

Crosslinks Code of Conduct

1. Overview

Crosslinks is committed to a Code of Conduct which provides guidance to all Crosslinks Personnel, so decisions and actions taken reflect the highest standards of conduct when representing the organisation. This document provides a practical set of guiding principles to help Personnel make decisions about daily work, whatever they do and wherever they do it.

The Code of Conduct is underpinned by the Crosslinks values which represent what Crosslinks recognises as acceptable levels of behaviour or conduct. As a participant-centred organisation, Crosslinks expects all personnel to go beyond simply complying with minimum standards of personal conduct and make informed choices that integrate our values.

The goal is to make every decision and every action something that all personnel at Crosslinks can be proud of contributing to a positive organisational culture which is recognised as a professional, safe and healthy work environment. This will enable the organisation to meet the requirements of the operational plan of connecting individuals who receive Crosslinks services to their community and maximise their potential by providing flexible personalised options, supporting the vision statement of your life, your choice, your way.

2. Purpose

All Personnel's actions and decisions are underpinned by the Crosslinks Values;



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3. Scope

The Code of Conduct applies to all **Personnel**, which for the purposes of this code includes;

- a) Every employee or officer of Crosslinks,
- b) Every contractor of Crosslinks when performing activities on behalf of Crosslinks; and
- c) Every Volunteer of Crosslinks.

It is important all Personnel reads and understands the Code of Conduct and complies with it as personnel of Crosslinks. Breaches of the Code of Conduct may lead to disciplinary action such as counselling through to dismissal. In addition, if personnel break the law they may also be held personally and criminally liable for their action.

4. Principles

Crosslinks is committed to the obligations of the National Disability Insurance Scheme (NDIS);



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Respect and Integrity

At Crosslinks we aim to ensure our participants are;

- ✓ provided with necessary mechanisms to safeguard their emotional wellbeing, personal security and property, and make choices and decisions for themselves;
- ✓ encouraged to maintain and develop their health and wellbeing;
- ✓ active participants in the community;
- ✓ able to explore their talent, interests and abilities;
- ✓ engaged in socially valued activities, including work, education, and leisure activities; and maintain independence and control of their own lives.

Crosslinks will;

- ✓ Have a person-centred approach to service design, planning, delivery and review allowing people who choose to use Crosslinks to direct their services and make choices;
- ✓ Communicate with participants in a form, language and manner that enables them to understand the information and provide opportunities for the participants to communicate their will, choices and preferences;
- ✓ Understand, respect and respond to the cultural needs of participants, their family and carers from other cultures, including Aboriginal and Torres Strait Islander people.



Privacy

Crosslinks personnel must maintain the confidentiality of information entrusted to them by Crosslinks, its participants and families, contractors, suppliers and corporate partners, except when the disclosure is authorised in writing by a member of the Executive Team or required by laws and regulations to which Crosslinks is bound.

Personnel will always be mindful to protect the participants' dignity when sharing required handover information with other personnel and value the participants right to be respectfully and accurately represented.

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Provide support and services in a safe and competent manner

Crosslinks Personnel will;

- ✓ perform duties conscientiously and with professionalism, integrity and honesty;
- ✓ apply the highest standards of personal conduct in dealings with participants, families, carers, advocates and other agencies;
- ✓ fulfil responsibilities and accountabilities in accordance with their job description and other duties as so directed, with due care and diligence;
- ✓ support the decisions of management and the Board of Crosslinks;
- ✓ adhere to policies, procedures and work guidelines of Crosslinks;
- ✓ take all reasonable care and consideration to avoid placing participants at risk of injury or harm;
- ✓ understand and comply with Crosslinks work instructions and maintain records as required; and
- ✓ observe the privacy, dignity, confidentiality of co-workers, participants, their families, carers and advocates.



Integrity, Honesty & Transparency

Crosslinks will;

- ✓ respect individual differences and the rights of others to have an opinion that is different to ours;
- ✓ act with fairness and impartiality;
- ✓ assist participants to present themselves in the community as they choose and in such a way that they are accepted and integrated;
- ✓ respect the rights and dignity of participants;
- ✓ to the best of our ability, give full information and advice in a manner that is clear, simple and most appropriate for the person it is intended.
- ✓ Protect the reputation of the organisation, participants and other personnel.
- ✓ Use resources (physical, human, financial, information) properly, efficiently, economically, sustainably and with care avoiding damage or loss.

