



Sydney Opera House

Code of Conduct

June 2016

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1 Introduction

All employees of the Opera House are government sector employees. Part 2 of the *Government Sector Employment Act 2013 (GSE Act)* establishes the *Ethical framework for the government sector* (the **Ethical Framework**). Our Code of Conduct is grounded in the values and principles of the Ethical Framework which applies to the whole of the government sector but also details specific conduct and behaviour expected of Opera House employees.

Who does the Code apply to?

This Policy applies to all Opera House staff (including permanent, temporary and casual employees), contractors and persons otherwise engaged to undertake work on behalf of the Opera House.

When is the Code to be applied?

The Code of Conduct is to be applied at all times in working relations with colleagues, clients and customers, stakeholders and the Government of the day.

What are my responsibilities under the Code?

All employees have responsibilities to:

- demonstrate high levels of personal conduct consistent with the Code of Conduct;
- seek assistance when unsure about how to implement the Code of Conduct;
- promote the implementation of the Code of Conduct to their colleagues; and
- report possible breaches of the Code of Conduct to relevant officers.

All managers and directors have the responsibilities of employees (above) and in addition have responsibilities to:

- lead and promote implementation of the Code of Conduct;
- ensure their workplace culture, practices and systems (including recruitment and promotion) operate consistently with the Code of Conduct;
- recognise and promote employee and team conduct that exemplifies the Code of Conduct;
- act promptly and with due process to prevent and address any breaches of the Code of Conduct;
- declare in writing private interests that have the potential to influence, or could be perceived to influence, decisions made or advice given by the staff member; and
- ensure that any real or perceived conflicts of interests are avoided or effectively managed.

The Chief Executive Officer has the responsibilities of executives (above), and in addition has a responsibility to:

- lead and promote implementation of the Code of Conduct;
- ensure the general conduct and management of the functions and activities are in accordance with the core values of the Ethical Framework; and
- oversee the implementation of the Code of Conduct and make improvements where necessary.

Approval

This Code of Conduct has been approved by the Chief Executive Officer of the Opera House.

APPROVED



Chief Executive Officer

Date: 3 June 2016

2 The Ethical Framework

The objective, core values and principles of the Ethical Framework are to be demonstrated in the conduct of all government sector employees and heads of government sector agencies.

The **objective** of the Ethical Framework is to:

- recognise the role of the government sector in preserving the public interest, defending public value and adding professional quality and value to the commitments of the Government of the day;
- establish an ethical framework for a merit-based, apolitical and professional government sector that implements the decisions of the Government of the day.

The four **core values** for the government sector and the principles that guide their implementation are:

Integrity

- Consider people equally without prejudice or favour.
- Act professionally with honesty, consistency and impartiality.
- Take responsibility for situations, showing leadership and courage.
- Place the public interest over personal interest.

Trust

- Appreciate difference and welcome learning from others.
- Build relationships based on mutual respect.
- Uphold the law, institutions of government and democratic principles.
- Communicate intentions clearly and invite teamwork and collaboration.
- Provide apolitical and non-partisan advice.

Service

- Provide services fairly with a focus on customer needs.
- Be flexible, innovative and reliable in service delivery.
- Engage with the not-for-profit and business sectors to develop and implement service solutions.
- Focus on quality while maximising service delivery.

Accountability

- Recruit and promote employees on merit.
- Take responsibility for decisions and actions.
- Provide transparency to enable public scrutiny.
- Observe standards for safety.
- Be fiscally responsible and focus on efficient, effective and prudent use of resources.

There is no hierarchy among the core values and each is of equal importance.

Nothing in the Ethical Framework gives rise to, or can be taken into account in, any civil cause of action.

Good practice guides.

Good practice guides are provided at **Appendix B** to assist staff to make the best-available decisions and which suggest ways to support the ethical behaviour of other employees.

3 The Principles

The core values and principles that underpin the Ethical Framework are discussed in more detail below. The core values and principles have been grouped under the following headings:

- We have respect for others and maintain a fair and harmonious workplace;
- We act with fairness, personal integrity and honesty;
- We value our customers and are committed to service excellence at all times;
- We maintain a healthy and safe work environment;
- We work with economy and efficiency; and
- We act in the best interests of the Opera House.

We have respect for others and maintain a fair and harmonious workplace.

