

# Code of Conduct Policy

Policy no: 006

Version 2

Approved on: 22 June 2023

Approved by: Health Equity Matters Board

## 1. Purpose

Health Equity Matters is committed to maintaining the highest levels of ethical conduct and professional behaviour.

This Policy, together with Health Equity Matters policies and procedures, and terms and conditions (outlined in staff employment contracts, consultancy contracts and volunteer contracts) provides a framework that articulates expected behavioural standards and supports Health Equity Matters to implement, monitor and enforce these behavioural standards.

## 2. Scope

This policy applies to all Health Equity Matters Personnel, including Board and Committee members, staff employed in Australia and by the AFAO Foundation, volunteers, contractors and consultants.

Health Equity Matters Personnel are required to comply with this policy during work hours, when representing or acting on behalf of Health Equity Matters and at work-related events and social functions.

In addition to the conflict of interest procedures in this Policy, specific conflict of interest procedures related to the Board are outlined in the Governance Policy.

## 3. Definitions

Term	Definition
<b>Conflict of Interest</b>	<p>Occurs when Health Equity Matters Personnel’s duty to act in the best interest of Health Equity Matters ‘conflicts’ (or may conflict) with their personal interests or the personal interests of someone related or close to them.</p> <p>A conflict of interest may be actual, potential or perceived and may be financial or non-financial. Even if an Health Equity Matters Personnel member feels that there is no conflict of interest, if an outsider is likely to perceive it as an issue, then this needs to be disclosed and managed.</p> <p>Conflicts of interest, if not disclosed and managed, carry the risk that Health Equity Matters Personnel may make a decision based on their personal interests rather than the best interests of Health Equity Matters.</p>
<b>Declaration of interests</b>	<p>Personal interests of Health Equity Matters Personnel are required to be declared at initial engagement, on an annual basis, and when circumstances change. This proactive risk mitigation strategy enables Health Equity Matters leadership to understand their risk exposure and thoughtfully mitigate risks associated with the personal interests of Health Equity Matters Personnel.</p>

## 4. Policy Statement

Health Equity Matters is committed to fostering an open, transparent, ethical and professional workplace culture, guided by its values, and in line with its strategic plan and policies. Health Equity Matters’ values are the core principles

and beliefs on which the organisation is founded. They inform and guide the behaviours, relationships, actions and decisions of Health Equity Matters Personnel, and are outlined below.

- **We create success together**
  - We value individual thinking and collaborate to achieve stronger outcomes
  - We follow the needs of our members and partners and lead on shaping collective solutions
  - We are honest, transparent, and have no tolerance for hidden agendas or politics
- **Equality is non-negotiable**
  - We recognise Aboriginal and Torres Strait Islander people as the First Australians and respect communities' traditions, views and ways of life
  - We respect the dignity of all people and value diversity
  - We protect and promote the human rights of all communities and remove social and cultural barriers that hold back justice and health
- **Push for better**
  - We are goal driven and oriented towards action, with a 'can do' spirit
  - We pivot where relevant, challenge prevailing assumptions, and champion better approaches
  - We are resourceful and resilient and find a way through set backs
- **Thoughtful**
  - We take care in every aspect of our work with strong attention to detail
  - We take time to gather and analyse a diverse range of data and make informed decisions with a clear understanding of their impact
  - We treat all stakeholders and each other with respect, understanding and consideration

Health Equity Matters' Code of Conduct distils these values and key policy commitments into a set of core behaviours that Health Equity Matters Personnel are required to adhere to. Health Equity Matters Personnel must adhere to Health Equity Matters policies and procedures, including key policies listed in Section 8 of this Policy.

Health Equity Matters Personnel must read and sign the **Health Equity Matters Code of Conduct** and complete the **Declaration of Interests Form** at **Appendix 2** on commencement with Health Equity Matters, and whenever the Policy is updated.

