wellbeing

BCVL is committed to ensuring the health, safety and welfare of all staff members and customers and will ensure the safety of visitors and external service providers whilst working for, or visiting BCVL.

BCVL recognises it has both corporate and social responsibilities regarding work health and safety (WHS) and acknowledges that the needs of customers can only be met when the health, safety and welfare of all staff members is not compromised.

BCL will not accept behaviour from staff members that puts at risk the safety of a co-worker, customer or anyone else they interact with in the course of performing their duties with BCVL. All parties will:

- a. Behave in a way that ensures their safety and the safety of others. Staff members will not put the safety of others or themselves at risk through their own acts or omissions;
- b. Follow and cooperate with all safety requirements, reasonable instruction, guidelines, policies and procedures;

- c. Use BCVL's resources and capital items in a respectful and proper manner so as to not create a risk to their own or others safety;
- d. Maintain personal presentation standards;
- e. Not be impaired by the effects of alcohol whilst on duty or at work related functions held during business hours/hours of work where they are representing BCVL;
- f. Not use, possess or be impaired by the effects of any illegal drugs whilst on duty or at work related functions held during business hours/hours of work where they are representing BCVL;
- g. Not operate or drive any company vehicle whilst under the influence of alcohol or impaired by other drugs, including prescription drugs;
- h. Not possess illegal drugs or weapons whilst at work;
- i. Not smoke or vape in any of the BCVL buildings, customer's homes and in/or around the grounds adjacent to either of these;
- j. Not smoke or vape in company owned and operated vehicles;
- k. Report any hazards they become aware of to their manager, and correct minor hazards if safe to do so;
- l. Escalate reporting of any unresolved safety issues to seek resolution;
- m. Report any incidents as soon as possible to their manager; and
- n. Report any injuries, illness or use of prescription medication, which may or may not be work related that may affect their ability to safely perform their role or may put others at risk.

Refer to the OHS Policy for further information.

5. Fit for Work

Staff members must be fit to undertake the duties and responsibilities.

Should a staff member become aware of any medical condition that may affect their ability to carry out the duties and responsibilities they must notify their manager as soon as practically possible.

BCVL may require a staff member to undergo medical assessments either as a precautionary measure or in the event that a matter relating to the staff members fitness for work arises. It is a condition of the employment that the staff member undergoes such assessments, and the staff member consents to the medical examiner providing reports to BCVL about the staff members fitness for work.

6. Privacy

All staff must comply with the requirements of the Privacy Act 1988 that includes the 13 Australian Privacy Principles and treat official information such as customer, staff and BCVL organisational information, with utmost confidentiality in accordance with the Privacy Act 1988 and BCVL policies and procedures.

Staff members may have access to and may be required to, within their daily duties, collect personal information (any sort of information that can identify a person) and sensitive information (individual information including racial or ethnic origin, religious belief/affiliation or health status) from customers, their carers or representatives, contractors, vendors, prospective employees and volunteers in order to provide

appropriate services or undertake BCVL operations. Inappropriate use of official information (including careless handling and poor security practice, unauthorised disclosure and access without a legitimate need to know) may compromise security, commercial interests or privacy of individuals. It may also compromise BCVL's reputation.

The names and personal information of customers and staff members as well as information on services customers are receiving must not be:

- a. used for any purpose other than the reason for which it was collected without the written consent of the party providing the information;
- b. disclosed to any third party including other customers; unauthorised staff members; partners, government agencies, unauthorised family members or friends of customers or any individual not involved in the direct provision of services to that customer;
- c. left lying around offices to include desks, printers/photocopiers; and/or
- d. removed from the workplace.

Inappropriate collection and use of official information (including careless handling and poor security practice, unauthorised disclosure and access without a legitimate need to know) may constitute a breach of the Privacy Policy, the Code of Conduct and the Privacy Act 1988.

Any perceived or actual breaches are to be reported to the staff member's Manager or Chief Executive Officer or their delegate.

Any requests to obtain or amend a customer record must be reported to the staff member's Manager, with the decision and approval to release information, made only by the Operations Manager in accordance with obligations outlined in the Privacy Act 1988.

7. Confidentiality

Staff members must uphold the confidentiality of all BCVL documents, Intellectual Property (IP) and strategic business information.

Privileged BCVL corporate information can only be released with the explicit permission of senior management or the Chief Executive Officer or Board. All staff members will:

- a. Not disclose or offer to supply confidential or private BCVL records or information, except when authorised to do so as part of their normal duties or where disclosure is authorised or required by law;
- b. Use confidential information solely for authorised purposes;
- c. Take responsibility to safeguard confidential files and information; and
- d. Only use their own system log-on identification (ID) and passwords, and not provide such details to another person.

It will be considered a breach of privacy and confidentiality by staff members if customer information, details or particulars are divulged in any way or discussed with:

- a. the customer's family members and friends whom are unauthorised representatives;
- b. another customer or unauthorised member of staff;
- c. a volunteer and/or contractor working with BCVL;
- d. a partner, government agency representative or other external provider
- e. the staff member's own partner, family or friends; and/or
- f. posted on a social media site.

