

Code of Conduct Policy

Policy Owner:	The Manager People & Culture is responsible for the review and currency of this policy.
Endorsement:	Endorsed by the Executive Leadership Group on 11/08/2026
CEO Approval:	Approved by the Chief Executive Officer on 11/08/2026 This policy is valid from the date of CEO approval and remains in force, as amended from time to time, until such time as formally revoked by resolution at a meeting of the Executive Leadership Group.
Next Review Due:	July 2029

1. Purpose

The purpose of the Code of Conduct Policy is to uphold the organisation's purpose, vision and values, and providing employees with a clear understanding of MASP's standards and expectations.

2. Scope

The Policy applies to all employees, volunteers, carers and students on placement (collectively, employees).

To the extent that the contents of the Policy refer to obligations on MASP, they are guidelines for management or summaries of applicable legislative requirements only and are not contractual terms, conditions or representations on which a staff member may rely.

3. Policy Statement

MASP is committed to ensuring all employees act ethically, responsibly and in the best interests of the organisation and its clients.

MASP expects every employee will maintain the highest standards of professional conduct and ethics in their dealings with contacts, clients and suppliers, the community and each other.

Any actual or perceived conflicts between individual interests and the interests of MASP must be disclosed and appropriately managed so they do not affect the services, activities or decisions of MASP.

Conduct that may threaten our employees or damage MASP's reputation may constitute unacceptable behaviour.

MASP is committed to equity, inclusion and respect for diversity. Every individual has the right to reach their full potential, provided that doing so does not infringe on the rights of others and is protected against discrimination on the basis of sex, age, race and disability. Social inclusion is a human right and encourages individuals to play an active role in society. An inclusive society is based on the fundamental values of tolerance and embracing diversity.

MASP recognises First Nation people and their right to self-determination.

Prior to commencement of employment with MASP, all employees are expected to sign a Code of Conduct Declaration agreeing to adhere to this Policy. This is completed via the onboarding process in the HRIS.

3.1 Standards of work

All individuals are expected to perform their duties to the highest professional and ethical standards and be accountable for their work and interactions with others.

In accordance with this Policy and MASP's Child Safe Policy, all individuals are expected to read, understand and comply with the Child Safe Standards for Victoria and NSW, and ensure they promote and guide child safe and positive work practices.

In carrying out their duties, or acting on behalf of MASP, employees are expected to:

- obey lawful and reasonable directions;
- obey MASP policies, procedures and code of conduct;
- act honestly, lawfully and professionally to maintain public confidence and integrity;
- respect the privacy and confidentiality of all clients;
- be open, honest and transparent when making decisions or providing any advice or service;
- perform duties effectively, efficiently, impartially and to the best of their ability;
- observe Occupational Health and Safety (OHS) requirements and remove associated risks where possible;
- follow incident reporting processes designed for the proactive reporting and resolution of health and safety hazards;
- report breaches of any MASP policies promptly;
- respect the dignity, culture, values and beliefs of the clients; and
- refrain from engaging in representations, exploitation or misinformation regarding MASP services.

3.2 Unacceptable Behaviour and Serious Misconduct

Employees should understand that the distinction between unacceptable behaviour and serious misconduct is one of both degree and repetition. In general, serious misconduct is wilful and/or reckless and is likely to result in instant dismissal for a single offence.

Unacceptable behaviour may result in a range of disciplinary action including dismissal depending on severity.

If an employee commits an act or persists in behaviour which is not listed, but which management considers is of a similar quality, the employee will still be subject to disciplinary action, including dismissal.

3.2.1 Unacceptable Behaviour

The following non-exhaustive list constitutes unacceptable behaviour and will result in disciplinary action that may include dismissal:

- failure to follow MASP's policies or standard procedures;
- misuse or unauthorised use of MASP property (including intellectual property);
- unauthorised absences from work;
- posting offensive notices on MASP premises or property or making offensive comments via social media;
- preventing or hindering another employee from conducting their work;
- wasting company time or resources;
- failure to complete rostered hours, without reasonable excuse;
- failure to report a work-related incident or accident;
- continual lateness or lack of application to an assigned task;
- reporting for work in a condition incapable of carrying out duties properly or safely;
- consumption of drugs (other than as prescribed by a registered medical practitioner) or alcohol on MASP premises without authorisation;
- violation of MASP's Anti-Bullying, Discrimination & Sexual Harassment Policy;
- use of abusive or offensive language to other employees, suppliers or clients;
- sleeping during working hours; and
- job performance at a level below that which is reasonably acceptable to MASP.

