



**Ngangganawili Aboriginal Community Controlled  
Health and Medical Services Aboriginal Corporation**

**ICN 1870**

**ABN 85 650 098 620**

44 Scotia Street, Wiluna WA 6646  
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## Code of Conduct

### 1. Policy & Rationale

The purpose of the Code of Conduct is to provide for a workplace that is respectful of all people, which achieves the highest standards of integrity and honesty and that is accountable to each other and the Wiluna Martu community whom we serve.

Ngangganawili Aboriginal Health Service employees are in a unique position of trust requiring standards of behaviour that reflect community and professional expectations.

Performing to the required standard means:

- Providing services that are at all times respectful of our patients
- Providing services which are consistent with evidence based best practice standards and that are delivered in a culturally sensitive way
- Creating an environment for colleagues that is just, reasonable and fair
- Proper and appropriate use of resources, information and authority
- Ensuring that personal interests do not adversely influence the business of NAHS
- Complying with legislation, regulations, guidelines and policies relevant to NAHS and the community in which we work.

There are three broad elements, which underpin ethics and standards of conduct:

- Integrity
- Respect
- Accountability

This policy applies to all employees, Accredited Clinicians and other contractors otherwise engaged to work at NAHS.

#### 1.1 Definitions

- Integrity: Integrity is about acting in a way, which is honest, sincere and in the best interests of the organisation and the people it serves..
- Respect: Respect is about how other people are treated.
- Accountability: Accountability is about employees being accountable to themselves, to the organisation, to patients, to stakeholders and to the community at large. It involves aspects of integrity, respect and responsibility. All people are accountable for their actions. In the context of employment with NAHS, NAHS may hold an employee personally accountable for their actions.



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## 2. Procedure

### 2.1 Organisational Values.

These values underpin the organisation's ethics and standards of conduct, shape our organisational culture, provide guidance and information on our governance and policy frameworks; and establish a benchmark for the expected behavior of the organisation's employees toward each other as well as our consumers of health care.

**Respect for Culture;** acknowledging and understanding the importance and diversity of the culture of the Wiluna Martu people in all that we do.

**Resilience;** the ability to embrace challenges and harness opportunities to empower our community to take a leadership role in health issues

**Accountability;** Being accountable to all our patients, key stakeholders and the community. Being accountable for our professional behaviour to other staff members.

**Collaboration;** fostering and contributing to identified and agreed objectives through inclusiveness and engagement with the community.

**Passion;** exhibiting passion, positivity and commitment in all that we do to inspire and empower the local community and families to reach improve their health outcomes.

**Integrity;** working with personal and collective integrity whilst striving to achieve improved health care outcomes for the Wiluna Martu people.

### 2.2 Respect for Culture

As an Aboriginal Community Controlled Organisation, our focus on cultural safety is about creating an environment that is safe for people. It is about shared respect, shared meaning, shared knowledge and experience, of learning, living and working together with dignity and truly listening. Providing culturally appropriate services is working in a way that reinforces these principles. NAHS is committed to providing services that promote these principles.

In order to achieve this NAHS will:

- Ensure all employees participate and complete Cultural Safety Training as part of the induction process
- Deal with culturally inappropriate behaviour in a manner that limits the negative impact on other employees, patients and broader community and provide an opportunity for the person to learn and develop.

In order to achieve this, employees will be expected to:

- Engage with cultural mentors to clarify any questions or concerns
- Be respectful of other cultures
- Be open to learning new ways of working



- Follow the cultural protocols that have been established when working with local Martu people
  - NAHS staff will refrain from intervening in family disputes within the community where there is no direct self referral from an involved person. Elders are the appropriate people to deal with these disputes in a culturally safe manner. Where a family dispute presents a risk or potential risk of violence to another individual the matter should be referred to the police in the first instance.

## **2.2 Resilience:**

Organisational resilience is about the collaborative challenges that we overcome and successes that we achieve. Resilience is the ability to handle yourself in the face of adversity and to remain committed to the organisation's vision and purpose even in complex and challenging situations.

Employees demonstrate resilience by:

- Ability and willingness to adapt to change, be flexible and be open to continuous improvement.
- Reflecting on past experiences in order to manage and continually improve own performance.
- Working with compassion and empathy and self-awareness to problem solve challenging situations.

The Organisation demonstrates resilience by:

- Thorough policy and planning, implement formal and robust processes for identifying, analysing, evaluating and treating risk, disruption and adversity.
- Leading by example, demonstrating leadership adaptability by adopting a range of leadership styles to suit different situations.
- Recognising and celebrating achievement and progress

## **2.3 Accountability:**

Accountability is about employees being accountable to themselves, to the organisation, to patients, to stakeholders and to the community. It involves aspects of integrity, respect and responsibility. All people are accountable for their own actions. In the context of employment, the organisation will hold an employee personally accountable for their actions. Accountability relates to:

- Employee management and lines of management
- Use of equipment, consumables and all NAHS resources
- Use of the internet and email



- Accountability to other service providers
- Accountability to funding bodies

Accountability includes lines of management:

- Employees are accountable to and report to their Line Manager
- Employees are also accountable to the CEO via their Line Manager
- The CEO is accountable to the Board via the Chairperson.

