

# Code of Conduct Policy

## 1.0 OBJECTIVE

- 1.1 The objective of this Code of Conduct Policy (the 'Code') is to outline the standards of conduct in professional and personal behaviour that North West Queensland Indigenous Community Social Services Limited ('NWQICSS') expects of its personnel to achieve a safe, supportive, productive and harmonious workplace and to uphold the values, integrity and reputation of NWQICSS.

## 2.0 SCOPE

- 2.1 This Code applies to all NWQICSS personnel, including employees, contractors, consultants, volunteers, trainees, students on placement, and any other individuals engaged in NWQICSS activities, whether paid or unpaid.
- 2.2 The Code outlines the expected obligations, responsibilities, and standards of behaviour for all personnel in the performance of their duties and while representing NWQICSS.
- 2.3 All personnel are required to familiarise themselves with this Code and ensure that their conduct is aligned with the principles, behaviours, and obligations described.
- 2.4 Breaches of this Code may result in disciplinary action, up to and including termination of employment or engagement. In some cases, breaches may also be referred to external authorities and may result in criminal prosecution.
- 2.5 Certain obligations set out in this Code are based on legislative requirements. Breaching these obligations may have legal consequences under applicable laws and regulations.

## 3.0 POLICY STATEMENT

- 3.1 NWQICSS affirms its commitment to upholding its organisational obligations, values, integrity, and reputation. This includes providing services in a manner that is ethical, lawful, inclusive, and respectful of all individuals and communities, particularly Aboriginal and Torres Strait Islander peoples.
- 3.2 Personnel are expected to uphold the values of NWQICSS and act in ways that reflect integrity, accountability, respect, cultural safety, and professionalism. This includes avoiding conduct—whether through words, actions, or public behaviour—that may compromise the organisation's reputation or the wellbeing of those it serves.
- 3.3 NWQICSS is committed to the delivery of services consistent with national and state-based human services and child safeguarding frameworks ("Safe and Supported"), supported by appropriate standards of professional and personal conduct as outlined in this Code.

### 3.4 NWQICSS upholds the values and intent of its Child and Vulnerable Person Safeguarding Commitment:

- 3.4.1 *NWQICSS is committed to providing a safe environment for all clients, particularly children and vulnerable adults, and applies a zero-tolerance approach to abuse or neglect in any form and reflects this commitment in its procedures.*
- 3.4.2 *The organisation recognises the importance of listening to and valuing the voices of children and vulnerable people, ensuring their views are heard and reflected in service design and delivery.*
- 3.4.3 *NWQICSS believes all individuals have an intrinsic right to safety, dignity, and respect, and actively works to prevent emotional, physical, spiritual, psychological, or cultural harm.*
- 3.5 NWQICSS operates a range of services across its programs and locations. Each program or unit is responsible for implementing policies and governance frameworks to support the principles of this Code, including managing conduct expectations, breaches, and complaints. Formal reporting and accountability structures are set out in relevant internal procedures and guidelines.

### 3.6 Code of Conduct Breaches

- 3.5.1 Personnel must report to their direct manager any situation where they believe a breach of the Code has occurred, including misconduct by themselves or others.
- 3.5.2 If the breach involves a manager, it must be reported to the CEO.
- 3.5.3 If personnel are uncomfortable reporting a breach through standard reporting lines, they may use NWQICSS's Whistleblower Policy or Complaints Management Policy to raise their concerns confidentially.
- 3.5.4 External parties (e.g., clients, community members) may report concerns or breaches through NWQICSS's Complaints Management Policy.
- 3.5.5 In all instances of a report relating to harm to a child or vulnerable adult that is received by the NWQICSS office, Program staff, Management, Safeguarding Officer, or Staff Services must be immediately advised. Reports relating to Organisation staff should be reported to the CEO. If the Report relates to conduct that may amount to a criminal offence, this should be immediately reported to the Queensland Police Service.

### 3.7 Protected Disclosures

- 3.7.1 In reporting any suspected breach of this Code, personnel are entitled to seek support and protection when making such disclosures, and to be notified of the action taken in relation to the disclosure.
- 3.7.2 Personnel are not entitled to protection for disclosures which, on investigation, are found to be vexatious or malicious allegations, and may be liable for disciplinary action as a result.

## 4.0 CATEGORIES OF BREACHES OF THE CODE

There are twelve (12) identified categories of Breach of the Code which have been identified to assist NWQICSS in appropriately managing any reported Breaches.