3.2.2 Serious Misconduct

The following is a non-exhaustive list of behaviour which may constitute serious misconduct, which is likely to be dealt with by instant dismissal:

- breach of confidentiality obligations;

- falsification or theft or unauthorised destruction of MASP's information or records;
- unauthorised possession of the property (including intellectual) of MASP;
- unlawful bullying, harassment or discrimination of any kind;
- sexual harassment;
- theft or wilful damage to MASP's property (including intellectual property);
- deliberate acts or omissions which jeopardise quality or safety;
- any act which does or may lead to criminal charges, which in the reasonable opinion of MASP, affects their ability to effectively perform their duties or which may cause harm to MASP's reputation.
- any conviction on a dishonesty related charge; and
- access of pornographic or lewd material through the internet, whether displayed or stored on MASP's equipment or sending or receiving lewd emails.

3.3 Gifts and Benefits

Employees must not accept any gifts or benefits because of their position as an employee of MASP, if they:

- influence or might be seen to influence the performance of their duties;
- influence or might be seen to influence another staff member in the performance of their duties or exercise of any decision-making power;
- are cash; or
- are substantial.

Employees must not, under any circumstances, offer or give any gifts or benefits where the gift or benefit influences, or could reasonably be perceived as intended to influence, the performance of that person's duties, decision-making power, or the nature of their relationship with MASP. This includes gifts and benefits offered or given to another employee of MASP, a client, or any person or organisation outside of MASP.

Employees must not give gifts or benefits to clients, including current or former clients, where doing so could create a real or perceived conflict of interest, a sense of obligation, favouritism, dependency, or an imbalance of power, or where it may compromise professional boundaries. For the avoidance of any doubt, employees should refrain from giving gifts to clients.

This section is not intended to limit any gifts given out of friendship between colleagues, such as birthday gifts.

3.4 Child Safe Standards

MASP is committed to meeting the highest child safety standards to ensure the protection and wellbeing of children in the broader Mallee region. The safety and welfare of children are

always our first priority, and all children have the right to feel safe, supported and respected whilst accessing our services.

MASP has zero tolerance to child abuse. All allegations and safety concerns are taken seriously and responded to in accordance with legal and organisational requirements. Everyone working within MASP shares responsibility for protecting children and for reporting suspected child abuse.

We support and respect all children, including ensuring the cultural safety of Aboriginal children, and children from culturally and linguistically diverse backgrounds and children with a disability.

MASP has robust policies and procedures to support human resources and recruitment practices. This includes systems and controls such as risk identification and mitigation, Working with Children Checks, staff training and development, incident management and feedback management processes.

3.5 Responsibility to Clients (including children and young people)

All MASP employees must:

- establish and maintain professional relationships at all times;
- not form personal relationships that may compromise the relationship;
- maintain confidentiality of client information, except where disclosure is required by law;
- support clients to make informed decisions and access information about themselves;
- treat clients with dignity, respect and acknowledge their capacity for self-determination; and
- maintain and develop their skills and knowledge for the benefit of both themselves and the client.

3.6 Professional Boundaries

Employees must maintain clear and professional boundaries with clients at all times, as well as be aware of the vulnerability of clients and the imbalance of power that exists in the client relationship. Safety, trust and ethical behaviour underpin the professional relationship and all interactions.

The blurring of professional boundaries is unacceptable. This includes inappropriate behaviour, sexual innuendo, misconduct or harassment, physical or financial abuse, dual relationships or breaches of confidentiality. Any exploitation of the relationship is an abuse of power and trust by the MASP employee.

MASP employees should seek advice and assistance from their program manager if boundary issues arise.

The buying and selling of goods and services (or renting personal property) to current MASP clients is inappropriate and not permitted.

Unacceptable behaviour towards clients includes, but is not limited to:

- taking clients including children/families to and employees home;
- engaging in sexual relationships with clients or close family;
- accepting gifts or donations from clients for work performed;
- consuming alcohol with clients;
- inappropriate or suggestive dress or clothing;
- taking client files or records home;
- smoking in front of clients;
- using coarse or abusive language in front of clients; and
- providing alcohol or cigarettes to underage children.

A sexual relationship with clients with intellectual disabilities or minors is illegal; any breaches of this kind will be met with instant dismissal and police notification. Sexual relationships with any clients will constitute a breach of this Policy.

3.7 Conflict of Interest

A staff member's private interests must never conflict with their responsibilities as an employee or contractor or with the business interests of MASP.