## 5. Conflict of Interest

A key element of protecting Health Equity Matters' integrity and reputation is ensuring that Health Equity Matters Personnel consistently act in the best interests of Health Equity Matters. Health Equity Matters Personnel will therefore strive to avoid conflicts of interest with the work of Health Equity Matters, and where that may not be possible, promptly declare those personal interests so that Health Equity Matters is informed and well positioned to mitigate any associated risks. Where Health Equity Matters Personnel are unsure whether to declare an interest, they are encouraged to err on the side of caution.

Health Equity Matters Personnel must update the Declaration of Interests Form on an **annual basis** (including noting where there are no changes to interests), and disclose relevant personal interests more often, when their circumstances change.

## 6. Breach of Code of Conduct

Health Equity Matters Personnel must behave in a manner that is consistent with the standards and expectations outlined in this Policy. Failure to comply with these standards and expectations may result in disciplinary action, including suspension of or reduced duties where actions need to be investigated. Breaches of the Policy that are

substantiated and regarded as gross misconduct will result in termination of employment, consultancy contract, or ability to volunteer with Health Equity Matters.

If any Health Equity Matters Personnel suspect that a breach of the Policy has occurred, they should raise their concerns informally in the first instance with their manager, or another member of the Management Team.

## 7. Roles and Responsibilities

Who	Responsibility
Board	Cultivate an ethical and professional workplace culture Approve this policy and any updates
Finance and Audit Committee	Review the Conflicts of Interest Register annually, or more often as required, to assure the integrity of organisational conflict of interest processes, and ensure conflicts are being effectively and consistently managed
CEO	Actively and regularly review workplace culture, work to address any issues, and foster an ethical and professional workplace culture Lead by example, and model the behaviours in the Code of Conduct Ensure policy is regularly reviewed, at least every three years
Business Operations and Finance Manager	Oversee the Code of Conduct and Conflict of Interest system, review and highlight any interests requiring Management Team input, and reinforce compliance requirements with staff
Managers	Model the behaviours in the Code of Conduct, reinforce the need for these behaviours with staff, and support staff compliance Identify/resolve workforce behaviours that are inconsistent with the Code
Health Equity Matters Personnel	Adhere to this Code of Conduct and recommit to it each year (or when it is updated), together with declaring any interests.

## 8. Related Policies and Documents

Policy	Title and hyperlink
011	<a href="#">Anti-Fraud and Financial Wrongdoing Policy</a>
038	<a href="#">Communications Policy</a>
042	<a href="#">Complaints Handling and Whistleblowing Policy</a>
040	<a href="#">Counter-Terrorism and Financial Wrongdoing Policy</a>
007	<a href="#">EEO, Discrimination, Bullying and Harassment Policy</a>
030	<a href="#">Environmental Management Policy</a>
002	<a href="#">Governance Policy</a>
032	<a href="#">Human Rights, Diversity and Inclusion Policy</a>
015	<a href="#">Internet and Email Policy</a>
035	<a href="#">Non-Development Policy</a>
012	<a href="#">Privacy Policy</a>
041	<a href="#">Safeguarding Policy and Code of Conduct</a>
016	<a href="#">Social Media Policy</a>
005	<a href="#">Work Health and Safety Policy</a>

## 9. Policy History

Date of update	Version	Key changes	Endorsed by	Approved by	Next review
22 June 2023	2	Updated to remove overlap with new Safeguarding Policy, tighten scope, separate declarations of interest statements into an appended form, and include a set of expected behaviours.	Finance and Audit Committee	Health Equity Matters	June 2026
29 April 2021	1	Establishment of inaugural Code of Conduct Policy	Management Team	Health Equity Matters Board	April 2023

## ANNEX 1

### HEALTH EQUITY MATTERS CODE OF CONDUCT

I, \_\_\_\_\_ [insert name] acknowledge that I have read and understood Health Equity Matters' Code of Conduct Policy and agree to abide by that Code at all times.

I have declared whether I have any relevant personal interests and detailed those in the Declaration of Interests form at Annex 2.