### 4.1 Safeguarding of Children and Vulnerable Adults

4.1.1 NWQICSS is committed to creating and maintaining a culturally safe, inclusive, and protective environment for all children and vulnerable adults—particularly First Nations children, children from culturally and linguistically diverse backgrounds, and those with disabilities or additional vulnerabilities.

4.1.2 Personnel have legal and ethical obligations to protect children and vulnerable adults in the course of their work, by:

- acting in accordance with the NWQICSS *Safeguarding Children and Vulnerable Adults Policy* and procedures;
- maintaining a duty of care for all children and vulnerable adults in their care or under their supervision; and
- declaring any conflicts of interest that may impact their responsibilities in relation to their work with children and vulnerable adults.

4.1.3 Personnel must report, in accordance with the *Safeguarding Children and Vulnerable Adults Policy* and procedures:

- a child or class of children, who are at risk of serious harm;
- Personnel who have a reportable allegation made against them, or who have been charged or convicted of a reportable offence (against children or serious violence against adults);
- Personnel engaged in child-related work without a Working with Children Check; or
- Personnel who are alleged to have seriously breached professional standards with children or vulnerable adults.

4.1.4 Personnel must support internal investigations which will be undertaken pursuant to the NWQICSS *Safeguarding Children and Vulnerable Adults Policy* and procedures, into allegations of abuse, reportable conduct or breaches of professional standards against children or vulnerable adults by:

- maintaining neutrality during the investigative process;
- maintaining strict confidentiality about the investigation;
- being a truthful witness in the investigation; and
- volunteering any information that they hold that is relevant to the investigation.

### 4.2 Lawful Compliance

Personnel, while engaged by NWQICSS must meet the obligations of the organisation, namely act lawfully and comply with all legislative, contractual and industrial requirements. Personnel must comply with the organisation's policies and follow all reasonable and lawful directions given by NWQICSS.

### 4.3 Ethical Behaviour

Personnel are expected to:

- respect the dignity, rights and views of others;
- listen and seek to understand different points of view (this does not necessarily mean agreeing with the point of view);
- act respectfully at all times, including respecting cultural, ethnic and religious differences;

- acknowledge the genuine contributions that others make;
- express constructive feedback considerately and in a moderate tone;
- not harass, bully or discriminate against colleagues, students, people we support or members of the community;
- be courteous, fair, sensitive and considerate to the needs of others;
- be honest and act with integrity at all times; and
- actively assist in managing workplace conflict that personally affects them or personnel under their supervision to create positive and constructive outcomes.

#### 4.4 Professional Behaviour and Development

##### 4.4.1 Personnel are expected to:

- maintain a high standard and quality of work;
- maintain and develop knowledge and understanding of their area of expertise;
- continuously seek to improve work performance and bring about improvements in the workplace;
- not ignore work duties or waste time during working hours;
- maintain confidentiality and privacy where required; and
- maintain adequate documentation to support any decision making.

##### 4.4.2 Personnel are expected to:

- exercise care, responsibility and sound judgement when carrying out their duties;
- ensure procedural fairness is followed in all processes; and
- where relevant, adhere by any dress code requirements of NWQICSS.

##### 4.4.3 Personnel are expected to:

- take reasonable care of their safety and health;
- take reasonable steps that their acts/omissions do not adversely affect the health and safety of others;
- comply and cooperate with any reasonable instruction, policy or procedure, including with respect to work health safety matters;
- refrain from carrying out their duties under the influence of any substance (illegal or legal), or any drug which impairs work performance or poses a safety risk to themselves or others; and
- not operate a NWQICSS vehicle or other equipment/machinery if under the influence of alcohol (above the legal limits for their class of drivers' licence), any illegal substance, or any drug which impairs work performance.

##### 4.4.4 Personnel are expected to:

- not take, or seek to take, improper advantage of any information gained in the course of their engagement;
- not take improper advantage of their position to benefit themselves or others; and
- not allow personal/political views/affiliations or other personal interest to influence the performance of duties or exercise of responsibilities.

#### 4.5 Conflicts of Interest

4.5.1 A Conflict of Interest includes any circumstance, whether actual or perceived, arising from a conflict between the performance of a member of personnel's professional



duties with NWQICSS and their personal interests. Personnel are to take all appropriate steps to disclose a Conflict of Interest (or potential conflict) to NWQICSS as soon as the member of personnel becomes aware of it.

