CatholicCare
DIOCESE OF BROKEN BAY

Agency Code of Conduct & Ethics Framework

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Framework purpose and background

CatholicCare Diocese of Broken Bay (CatholicCare) is committed to ensuring that we care for and protect each other, our clients, our environment and our organisational reputation. We are committed to ensuring the advancement of human rights, providing services to the community and conducting all our business affairs with the highest standards of ethical principles.

We treat others with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all and help create an inclusive and ethical culture.

Our Code of Conduct and Ethics Framework is fundamental to who we are and what we do.

These characteristics not only define us, but they underpin our expectations of all persons engaged by CatholicCare including volunteers and independent contractors in respect to personal and professional conduct when working at CatholicCare or in connection with CatholicCare.

CatholicCare carries out its work within the structures of the Diocese of Broken Bay and in line with the social teaching of the Catholic Church. We acknowledge the Bishop has the responsibility to oversee, guide and support pastoral work in the Diocese. At CatholicCare we hold every worker accountable for upholding our ethical standards and expectations of workplace behaviour. Those standards go well beyond compliance with legislation, regulations and policies that govern our organisation. They require us to abide by our CatholicCare values of Faith, Respect, Compassion, Excellence, Courage and Social Justice in every decision we make and in all our interactions.

This Framework contains the details of the Code of Conduct and Ethics as well as an overview of related policy elements. When read as a scheme, these elements provide a set of integrated principles and policies that define our approach to conduct and behaviour so that we can create and maintain a workplace that maximises safety, employee satisfaction, engagement and productivity in order to achieve CatholicCare's vision and mission.

Staff are encouraged to consult other policies and resources, including discussions with their manager and representatives of the People and Culture team whenever an ethics-related or behavioural question arises.

What is the Code of Conduct & Ethics Framework?

The Code of Conduct and Ethics Framework (Code) sets standards for the way we work at CatholicCare. The Code provides a practical set of guiding principles to help staff make decisions in their day to day work and outlines the behaviours expected of all persons working with or in connection with CatholicCare.

A suite of detailed policies and practice guideline inform the Code of Conduct and Ethics Framework.

The Seven Principles

1. We act ethically and with integrity at all times.
2. We treat others with respect, we are inclusive of, and sensitive to, the diverse needs of others.
3. We respect and value privacy and confidentiality.
4. We are a child safe organisation.
5. We act in the best interests of CatholicCare and our clients.
6. We ensure compliance with legislation, CatholicCare policies and procedures.
7. We maintain a safe working environment for our clients and ourselves.

Scope

This Code applies to the Board of Directors and all Sub Committees, all CatholicCare staff, volunteers, student placements and independent contractors and describes how you must behave and treat people receiving our services.

The Code applies to you whenever you are at work, acting in the capacity of CatholicCare or a representative of CatholicCare.

In certain circumstances, this will include times, locations and activities which are outside the immediate work location or working hours, for example using social media, attendance at social functions organised by CatholicCare, conferences, or other out of hours activities, or when you are involved in public or community activities on behalf of CatholicCare.

You are encouraged to raise any queries or clarification of details in this policy with your work supervisor or a representative of the People and Culture team.

How do I ensure compliance with the Code?

The Code and related policies provide general guidelines and outline the minimum expectations of conduct and behaviour that CatholicCare require of all persons working in or connected to our organisation. The Code is not an exhaustive list of every possible scenario that may arise during your working relationship with CatholicCare. This framework is to be read in conjunction with the relevant CatholicCare policies and procedures.

Standards of Performance

Staff will make every effort to:

- Maintain and develop their knowledge of the organisation, its purpose and strategic plan
- Improve their own performance and service delivery to clients of the organisation
- Maintain relevant qualifications and improve the skills, knowledge and competencies required for their position through continued training and development
- Keep up to date with advances and changes in the body of knowledge and the professional and ethical standards relevant to their area of expertise
- Exercise care, responsibility and sound judgement when carrying out their duties and conform to the principles of natural justice
- Ensure procedural fairness is followed in all processes
- Follow organisational procedures and protocols
- Seek feedback on their work performance.

If you need more information or are unsure of our expectations or your obligations, we encourage you to speak with your supervisor, Manager or a representative of the People and Culture team who can assist where necessary.