The Ethical Framework requires us to:

- consider people equally without prejudice or favour;
- take responsibility for situations, show leadership and courage;
- appreciate difference and welcome learning from others;
- build relationships based on mutual respect; and
- communicate intentions clearly and invite teamwork and collaboration.

The Opera House is committed to maintaining an inclusive workplace that values the contributions of everyone and is respectful of difference. We all must behave fairly, respectfully and without discrimination to any person we deal with in our work, including other employees, customers and business partners at all times.

Bullying, harassment or discrimination in any form will not be tolerated. The *Anti-Discrimination Act 1977* prohibits discrimination on the basis of race, sex, marital status, disability, homosexuality, pregnancy, political belief, age, carer's responsibilities, transgender identity or religious belief. The Opera House encourages staff to resolve workplace issues directly at a local level through a process of discussion and conciliation where possible. This is often the best way to deal with issues quickly and effectively. If you witness bullying, harassment or discrimination, report the matter confidentially to your supervisor or the Head of People and Culture. For more information please see the [Bullying and Harassment Policy](#) and [Work Related Grievances Policy](#).

We act with fairness, personal integrity and honesty.

The Ethical Framework requires us to:

- act professionally with honesty, consistency and impartiality;
- place the public interest over personal interest;
- uphold the law, institutions of government and democratic principles;
- recruit and promote employees on merit;
- take responsibility for decisions and actions;
- provide apolitical and non-partisan advice; and
- provide transparency to enable public scrutiny.

Integrity and honesty underpin everything we do. The trust of our customers, partners, colleagues and the community can only be achieved through ensuring all our decisions and actions are honest and made in the best interests of the organisation and its stakeholders.

Further information in relation to how to manage corrupt and unethical conduct, conflicts of interest, gifts and benefits, political and community participation and interactions with lobbyists follows.

Conflicts of interest

How do I act in the public interest?

You should treat all people with whom you have contact in the course of your work:

- equally without prejudice or favour; and
- with honesty, consistency and impartiality.

You should also, in the course of your work:

- place the public interest over your personal interest;
- uphold the law, institutions of government and democratic principles;
- provide apolitical and non-partisan advice;
- provide transparency to enable public scrutiny; and
- be fiscally responsible and focus on efficient, effective and prudent use of resources.

Acting in the public interest requires leadership, courage and innovation to develop practical recommendations and actions that are consistent with the core values and will help the Government of the day achieve its objectives. Acting in ways that are expedient or convenient, but which do not promote the integrity, trust, service and accountability of the public sector, is not in the public interest.

How do I manage conflicts of interests?

Sometimes you may find that your private interests make it difficult for you to perform your duties impartially in the public interest. This may happen when there is a direct conflict between your current duties and responsibilities and your private interests (an 'actual' conflict of interests); when a person could reasonably perceive that your private interests are likely to improperly influence the performance of your official duties, whether or not this is in fact the case (a 'reasonably perceived' conflict of interests); or when you have a private interest that could conflict with your official duties in the future (a 'potential' conflict of interests).

Actions you should take include:

- always disclose actual, potential or reasonably perceived conflicts of interests to your manager or supervisor as soon as you become aware of the conflict; and
- where a conflict of interests occurs it should always be resolved in favour of the public interest, rather than your own.

To resolve any conflicts of interests that occur, or could occur, a range of options is available depending on the significance of the conflict. These options include, but are not limited to:

- informing likely affected persons that a disclosure has been made, giving details and the agency's view that there is no actual conflict or the potential for conflict is minimal;
- appointing further persons to a panel/committee/ team to minimise the actual or perceived influence or involvement of the person with the actual or reasonably perceived conflict;
- where the persons likely to be concerned about a potential, actual or reasonably perceived conflict are identifiable, seeking their views as to whether they object to the person having any, or any further, involvement in the matter;
- restricting the access of the person to relevant information that is sensitive, confidential or secret;
- directing the person to behave at all times in ways that are consistent with their agency's responsibilities and functions;
- removing the person from duties or from responsibility to make decisions in relation to which the 'conflict' arises and reallocating those duties to another employee (who is not supervised by the person with the 'conflict'); and
- persons with a 'conflict' who are members of boards or committees absenting themselves from or not taking part in any debate or voting on the issue.

How do I declare private interests?

All senior executives and nominated staff must make a written declaration of private financial, business, personal or other interests or relationships that have the potential to influence, or could be perceived to influence, decisions made or advice given by the staff member.