**I agree that while performing my duties with Health Equity Matters, I must:**

1. uphold the integrity and good reputation of Health Equity Matters by ensuring that my professional and personal conduct is consistent with Health Equity Matters values, policies and procedures and this Code of Conduct, as well as all relevant laws and regulations.
2. be accountable for the professional and personal actions I take and ensure that I effectively manage the power and responsibility that comes with my Health Equity Matters role.
3. comply with any lawful and reasonable direction given by someone in Health Equity Matters who has the authority to give the direction. I will respect the role and decisions of managers, the CEO and Board.
4. promptly report any suspected form of misconduct to Health Equity Matters line management.
5. appropriately account for all Health Equity Matters money and property including vehicles, office equipment, medical equipment, Health Equity Matters-provided accommodation, computers including the use of internet, e-mail and intranet. I will treat Health Equity Matters property with due care and ensure it is secured against damage, theft and misuse.
6. use my best endeavours to avoid providing support to any individuals of organisations associated with terrorism, through the implementation of appropriate risk and financial management controls.
7. inform Health Equity Matters of any relevant criminal convictions or charges I have had prior to my work with Health Equity Matters, or during my work with Health Equity Matters, where Health Equity Matters may have a legitimate interest.
8. not work under the influence of alcohol or use, or be in possession of, illegal substances on Health Equity Matters or partner premises, vehicles or accommodation.
9. treat all people with respect and dignity and challenge any form of harassment, discrimination, intimidation, exploitation or abuse. I will promote and protect the principles and practice of gender equity, disability and social inclusion.
10. respect all people's rights and contribute to a working environment characterised by mutual respect, integrity, dignity and non-discrimination.
11. be mindful that I hold a privileged position of power and trust in relation to members, partners and key population communities throughout Australia and the Asia-Pacific that Health Equity Matters and will not abuse this position of power and trust at any time.
12. promote members, partners and key population communities rights, voice and priorities and avoid welfare, evangelical and partisan approaches. I will ensure that my conduct is consistent with community-led approaches and that all programs that I am involved with are informed by local needs and priorities.
13. perform my duties in the best interests of Health Equity Matters and conduct my professional and private life in a manner that avoids or minimises possible conflicts of interest with the work of Health Equity Matters.

14. declare any current personal interests which may impact on the work of Health Equity Matters when they arise (e.g. contract for goods/services, employment or promotion within Health Equity Matters or partner organisations) and on an annual basis, in accordance with **Appendix 2: Disclosure of Interests**.
15. disclose, or decline any gifts, that may be perceived to impact my integrity and impartiality.
16. protect and avoid any unnecessary risk to the health, safety, security and welfare of myself and others, including partners organisations and community members, and comply with local security management guidelines.
17. undertake and act on appropriate risk assessments.
18. show reasonable care and only use Health Equity Matters property and equipment, resources, or funds for authorised purposes.
19. use my discretion when handling sensitive or confidential information and not disclose personal or other information unless it has specifically been classified as public.
20. seek authorisation before communicating externally in Health Equity Matters' name and avoid any unintended detrimental repercussions for me or Health Equity Matters, in accordance with Health Equity Matters' Communications Policy and Social Media Policy.
21. avoid downloading material that is inappropriate including using the internet or e-mail to access or distribute material which would be regarded as being offensive or constituting the use of these for menace or harassment. Accessing adult or child pornography using Health Equity Matters equipment is strictly forbidden and will lead to disciplinary action including termination of employment or ability to volunteer on Health Equity Matters programs.
22. use my best endeavours to protect the natural environment and work in a sustainable way in line with the Environmental Management Policy.
23. adhere to the Safeguarding Policy and the behaviours outlined in the Safeguarding Code of Conduct. I will therefore not have sexual relations with children (defined as under 18 years old) or with partners and individuals benefitting from Health Equity Matters program, will not engaged in fraternisation or use child or adult pornography, and I will ensure that children and adults are represented in a dignified and respectful manner (i.e. adequately clothed and depicted in a manner which is not vulnerable, submissive or sexually suggestive) in all photographs, films, videos and other digital images that I take or use.
24. collect, store and use information and images from members, partners and community members in a way that respects their dignity, values, history, religions, language and culture, is authentic to the context, and in line with the terms of their documented and informed consent.