4.5.2 A conflict can arise when there is a reasonable expectation of a personal benefit, direct or indirect, for a member of personnel that could influence the performance of their duties. This benefit may be financial or non-financial.

4.5.3 Personnel must take suitable measures to avoid, or appropriately deal with, any situation or relationship they may have where a Conflict of Interest could, directly or indirectly, compromise the performance of their duties.

4.5.4 Personnel may ask themselves the following questions to assist in identifying whether a situation or relationship is potentially a Conflict of Interest:

- Do I have a personal interest that may conflict or be perceived to conflict with my position at NWQICSS?
- Could there be benefits for me, now, or in the future, that could cast doubt on my objectivity to make decisions in my position at NWQICSS?
- How would my involvement in the decision or action be viewed by others?
- Does my involvement appear fair and reasonable in all the circumstances?

4.5.5 Human Resources will keep a Conflict of Interest Register for personnel of NWQICSS. The Conflict of Interest Registers must be confidential and secured in appropriately secure digital or physical format.

#### 4.6 Secondary Employment and volunteering

4.6.1 Personnel employed on a full-time, part-time and casual basis must seek approval from their line manager to undertake secondary employment or volunteering roles if:

- the secondary employment/volunteering may result in potential Conflicts of Interest that could adversely impact on their ability to perform their duties with NWQICSS, including work, health and safety concerns;
- the secondary employment/volunteering may affect NWQICSS's financial position, reputation, services or standing in the community.

4.6.2 Approval for secondary employment is still required when personnel are on leave, including periods of leave without pay.

4.6.3 Where a member of personnel is already involved in secondary employment/volunteering roles, they must obtain the necessary approval if the secondary employment/volunteering falls into the categories outlined in 4.6.1 above.

4.6.4 Personnel are to notify their line manager if they intend to act in the capacity of a volunteer for NWQICSS.

#### 4.7 Management of Resources

4.7.1 Personnel must use NWQICSS's resources economically and ethically. Such resources include finance, facilities, equipment (e.g., phones, IT equipment), vehicles, services (e.g., internet) and any other property which is owned or is the responsibility of NWQICSS. Personnel also have a duty to ensure the organisation's resources are used only for their intended purpose, are well maintained and secured against theft or misuse.

4.7.2 Personnel are fully accountable for the use of NWQICSS work time and resources.

Personnel should not use the organisation's work time or resources for an outside interest, secondary employment or personal gain. Such examples include the development of a new commercial idea or writing a book.

#### 4.8 Gifts and Benefits

- 4.8.1 Personnel must not solicit or accept gifts, benefits or hospitality which might be reasonably seen to either directly or indirectly compromise or influence their professional duties with NWQICSS.
- 4.8.2 All gifts must be brought to the attention of the relevant manager who will decide how the gift should be treated.
- 4.8.3 Generally, gifts of a nominal value or moderate acts of hospitality offered as a genuine thank you by a client, may be personally retained as long as they have not been solicited by personnel or could be seen to have compromised or unduly influenced a member of personnel's professional duties with NWQICSS.
- 4.8.4 Gifts or hospitality offered as an inducement to purchase, provide information or treat someone favourably are not acceptable regardless of their monetary value. Examples of inducement include a recruitment agency offering theatre tickets for each temporary person engaged.
- 4.8.5 Gifts, such as a Christmas hamper or a box of chocolates from a consultant, should be shared and made available for consumption by all personnel. Consideration should also be given to donating such gifts to charity.

#### 4.9 Social Media

- 4.9.1 Personnel should not use social media in a manner which may bring NWQICSS into disrepute not in a way that conflicts with the values of NWQICSS.
- 4.9.2 Personnel must not add, follow, or friend clients under 18 years of age on social media.

#### 4.10 Public Comment

Only personnel authorised by the organisation are permitted to make public statements or give interviews on behalf of NWQICSS to a media representative.

#### 4.11 Confidentiality

- 4.11.1 Personnel must not divulge, either during employment or after, any confidential information gained as a member of personnel of NWQICSS.
- 4.11.2 Personnel of NWQICSS are expected to:
  - Abide by the organisation's *Privacy Policy* and associated guidelines and documents to ensure compliance with relevant laws and regulations regarding the collection, dissemination, use, sharing and security of all personal and sensitive information;
  - Treat confidential and personal information about colleagues, volunteers, students, people we support and other members of the community respectfully;
  - Only use such information for work-related purposes; and
  - Only communicate such information to those who need to know in order to perform their role.