You will be required to:

- Read and understand the Code of Conduct and Ethics Framework and its associated policies
- Complete the Code of Conduct and Ethics Declaration as required by CatholicCare
- Complete the necessary orientation training as well as refreshers as required
- Maintain an up-to-date understanding of the Code
- Act promptly when you consider that there may be an actual or potential breach of the Code by reporting the issue to your work supervisor or a representative of the People and Culture team.

What may happen if I breach the Code?

Depending on the nature of the breach, CatholicCare may consider it is necessary to investigate the matter as a breach or potential breach of the Code. Any conduct which is assessed as a breach of the Code may result in disciplinary action as detailed in the *Managing Unsatisfactory Performance and Misconduct Policy*. Such action may include, but is not limited to, performance feedback, coaching, training and education, disciplinary action, or termination of employment. Whilst contractors, consultants, and volunteers are not usually subject to disciplinary action, conduct that would be assessed as being a breach of the Code may result in the termination of their engagement.

*In addition, under the NSW Crimes Act of 1900, any suspected criminal behaviour will be reported to the NSW Police, as well as any related statutory bodies as legally required, such as the NSW Ombudsman, the Office of the Children's Guardian or the Department of Communities and Justice. Any suspected federal criminal matters will be reported to the Australian Federal Police.

Our Principles

Principle 1: We act ethically and with integrity at all times

Ethical conduct, consistent with the values of CatholicCare is essential to everything we do. The quality of our services and the differences we make to the lives of our clients depends on the professional relationships we build, connections we make and trust we establish; all of which we earn by acting with consistency, honesty and integrity through all our interactions and decision making.

Ethical conduct, honesty and integrity can be just as important as the things we fail to respond to, identify or condone. For example, failing to report the inappropriate conduct of a person reflects on our own honesty and integrity, and may ultimately affect the reputation of CatholicCare or expose the organisation and or individuals to legal risk.

CatholicCare is committed to managing our business practices ethically to ensure our activities do not cause or contribute to adverse human rights impacts, and we expect our business partners and suppliers to share this commitment. For example, possible violation of labour laws and risks of modern slavery within CatholicCare operations or supply chains.

Our actions for Principle 1 include:

- We act with integrity, honesty and transparency in all our communications and decisions.
- We actively support CatholicCare in conducting its business in a transparent, honest, fair and open manner and will identify and raise ethical dilemmas appropriately.
- We seek approval for any secondary (other) employment outside of CatholicCare. We do not accept private work from clients or, canvas, solicit, procure, or otherwise attempt to entice clients away from CatholicCare.
- When we are at work, we are fully engaged, and client centred in our work. We will not be distracted by things unrelated to our immediate responsibilities and ensure that client engagement is our priority at all times.
- We ensure professional boundaries are maintained at all times in all areas of our work, for example treating clients in a consistent manner without inappropriate familiarity.
- We seek appropriate approval and record any donations, sponsorships, charitable contributions, gifts and entertainment we may be offered or accept from or give to a third party on behalf of CatholicCare including loans from a colleague or work supervisor.
- We declare any actual, potential or perceived Conflicts of Interest to Senior Management and ensure risk mitigation strategies are in place to remove or manage the conflict of interest.

Principle 2: We treat others with respect, we are inclusive of, and sensitive to, the diverse needs of others

CatholicCare values difference and is committed to supporting a culturally diverse client base including working with children and special needs groups. We have a diverse workforce that remains inclusive and respectful of each other's differences. Inherent in our organisation is the obligation of employees to treat all people we deal with through our work with dignity and respect, irrespective of whether they are fellow employees, clients, suppliers or other third parties.

Unlawful discrimination, harassment of any kind, bullying, vilification, retaliatory behaviour or victimisation or other unacceptable or offensive conduct will not be tolerated.

Our actions for Principle 2 include:

- We treat all people with dignity and respect, valuing their diversity and ensuring inclusive practices.
- We must ensure the words we use, the tone we use, and our behaviour is professional and respectful at all times and considered appropriate in the opinion of a reasonable person.
- We respect the individual's right to self-determination and decision-making and will support clients in expressing their preferences and making informed choices regarding their care.
- We undertake our duties safely and competently with care, respect and diligence consistent with the values and directions of CatholicCare.
- We will not swear, use inappropriate language or gestures (including sexualised) that could offend or unsettle a colleague, child or client. We will consider the needs of those we are communicating with including those with communication difficulties and seek safe ways to communicate or seek advice.
- We never unlawfully discriminate, harass, or bully our colleagues, clients, visitors or anyone else in the workplace.
- We will not discriminate or mistreat any colleague who in good faith reports or proposes to report a genuine complaint of unacceptable behaviour, conduct, or practice to CatholicCare.

