

HVTC prides itself on providing quality and innovative vocational education and training opportunities which produce high level skills and positive employment outcomes. HVTC's success is because of its people. In striving for success we should not compromise our ethics or principles. HVTC places great importance on honesty, integrity, quality and trust.

Regardless of your role or location at HVTC you are expected to:

- Demonstrate the behaviours of honesty, integrity, quality and trust at all times
- Set an example for others and recognise those around you who also demonstrate these behaviours
- Speak out when you feel that these behaviours are threatened or compromised.

HVTC takes the Code, and all the underlying policies that make up the Conduct and Ethics Policy Framework very seriously. As someone working with HVTC, you are required to comply with the principles and spirit of the Code and Policy Framework.

HVTC's Code of Conduct Principles are:

We act in best interests of HVTC and value HVTC's reputation

We act honestly, ethically and value difference

We treat others with respect, value difference of opinion and maintain a safe working environment

We respect and maintain privacy and confidentiality

We identify conflicts of interest and manage them responsibly

We comply with this Code, the law and HVTC policies and procedures

We immediately report any breaches of the Code, the laws or HVTC policies and procedures

1. What is the Code of Conduct and Ethics?

The Code of Conduct and Ethics sets standards for the way we work at HVTC.

The Code is a set of rules outlining the responsibilities of employees and promoting the business practices expected of HVTC employees. It is fundamental in defining the way we do work and promote our business and provides guidance and direction on employee powers, responsibilities and rights within the workplace. It is essentially the way we work and how we should operate in our roles and underpins HVTC's values and goals.

The Code is supported by a number of more detailed policies that form part of the HVTC Conduct and Ethics Policy Framework. These are referred to in this document and hyperlinked to where they are located on the intranet.

Our ethical standards are defined by this Code of Conduct; they are the moral principles of HVTC.

2. Who does the Code apply to?

The Code applies to all HVTC employees and contractors at all times, whilst we are performing our regular duties and whilst representing HVTC on business trips, training and social or networking events. The code essentially outlines the expected behaviours and practices we should demonstrate as a member of the HVTC family.

Throughout the code we use the term 'employees' to refer to all who must follow the Code as outlined above.

3. How will the Code help me?

The Code of Conduct utilises information from a number of Company Policies and captures information relevant to employees across the board. It is a great summary of the behaviours you are expected to exhibit and elements associated to the business practices that may be relevant to your position.

All employees must adhere to the Code and in doing so, will need to speak with their managers to understand how the code may be applied to their position. Whether you are onsite or in an office, deal with customers or only internal stakeholders, make routine decisions or high risk decisions you will find the Code of Conduct a clear guideline on the business behaviours you are expected to exert at all times.

The Code does not detract the need for you to make decisions and apply sound judgement – it merely supports us all to do this easier. We all have a responsibility to act in accordance with the HVTC Code of Conduct as well as within the constraints of laws and still make sound judgements.

Whilst you may still need to refer to a HVTC Policy or Procedure for the specific details of an area listed within the Code, essentially the Code will provide a quick reference point of the expected behaviours and work practices you will need to demonstrate as part of the team here at HVTC.

4. HVTC Values and Goals

Values

- Provide a safe work environment
- Innovative in the delivery of training
- Excellence in business practice
- Provide best service to our customers
- A caring employer
- Open in communication
- Act with integrity at all times and
- Environmentally aware and responsible.

Goals

To be an organisation that:

- Strives for excellence in all that it undertakes
- Achieves innovative and leading edge initiatives
- Is committed to a culture of positive and safe working and learning
- Is the premier provider for training, education and employment options and
- Is actively engaged with communities.

The HVTC Values and Goals are at the heart of HVTC's business. As an employee, you make a commitment to uphold HVTC values and goals and this should be reflected in our decision making and our judgement.

It is our responsibility to ensure our values are exhibited in our behaviours and actions when conducting business for HVTC. It is through this commitment to HVTC's values that we can work together as a united team and work towards accomplishing our goals.

5. How do I know if something may be wrong?

If you are unsure as to whether you should do something or perhaps say something if it is something you have witnessed of another person's actions, the test below will aid you.

- The safety test – could this cause risk of harm to yourself or another person?
- The law test – is this legal and within the constraints of company policies/procedures?
- The values test – is this consistent with HVTC values?
- The family test – would you allow or instruct a family member to do this?
- The media test – if this became a news story, would this be a negative image?
- The gut test – does this feel wrong?

