

# Code of Conduct

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## Message from the CEO

The Women's Housing Company is the largest specialist community housing provider in Australia, with a focus on the provision of housing and homelessness services to women and their dependent children. We are entrusted by government, the community and our clients to manage our services and assets efficiently, fairly, impartially and with integrity. We hold an important position in the community that requires transparency, honesty, respect and fairness for all people we support and serve. We make decisions each day that affect the lives of others. In everything we do, we are expected to act and be seen to act in the interest of those we are here to serve.

Our people are expected to adhere to the Code of Conduct (the Code) in the course of their duties and when representing the company at any external meeting or event. The Code explains the minimum standards of conduct and behaviour expected of our people.

Our people are encouraged to discuss the Code regularly at meetings and refer to it when making important decisions.

Active and open discussion of ethical dilemmas and conflicts of interest helps to foster a healthy and professional organisational culture and one that can withstand the highest scrutiny.



Catherine Stuart  
**Interim Chief Executive Officer**

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## 1 Women's Housing Company Corporate Values

The Women's Housing Company Corporate Values guide our actions and determine who and what we aspire to be. They are expressed through our interaction with our colleagues, clients, applicants and tenants, suppliers, partners and all other Women's Housing Company stakeholders including the wider community. We use our Corporate Values to make decisions that will align with our vision: **Empowering women to improve their lives through the provision of housing that is affordable.**

### Our Values are:

#### Collaboration

Working together as a community housing provider and in partnership with others who share our concerns and interests for women

#### Integrity

Working with integrity and transparency within the community and in our relationships with others

#### Courage

Taking informed risks, embracing the new and standing up for what we believe to be right

#### Respect

Respecting the rights of tenants, clients, staff and the community

#### Focus

Remaining focused on our philosophy, strategy and priorities in a professional manner at all times and on specific issues during times of conflict

## 2 Purpose and Scope

The Women's Housing Company Code of Conduct applies to Board members, employees (including temporary staff whether recruited directly or via employment agencies), and volunteers (herein referred to as our People).

Our People are responsible for upholding the integrity of the organisation and complying with the Code. One person's misconduct can tarnish the credibility of all of us and make it more difficult to achieve our organisational objectives.

All Women's Housing Company People are expected to adhere to the Code in the course of their duties and allow it to guide their behaviour, decision making and development whilst working for the Women's Housing Company.

The Code should be read in conjunction with the Contractor Code of Conduct (which applies to maintenance contractors), the other policies that are referred to in this document and within the context of our Corporate Values.

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### 3 Expectations and Responsibilities

In addition to the responsibilities applicable to all of our People, Board members and other leaders of the Women's Housing Company have an important role in demonstrating ethical leadership, and role modelling the standards of behaviour outlined in this Code.

#### 3.1 Board Responsibilities

The Women's Housing Company Board of Directors is responsible for approving this policy and overseeing the governance frameworks and systems that support the policy.

#### 3.2 Leadership Responsibilities

Leaders of the Women's Housing Company of all seniority, including Team Leaders, Senior Managers and Executive Managers, must demonstrate accountability for their own performance and behaviour as well as that of their direct reports, if any.

Leaders are responsible for the health and safety, and performance of their direct reports. They are accountable for addressing continued unsatisfactory performance, misconduct and breaches of this Code and other company policies and procedures.

Leaders are responsible for ensuring that their direct reports:

- understand and follow the Code
- understand and adhere to relevant legislation, policies, procedures and the corporate values
- understand their job, how they are expected to do their job and the results for which they are accountable
- have equitable access to learning and development opportunities.

Leaders are also responsible for ensuring:

- they set a good example of ethical behaviour, accountability and open, honest communication
- they acknowledge and encourage ethical and professional work practices
- the systems of work and the work premises and environment are safe and free from inappropriate behaviour such as discrimination, harassment, bullying and fraud and any other unlawful conduct
- they encourage compliance with the Code and ensure that its principles are discussed regularly through team meetings, one on one sessions with managers, and during the performance review process
- they take appropriate action on breaches of the Code and report major breaches to senior management
- that any breach or potential breach is treated seriously and professionally and managed promptly and confidentially.