Where a staff member has no such private interests to declare, s/he must declare a "nil return".

After a staff member makes an initial declaration, a fresh declaration must be made:

- as soon as practicable, following any relevant change in the staff member's private interests;
- as soon as practicable, following the staff member's assignment to a new role or responsibility; and
- at least annually.

The form for making a private interests declaration is provided at **Appendix A** to this Code of Conduct.

Who do I provide my declaration to?

Senior executives and nominated staff must provide their declaration to Director of People and Culture. The Chief Executive Officer must provide their declaration to the Department Secretary.

A person to whom a declaration is to be provided is responsible for ensuring:

- staff members complete declarations; and
- handling and storage of declarations complies with the requirements of the *Privacy and Personal Information Protection Act 1998*.

Gifts and benefits

In general, gifts and benefits should not be accepted. Token gifts occasionally received in the normal course of your job or as a thank you, such as flowers, chocolates or other inexpensive items are usually acceptable. Details of gifts and benefits (including hospitality) that must be declared in the central Gifts and Benefits Register are outlined in the [*Gifts and Benefits Policy*](#).

Political and community participation

You should ensure that any participation in party political activities does not conflict with your responsibility as a public employee, which is to serve the Government of the day in a politically neutral manner. If you are aware that a potential conflict of interest has arisen or might arise, you should inform your manager immediately. You are free to fully participate in voluntary community organisations and charities and professional associations. Generally, disclose only official, factual information that would normally be given out to members of the public.

Media Interactions (including social media)

All media enquiries must be directed to the communications team for response. You must not, under any circumstances, attempt to respond to media enquiries (even “off the record”). You should also never initiate contact with the media unless you have been authorised to do so by the head of the communications team.

Outside of work, you of course have the right to make public comment and enter into public debate on political and social issues via social media sites, tools, applications and platforms. However, as set out in the *Social Media Policy*, you must:

- be mindful that, while engaged by the Opera House, there are circumstances in which your personal opinion may be interpreted as being an official comment about or on behalf of the Opera House or the NSW Government. If your social media activity relates to the Opera House, please identify yourself as a staff member, consultant or contractor of the Opera House and do not imply that you are authorised to speak as a representative of the Opera House or the NSW Government, nor give the impression that your views are shared by the Opera House or the NSW Government;
- be responsible and protect your reputation and the reputation of the Opera House;
- respect confidentiality and not disclose any confidential information obtained as a result, or in the course of, your employment; and
- be mindful that information posted online is public and permanent.

Interacting with lobbyists

All government sector employees and heads of government sector agencies must comply with Premier’s Memorandum M2014-13- NSW Lobbyists Code of Conduct published on the Department of Premier and Cabinet’s website, as amended from time to time.

Corrupt and unethical conduct

You are expected to maintain the highest ethical standards and corrupt or unethical conduct will not be tolerated. Examples of corrupt or unethical conduct include:

- fraud (including theft and forgery), bribery or blackmail;
- misuse of public property, facilities or services;
- abuse of power;
- failure to apply the law or inconsistently applying the law; and
- purchase of unnecessary or inadequate goods.

If you receive information or become aware of corrupt or unethical conduct you must report this matter in accordance with the *Public Interest Disclosures Act 1994*. Guidance on this reporting can be found in our *Public Interest Disclosures Policy*.

We value our customers and are committed to service excellence at all times.

The Ethical Framework requires us to:

- provide services fairly with a focus on customer needs;
- be flexible, innovative and reliable in service delivery;
- engage with the not-for-profit and business sectors to develop and implement service solutions; and
- focus on quality while maximising service delivery.

Everyone who comes into contact with us is a customer, including presenting partners and service providers, audiences, tourists, the general public and colleagues. We are proud of the diversity of our customers, which is reflected in our programs, products and services.

You should always make customers feel warmly welcomed and strive to ensure that visiting the Opera House is a vibrant, compelling and memorable experience that exceeds expectations by:

- offering a courteous, helpful, informed and personalised response to all our different customers, visitors and guests;

- bringing your knowledge and expertise to each interaction, offering responsive, effective and exceptional service to achieve the best possible outcome;
- seeking and valuing customer feedback and support each other in responding to customer needs; and
- working together, supporting each other and taking personal responsibility to ensure that the customer experience is always seamless and consistently excellent.

