

## CODE OF CONDUCT / CONFLICTS OF INTEREST Policy & Procedure

<b>QA REFERENCE</b>	M't P&P No 34
<b>DATE INTRODUCED</b>	28 03 2019
<b>DATE REVIEWED</b>	28 03 2019
<b>DATE OF NEXT REVIEW</b>	28 03 2022
<b>REVIEW RESPONSIBILITY</b>	Chief Financial Officer
<b>SIGNATURE OF APPROVAL</b>	<p>.....</p> <p>Gary Simpson, Chief Executive Officer</p>
<b>REFERENCES</b>	
- <b>Relevant Legislation</b>	<ul style="list-style-type: none"> <li>• Privacy Act 1988 (C'wlth)</li> <li>• Privacy and Data Protection Act 2014 (Vic)</li> <li>• Housing Act 1983 (Vic) Part VIIIA – Social Housing</li> <li>• Performance Standards for Registered Housing Agencies</li> <li>• DHHS Victorian Housing Register Operational Guidelines</li> <li>• Charter of Human Rights and Responsibilities 2006</li> <li>• Children, Youth and Families Act 2005 (Vic) (effective 2020 for CHOs)</li> <li>• Child Wellbeing and Safety Act 2005 (Vic) (effective 2020 for CHOs)</li> </ul>
- <b>Other MASP Policies</b>	<ul style="list-style-type: none"> <li>• Accessibility Modifications</li> <li>• Allocations MASP Properties</li> <li>• Being a Good Neighbour</li> <li>• Bond Management</li> <li>• Complaints and Appeals</li> <li>• Eligibility</li> <li>• Inspections</li> <li>• Maintenance and Repairs</li> <li>• Property Damage by tenant</li> <li>• Privacy and Information Security</li> <li>• Rent Arrears Management and Evictions</li> <li>• Rent Setting and Collection</li> </ul>
<b>FORMS &amp; TEMPLATES</b>	

### Purpose

This policy sets out a code of conduct for all staff and board members of MASP.

### Scope

MASP staff, contractors, students on work placement, board members and volunteers must all follow this policy.

## **Guiding Principles**

MASP is committed to the principles of:

- Equity
- Integrity
- Accountability
- Team work
- Respect

### **Equity**

- We will embrace diversity and at all times act in an open and fair manner ensuring equal access to opportunities for clients, partners and staff.
- We will ensure our relationships are one of equality and always operate in a manner that provides sufficient support and access to information to sustain service delivery.
- We will promote fair, non-discriminatory behaviour and actively discourage behaviour that is discriminatory.

### **Integrity**

- We will at all times will act professionally
- Our behaviour will consistently be truthful and honest.
- We will carry out our duties in a lawful manner and ensure that MASP carries out its business in accordance with the law.
- We will observe the confidentiality of non-public information acquired in our roles with MASP and not disclose to any other person such information. See Privacy and Information Sharing Policy.

### **Accountability**

- We will accept responsibility for our actions and outcomes and we will disclose the results in a transparent manner.
- Staff will be diligent, attend Staff meetings, supervision meetings and other scheduled organisational meetings and devote sufficient time to prepare for these meetings to allow for full and appropriate participation to contribute to any decision-making process.
- Board members will be diligent, attend Board meetings and devote sufficient time to prepare for Board meetings to allow for full and appropriate participation in the Board's decision making.
- Staff will actively participate in their performance appraisals as the basis of their own development and quality assurance. Individual staff will be given the opportunity to review their own performance with the CEO with a view to ensuring a suitable contribution to MASP and input for decision-making. It is expected that if their performance is found lacking they would pursue training to improve their performance.
- We will all observe a reasonable duty of care to clients, colleagues and the general public in carrying out the work of MASP.

### **Team Work**

- We will work in a manner that provides support to one another while working towards a common goal.

### **Respect**

- We uphold the worth and dignity of all people regardless of their circumstances.
- We will show this respect in our communication with clients, colleagues, staff and managers whether in person, by written communication or by phone communication.

### **Conflicts of Interest**

The common law requires disclosing potential conflicts of interest as soon as they arise. This includes financial, political or personal benefit from:

- other business or professional activities;
- other commitments or interests;
- employment or accountability to other people or companies;
- membership of other companies;
- ownership of property or other assets;
- staff, contractors or board members entering into an agreement which benefits them personally or results from a position of conflict and MASP suffers;
- staff, contractors or board members, or their families, receive services from MASP where they are involved with decisions about the services.

**MASP performs a range of functions, many of which could present the potential for a conflict of interest, including:**

- employment and selection of staff
- selection of a contractor for services or purchases
- allocation of properties, tenant selection
- delivery of goods and services
- authorisation of expenditure
- where an employee of MASP holds secondary employment that may compromise their responsibilities with MASP.

**Real or perceived conflicts of interest will be guarded against by:**

- ensuring that no special treatment or favours are granted to people, or their relatives or friends as a result of their positions
- ensuring that they do not receive payments or personal gifts as a result of their position
- not entering into agreements which benefit them personally
- not participating in decisions where they may have a conflict of interest
- if necessary, removing themselves from particular discussions or decisions; and
- ensuring that they do not, as a staff member, use insider information about the organisation or job or spreading information about a client gained as a staff member. See Privacy and Information Sharing Policy.

Personal relationships are not to influence work behaviours. It could be a conflict of interest if an employee acts on the basis of personal friendship or personal animosity to advantage or disadvantage a fellow employee, supplier, service provider, customer or tenant

Employees who are uncertain whether or not they are placed in a situation where a potential or actual conflict of interest exists should seek advice from their supervisor or manager.

### **Breaches of this Code**

The behaviours listed in this code that reinforce our values outline an expected standard of behaviour. Behaviours which are contrary to the spirit or the stated requirements of this Code 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 MASP's disciplinary procedures and, if in scope a report may be made to DHHS CIMS (Client Incident Management System). Where appropriate MASP Complaint Management policy may also be enacted. Actions could include:

- verbal or written warnings
- undertakings to correct behaviour, attending training or mentoring to improve behaviour,
- where necessary, termination of employment or cessation of engagement with the organisation, in accordance with any relevant policies/procedures and current employment legislation.

### **Transparency and accessibility**

This policy will be available on the MASP website [www.masp.org.au](http://www.masp.org.au)