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### 3.3 Our People's Responsibilities

Our People are responsible:

- to jointly pursue the Vision of the Women's Housing Company - **“Empowering women to improve their lives through the provision of housing that is affordable”** whilst being guided by our Values of Collaboration, Courage, Focus, Integrity and Respect
- where relevant, for discharging their duties of employment in a manner that is consistent with:
  - all relevant legal and regulatory obligations
  - this Code
  - all Policies and Procedures of the Women's Housing Company
  - reasonable directions of their manager
- where relevant, to seek guidance from their managers with a view to resolving any queries or uncertainties
- for taking reasonable care for their own health and safety and those of their colleagues, including promptly reporting any work, health and safety incidents and injuries

### 3.4 What our People can expect from the Women's Housing Company

Our People can expect:

- to have health and safety issues attended to promptly and in accordance with policy
- they are treated with respect and free from bullying, harassment and discrimination
- an inclusive workplace where diversity is respected
- their queries or questions will be addressed by their direct manager (where relevant), or by another appropriate manager, CEO, Board Committee Chair or Board Chair
- appropriate training, direction, and feedback regarding their work
- that their personal information is protected and managed in accordance with legal requirements
- to be safe from the fear of reprisal should any reports be made in relation to breaches of this Code.

### 3.5 What our clients and communities can expect from the Women's Housing Company

The Women's Housing Company is committed to delivering services and interacting with clients and other external stakeholders in a manner which is consistent with our corporate values. The people and organisations that we interact with can expect that we will:

- Treat them in a respectful and non-discriminatory manner
- Provide fair, consistent and timely services
- Use feedback to improve our services

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- Provide accurate information and access to translations where required
- Securely collect, store, use, disclose and dispose of personal information

## 4 Our Standards of Behaviour

### 4.1 Accountabilities

Our People are responsible for their own behaviour, performance and safety. They are expected to uphold the standards of behaviour and work performance communicated to them by their manager and within Women's Housing Company policies and procedures.

They are expected to follow organisational practices in carrying out their role and it is their responsibility to ensure they understand and implement those expectations and ask questions about any aspect of their work, policy or procedure that is unclear to them.

### 4.2 Professional conduct

Our People should behave professionally in all situations when working or representing the Women's Housing Company.

Professional conduct is defined as **exhibiting a courteous, conscientious and generally business-like manner.**

At the Women's Housing Company, this is demonstrated by how our People communicate, their personal presentation and how they conduct and present themselves at work, in meetings, and at external events, training and seminars.

The following are examples of acts that the Women's Housing Company considers unprofessional and unacceptable:

- offensive language, including swearing and racial slurs
- showing aggression through yelling or gestures
- refusing to follow or failing to carry out a reasonable instruction
- ignoring work duties or wasting time during work hours and serious delays in making a decision or taking action
- undertaking their duties while under the influence of alcohol or drugs or bringing illegal substances to work
- being absent from work or Board meetings without a valid reason or without notifying their manager/Chair
- being continually late for work, events or meetings
- being wasteful or neglectful of company equipment or using company resources for un-authorised or illegal purposes.

Our People represent the Women's Housing Company in various forums and interact with a broad range of stakeholders. Our People's dress code will reasonably vary according to factors such as the person's role, duties, the occasion, the environment and taking due consideration of any safety risks. For example, business casual attire is expected in the office;

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business attire is expected when attending any official functions; and appropriate safety equipment and footwear are expected when attending construction sites.

### 4.3 Discrimination, bullying and harassment

We have a zero tolerance for discrimination, bullying and harassment.

The Women's Housing Company will ensure that all decisions affecting our People, tenants and clients are free from discrimination.

Bullying and harassment are against the essence of the Women's Housing Company Corporate Values and this Code and our People must ensure their behaviour and actions do not offend, intimidate or humiliate any person they engage with in the course of undertaking their role.

**Policy Reference:** Equal Opportunity, Discrimination, Harassment and Bullying Policy

### 4.4 Diversity and Inclusion

The Women's Housing Company recognises, respects and values the diversity of our People, tenants, clients and other stakeholders.

The Women's Housing Company is committed to supporting workplace inclusiveness and embraces diversity in the context of our work, including differences in cultural backgrounds, race, ethnicity, disability, age or sexual orientation.

The Women's Housing Company is a specialist Community Housing and Homelessness Support Services Provider, focusing on the provision of services to women and women with children, many of whom have experienced domestic and family violence. The work of the Women's Housing Company is supported by an exemption under section 126A of the *Anti-Discrimination Act 1977* (NSW) for the provision of accommodation services for single women. This exemption will be applied in a manner guided by applicable law.