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Complaints, Disputes and Incident Management

Crosslinks will;

- ✓ support a culture where all personnel, participants, and their families can feel safe and empowered to raise concerns and report all quality and safeguarding issues through the appropriate channels;
- ✓ refrain from, and not accept, bullying, harassment and discrimination and will report any such conduct by co-workers to management as soon as possible;
- ✓ follow the Incident Management procedure when you identify a potential incident or a complaint;
- ✓ report incidents of misconduct to management immediately or as soon as practicable;
- ✓ resolve complaints, grievances and disputes fairly, efficiently and in a timely manner appropriate to the individual's needs (e.g. cultural context and nature of disability), and in a non-threatening, non-defensive manner without threat or fear of adverse consequences;
- ✓ be flexible in responding to minor suggestions about service delivery to better suit the participant's need (such as adjusting mealtimes or moving a piece of furniture); and
- ✓ offer opinions but support the decision of the team and decisions by management and the Board of Directors.



Protection of Human Rights

Crosslinks will;

- ✓ educate personnel on all aspects of a participant's Human Rights;
- ✓ Safeguard a participants Human Rights by preventing, acting on and reporting any form of discrimination, exploitation, abuse, harm, neglect and violence to the participants. This includes:
 - Acting in a way that prevents any form of discrimination, exploitation, abuse, harm, neglect and violence to the participants;
 - Not committing or participating, in any form of discrimination, exploitation, abuse, harm, neglect and violence to the participants;
 - Identifying, and responding to any situations that could lead to any form of discrimination, exploitation, abuse, harm, neglect and violence to the participants; and

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- Reporting incidents of, or incidents that may lead to, any form of discrimination, exploitation, abuse, harm, neglect and violence to the participants, to the Crosslinks Management and/or regulatory bodies.
- ✓ Report any occurrence of any unauthorised Restrictive Practices immediately (as far as practicable) via The Links. If a Restrictive Practice is required and used in an emergency, or a crisis, in order to safeguard the participant and prevent greater harm, ensure personnel will document and report the use of such practice immediately via The Links.
- ✓ Document any ongoing restrictive practises in a Positive Behaviour Support (PBS) plan, developed by an accredited PBS practitioner, which is understood and followed by each personnel that provides support for the participant.
- ✓ Personnel must work in partnership with the PBS practitioner and manager.
- ✓ Act to safeguard the personal security and property of participants and co-workers.



Prevention of Sexual Misconduct

Crosslinks will;

- ✓ Report any form of sexual misconduct, and act to protect the participant, and report cases of sexual misconduct or their concerns about sexual misconduct;
- ✓ Ensure personnel are aware that sexual misconduct encompasses acts or behaviours experienced by the person with disability as being sexual in nature and can be physical and verbal in nature;
- ✓ Maintain professional boundaries in developing relationships with participants and their families;
- ✓ Ensure that no personnel, volunteer, student, contractor, or Board member connected with Crosslinks enters an intimate or sexual relationship with Crosslinks' participants;
- ✓ report any concerns relating to sexual misconduct or inappropriate relationships, to their line manager. These include abuse or concerns of an alleged abuse towards a participant from a third party.



Workplace Behaviour

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All personnel will conduct themselves in a professional manner when interacting with others or when managing personnel. All personnel must consider their own behaviour and the impact that this can have on others. It is not the intent, but the effect of the behaviour. Crosslinks recognises that personalities, characters and management styles may differ but, notwithstanding these differences, as a minimum standard all staff are expected to:

- Work co-operatively with others in order to achieve objectives;
- Manage performance in an appropriate and fair manner;
- Give and receive constructive feedback as part of normal day-to-day work. Such feedback should be evidence-based and delivered in an appropriate manner;
- Consider other people's perspectives in order to help reach agreement; and
- Establish good working relationships.

Crosslinks **will not** support any of the following and disciplinary procedures may occur for;

- ✓ abusive, derogatory or obscene language;
- ✓ discriminatory, threatening, harassing or bullying behaviour;
- ✓ providing advice to participants on financial matters;
- ✓ offering or providing services that create a conflict of interest;
- ✓ any relationship that has the potential for a conflict of interest;
- ✓ providing services which the personnel does not have the appropriate skills and/or training, or authorisation to do;
- ✓ physical violence including throwing objects;
- ✓ insensitive jokes and pranks;
- ✓ inappropriate behaviour of a sexual nature, including unwelcome advances, jokes and comments on appearance;
- ✓ body contact or display of offensive materials;
- ✓ inappropriate criticism of personnel or Crosslinks;
- ✓ inappropriate arguments with participants, their families, carers or other service providers and;
- ✓ not following lawful instruction and
- ✓ inappropriate standard of dress.