### 5.0 **APPLICABILITY**

- 5.1 The Code applies to all NWQICSS personnel.

## 6.0 RESPONSIBILITIES

Policy Owner	The Policy Owner for all NWQICSS policies is the Board.
Policy Manager	The Policy Manager for this policy is the Chief Executive Officer
Communication	<ul style="list-style-type: none"> <li>The Policy Manager is to advise all Centers and programs covered by this policy and its enacted date.</li> <li>The Policy Manager is to advise the organisation's staff and committees of this policy and its compliance.</li> <li>Senior Management are to provide advice and communicate this Policy to All organisation staff and volunteers.</li> </ul>
Compliance	<ul style="list-style-type: none"> <li>Each Manager is responsible for implementing appropriate policy/systems/processes for their Center/Program to effectively identify and manage Code of Conduct breaches.</li> <li>Minor non-compliance of this Policy in the first instance is to be drawn to the attention of the coordinator or manager of the relevant personnel for discussion and remedial action.</li> <li>Continued non-compliance should be reported to Staff Services and the Policy Manager.</li> <li>In all instances of a Report relating to Harm to a child or vulnerable adult the organisation's Safeguarding officer must be immediately advised. If the Report relates to conduct that may amount to a criminal offence, this should be immediately reported to the Queensland Police Service.</li> <li>In all instances of a serious Breach, the CEO must be informed immediately.</li> </ul>
Monitoring and Review	The Policy Manager has responsibility to review the policy every three years (or sooner if required) to ensure it is compliant with relevant organisational goals, legislation/regulation and NWQICSS requirements.
Reporting	The Safeguarding officer will report to the CEO at the time of the policy review.
Accessibility	This policy will be available to external NWQICSS stakeholders and placed on the Organisation's website.

## 7.0 SCHEDULES TO THIS POLICY

Schedule 1 NWQICSS Safe Conduct Standards

## 8.0 RELATED POLICIES, PROCEDURES AND RESOURCES

- North West Queensland Indigenous Community Social Services Privacy Policy
- North West Queensland Indigenous Community Social Services Safeguarding Children and Vulnerable Adults Policy and procedures
- North West Queensland Indigenous Community Social Services Whistleblower Policy
- North West Queensland Indigenous Community Social Services Compliance Policy

Version Date	Enacted Date	Comments
August 2025	September 2025	Original Policy and Guidelines
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Approved by:

Faisal Khan  
Chief Executive Officer

Date: 08/12/2025

NWQICSS



## DEFINITIONS

*Breach:* A Breach of the Code of Conduct occurs when any personnel within their workplace breached an obligation under this Policy including any improper use, waste or abuse of resources, corrupt or fraudulent conduct or inadequate administration or accountability.

*Personnel:* A staff member who is employed by North West Queensland Indigenous Community Social Services or engaged on a contract, subcontract, voluntary or unpaid basis.

*Conflict of Interest:* Includes any circumstance, whether actual or perceived, arising from a conflict between the performance of a member of personnel's professional duties with NWQICSS and their personal interests.

*Drugs (illicit substances):* For the purpose of this policy, this term should be taken to cover any substance or item whose possession is prohibited under the Drugs Misuse Act 1986.

*Harm:* Refers to any detrimental effect of a significant nature on the person's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological, or emotional abuse or neglect; or sexual abuse or exploitation. It may be caused by a single act, omission or circumstance; or a series or combination of acts, omission or circumstances.

*Lawful Compliance:* Behaviours and practices that are conducted in accordance with local laws, Queensland and Australian legislation and regulations.

*Obligation:* A requirement specified by laws, regulations, codes or organisational standards, which are documented codes of ethics, Code of Conduct, good practices and charters that NWQICSS has adopted across its operations.



# NWQICSS

## SCHEDULE 1: NWQICSS SAFE CONDUCT STANDARDS














### 'Respecting & Protecting Children & Vulnerable Adults'

North West Queensland Indigenous Community Social Services is committed to safeguarding everyone involved in its programs, but gives special priority to the safety & wellbeing of children & vulnerable adults. Therefore, all NWQICSS personnel are expected to conduct themselves in accordance with these standards in all interactions with children & vulnerable adults, including on line. These standards are also to be read in conjunction with other relevant NWQICSS behaviour standards or codes of conduct.














**Child** - a person under 18 years of age.

**Vulnerable Adult (adults at risk)** - Any individual aged over 18 years who due to their diverse circumstances and experiences, may place them at increased risk of abuse or exploitation.