When asking yourself the above questions, if you have failed any of the tests it is likely the action or behaviour is wrong. It is your responsibility to always seek advice if you are still unsure of the appropriate action.

6. Responsibilities of Managers and Supervisors

Managers and supervisors must take all reasonable action to ensure that the people for whom they are responsible are aware of and adhere to the behaviours outlined in the Code.

To achieve this, as a manager or supervisor you should do the following:

- Consistently leading by example and demonstrating exemplary behaviours
- Foster a culture in which employees understand their responsibilities, feel comfortable raising concerns and are recognised for such behaviours
- Ensure all company policies, procedures are accessible and employees understand the content
- Address all questions and concerns about business conduct issues in a timely manner
- Establish internal processes that mitigate the risks associated with business conduct and ensure appropriate investigations are conducted where potential breaches are identified

We act honestly, ethically and value difference

All employees have an obligation to uphold the truth and ethical standards within the workplace and whilst representing HVTC. It is expected that all employees behave professionally and treat one another with respect, courtesy, and consideration to other's rights. At all times employees are to refrain from allowing personal relationships to affect professional relationships.

What you must do:

- Speak the truth with no intent to deceive or mislead by technicalities or omissions
- Consider the interests and needs of our hosts and hosted employees when providing our services and advice
- Be honest with all your communications and dealings with HVTC; this includes communication with all HVTC employees and all HVTC customers
- Use HVTC resources for proper purposes and
- Immediately report any suspicion of dishonest or unethical behaviour of others.

We treat others with respect, value difference of opinion and maintain a safe working environment

Equality in Employment

Every employee has the right to be treated with respect, fairly and without discrimination. All employees will have the opportunity to contribute to the success of the business and do so free from unwarranted assumptions and judgement of others.

Work Health and Safety

HVTC is committed to achieving best practice work health and safety solutions in the workplace.

In all cases, we will aim to meet or exceed applicable legal and other regulatory requirements, as we believe that all incidents, occupational illnesses and injuries are preventable.

At HVTC we strive to ensure every employee returns home safely to their families at the end of every day.

The performance of the business in work health and safety is monitored closely and reported regularly. Any safety incident or breach is considered to be a serious matter and will be investigated accordingly.

Alcohol, Drug and Tobacco Use

HVTC is committed to providing a safe workplace for all employees. In doing so, the use of alcohol and other non-prescription drugs in the workplace is prohibited. The [Drug & Alcohol Procedure](#) clearly describes the treatment of such behaviours and the circumstances under which drug and alcohol testing can take place. Whilst HVTC respects the right of choice for all employees in relation to smoking tobacco, smoking is not permitted on any HVTC site (including vehicles) and is only permissible in designated breaks. As part of HVTC's commitment to the health and wellbeing of all employees the [Smoke Free Workplace Procedure](#) aims to mitigate potential passive smoking risks and provides support for employees seeking assistance to quit smoking.

Harassment or Bullying

HVTC will not tolerate harassment or bullying and deems this type of inappropriate behaviour to be misconduct. Any incidents of this nature will be managed according to the [Bullying and Harassment Procedure](#). This behaviour will result in disciplinary action up to and including termination of employment.

We immediately report any breaches of the Code, the laws or HVTC policies and procedures

There are incidents where a person may not realise their behaviour is contributing towards making a fellow worker feel uncomfortable. Where an employee witnesses an incident of potential harassment or bullying it is strictly prohibited to take retribution on the individual or to take matters into their own hands. Feedback on performance of work is intended to aid the employee in improving their work and providing feedback that is constructive, not humiliating and such discussions will not be deemed as bullying or harassment.

What you must do:

- Treat all people you deal with through your work at HVTC with dignity and respect
- Show your respect to your colleagues by properly acknowledging their ideas, work and contributions to the success of HVTC
- Make employment decisions based on merit, and not on attributes that are irrelevant to employment or performance
- Adhere to all safety related policies, procedures and practices
- Contribute to promoting a safe working environment by taking responsibility for work health and safety and reporting any issues as soon as possible
- Never discriminate, harass or bully your colleagues, customers or anyone else you have contact with at work
- Take responsibility and care for the wellbeing of others around you by reporting any cases of perceived bullying or harassment to your supervisor or human resources department immediately
- Attend work in a fit state without being under influence of drugs or alcohol and
- Not smoke within HVTC sites or cars.