Consequence and power control approach

Crosslinks **will not** support a consequence and power control approach to care. This is when someone uses warnings, threats or intimidation to make someone do what they want them to do. Consequence control often involves threats about things, people or activities that are important to the person.

Examples include:

- personal threats involving relationships or possessions;
- coercion or bribery; and
- punishment or implication of punishment.

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Power control is where a person uses their position of power or authority to control another person's behaviour or make them do something.

Examples of power control include:

- being told not to move or to speak;
- being told to sit down; and
- treating adults like they are children.

Bullying and Harassment

Crosslinks has **zero tolerance** for Bullying, Discrimination and Harassment in the workplace. If proven Crosslinks will take disciplinary action. Behaviours that characterise bullying may include but not limited to repeated offensive, abusive, belittling or threatening behaviour directed at another person or a group of people.

Bullying may lead to the person or group of people subjected to the behaviour feeling victimised, offended, demeaned, humiliated, intimidated, or suffering detriment or disadvantage.

Managers and team members must take action to address and prevent bullying and harassment in the workplace and report immediately.



Leadership Behaviour

Leaders will:

- ✓ provide fair and consistent leadership, information, resources;
- ✓ support correct policies and procedures usage;
- ✓ coach and mentor personnel to develop in their chosen role;
- ✓ ensure this Code of Conduct is communicated to personnel at induction and annually and that they are aware of its contents and how it applies to them;
- ✓ ensure that personnel know what their job involves (what is expected, how it is to be done, what they are accountable for and how their performance will be managed);
- ✓ supervise personnel in their teams, acknowledging good performance and actively correcting unsatisfactory performance;
- ✓ support the ongoing development of personnel; and
- ✓ manage change as ongoing, continuous and positive in the workplace.

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Conflict of Interest

A conflict of interest exists when personnel participate in an activity, decision making process or business interest which could interfere with the interests of Crosslinks. It is expected that no personnel be involved in any conduct or activity that may compromise their ability to make impartial business decisions and which, in turn, could harm or adversely affect the organisation's operations, business or interests.

All personnel are required to avoid actual and apparent conflicts of interest and furthermore, if a potential conflict of interest is known they must advise their line manager as soon as possible. Personnel wishing to pursue business interests outside of their employment contract with Crosslinks such as serving as a Director of another organisation working at other organisations which may be perceived or a real conflict, are required to obtain written approval from Crosslinks.

Crosslinks personnel involved in decision making processes who have an interest or who may be perceived as having an interest that may influence an objective decision-making process, must declare the potential conflict of interest and excuse themselves from the process.



Record Keeping and Financial Controls

Crosslinks requires honest, accurate and timely recording and reporting of information in order to make responsible business decisions. All Crosslinks personnel are required to assist in these processes. All Crosslinks taxation, claims, accounting, insurance, financial and legal matters must be documented and recorded accurately in a timely manner. Any identified information relating to personnel, finances, participants or third parties, which is not correct must be rectified immediately. Crosslinks is dedicated to collecting information in an efficient, value-adding manner which ensures compliance with legislation, regulatory bodies to ensure sound business decisions are made.

Crosslinks owns the Intellectual Property (IP) rights to anything personnel create or develop during their employment. Crosslinks is entitled to the exclusive benefit of the works created by personnel and may require that moral rights to those works be waived.

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Health and Safety

Crosslinks is committed to workplace wellbeing, health and safety. The priority is to ensure all personnel and participants regardless of where they work or what they do, return home safely and well at the end of every work day.

Successful Workplace wellbeing, health, and safety assured by:

- ✓ Personnel taking care of their own health and safety and that of co-workers, participants, suppliers and stakeholders;
- ✓ Reporting hazards, incidents or accidents and stopping or not commencing any work which appears to be unsafe;
- ✓ Wearing the specified footwear, clothing and personal protective equipment required for the job, without exception;
- ✓ Not coming to work under the influence of alcohol or illegal drugs or if you are generally unwell;
- ✓ Not smoking in or near any Crosslinks workplace and being at least 200 metres from Crosslinks signage and,
- ✓ Co-operate with all reasonable instruction to ensure that the highest possible WHS standards are maintained.

5. Accountabilities

The code content owner is accountable for;

- a) Implementing this code,
- b) personnel affected by this code are aware of the responsibilities as it relates to their role in the organisation;
- c) Ongoing compliance at induction and annually as an employee or if disciplinary outcomes requires further understanding in the Code. (as required),
- d) Remedial action is taken if there is a breach, and
- e) Monitoring the requirements of the code and the relevance to Crosslinks.