#### I will:

-  Promote the rights & safety of children & vulnerable adults
-  Comply with policies & procedures that safeguard children & vulnerable adults
-  Treat children & vulnerable adults with respect & dignity
-  Respect & protect the privacy of children & vulnerable adults
-  Comply with Diocesan protocols for communicating with children & vulnerable adults
-  Maintain proper personal & professional boundaries with children & vulnerable adults
-  Listen & respond to the views & concerns of children & vulnerable adults
-  Respect cultural & religious differences of children & vulnerable adults
-  Identify & manage risks to the safety & wellbeing of children & vulnerable adults
-  Promptly respond to any concerns or complaints of abuse or harm to children & vulnerable adults
-  Report all suspected or disclosed abuse or harm to children or vulnerable adults in accordance with Diocesan protocols
-  Comply with legal reporting obligations in respect to suspected abuse or harm to children or vulnerable adults
-  Report any suspected breaches of these conduct standards

#### I will not:

-  Engage in any unlawful activity with or in relation to a child or vulnerable adult
-  Engage in any activity that is likely to physically, emotionally, sexually or spiritually harm a child or vulnerable adult
-  Expose a child or vulnerable adult to sexual videos or images
-  Use harsh or offensive language towards or in the presence of a child or vulnerable adult
-  Unlawfully discriminate against a child or vulnerable adult or their family or carers
-  Be alone with a child or vulnerable adult unnecessarily
-  Engage in unnecessary physical contact with a child or vulnerable adult
-  Use physical violence or corporal discipline on a child or vulnerable adult
-  Supply liquor or a prohibited drug to a child or vulnerable adult
-  Engage with children while under the influence of liquor or a prohibited drug
-  Arrange personal contact, including online, with a child or vulnerable adult for a purpose not related to my ministry or work with the Diocese
-  Receive, produce or share sensitive information about a child or vulnerable adult, including images, unless I have proper consent or am authorized to do so legally or under Diocesan policy
-  Ignore or disregard suspected or disclosed abuse or harm to a child or vulnerable adult

## SCHEDULE 2: ROLES AND RESPONSIBILITIES

Role	Code of Conduct Management Policy responsibility	Frequency
Board	<ul style="list-style-type: none"> <li>Approve <b>Code of Conduct Policy</b>.</li> </ul>	Every three Years
Board and CEO	<ul style="list-style-type: none"> <li>Review <b>Code of Conduct Policy</b>.</li> </ul>	Every three Years
Board	<ul style="list-style-type: none"> <li>Review and endorse organisational Codes of Conduct and breach management processes.</li> </ul>	Every three years
Management	<ul style="list-style-type: none"> <li>Responsible for implementing Codes of Conduct and breach management processes for their Center/program.</li> <li>Provide advice and communicate this Policy to all Center/program staff and volunteers.</li> <li>Receive reports of non-compliance and report all instances of serious non-compliance to the CEO.</li> <li>Advise the CEO of any Code of Conduct breaches/reports that constitute a high level or strategic risk, in accordance with the NWQICSS <i>Risk Management Policy</i>.</li> <li>Coordinate Code of Conduct training for personnel within the Center/program.</li> </ul>	Ongoing
Management	<ul style="list-style-type: none"> <li>Advise the organisation staff and committees of this Policy and its compliance.</li> <li>Approve engagement by personnel in any secondary employment or business activity.</li> </ul>	As required
CEO	<ul style="list-style-type: none"> <li>Policy Manager of the <b>Code of Conduct Policy</b>.</li> <li>Advise all Centers/programs covered by this policy and its enacted date.</li> <li>Review the <b>Code of Conduct Management Policy</b> and <b>Process</b> every three years or sooner, in consultation with the Board.</li> </ul>	Every three Years
Safeguarding Officer	<ul style="list-style-type: none"> <li>Facilitate Code of Conduct training for personnel where required.</li> </ul>	Ongoing
Staff Services	<ul style="list-style-type: none"> <li>Establish and maintain the Conflict-of-Interest Register for organisation's personnel.</li> <li>Holds the NWQICSS Conflict of Interest Register.</li> </ul>	Ongoing
External Review (external provider)	<ul style="list-style-type: none"> <li>Third party review of <b>Code of Conduct Policy</b> and <b>Process</b>.</li> <li>Code of Conduct Management Health Check, to determine the adequacy of nominated controls, and identification of Code of Conduct breaches.</li> </ul>	Every two years