Where a staff member believes their private interests conflict with or may give rise to a perception of conflict with their duties as an employee or contractor, they must notify their supervisor or manager immediately.

"Private interests" includes any financial, legal or other significant interest, which may reasonably interfere with a staff member's ability to give faithful service to MASP. This extends to the interests of a staff member's family.

In accordance with the Secondary Employment Policy, employees may undertake other paid employment only if there is no conflict of interest and if the employee's duties and responsibilities with MASP are not affected in any way.

Employees must disclose any perceived conflicts of interest in accordance with the Conflict of Interest Policy and the Secondary Employment Policy. A failure to do so may lead to disciplinary action up to and including dismissal.

3.8 Fraudulent or corrupt conduct

All employees must act with integrity and must not engage in fraudulent or corrupt conduct. This includes but not limited to the misuse of MASP assets, falsification of records, or improper influence over business decisions. Employees are required to comply with all applicable laws, regulations, and internal controls designed to prevent fraud and corruption. Any suspected or actual misconduct must be reported promptly, and retaliation against those who report concerns in good faith will not be tolerated.

3.9 Breach of policy

Employees, who breach the standards of conduct contained in this Policy may face disciplinary action. In cases of serious misconduct, this may result in termination of employment.

4. Roles and responsibilities

Role	Responsibility
Employees	- Adhering to this Code of Conduct at all times. - Completing a Code of Conduct Declaration prior to commencing employment with MASP, and at any other time deemed necessary by MASP.
Supervisors and Managers	- Proactively communicating this policy to their teams - Ensuring compliance with the Code of Conduct and addressing issues/minor breaches where necessary and appropriate.
Directors	Endorsement of the Code of Conduct
CEO	Approval of the Code of Conduct
Manager People & Culture	- Reviewing and communicating this policy. - Ensuring the Code of Conduct is available to all employees and volunteers. - Seeking legal advice in relation to breaches of the Code of Conduct where necessary.

5. Definitions

For the purpose of this policy and related policy documents, the following definitions apply:

HRIS	Human Resources Information System (currently ELMO).
Employees	Employees are all individuals who undertake paid work on behalf of MASP. For the purpose of this policy, this also includes those who work at MASP but whose wages are paid by a third party (e.g. trainees or labour hire casuals).
Private interests	any financial, legal or other significant interest, which may reasonably interfere with a staff member's ability to give faithful service to MASP. This extends to the interests of a staff member's family

Serious Misconduct	In accordance with the Fair Work Regulations 2009, conduct that is serious misconduct includes: a) wilful or deliberate behaviour that is inconsistent with the continuation of the contract of employment; i) conduct that causes serious and imminent risk to: ii) the health or safety of a person; or b) the reputation, viability or profitability of the employer's business; c) engaging in theft, fraud, assault or sexual harassment in the course of the employee's employment. d) being intoxicated at work; e) refusing to carry out a lawful and reasonable instruction that is consistent with the employee's contract of employment.
Students	Anyone undertaking an unpaid tertiary placement at MASP.
Volunteers	Volunteers undertake unpaid work on behalf of MASP. For example, as part of the Youth Mentoring Program. For the purpose of this policy, this excludes Foster Carers.

6. Related Documents

This policy is implemented in conjunction with the following related documents:

Policies	• Alcohol and Other Drugs Policy • Anti-bullying, Discrimination and Sexual Harassment Policy • Child Safe Policy • Confidentiality Policy • Conflict of Interest Policy • Dress Standards Policy • Information Technology Policy • Occupational Health and Safety Policy • Performance Management, Counselling and Discipline Policy • Probity Checks Policy • Recruitment & Selection Policy • Secondary Employment Policy • Smoke-free Workplace Policy • Social Media Policy
Procedures	•
Instructions and Guidelines	• Appropriate Workplace Behaviours Training Module • Fraud and Corruption Framework • Therapeutic Model of Care
Forms and Templates	• Code of Conduct Declaration • Conflict of Interest Declaration • Secondary Employment Declaration

7. Legislation and other References

Related Legislative Acts and other sources of Authority	• Charter of Human Rights and Responsibilities Act 2006 • Fair Work Act 2009 (Cth) • Fair Work Regulations 2009 (Cth) • Occupational Health & Safety Act 2004 (Vic) • Work Health & Safety Act 2011 (NSW)
Related Standards, Guidelines and other References	• Child Safe Standards (NSW) • Child Safe Standards (Vic)