Accountability includes responsibilities to work colleagues:

- It is the responsibility of all employees to not deliberately or recklessly disrupt other employees or prevent other employees from carrying out the performance of their duties
- Your decisions as an employee affect other employees, our patients and the community and are expected to be fair, consistent and equitable.
- Employees must be punctual and efficient in the completion of required documentation as specified in the relevant NAHS Policies and Procedures.
- Employees are to be ready for duty at the time stated on their Letter of Offer and/or employment contract.

## **2.4 Collaboration:**

Collaboration is about working closely with colleagues, to cultivate an atmosphere of mutual respect, inclusion and collaboration to achieve shared goals, common outcomes and the organisation's vision.

Employees demonstrate collaboration by:

- Creating a workplace culture that is free from harassment, intimidation, bias and unlawful discrimination.
- Welcoming the diversity of our colleagues, all patients and the wider community.
- Building trust and understanding through good communication.
- Seeking and integrating a diverse range of perspectives, knowledge and ideas.
- Giving and asking for feedback to improve themselves and others.

The organisation supports collaboration by:

- Supporting employee representation in as many cross-organisational matters as much as possible.
- Seeking input and consulting with employees from all levels on the organisation's strategies, goals and ways of working.



## **2.4 Passion:**

Passion is about working and conveying a clear sense of enthusiasm for your work and the organisation's work; demonstrably striving to succeed in your work and to achieve the organisation's vision.

Employees demonstrate passion by:

- Their commitment to the organisation, our patients, and the wider community.
- Behaving in a way that reflects positively on the organisation, exemplifies our values and our mission.
- Being innovative, working within a defined scope of practice, learning from mistakes and striving to continuously work towards and create 'best practice'.
- Seeking new opportunities, challenges and having an open mind to the possibilities of every idea.

The organisation supports working with passion by:

- Reflecting all values in its mission, strategic goals and vision.
- Managers exemplifying their passion and commitment in all aspects of their leadership.
- Recognising and rewarding employees who exemplify passion and the organisation's values.
- Ensuring an effective work life balance for the FIFO workforce

## **2.5 Integrity**

Integrity is about acting in a way which is honest, sincere and in the best interests of the organisation and the community it serves. All employees, patients and members of the public are treated with respect, fairness and courtesy at all times and for all matters.

Employees have a responsibility to conduct themselves with integrity by:

- Always performing to the highest standard of care and diligence.
- Always endeavouring to meet performance standards and other organisational requirements including working within their own scope of practice.
- Acting in an honest, ethical, and professional manner at all times.
- When in public, always demonstrating conduct that will not reflect adversely on the community, the organisation or other employees.
- Ensuring that conduct reflects community expectations and the expectations of the organisation.



- Always acting in such a way that the objectives of the organisation are progressed and in no way obstructed.
- Endeavouring to protect, enhance and promote the interests, welfare, profitability, growth and reputation of the organisation.
- Always performing the duties and responsibilities of the Position Description in a proper, professional and efficient manner.
- At all times carrying out all matters relating to the duties and responsibilities to the best of their ability and with reasonable care and skill.

The organisation has a responsibility to:

- Manage in a just, fair and reasonable manner all aspects of employment including the management of performance, underperformance and misconduct;
- Promoting a zero tolerance for bullying, harassment and discrimination in any form.
- Protect employees and the organisation from actual or perceived lapses in integrity by ensuring that processes are consistent with laws and the high ethical standards set for the organisation.

## **2.6 Use of equipment and resources:**

All employees are required to use the organisations resources with reasonable care and respect. This includes all computer equipment (e.g. tablets such as iPads; smart phones), vehicles, telephones, fixtures, clinical equipment and office equipment. Organisational resources are for the sole benefit and use of the organisation and shall not be for any personal use by an employee, Board Member or consultant. Organisational resources are also not for use by a person who is not an employee, Board Member or consultant. For example:

- No vehicle is to be driven by a person other than an employee, or other person if that person is specifically authorised by the CEO. All vehicle use must be in compliance with the NAHS policies (Doc\_307 & Doc\_344)
- Equipment and resources should not be used for personal reasons unless with prior approval by that employee's Line Manager, and only then in exceptional circumstances.
- No equipment is to be substantially altered in such a way that any warranty is void.
- Employees, Board Members or consultants etc. cannot use organisational resources, including products, works, materials and intellectual property (whether produced, created or worked on by that individual) outside of the



scope of their position. This includes after termination of any contract they may have with the organisation.