For more detailed information see:

[HVTC Fair & Diverse Workplace Policy](#)

[HVTC Recruitment Procedures](#)

[HVTC Bullying and Harassment Procedure](#)

[HVTC Drug & Alcohol Policy](#)

[HVTC Drug & Alcohol Procedure](#)

[HVTC Smoke Free Workplace Procedure](#)

[HVTC WHS Policy](#)

[HVTC Consultation Statement](#)

All employees are responsible for reporting any breaches of the Code of Conduct & Ethics.

Managers and supervisors will be held accountable not only for their own business conduct, but for their employees.

Where a breach has been identified through the investigation process, the matter will be discussed with HR and management may determine disciplinary action subject to the investigation outcomes. Appropriate disciplinary action includes performance management up to and including termination of employment. The severity of disciplinary action will be dependent on the nature of the breach. Some examples of disciplinary action are a discussion with management about desired behaviour, verbal or written warning, counselling on misconduct, suspension and dismissal.

If the situation involves a violation of the law, the matter may also be referred to the appropriate law enforcement authorities for consideration.

What you must do:

- Promptly raise known or suspected breaches of the code or other company policies and procedures
- Cooperate in any investigations of possible breaches
- Never request others to breach the code and
- Never retaliate against another person for reporting a potential breach.

We act in best interests of HVTC and value HVTC's reputation

HVTC has a reputation as a respected organisation in our industry and local communities. This is an important asset that all employees are able to build and maintain. Equally, this reputation can be harmed and undermined. HVTC's policies and procedures provide the processes to follow so as all employees can act in the best interests of the company.

External Communication and Public Relations

All external communication must be managed as outlined in the Media Procedure. In the interest of maintaining company brand it is a requirement that all materials for media use meet HVTC's Identity Standards and be approved by Corporate Communications Department. The CEO attends to all media matters in the first instance. Media enquiries should be referred to Manager Corporate Affairs & Communication or other executive management.

Company Assets

Company assets include but are not limited to property, time, intellectual property, brand-named information, funds and equipment such as mobiles phones, IT equipment, company vehicles, materials and other goods.

Motor Vehicle Use

HVTC motor vehicles are branded to promote the business. All employees driving a company vehicle are representing HVTC and must drive in a safe and courteous manner

What you must do:

- Undertake your duties with care and diligence to maintain our good name and reputation
- Strive to build collaborative relationships with other industry professionals and others for the advancement of our professions and industry sector
- Use HVTC resources diligently and efficiently; including (but not limited to) office facilities and equipment, vehicles and corporate credit cards
- Ensure company assets are not misused, damaged or stolen
- Not allow assets and resources to be sold, disposed of, loaned or donated without the appropriate approvals and
- Follow all company policies and procedures.

For more detailed information see:
[HVTC Communications and Information Technology Policy](#)

[HVTC Communications and Information Technology Procedure](#)
[HVTC Media Procedure](#)
[Business Related Travel Procedure](#)

Question: There is an investigation being conducted and I don't feel comfortable answering questions in case someone gets in trouble. Do I have to be involved?

Answer: Yes. It is in the best interests of HVTC for all employees to participate openly and honestly in workplace investigations. The process will be done in a fair and reasonable manner.

We identify conflicts of interest and manage them responsibly

A conflict of interest is considered to be where an outside activity or situation jeopardises or could jeopardise an employee's judgement, objectivity or independence. Business dealings or personal relationships that cause or may cause conflicts of interest must be avoided. Management of conflict of interest will be on a case by case basis. Some examples of conflicts of interest are:

- Holding outside jobs and affiliations
- Jobs and affiliations of close relatives
- Offering or accepting gifts, hospitality and entertainment
- Pursuing HVTC business activities for personal gain and
- Personal relationships between staff, employees or students.

What you must do:

- Refuse to engage in or sanction activities for personal gain at the expense of HVTC
- Not accept personal compensation from an individual stakeholder beyond the limitations established by principle and policy which includes full disclosure and arm's length dealings and
- Alert executive management to any potential conflict of interest for consideration and appropriate action.