Our service and employment decisions will be based on merit, and not on attributes that are irrelevant to need, employment or performance

Principle 3: We respect and value privacy and confidentiality

We are entrusted in our work with sensitive personal and confidential information and as such it is an inherent requirement of our work that we respect the access, use and protection of confidential and private information.

Our actions for Principle 3 include:

- We respect and protect the privacy of all individuals and maintain confidentiality in all dealings. We will only share private or confidential information with other staff if it is relevant to the work required or for legal requirements.
- We seek approval from a Senior Leader or authorised delegate to release information about the business, clients or colleagues to third parties if CatholicCare is required to release the information under the law.
- We seek the necessary consent (i.e. the person it's related to) to release information about the business, clients or colleagues to third parties (and family members) outside of CatholicCare.
- We collect, use, store, handle, update and destroy information, particularly personal information, in line with privacy legislation, applicable policies and processes.
- We comply with all IT and security protocols and procedures relating to the maintenance of passwords and user profile setup. We will not use another person's log on details nor provide our log on details to another person.
- We will immediately report any breach or suspected breach of privacy to the Executive Manager Quality Safeguarding Risk and Compliance.

Principle 4: We are a child safe organisation

CatholicCare is committed to the safety and wellbeing of children and holds this at the centre of our decision making and practice. We believe in the principle of paramountcy of the safety of children.

This means that the safety, wellbeing, and best interests of the child are the primary consideration in all decisions, actions, and practices. Where there is a conflict between the interests of a child and those of adults or the organisation, the child's safety and wellbeing will always come first.

At CatholicCare, we are committed to creating and maintaining environments that provide and promote safety to all children and young people. We are committed to preventing any form of harm or abuse towards a child, including physical, sexual, emotional, or psychological abuse as well as any type of ill-treatment or neglect.

CatholicCare promotes a safeguarding culture where the prevention and reporting of abuse is mandatory. All staff, volunteers and contractors are individually and collectively responsible for ensuring the safety, wellbeing and empowerment of children and young people within our services.

The principles set out in this Code are the minimum requirements in terms of how staff, volunteers and contractors should behave towards children. This Code identifies some of the positive child safe behaviours expected as well as some of the behaviours considered unacceptable when working with children. CatholicCare's Child Safe Policy alongside participation in child safe training will provide opportunity for further learning on this.

Engaging in unacceptable practices and behaviours towards a child or young person is a breach of the Code and will be assessed and managed within the terms of current CatholicCare's Policy and Procedures as well as relevant state and federal legislation.

Any suspected criminal behaviour towards a child or young person will be reported to the NSW Police, as well as other statutory bodies as required.

We will not:

- Condone or participate in illegal, unsafe or abusive behaviour towards children, including physical or sexual abuse
- Subject a child to unauthorised restrictive practices or any form of corporal punishment, social isolation, immobilisation, sexual suggestion, offence or misconduct
- Ignore, disbelieve or minimise allegations or concerns of abuse
- Act in a way that is likely to emotionally abuse, humiliate, oppress or degrade children or young people
- Act in a way that is likely to result in harm in any way, including emotional, psychological, or cultural harm
- Develop any 'special' relationships with children that could be seen as grooming/ favouritism such as the offering of gifts or special treatment
- Do things of a personal nature that a child can do for themselves, such as toileting or changing clothes.
- Unlawfully discriminate against any child on the basis of age, gender, race, culture, vulnerability or sexuality
- Engage in unnecessary or inappropriate physical contact, such as rough physical play
- Exchange personal contact details or have unauthorised contact outside the scope of services

- Take photos or video footage without child and parent/carer consent
- Work under the influence of drugs or alcohol
- Use inappropriate language, discuss adult topics, or express personal views about culture, race, or sexuality in front of children
- Verbally assault a child or create a climate of fear
- Offer alcohol, cigarettes or other drugs to children

Our actions for Principle 4 include:

- We uphold the rights of the child and treat all children and young people with respect.
- We act as a positive role model for children and young people.
- We model respectful behaviour at all times.
- We listen to, value and respond to children and young people's ideas and opinions, and believe them.
- We promote an open environment where children can express thoughts and feelings and be taken seriously.
- We treat all children fairly, equally and with respect.
- We actively promote cultural safety and inclusion for all children and their families and support children to express their culture and enjoy their cultural rights.
- We are sensitive to the needs of children from culturally and linguistically diverse backgrounds.
- We act promptly to identify and address any instances of racism.
- We are sensitive to the needs of children with a disability.
- We respect children's privacy and keep information confidential unless required for safety.
- We maintain professional standards of conduct, including clear boundaries between professional and personal and report any conflicts of interest (such as an outside relationship with a child). We welcome parents and carers to participate in decisions about their child.
- We promote respectful behaviour and intervene in situations of bullying between children.
- We are alert to risk of harm from adults or other children.
- We are aware of our duty of care, adhere to all relevant legislation such as mandatory reporting and act in accordance with our child safe policies and practice guidelines, and participate in compulsory training.
- We raise concerns with management if any risks to child safety are identified.
- We report and act on any concerns or observed breaches of this Code of Conduct.
- We take all reasonable steps to protect children from abuse and take a child seriously if they disclose harm or abuse.
- We abide by all organisational policies, practice guidelines and this Code of Conduct.

Principle 5: We act in the best interest of CatholicCare and our clients

Our reputation as a trusted and respected organisation is essential to ensuring that CatholicCare can continue to deliver the vital services we currently provide. Each of us can build and enhance our reputation or damage that reputation and our capacity to support our clients and the broader community.

In everything we do, we should consider how our, or someone else's, actions could impact on performance, reputation or other assets and act to prevent or remedy anything that could adversely impact our organisation or our clients. Public comment (includes public speaking engagements, media comments and letters to newspapers or social media) related to CatholicCare and its activities is the responsibility of the Chief Executive Officer or person/s expressly appointed by them.

Our actions for Principle 5 include:

- We present for work well-groomed in clothing that is clean, tidy and suitable to safely perform our duties.
- We behave in a way that takes into account our impact on the broader community and the environment in both the short and long term.
- We act to protect CatholicCare and our clients. This includes being alert to behaviour and reporting suspicious activity.
- We deal fairly and honestly with all clients, suppliers and third-party agencies.
- We use all CatholicCare systems safely and responsibly and for proper purposes in line with our position. This includes email, messaging, internet access, portable technology and business systems.
- We avoid situations or participate in activities or functions in a way that may damage our reputation, for example using unsuitable language or making inappropriate comments on social media.
- We make decisions that are based on factual information, ensure procedural fairness and are made in line with our delegated responsibility as per CatholicCare governance structure. We maintain records to support these decisions.
- We foster an organisational culture of continuous improvement, learning, reflection and staff support.

Principle 6: We ensure compliance with current legislation, CatholicCare policies and procedures

As a not-for-profit organisation, we are subject to a variety of laws and obligations given the nature of our services and the environments in which we operate. We must be familiar and comply with all relevant legislation, policy and regulations applicable to our employment. Any breaches of the law and or policy can have serious consequences beyond our employment, both for CatholicCare and for you as an individual. Although the legislation that applies may be complex, ignorance is no excuse as it is an expectation and a condition of our employment that we are ultimately responsible for understanding which legislation and policies apply to us and the work we do.

CatholicCare is committed to helping you by designing systems, policies and processes that comply with the law, and by providing relevant training. This Code, and our policies, procedures and practices consider not only our legal obligations but also CatholicCare culture and values. If there is an inconsistency between an applicable law and this Code, a CatholicCare policy, procedure or practice, we will comply with whichever is the higher standard.

All workers have a duty to advise CatholicCare or a representative of the People and Culture team if he or she observes conduct or behaviour that may be in breach of this Code, the law as it applies in our organisation, current state and federal legislation, or our policies, even if no grievance or complaint has been raised.

Our actions for Principle 6 include:

- We comply with the principles of the Code of Conduct and Ethical Framework, CatholicCare policies, procedures or practices and current state and federal legislation.
- We are aware that there are circumstances where not taking any action, or failing to take any action, may also breach this Code, current legislation, CatholicCare policies, procedures or practices.
- We actively complete all required training and education programs to build and maintain our awareness and understanding of relevant laws, policies, procedures and practices.
- We actively seek guidance from our supervisor or the People and Culture team to clarify any relevant legislation, policy, procedure or practice.
- We are accountable for the decisions we make and the actions we take.
- We report in good faith any actual or suspected breaches of the law, the Code, or CatholicCare policies as soon as possible to our supervisor or a representative in the People and Culture team.
- We escalate any admission of crime or intention to commit a crime or self harm disclosed during delivering services, to a senior manager who will support staff with legal reporting obligations.
- We report any suspicion of unethical or inappropriate behaviour, or allegations to our supervisor.
- We encourage those involved in wrongful or harmful actions to adopt strategies focused on preventing or minimising harm.