Use of official information

In your day-to-day work, you may come across confidential information, such as personal information relating to customers, staff or other third parties. All confidential information must be responsibly and securely stored to avoid unauthorised access or disclosure. Misuse or unauthorised disclosure of confidential or personal information may have severe consequences for the Opera House, as well as those the subject of the information. It is important to collect and store Opera House knowledge and information so it is preserved, accessible and can be used for future decision-making. We all have a responsibility to make and store records that support day-to-day operations, outcomes and decisions.

We maintain a healthy and safe work environment.

Safety and security in our workplace is of vital importance to the Opera House. Everyone is expected to contribute to creating and maintaining a safe and secure workplace by observing safety and security standards, procedures and policies.

Safety

All staff have a responsibility to report any emergencies within the Opera House by dialling 2 on any in-house phone. At other premises dial 000 then report to the Sydney Opera House Control Room (x7200).

Additionally, all injuries, incidents, hazards and near misses must be reported. Contact Emergency Planning and Response by dialling 2 to report any immediate injuries. Subsequent reporting for injuries, near misses and other hazards should be done via the online Incident/Hazard Form. Make sure you understand and are able to carry out the safety procedures for your area and job and raise any safety or security issues with your manager or OH&S representative.

You must not smoke inside any Opera House building, vehicle, or other designated 'smoke free' area.

Performing our work unimpaired by the consumption of alcohol or use of drugs.

The Opera House requires all staff to be unimpaired by alcohol or other drugs that may affect your ability to work safely and effectively. It is important to advise management if you are concerned your work performance may be impaired by medication. Attendance at work while affected by prior use of alcohol or other drugs is not permitted in line with the *Alcohol and Other Drugs Policy*.

Security

All staff must observe security procedures and policies by:

- following all emergency evacuation procedures and instructions promptly;
- always wearing your Electronic Access ID Card visibly at all times. You may be requested to present your ID for checking at any time by Sydney Opera House Security. Report any lost ID Cards immediately.
- following the directions of Event Safety Officers or events personnel;
- accessing and exiting the building through Stage Door only, or by the main foyers at other Sydney Opera House premises;
- not entering any restricted or unauthorised area without prior consent from the relevant manager; and
- ensuring all visitors are signed in at Stage Door and are supervised at all times.

Child protection

It is important that all staff contribute to ensuring the safety and wellbeing of all children on our site, whether visitors, customers or guests. If you become aware of any allegation or conviction against another Opera House staff member, which may be 'Reportable Conduct' involving a child, you are required, pursuant to the *Ombudsman Act 1974*, to report the allegation to the Chief Executive Officer. Reportable Conduct includes any sexual offence, sexual misconduct, assault, ill treatment or neglect of a child (including behaviour that causes psychological harm).

We work with economy and efficiency.

The Ethical Framework requires us to be fiscally responsible and to focus on efficient, effective and prudent use of resources.

How do I use public resources appropriately?

You must use public resources in an efficient, effective and prudent way. Never use public resources – money, property, equipment or consumables – for your personal benefit, or for an unauthorised purpose.

If you are responsible for receiving, spending or accounting for money, ensure you know, understand and comply with the requirements of the *Public Finance and Audit Act 1983*, the *Public Works and Procurement Act 1912* and the *Government Advertising Act 2011*.

Information systems

Use of Sydney Opera House information systems must be carried out in accordance with relevant policies and procedures. Use of information systems is monitored. Serious breaches of Opera House policies and guidelines will result in disciplinary action and may lead to dismissal.

We act in the best interests of the Opera House.

Valuing our heritage

The Opera House is the symbol of modern Australia, the nation's No. 1 tourism destination and one of the world's busiest performing arts centres. In the four decades since it opened, the Opera House has played a transformative role in Australian life. This significance of the Opera House is reflected in its State, National and World Heritage listings.

To preserve and protect the heritage values a number of documents have been commissioned to guide the operation, management, maintenance and development of the Opera House, including the *Sydney Opera House – A revised plan for the conservation of the Sydney Opera House and its site – 3rd Edition*, the *Utzon Design Principles* and the *Sydney Opera House Heritage Risk Management Plan*.

You should ensure that all risks to the heritage values associated with the Opera House are identified and managed in accordance with these governing documents.