Question: What if a colleague tells me about time they are spending with hosted employees on the weekends. If they haven't told anyone, why should I? It's their time outside of work.

Answer: You are responsible to let your supervisor know so that it can be established if there is a conflict of interest or not. This will depend on the person's role and the nature of the relationship.

We respect and maintain privacy and confidentiality

In your work at HVTC, you may have access to confidential and private information relating to HVTC, host employers, hosted employees and other stakeholders of HVTC. When people provide us with this information they trust HVTC to only use it for its intended purpose. To misuse private information is not only damaging to our reputation and relationships with stakeholders, but is against the law. HVTC is committed to maintaining the confidentiality of this information and you are expected to do your part to honour this commitment.

Personal Information and Privacy

Personal information means data relating to an individual who can be identified by that information. HVTC only collects personal information in a lawful and fair manner, and in a way which is not unreasonably intrusive. Information will not be disclosed for any purpose other than the purpose for which it is collected.

Record Keeping and Information Systems

Record keeping and reporting must be performed with a high level of accuracy and validity. Any falsifying or tampering with data or records is strictly prohibited. An employee who believes they have been requested or instructed to alter data against the intent of this code or in a way that compromises the integrity of HVTC information systems is to report the incident to executive management or the human resource department. All financial record keeping or reporting laws and regulations will be adhered to by the Company and persons within relevant positions.

Intellectual Property

As markets become increasingly competitive it is important for HVTC to protect its intellectual property. Intellectual property can be a creative solution, original design, trademark or the application of a good idea that has developed commercial value. All employees have a responsibility to protect intellectual property from use by outsiders.

What you must do:

- Do all you can to keep information secure. This includes not sharing private or confidential information with other employees unless they need it to perform their work at HVTC.
- Collect, use, store, handle, update and destroy information, particularly personal information, in line with applicable processes at all times.
- Never disclose information about HVTC that is not already in the public domain without the proper authority to do so.
- Never release information about hosts or employees to third parties outside of HVTC unless the person the information relates to has agreed or HVTC is required to release the information by law.

For more detailed information see:

[HVTC Privacy Policy](#)

Question: One of my friends is working for HVTC and wants to know how their pay compares with another trainee and friend who is working with a different host. Can I tell them?

Answer: No, payroll information is private and confidential. Unless you are directly involved with your friend's payroll administration you should not access his/her information either.

We comply with this Code, the law and HVTC policies and procedures

All employees must adhere to the Code of Conduct & Ethics and must take reasonable steps to ensure other individuals, including consultants or any other third party representing HVTC or conducting business on behalf HVTC act accordingly. The Code of Conduct & Ethics **does not** negate the need for all employees to be aware of, and have a detailed understanding of company policies and procedures.

Queries on the meaning of the Code or concerns of breaches must be raised promptly with management or the human resource department. Whilst it may seem best to remain silent, our commitment to success means we all must never ignore an issue.

In most cases a breach of the code is caused not by a deliberate action or intent to disobey but most commonly can be attributed to a lack of knowledge or understanding and what we would call an honest mistake. People may want to 'get the job done' and forget their responsibilities. It is for this reason that we must raise all concerns promptly to avoid the issue getting larger.

What you must do:

- Always behave in accordance with this Code of Conduct & Ethics, the law, HVTC policies and procedures
- Comply with all levels of government regulations and HVTC policy concerning lobbying by using only legal, ethical and moral means when attempting to influence legislation or regulations affecting HVTC or the vocational education sector (GTO or RTO sectors)
- Complete all the required training to build and maintain your awareness and understanding of this Code of Conduct & Ethics, relevant laws, policies and procedures and
- If you are unsure whether a particular law, policy or procedure applies, seek guidance from your supervisor, human resources department or operational manager.

Question: A host has requested that a new employee start tomorrow. The employee has completed all the necessary paperwork except for the induction. I don't want to disappoint the host. Can the employee start and do the induction later in the week.

Answer: No, all hosted employees must complete the online induction before they start work as per the [Recruitment Procedure](#). HVTC has an obligation to ensure our employees are safe at work. The induction provides important safety information that must be provided before starting work.

Signed:



Sharon Smith
Chief Executive Officer

Approved by Board of Directors:

11 September 2014

Due consideration has been given to legislation that may have been pertinent in the development of this policy. The relevant components have been incorporated and are again considered when conducting the policy review process.