It will also be considered a breach of confidentiality if any customer information not related to service requirements is discussed with another person associated with BCVL.

Accessing and/or downloading customer information from external systems such as Centrepay without the appropriate customer written consent is prohibited. Any such occurrence will result in disciplinary action being taken against the staff member.

Any questions or concerns a staff member has about the collection, management and use of personal or commercial information should be discussed with their manager, or the staff member should be referred to the Privacy Policy.

8. Conflicts of Interest (including other employment)

Conflicts of interest can occur where a staff member or volunteer makes a business decision, or influences a business decision of a customer, supplier, contractor or co-worker that provides a personal benefit to themselves or a related third party such as a partner, relative, business or associate. While conflicts of interest are not wrong in themselves, and indeed cannot always be avoided, the potential for a conflict of interest exists in all aspects of BCVL's operations, including assessment, selection, staffing, administration, and commercial activity.

All parties are required to disclose and obtain evaluation of any conflict of interest. The Conflict-of-Interest Policy outlines the process to identify and manage actual, potential or perceived conflicts of interest, and conflicts of commitment.

All party members working with BCVL will avoid situations where private or personal interests might impact upon their ability to perform their duties, deliver services, handle complaints, apply policies and procedures, supervise, report or make accurate business decisions. All parties will:

- a. Ensure there is no actual, potential, or perceived conflict between their personal interests or their duties to other parties and their duties and responsibilities as a staff member, service provider or contractor of BCVL;
- b. Not engage in any outside employment or other business dealings that relate to the activities of BCVL unless declared in writing and otherwise authorised by the Chief Executive Officer or their delegate;
- c. Ensure any other employment or commitment does not impair their ability to perform their role for BCVL; and
- d. Make full disclosure of all the relevant facts and circumstances giving rise to an actual, potential or perceived conflict of interest or commitment to their manager on commencement of employment and/or within 48 hours of becoming aware of the conflict. Reports can be made by completing a Declaration of Interest Form and emailing it to their manager or to the Chief Executive Officer or their delegate.

9. Media Relations

Any approaches made to staff members by media organisations for comments or interviews must be referred to the Director of Marketing and Communications, Chief Executive Officer or their delegate immediately. Only authorised staff members are permitted to undertake this responsibility.

Staff members who provide unauthorised comment to the media (including social media) will be in breach of the Confidentiality provisions in their Employment Agreement and the BCVL Privacy Policy and may be subject to disciplinary action and/or dismissal.

10. Fraud, Corruption and Criminal Conduct

BCVL is committed to mitigating the risk of fraud and corruption for the purpose of protecting its assets and the reputation of BCVL and all its stakeholders.

BCVL management is committed to and responsible for identifying risk exposures to fraudulent and corrupt activities and for establishing policies, controls and procedures for prevention and detection of these activities.

The basis of BCVL's Fraud, Corruption and Criminal Conduct Policy is our value of Integrity. BCVL expects all employees, service providers, customers, vendors or other third parties to be united in their commitment to professionalism and accountability and to refrain from fraudulent or corrupt conduct.

Fraud is defined as:

"Dishonest activity causing actual or potential financial loss to any person or entity including theft of monies or other property by employees or persons external to the entity and where deception is used at the time, immediately before or immediately following the activity."

Corruption is defined as:

"Dishonest activity in which a director, executive, manager, employee, volunteer or contractor of an entity acts contrary to the interests of the entity and abuses their position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity."

BCVL expects that all stakeholders will:

- a. act fairly, honestly and with integrity in all dealings;
- b. follow diligently the procedures and controls to prevent and mitigate fraud and corruption;
- c. safeguard the company resources for which they are responsible;
- d. conduct themselves such that they do not adversely affect the honest performance of the activities of BCVL;
- e. neither solicit nor accept gifts or benefits which might be seen to compromise or influence their duties; and
- f. avoid situations in which private interests may impact upon the discharge of their duties.

All parties are required to report a suspected act of fraud and/or corruption.

During the course of their employment, staff members may observe or identify an act of fraud and/or corruption. All staff members have a responsibility to report such conduct to their Manager, Chief Executive Officer or Board.

BCVL takes any suspected act of fraud and/or corruption very seriously. Any such matter will be promptly and professionally investigated by the Chief Executive Officer and/or an appointed external party in accordance with the Fraud, Corruption and Criminal Conduct Policy.

11. Company Resources and Intellectual Property

BCVL will not accept deliberate or reckless damage to, or the theft or misuse of its resources. BCVL resources include: equipment, stationery, files, data, records, computer hardware and software, intellectual property and company work time.

BCVL's intellectual property includes policies, procedures, forms, plans, manuals, images, logos, internal publications, documented strategies and business information of BCVL.