Taking secondary employment

In order to undertake any paid work outside of Sydney Opera House, permanent (including permanent part-time) and full-time temporary (including seasonal) staff must liaise with their manager and obtain written approval from their manager and the Director, People and Culture. If undertaking approved secondary employment:

- the work must be done in your own time or during unpaid leave;
- the other job should not affect your work at the Opera House;
- there cannot be any conflict of interest between your job at the Opera House and the outside work.

4 Behaviour contrary to the Code of Conduct

The effect of behaviour that is contrary to the Code

Behaviour contrary to this Code and to the Ethical Framework for the government sector can bring individual employees into disrepute, undermine productive working relationships in the workplace, hinder customer service delivery, and damage public trust in your agency or the broader government sector.

If you are unsure of what is appropriate conduct under any particular circumstances, discuss the matter with your supervisor, manager or the relevant member of your agency's executive. Heads of government sector agencies may also contact the Public Service Commissioner.

If you see behaviour contrary to this Code

If you see someone act in ways that are contrary to this Code, you should in the first instance discuss that person's behaviour with your immediate supervisor or manager, or report your concerns to any member of the agency's executive.

If you believe certain conduct is not just unethical, but may also be corrupt, a serious and substantial waste of government resources, maladministration or a breach of government information and privacy rights, then report your concerns to your agency's Public Interest Disclosures Coordinator or Disclosures Officer, the head of your agency or the relevant investigating authority (such as the Ombudsman, Independent Commission Against Corruption or the Auditor-General). Under the *Public Interest Disclosures Act 1994*, it is both a criminal offence and misconduct to take reprisals against an employee who makes a public interest disclosure.

Actions when allegations are made

If it is alleged that you have acted in a way that is contrary to this Code, you will have an opportunity to provide your version of events. How this will happen will be proportionate to the seriousness of the matter. In those cases where the allegation is minor or of a low level, your manager will usually discuss this matter directly with you. If the allegations are more serious, a formal process may be required.

If you are investigating an allegation of a behaviour that is contrary to this Code, you must ensure your decision-making is fair and reasonable by acting consistently with four principles¹:

- procedural fairness for both the complainant and staff member;
- investigations should be handled expeditiously. This will minimise the potential for breaches of confidentiality and lack of procedural fairness;
- confidentiality for all parties, where practicable and appropriate, until such time as the investigation process is completed; and
- meticulous recordkeeping, including recording of reasons for all significant decisions.

For employees of Public Service agencies, the GSE Act and GSE Rules set out how allegations of misconduct are to be dealt with.

Part 8 of the GSE Rules sets out the procedural requirements for dealing with allegations of misconduct, which include requirements that you be advised of the detail of the allegation; the process to be undertaken to investigate and resolve the matter; and that you be provided an opportunity to respond to the allegations.

The GSE Act sets out the actions that a Public Service agency head may take where there is a finding of misconduct against an employee. These actions are as follows:

- terminate the employment of the employee (without giving the employee an opportunity to resign);
- terminate the employment of the employee (after giving the employee an opportunity to resign);
- impose a fine on the employee (which may be deducted from the remuneration payable to the employee);
- reduce the remuneration payable to the employee;
- reduce the classification or grade of the employee;
- assign the employee to a different role; and
- caution or reprimand the employee.

5 Relevant legislation

Anti-Discrimination Act 1977

Government Information (Public Access) Act 2009

Government Sector Employment Act 2013

Independent Commission Against Corruption Act 1988

Ombudsman Act 1974

Privacy and Personal Information Protection Act 1998

Public Interest Disclosures Act 1994

Public Finance and Audit Act 1983

State Records Act 1998

Sydney Opera House Trust Act 1961

Sydney Opera House Trust By-law 2010

Work Health and Safety Act 2011

¹ NSW Ombudsman (www.ombo.nsw.gov.au/data/assets/pdf_file/0017/3707/FD_PSA_14_Natural_justice_Procedural_fairness.pdf)

Work Health and Safety Regulation 2011

Workplace Injury Management Act and Workers Compensation Act 1998

Copies of this legislation can be found on the [NSW Legislation](#) website.

6 Appendix A – Declaration of Private Interests

Instructions: The Code of Conduct requires senior executives and nominated staff to make a written declaration of private financial, business, personal or other interests or relationships that have the potential to influence, or could be perceived to influence, decisions made or advice given by the staff member.