Principle 7: We maintain a safe working environment for our clients and ourselves

We consider that it is an inherent obligation of all workers or visitors to promote a culture of safety and wellbeing at CatholicCare and take reasonable steps to ensure actions or omissions do not adversely affect the health and safety others.

We have zero tolerance for harm and are committed to delivering services free from all forms of violence, discrimination, exploitation, neglect and abuse. This includes taking all reasonable steps to prevent and respond to all forms of emotional, psychological, physical or sexual abuse, ill-treatment, neglect, exploitation, or general misconduct of our clients, staff, volunteers and others we engage with.

Our actions for Principle 7 include:

- We take proactive steps to prevent and respond to any incident of harm, ensuring a safe environment for both clients and staff.
- We actively contribute to promoting a safe working environment by taking responsibility for health and safety, by following safe work practices, and reporting any issues as soon as possible.
- We support and encourage staff to promptly report any concerns in relation to quality and safety of care.
- We recognise and actively look after ourselves by identifying our self-care needs and implementing self-care strategies.
- We prioritise the physical, emotional, interpersonal and psychological safety, welfare and wellbeing of all people including our clients, colleagues, work supervisors, volunteers and others we engage with.
- We take responsibility for the safeguarding of children and vulnerable people who use our services.
- We take the opinion and needs of children, young people and vulnerable adults seriously, and actively enable their voices to be heard and follow up appropriately.
- We demonstrate safeguarding practices and risk management in decision making. We understand and fulfil our legal responsibilities regarding mandatory reporting of children at risk of significant harm, the reporting of allegations against staff and reporting serious incidents to the relevant Commission.
- We demonstrate strength-based solution-focused principles in our written and verbal communication.

Supporting Policies and Practice Guidelines

This Code of Conduct & Ethics Framework is supported by CatholicCare Policies and Practice Guidelines, and these should be read in conjunction with it.

A current list of Agency wide policies and links are available on IsidoreNet in the *Agency Wide Policy Index*.

In addition to Agency wide policies, staff are also required to adhere to policies and practice guidelines specific to their service areas.

Sign off and review

This framework replaced version 5.1.1 of the Code of Conduct and Ethical Behaviour Policy on 30 June 2021.

This document remains valid until it is either superseded by a new version or officially revoked.

CatholicCare values your input and welcomes feedback on this Framework. Your suggestions help us improve and better support your work. Please send any feedback to policy.updates@catholiccaredbb.org.au.

Version	Authorised by	Approved date	Review cycle	Review due
1.0	Senior Leadership Team	30 June 2021	3 years	June 2024
2.0	Executive Manager People & Culture	27 August 2025	12 months	August 2026
3.0	Executive Manager People & Culture	13 July 2026	12 months	August 2027

Revision history

Version	Description	Author	Amendment date
1.0	Framework	Executive Manager People and Culture	30 June 2021
1.1	Linked Secondary Employment PG	HR Business Partner/Policy Specialist	26 October 2021
1.2	Linked Gifts & Hospitality Policy	Policy Specialist	8 August 2022
1.3	Added commitment to upholding human rights within business practices	Policy Specialist	18 October 2022
1.4	Updated links and altered review cycle	Policy Specialist	17 July 2023
1.5	Updated to align more closely with Aged Care Code of Conduct	Policy Specialist/Executive Manager Quality Safeguarding Risk & Compliance	17 October 2024
2.0	• Expanded on Principle 4 to align with Child Safe Standards. • Added two actions to Principle 6 replacing the Criminal and life-threatening disclosure section. • Replaced the list of linked policies with a link to the policy index. • Temporarily changed to this template due to ease of editing	Policy Specialist/Executive Manager Quality Safeguarding Risk & Compliance	27 August 2025
2.1	No content change. Removed previous ED photo and signature	Policy Specialist	7 July 2026
3.0	Added Child Paramountcy Statement to Principle 4	Senior HR Business Partner	13 July 2026