Any forms of documentation, concepts, business or service information generated or created by employees, volunteers on behalf of BCVL, remains the intellectual property of BCVL. All staff members will:

- a. Use company resources for the purpose intended;
- b. Not use company letterhead for any personal use including providing character or work references without authorisation from the Chief Executive Officer or their delegate;
- c. Use email and other data communication systems for business purposes and limited personal use;
- d. Not use the internet to access, view, download, create, retain or transmit any offensive material that is pornographic, defamatory, discriminatory, or material considered offensive or inappropriate according to BCVL policies, fellow colleagues or management;
- e. Not share, distribute or use BCVL intellectual property outside of their employment with BCVL;
- f. Abide by copyright and trade-mark laws, including company logos; and
- g. Maintain accurate business records and not falsify them.

12. Abuse, neglect and exploitation of vulnerable people

Abuse of vulnerable people occurs when there is any act occurring within a relationship where there is an implication of trust, which results in (wilful or intentional) harm to the person (or child).

Abuse is a serious crime and contravenes basic human rights and can include financial, sexual, psychological, physical, and social abuse as well as neglect and exploitation. Neglect relates to the failure to provide adequate care, such as food, shelter, stimulation, clothing, medical or dental care. Exploitation is taking advantage of the vulnerability of a person in order to use them, or their resources, for another's profit or advantage.

Vulnerable people face many barriers to reporting abuse, neglect and exploitation such as fear, economic dependence, lack of access, communication and credibility issues.

BCVL does not condone any form of abuse and all staff are obligated to report concerns immediately to their Manager. Where the staff member has been unable to reach their Manager, or where the staff member is unable to confirm their Manager has received the report, they are to immediately escalate their concern to their next in line Manager.

The following standards are provided as a minimum and are to be adhered to in conjunction with the BCVL Child Safety Policy and where applicable NDIS Operational Guidelines - Responding to Abuse, Neglect and Exploitation.

All staff members will:

- a. Be alert to any changes in a customer's condition, behaviour or environmental circumstances that may indicate abuse or neglect; and
- b. Report incidents or concerns immediately to their Manager.

All BCVL staff are required to undertake a national police check upon commencement of employment and every three years thereafter of their employment. Staff members in front

line positions are also required to undertake a Working With Children and Vulnerable People Check and National Disability Insurance Scheme (NDIS) screening check.

It is a condition of employment that any change in a staff members criminal history must be reported to their manager as soon as practicable. Refer to the Probity Employment Checks Policy.

13. Breaches of this Code

All BCVL employees, service providers or contractors are encouraged to raise any concerns they may have about the conduct of others in the workplace. Genuine Code breaches should be raised with immediate managers or the Chief Executive Officer or their delegate as appropriate, and all matters will be addressed, 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 BCVL Whistleblower Policy.

Trivial or vexatious complaints with no substance will be treated in the same manner as a false report and may constitute a wrongdoing. Unsubstantiated allegations which are found to have been made maliciously, or knowingly false will be viewed seriously and may be subject to disciplinary action including dismissal.

Behaviours which are contrary to the spirit, or the stated requirements of the Code of Conduct may result in the provision of counselling and/or guidance. In severe or repeated cases of behaviour which disregard the Code, disciplinary action may be taken in accordance with our Disciplinary Action Policy and Procedure.

14. Related legislation, frameworks, policies and procedures

4.1 Legislation

Housing Assistance Act 1996 (COM)
Housing Act 1983 (VIC)
Residential Tenancies Act. 1997 (VIC)
Residential Tenancies Amendment Regulations 2021 (Vic)
Planning and Environment Act 1987 (Vic)
Charter of Human Rights and Responsibilities Act 2006 (VIC)
National Disability Insurance Scheme

4.2 Codes, frameworks and agreements

The National Affordable Housing Agreement
OOH, Homelessness Assistance Program Guidelines and Conditions Funding 2006-2009 (VIC)
Consumer Charter for Community Managed Housing and Homelessness Services

Victorian Community Housing Regulatory Framework
National Community Housing Standards
Department of Human Services Standards
NDIS Practice Standards and Quality Indicators
NDIS Code of Conduct

4.3 BCVL related policies and processes

Housing and Homelessness Policies and Procedures
Customer Feedback and Appeals Policy and Procedures
Privacy Policies and Procedures
Professional Behaviours Guideline
Disciplinary Action Policy and Procedure

15. Monitoring and review

This document should be periodically reviewed and revised. Revisions should be made as and when required. The period between reviews must not exceed one year. The date for review of this document is on or before April 2024. Training will be provided to each staff member and the Board as a component of their induction.

Review history

Date and version	Reason for review	Review frequency	Owner	Approver
Version 1.0, April 2023	New	Annually	Chief Executive Officer	BCVL Board
Version 2.0, October 2024	Periodic review, section 4 and minor updates to grammar	Annually	GLM Operations Director	BCVL Board

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