Where a staff member has no such private interests to declare, s/he must declare a “nil return”. After a staff member makes an initial declaration, a fresh declaration must be made:

- As soon as practicable, following any relevant change in the staff member’s private interests
- As soon as practicable, following the staff member’s assignment to a new role or responsibility
- At least annually.

Senior executives and nominated staff must provide their declaration to the Director, People and Culture. The Chief Executive Officer must provide their declaration to the Department Secretary.

A person to whom a declaration is to be provided is responsible for ensuring:

- Staff members complete declarations
- Handling and storage of declarations complies with the requirements of the *Privacy and Personal Information Protection Act 1998*.

Person Making Declaration

Name: _____

Role Title: _____

Business Unit : _____

Declaration: I declare that:

- I have read and understand the requirement under the Code of Conduct to declare any private financial, business, personal or other interests or relationships that have the potential to influence, or could be perceived to influence, decisions made or advice given by me.
- I will take prompt action to manage any actual and/or reasonably perceived conflicts of interests, as required by the Code.

Option A

Annexure A lists my private interests for the purpose of this declaration. In preparing this list, I have had regard to:

- my private financial, business, personal and other interests or relationships
- the functions and responsibilities of my Department/agency
- my role and responsibilities in the Department/agency.

OR

Option B

I have no private interests to declare.

Tick one option only.

Signature: _____

Name: _____

Date: _____

DECLARATION OF PRIVATE INTERESTS – Annexure A

LIST OF INTERESTS

Instructions: Please list any private financial, business, personal or other interests or relationships which have the potential to influence, or could be perceived to influence, decisions made or advice given by you.

The types of interests and relationships that may need to be disclosed include real estate investments or holdings; shareholdings; trusts or nominee companies; company directorships or partnerships; other significant sources of income; significant liabilities; gifts; and private business, employment, voluntary, social, family or personal relationships.

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7 Appendix B – Good Practice Guides

The following good practice guides are provided for use by all government sector employees:

Good practice guide 1 - deciding and acting ethically

To make the best-available decision:

Scope the problem

Clarify the scope of the problem, and consider carefully how the problem affects (or may affect in the future) work colleagues; clients and customers; stakeholders; and the government of the day. Wherever possible, consult affected people and communities.

Develop options

Develop a mix of options that address these questions:

- *Duties*: What are your responsibilities as defined by the law, Government policies, agency procedures, and your role description? Is it legal? Is it consistent with the principles & policies of the agency and the NSW government sector?
- *Results*: Which options will yield the greatest benefit (or least harm) to the most people, and minimise the number of people who might be disadvantaged – in the short and longer term? What will the consequences be for my colleagues, the agency and yourself? What will the consequences be for other parties?
- *Justice*: Which options support due process, transparency, fair compensation for any loss, and fair treatment of those affected by any decision?
- *Rights*: Which options support the legal rights of citizens?
- *Public interest*: Which options best advance the public interest, without regard to your own reputation, career, personal views or potential for personal gain or loss?
- *Resources*: What is the likely impact on government finances, workforce, infrastructure and other assets?
- *Innovation*: Can the issue be addressed in new ways (such as the redesign of services, reengineering of work practices, or a new model of service delivery)?

Evaluate and decide

Choose the option that best addresses the above issues and is in the public interest, supports integrity, builds trust, delivers better services and ensures accountability. To establish if your actions are consistent with the Ethical Framework consider your answers to the following questions:

- *Integrity*: Would your colleagues say you had considered the views of all interested parties and acted in the right way, even if it was at your personal cost?
- *Trust*: Would your action, if it became public, build confidence in the public sector?
- *Service*: Would your clients and customers say your actions improved the quality of the services they receive?
- *Accountability*: Would the head of your agency say your actions are consistent with the Ethical Framework and the law?

Implement

Implement the decision in ways that are consistent with the objectives, values and principles of the Ethical Framework.

Review and identify opportunities for continuous improvement.

Good practice guide 2 - encouraging ethical behaviour by other employees

Ways to support the ethical behaviour of other employees include:

Personal

Encourage your colleagues to act ethically by making ethical decisions and acting ethically yourself.

Interpersonal

Encourage all employees to openly discuss ways to better implement the Ethical Framework in their individual actions, your team's practices and in your services to clients and customers.

Organisational

Ensure the leadership, culture, governance, management and work practices, individual employee behaviour and customer services of your workplace are consistent with the Ethical Framework.