Cognisant of the special needs of our target client base, the Women's Housing Company has recruited an all-female workforce. This has been supported by an exemption under section 126 of the *Anti-Discrimination Act 1977* (NSW) and this exemption will be applied in a manner guided by applicable law.

## 5 Health and safety

Everyone at the Women's Housing Company is responsible for health and safety and must adhere to the health and safety policy. As a minimum, it is each of our People's responsibility to;

- immediately report any hazard or potential hazard, in order to avoid a potential injury
- report any injury, accident or near miss as soon as possible.

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Where appropriate (for example in the case of employees), our People should:

- ensure they know who their first aid officer and fire wardens are
- complete the WHS induction on commencement
- consider ergonomic issues that arise from their immediate workstation
- request any equipment they need to ensure their health and safety at work.

**Policy Reference:** Workplace Health and Safety Management System

## 6 Corrupt conduct, gifts, bribes and hospitality

Our People must not participate in any activity that is fraudulent or gives the perception of being fraudulent whether within the organisation or not.

They must not solicit or accept gifts, bribes, hospitality, benefits, service or favours. This may be considered corrupt conduct and certain types of corrupt conduct may amount to a breach of NSW or Commonwealth law.

In certain circumstances, declining a gift of nominal value may cause unnecessary offence. Gifts of nominal value may be accepted if they comply with the requirements of the Gifts and Benefits policy. The Women's Housing Company maintains a gift register, which is monitored by the Chief Financial and Corporate Services Officer.

Our People have a responsibility to guard against and report instances or potential instances of fraud and corruption.

**Policy Reference:** Gifts and Benefits Policy and Fraud and Corruption Policy

## 7 Conflict of interest

A conflict of interest occurs when any of our People's personal interest conflicts with or interferes with their ability to carry out their work impartially and in the best interests of the Women's Housing Company. A conflict of interest may be:

- Actual: An obvious or demonstrable conflict of interest
- Potential: A situation arises where there is potential for a conflict of interest to occur
- Perceived: An onlooker may reasonably assume there is a conflict of interest.

Our People will avoid any actual, perceived or potential conflict of interest with the primary responsibility, being the disclosure of the conflict in advance.

Conflicts of interest are particularly likely to arise where any of our People has a family or personal relationship with another party. As such, our People are required to disclose the relationships immediately where it may affect or be seen to affect the reputation of the Women's Housing Company.

**Policy Reference:** Conflict of Interest Policy

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## 8 Child protection - Mandatory reporting obligations and alternative reporting pathways

When the work of our People involves contact with children and young people, they should consider their safety, welfare and wellbeing, and comply with relevant policies and guidelines that apply to such work.

Our People are 'mandatory reporters' under the Keep Them Safe shared approach to child welfare which was introduced as part of the *Children's Legislation Amendment (Wood Inquiry Recommendations) Act 2009*. This means they are legally obliged to make a report to the Child Protection Helpline if, during the course of their work, they have reasonable grounds to suspect that a child or youth is at risk of significant harm.

Our People can refer to the Keep Them Safe Mandatory Reporting Guide or contact the Child Protection Helpline for advice about reporting requirements and related obligations.

**Policy Reference:** Child Protection and Mandatory Reporting Policy

## 9 Use of equipment and facilities

Our People must be careful and mindful when using company equipment and resources. They must not abuse, waste or destroy company equipment and resources.

Use of company equipment and resources for personal purposes must be kept to a minimum and it must not be abused or impinge on the operations of the Women's Housing Company or the ability for any of our People to complete their work or impact negatively on the company financially through time or resource wastage.

Any use of company equipment must not be used for gambling, pornographic, racist or illegal purposes and must not breach other Women's Housing Company policies or damage the reputation of the Women's Housing Company.

**Policy Reference:** Use of Company Equipment and Resources Policy, Motor Vehicle Policy, Electronic Communication and Social Media Policy.

## 10 Procuring goods and services

When procuring goods and services for the Women's Housing Company, our People must follow the Schedule of Delegations and the Procurement and Purchasing Policy, and keep in mind our policies and codes related to conflict of interest, fraud and corruption.

**Policy Reference:** Schedule of Delegations, Conflict of Interest Policy, Fraud and Corruption Policy, WHC Procurement and Purchasing Policy

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## 11 Corporate Information

### 11.1 Privacy

Information kept by the Women's Housing Company will be kept confidential and only be used for lawful purposes.