- Computer equipment / email / internet may occasionally be used for personal reasons (including social media), but all such use must be reasonable and not excessive. Regular audits are conducted on employee use of organisational computer equipment / email / internet, and any unreasonable or excessive use will be brought to the attention of the CEO. Those audits will include audits of software, apps, or other content downloaded to computer equipment (e.g. tablets; smart phones), this includes use for pornographic or offensive purposes. Searching for gambling websites (or distributing them by email), or downloading gambling software or apps, is not reasonable personal use.
- Unless there are exceptional reasons that are cleared with the employee's Line Manager, it is unreasonable for an employee to spend more than 10 minutes in any one day or more than 5 minutes at any one time on personal emails or the internet.
- Unreasonable personal use of computer equipment / email / internet will result in the relevant employee being charged for some or all of the costs associated with that usage.
- All work related documents should be stored on the shared drives, or saved across to them later if the work was first done offline, to prevent any loss of information.
- No software can be downloaded or installed on organisational IT equipment unless pre-approved by the CEO and/or IT Manager. The only exception is very limited downloading of apps to tablets or smart phones, but again note that such downloads are subject to the general "reasonable and not excessive" rules above, and that regular audits will be used to check compliance.
- Pornographic or offensive material must not be downloaded, accessed, used or distributed; and gambling websites must not be downloaded, accessed, used or distributed; by any employee during that employee's normal work hours, whether or not that employee uses the organisations IT computer equipment or other resources to do so.
- Similarly, employees must, during their normal work hours excluding lunch breaks or other breaks, ensure their use of email/internet even on their own device / mobile broadband meets the above policy on personal use of organisational IT equipment.

## **2.7 Public Statements, Actions and the Interests of NAHS:**



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Employees should be aware that even outside of work hours, actions, conduct and words have an indirect impact on the organisation.

Employees are not permitted to make public statements on behalf of the organisation or in a way that could be interpreted as being on behalf of the organisation without the expressed consent of the CEO.

Employees should be aware that there are strict laws governing the defamation of a person's character. Public statements include comments or 'published' statements made verbally to a family member or friend, to another colleague or on social networking forums. An individual can no longer control what happens with that information once the statement has been made. Importantly, it may damage the reputation or good standing of an individual or the organisation. When this happens there may be a legal cause of action against the person who first made the statement and against anyone who may have spread the statement. Penalties can be very high and in Western Australia can be in excess of \$400,000 plus legal costs.

It is in everyone's best interests to never make defamatory or damaging statements about individuals, especially on social networking sites or the internet. Negative statements about an individual may amount to harassment, bullying or defamation. The organisation will take all reasonable and necessary actions to protect the organisation and its employees from damage arising from such public comments.

## **2.7 Reporting suspected breaches of the Code of Conduct**

If an employee suspects a breach of the Code of Conduct has occurred, the CEO should be made aware of the suspected breach in the first instance. Please refer to our Grievance and Dispute Management Policy (Doc\_019) for more information.

## **2.8 Breaches of this Code of Conduct and Other Policies**

All employees are required to comply with the policy at all times. Any activity which represents a failure to meet these obligations is found to have breached this policy.

Employees may be subject to disciplinary action being taken in accordance with the organisation's Performance Management & Disciplinary Action Policy. The extent and severity of the disciplinary action will depend upon the circumstances of the incident and the seriousness of the breach, up to and including termination of employment.





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## **2.9 Criminal Conduct and Professional Misconduct**

A breach in the organisation's Employee Code of Conduct or other Policies and Procedures may also constitute a breach in the WA Criminal Code or a breach in a Professional Board or Authority that deals with the registration of the employee, such as a health practitioner.

In such instances where a breach amounting to criminal conduct or professional misconduct has been found to occur, the CEO or their nominated representative will report the conduct in writing to the Professional Board or Authority that deals with the registration of the employee, such as the Australian Health Practitioner Registration Agency (AHPRA), or the Western Australian Police.

### **2.10 Code of Conduct self assessment**

Employees faced with a difficult decision regarding their own conduct should ask themselves:

- Is the conduct ethical?
- Is the conduct legal?
- Is the conduct in line with the organisation's Code of Conduct?
- Is the conduct consistent with the organisation's values?
- Will it reflect poorly on myself, the organisation or the sector?
- Would I want to read about it in the media or have the Board or our patients read about it?
- Would I want it communicated to my Manager, my peers or my family?
- Would you be able to stand up in front of all your colleagues and say that you did the right thing and that it was in the best interests of the organisation?

If the answer to any of the above is "maybe" or "no", employees should seek advice from the CEO. All employees are responsible for their own actions and are subject to any consequences for breaching the Code, as set out above.

## **3. Non-compliance with this Policy and Procedure**

- 3.1 Lack of compliance with this policy will lead to uncontrolled risks relating to the conduct of employees which may give rise to material damage to the reputation of NAHS.
- 3.2 This policy will be revised by the Policy & Compliance Manager every 3 years or when any need arises for its review.

## **4. Evidence Base**

- AS ISO 31000:2018. Risk management – Guidelines



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- Equal Opportunity Act 1984 (WA)
- Fair Work Act 2009 (Cth)
- ISO 9001:2015 Quality Management Systems Requirements Clause 5 Leadership

## **5. Related Documents**

- Doc\_307 Motor Vehicle Use Policy
- Doc\_344 Learner Driver Car Use Policy
- Doc\_019 Grievance and Dispute Management Policy