6. Review

The code is to be reviewed and evaluated by the Board at least once every year considering the purpose of the code and the outcome of any compliance reviews including breaches.

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7. Definitions and Terms

Add terms and definitions if required and must align to Crosslinks and the sectors language.

Defined Terms	Definition
Policy Approver	The Board is responsible for the approval of the Code of Conduct document content.
Review Period	The time between each appraisal of the relevant document. This is usually annually in line with the anniversary of the code being reviewed.
Content Owner	The People and Culture Manager has been deemed responsible for the development, review and content of this document.
Conflict of interest	A situation in which a person can derive personal benefit from actions or decisions made in their official or work capacity.
Due diligence	Describes the steps in a process that a reasonable person exercises to avoid harm to another person or to their property.
Duty of care	A legal obligation to always act in the best interest of individuals and others; not act or fail to act in a way that results in harm. act within your competence and not take on anything you do not believe you can safely do.
Human Rights	Human rights are fundamental rights and freedoms that are intrinsic to every person by virtue of their status as a human being.
The Convention on the Rights of Persons with Disabilities	Is a legally binding document ensuring that people with disabilities have access to the same rights and opportunities as people without disabilities.
Person-centred service delivery	Ensures that people with disability lead and direct the services and supports they use. (National Standards for Disability Services)
Restrictive Practice	Means any practice or intervention that has the effect of restricting the rights or freedom of movement of a person with disability.
Sexual misconduct	Is a broad term encompassing any unwelcome acts or behaviours that are experienced by the person with disability as being sexual in nature? This includes physical and verbal actions committed without consent or by force, intimidation, coercion or manipulation. It includes sexual violence and

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	exploitation but is not limited to actions which constitute a criminal offence.
Sharp practice	A range of practices involving unfair treatment or taking advantage of people, including over-servicing, high pressure sales and inducements. Some sharp practices may undermine the integrity of NDIS providers, workers and/or the NDIS sector. Although not necessarily unlawful, sharp practices are considered unethical, dishonest and not in the interests of the person with disability.

8. Further Information

If you have questions relating to this policy, please contact the relevant Executive or CEO.

9. Related Legislation, Regulatory Body or Related Document

Item	Definition
Legislation	<ul style="list-style-type: none"> • National Disability Insurance Scheme (Code of Conduct) Rules 2018, which are NDIS rules made under the National Disability Insurance Scheme Act 2013 (NDIS Act). • Occupational Safety and Health Act 1994 (WA), Occupational Safety and Health Regulations 1996 (WA) • Age Discrimination Act 2004 (Cth) • Disability Discrimination Act 1992 (Cth), Racial Discrimination Act 1975 (Cth), • Sex Discrimination Act 1984 (Cth), • Australian Human Rights Commission Act 1986 (Cth), and Equal Opportunity Act 1984 (WA). • SCHADS Award 2010 • National Employment Standards (NES) • Fair Work Act 2009 • National Standards for Disability Services • National Disability Insurance Scheme (Code of Conduct) Rules 2018 • Convention on the Rights of Persons with Disabilities
Regulatory Body	<ul style="list-style-type: none"> • NDIS Quality and Safeguards Commission • Fair Work Ombudsman
Related Documents	<ul style="list-style-type: none"> • People and Culture Policy • Risk and Compliance Policy

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	<ul style="list-style-type: none"> • Financial Management Policy • WHS Policy • Quality and Safeguarding Policy • Performance and Development Procedure • Bullying, Harassment and Discrimination Policy • Whistleblowing Policy • Risk Management Framework • Risk Management Appetite
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10. Approval History

Code of Conduct - Document Number POL001			
Role	Title	Name	Date
The Board	Chairperson	Vicki Caudwell	8 June 2020
The Board	Chairperson	Vicki Caudwell	22 June 2021
Version	Date	Amended by	Notes
1	April 2020	Suzanne Woods	Draft changes to include the NDIS standards and look and feel.
2	29 April 2020	Kate McBride	Comments and suggestions incorporated from GM - Operations by Suzanne Woods.
3	15 December 2020	Suzanne Woods	Update of legislation references and new policy.
4	28 May 2021	Suzanne Woods	Update to legislation and Logo. No other changes.
Review Period	Annually		
Next Review Date	June 2022		
Policy Resolution	22 June 2022		

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