Our People have a responsibility to keep employee, client and tenant information stored appropriately to ensure we do not breach our privacy obligations as directed by the *Privacy and Personal Information Protection Act 1988*, the Australian Privacy Principles and the *Health Records and Information Privacy Act 2002*.

Record keeping and filing should be kept up-to-date and in a safe and secure location and only be used for lawful purposes as specified by legislation.

**Policy Reference:** Privacy Policy

### 11.2 Confidential information

Information which the Women's Housing Company has not released to the public via our website, the annual report, media releases etc. should be considered confidential unless otherwise stated by the Chief Executive Officer.

If unsure what information is considered confidential, our People should ask their manager or the Chief Executive Officer before disclosing any information related to the Women's Housing Company, its people or clients via any means or medium.

### 11.3 Public Comment

Our People must not make public comment on behalf of the Women's Housing Company to media, on radio and television or in the press, journals, books or other publications without the prior written consent of the Chair or Chief Executive Officer. Requests for information from media should be directed to the Chair or Chief Executive Officer.

**Policy Reference:** Schedule of Delegations

### 11.4 Record keeping

Our People have a responsibility to keep full and accurate records of activities relating to employment, clients, tenants and tenant applications in the relevant record keeping systems and files.

Our records are our corporate memory and provide evidence that we have followed proper procedures and the law in carrying out our work.

Record keeping and electronic and paper-based filing should be kept up-to-date as part of good business practice and to safeguard our privacy and confidentiality obligations.

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## 12 Other employment or business

Our People are required to disclose to the Women's Housing Company any external business or employment they are engaged in at the time or during their employment.

Any of our People wishing to undertake additional work or start a business must advise the Chief Executive Officer before commencing such activity.

Any additional work or other business activity must not adversely affect our People's ability to perform their role or give rise to a conflict of interest.

Our People should not allow their participation in any other work, whether volunteer or otherwise, to impact their ability to efficiently and effectively meet their obligation to the Women's Housing Company or use Women's Housing Company equipment, resources and time to complete this activity.

Board members must disclose to the Board any interests in corporations, partnerships or other business that may be relevant to the activities of the Board. This includes membership of other Boards.

Employees must seek permission from the Chief Executive Officer before they participate in secondary employment.

The Women's Housing Company reserves the right to discuss any impact that the other employment or business may have on any of our People's work performance, the company's reputation or conflict of interest and manage any issues accordingly.

## 13 Leaving the Women's Housing Company

When leaving the Women's Housing Company, our People are required to return all documentation, equipment, passwords and security devices provided or obtained during the course of their employment or tenure in the case of volunteers.

After leaving, material, ideas and other work produced during the course of employment remains the property of the Women's Housing Company, unless there is an agreement in writing to the contrary.

During subsequent employment and activities, our People must continue to respect the confidentiality of information gained during their time at the Women's Housing Company and not use it for personal or financial gain.

## 14 Applying this Code

This Code forms part of our People's conditions of employment and engagement. A breach of this Code may lead to action ranging from counselling and training, to disciplinary action and dismissal.

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The Women's Housing Company has no tolerance for willful regulatory or contractual breaches. Our People should be aware that legal action may be taken against them where breaches of this Code involve contravention of State or Commonwealth law.

## 15 Reporting Breaches of this Code

Our People should report breaches of this Code that they have experienced or witnessed. When our People report any breaches to this Code, they can be assured of doing so without fear of reprisal.

Where the report is within the ambit of the Whistleblower regime, for example where the breach involves actual or suspected misconduct, contravention of ethical or legal standards, Whistleblower protections apply. Refer to the Women's Housing Company's Whistleblower Policy for the relevant process and further information.

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## Appendix 1: Code of Conduct Declaration

### Acknowledgement

Directors, employees, and volunteers working on behalf of the Women's Housing Company (referred to in this Code of Conduct as our 'People') have an obligation to work in an ethical manner and to abide by the Company's Code of Conduct.

### Declaration

I agree that I have received, read and understood the Women's Housing Company Code of Conduct and I agree to comply with the Code of Conduct.

I acknowledge that not adhering to the Women's Housing Company Code of Conduct could result in disciplinary action, which could lead to dismissal.

<b>Signed:</b>	
<b>Name (print):</b>	
<b>Date:</b>	

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