**COMMITMENT TO LIVING THE HEALTH EQUITY MATTERS CODE OF CONDUCT**

I commit to adhere to the Health Equity Matters Code of Conduct.

I have read and understood the Code and will uphold it to the best of my ability.

Name.....

Signature.....

Date.....

Please e-mail this signed form to the Business Operations and Finance Manager at: [louise.vergelledios@afao.org.au](mailto:louise.vergelledios@afao.org.au)

## ANNEX 2

### DECLARATIONS OF INTEREST

***Please answer the following four questions which are designed to help you identify any relevant personal interests. If you answer ‘yes’ to any of the questions, please provide sufficient information to enable Health Equity Matters to understand and evaluate the interest. If you are unsure whether to disclose an interest, please err on the side of caution and make a declaration.***

***Question 1: Do you or any of your immediate family members have any financial interest in the work of Health Equity Matters?***

The term “financial interest” is broadly defined. For reference, the table below lists some financial interests and provides examples of how these may appear in practice.

Financial interest	Examples in practice that are to be declared on the form
A professional or financial relationship with an entity that is a competitor to Health Equity Matters	A Health Equity Matters employee or volunteer, or their family member, or other close personal relationship: <ul style="list-style-type: none"> <li>• is employed by a competitor to Health Equity Matters</li> <li>• is a Board Director of a competitor to Health Equity Matters</li> <li>• has any other professional or financial relationship with a competitor to Health Equity Matters.</li> </ul>
A direct financial or business relationship with an entity that receives Health Equity Matters grant funds	A Health Equity Matters employee or volunteer, or their family member, or other close personal relationship: <ul style="list-style-type: none"> <li>• is employed by a current or prospective grantee</li> <li>• is a consultant to develop a grant proposal</li> <li>• is a Board Director of a grantee.</li> </ul>
A professional or financial relationship with a contractor of goods or services	A Health Equity Matters employee or volunteer, or their family member, or other close personal relationship: <ul style="list-style-type: none"> <li>• provides consulting services to an Health Equity Matters contractor</li> <li>• holds ownership (for example, shares of stock) in a company submitting a bid</li> <li>• is employed by a company submitting a bid to supply goods or services.</li> </ul>

***Question 2: Have you or an immediate family member had a professional relationship with an organisation subject to review, audit or investigation by Health Equity Matters? Has there ever been an investigation by any other authority against you, your immediate family members or an organisation with which you have a professional relationship?***

Situations to be disclosed under this question include the following:

Relationship or activity	Examples in practice that are to be declared on the form
Investigations by any other authority against you, your family members or an organisation to which you have a professional relationship	A Health Equity Matters employee or volunteer, or their family member: <ul style="list-style-type: none"> <li>• is employed by an organisation that is subject to an investigation by a government authority</li> <li>• was the subject of an investigation by a government authority.</li> </ul>

**Question 3:** *Have you or any of your immediate family members been involved in a legal dispute with Health Equity Matters, or are you currently involved in any other legal dispute that could have a real or perceived effect on your Health Equity Matters duties?*

This question is intended to only address legal disputes that could have a real or perceived effect on your ability to work with the best interests of Health Equity Matters in mind. Both current and concluded legal disputes should be disclosed, including but not limited to, matters involving Health Equity Matters. Other examples of legal disputes to be disclosed are claims for professional malpractice, and legal proceedings relating to fraud, theft, and other financial or professional illegality (for example, money laundering).

**Question 4:** *Is there anything else not captured in the questions above that could affect your objectivity or independence in the performance of your duties for Health Equity Matters, or in your opinion, the perception by others of your objectivity and independence?*

This question is intended to capture any other situation, or perceived situation, which could affect your work, whether financial, professional, or personal in nature. This includes personal and intimate relationships, including sexual relationships where those relationships are with another Health Equity Matters staff member, volunteer or stakeholder.

Please e-mail this completed form to the Business Operations and Finance Manager at: [louise.vergelledios@afao.org.au](mailto:louise.vergelledios@afao.org.au)