

## VCCH TENANCY & PROPERTY MANAGEMENT

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**Policy Name:** Code of Conduct and Conflicts of Interest

**Approved by:** Policy Authorisation Committee

**Date effective:** November 2022

**Due to be reviewed:** November 2025

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### Section 1 – Introduction

#### PURPOSE

This Policy sets out a code of conduct and directions on conflicts of interest for all employees and Board Directors of VincentCare Community Housing (VCCH).

The policy is intended to provide advice on the standards of behaviour that are required of VincentCare Community Housing employees and Board Directors. It provides guidance on VincentCare's values and code of conduct and promotes ethical behaviour. This policy sets out expectations of our employees across all work locations and Board Directors when fulfilling their duties as directors of VincentCare Community Housing

VincentCare operates a diverse range of accommodation and support services for people experiencing homelessness and disadvantage, and is committed to applying an appropriate duty of care to all people in contact with VincentCare services. This includes protecting people's personal and cultural safety regardless of ability, cultural background, ethnicity, gender identity, sexual orientation or religion.

#### SCOPE

This policy applies to all employees and Board Directors of VincentCare Community Housing.

The term "Employee" used in this Policy includes subcontractors, agents, representatives, students, volunteers and consultants.

#### REVIEW CYCLE

This policy will be reviewed every three years. It will be modified or replaced whenever VincentCare Community Housing becomes aware that this policy no longer complies with the requirements of the organisation.

### Section 2 – Policy Statement

#### GUIDING PRINCIPLES

Those who work with VCCH are required to maintain standards of conduct and ethics and demonstrate the highest level of integrity and competence, treating everyone fairly, reasonably and equitably.

Ethical values to be practised by employees and the Board of Directors of VincentCare Community Housing include the following:

- **Responsibility and impartiality**  
Compliance with organisational values and with all relevant legislative, industrial and administrative requirements and act in an impartial manner.
- **Respect for people**  
All are to be treated fairly and consistently, in a non-discriminatory manner with proper regard for their rights and obligations. Performance of duties in a professional and responsible manner and ensure that decisions and actions are reasonable, fair and appropriate to the circumstances, are based on a consideration of the relevant facts, and supported by adequate documentation.
- **Honesty integrity and public interest**  
Always act honestly and in the public interest, rather than in their private interest.
- **Economy and efficiency**  
Look for ways to improve organisational performance and achieve high levels of service for clients experiencing disadvantage. The exercise of authority, use of resources and information should only be used for the work purposes intended.

VincentCare Community Housing employees and Board Directors are committed to the key principles of:

- Equity
- Integrity
- Accountability
- Team work
- Respect

Board Directors and employees must not disclose information or documents acquired as a consequence of membership of the Board other than with proper authority. Board Directors must also not make improper use of information acquired to, directly or indirectly; gain an advantage for themselves or for another person.

Board Directors and employees should be wary of accepting gifts and benefits where they may feel obliged to act contrary to rules of integrity, impartiality and honesty. Gifts received in order to obtain a benefit or favour a form of corruption.

Board Directors and employees must not accept gifts or benefits that place them under an actual or perceived financial or moral obligation. Accepting a gift or benefit is essentially a matter of judgement but a Board Director will need to be satisfied that their position will not in any way be compromised or appear to be compromised by acceptance. Transparency and disclosure should be normal practice to ensure integrity.

Employees and Board Directors are expected to carry out their duties in a professional, responsible and conscientious manner and to be accountable for their conduct and decisions.

## Conflicts of Interest

A conflict of interest can be defined as a situation in which a person has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties.

Pecuniary interests refer to interests that a VincentCare Community Housing decision maker may have in connection with a matter for decision or discussion where the decision maker (or a person or entity with whom or which the decision maker is associated) is reasonably likely to receive a benefit or a loss if the matter is decided in a particular way.

Examples of conflicts of interest are:

- when a Board Director or employee, or his/her immediate family or business interests, could stand to gain financially from any business dealings, programmes or services with or to VincentCare; and/or
- when a Board Director offers a paid professional service to VincentCare; and/or
- when a Board Director or employee stands to gain personally or professionally from any insider knowledge if that knowledge is used for personal or professional advantage.

Board Directors are required to disclose to the Board any actual, perceived or potential conflicts of interest. If a Board Director believes they may have a conflict of interest at any stage, the Board Director must disclose to the Board that actual or potential conflict as soon as it arises. If a Board Director has, or considers that another Board Director has, a possible conflict of interest, they should advise the Chair. Where a conflict of interest has been identified, the Board Director should not receive the relevant Board papers unless agreed with the Chair.

Employees may have private interests that could prove to be a conflict of interest with their role at VincentCare Community Housing. Staff shall avoid situations where there is a reasonable basis for the perception of such a conflict. Any staff with actual or possible conflict of interest shall stand down in any decision-making process where the impact could be felt and declare the full extent of it to the CEO without delay.

Employees must act honestly in the exercise of powers and the discharge of functions, and exercise the degree of care and diligence that a reasonable person in a like position would exercise in the circumstances.

The common law requires disclosing potential conflicts of interest as soon as they arise.

## Breaches of the Code of Conduct

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 disregards the code, disciplinary action may be taken in accordance with VincentCare's disciplinary policy and procedures, where appropriate. Resultant actions may include:

- verbal or written warnings;
- performance management processes;
- 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.

### Communication

VincentCare Community Housing will provide clear information and direction to both Board Directors and employees on their appointment/employment regarding the Code of Conduct and Conflict of Interest.

### Section 3 – Procedures

Procedures established by VincentCare Community Housing will include processes to ensure compliance with this policy.

### Section 4 – References

#### Legislation and standards

This policy implements the obligations of VincentCare Community Housing under:

- Housing Act 1983 (Vic)
- Guidelines for Registered Housing Agencies published by Department of Health and Human Services DHHS
- Privacy Act 1988 (Commonwealth)
- Privacy and Data Protection Act 2014 (Vic)
- Performance Standards for Registered Housing Agencies
- DFFH Victorian Housing Register Operational Guidelines
- Charter of Human Rights and Responsibilities 2006

### Section 5 - Governance

#### Responsibility

<b>Process Owner</b>	State Manager Housing
<b>Content Holder/s</b>	Housing Program Managers
<b>Recommending body</b>	Quality Committee
<b>Endorsed by</b>	Policy Authorisation Committee

#### Change history

Version	Effective Date	Author	Change
1	May 2019	GM Housing	<ul style="list-style-type: none"> <li>• This is a new policy for publication on VincentCare's website</li> <li>• This policy is a compliance requirement for registered agency participation in the Victorian Housing Register (VHR)</li> </ul>
2	September 2022	SM Housing	<ul style="list-style-type: none"> <li>• Minor amendments to reflect role title change and reference to internal policies not available on the internet</li> </ul>