

Code of Conduct Policy (New Zealand)

1. Purpose

The HOME in PLACE Group Code of Conduct Policy (the **Code**) which applies to all workers, directors, and members of governance committees and advisory panels of the HOME in PLACE Group is adopted in its entirety by HOME in PLACE (New Zealand) Limited (HOME in PLACE NZ). The Code as outlined in this Policy reflects the HOME in PLACE Group Code of Conduct with the following exceptions:

- References to HOME in PLACE policies have been amended to HOME in PLACE NZ Policies
- Legislation is added or amended to New Zealand legislation;
- References to NDIS legislation has been deleted or replaced for applicability to New Zealand; and
- References to NRAS legislation has been deleted or replaced for applicability to New Zealand.

The object of the Code is to provide a framework for conducting business and interacting with clients, customers, colleagues, stakeholders, and others which is to:

- act with the utmost integrity, honesty, transparency, and professionalism and be scrupulous in the proper use of HOME in PLACE Group information, funds, equipment and facilities; and
- exercise objectivity, fairness, equality, proper courtesy, consideration, and sensitivity in dealing with clients, colleagues, and other stakeholders; and
- identify and manage any conflicts of interest appropriately; and
- promote the safety and well-being of all children accessing its services and programs, to minimise the risk of abuse of children; and
- respect individual rights to freedom of expression, self-determination and decision-making to exercise choice and control over their own lives: and
- prevent and respond to all forms of violence against, and exploitation, neglect, and abuse of people with disability and vulnerable people.

All workers, directors, and members of governance committees and advisory panels of the HOME in PLACE Group are required to:

- represent the HOME in PLACE Group's 'best interests and value the HOME in PLACE Groups' reputation, the HOME in PLACE NZ Constitution expressly permits a director to act in the best interests of HOME in PLACE in accordance with S131(2) of the *Companies Act 1993* (NZ);
- demonstrate conduct and behaviour that reflects the HOME in PLACE Group's values honesty and integrity;
- to treat others with respect and value individual differences;
- use appropriate language which does not discriminate, upset or offend others;
- perform their duties with skill, care and diligence;
- maintain a safe working environment and report anything which could be unsafe;
- report any instance where the Code may be breached;
- to take all reasonable precautions to ensure a child safe environment is maintained and protect children from harms and abuses in performing their role for HOME in PLACE NZ;

- act to prevent violence, neglect, exploitation or abuse of vulnerable persons including children and people with a disability;
- respect and maintain privacy and confidentiality; and
- use any delegated authority in fair and equitable manner

The Code may apply when a worker, director, or member of a governance committee or advisory panel is performing duties or engaging in behaviour outside of the usual workplace location or their usual working hours for example whilst attending meetings and conferences or engaging with the community as a representative of the HOME in PLACE Group.

2. Scope

This Policy applies to HOME in PLACE (New Zealand) Limited (HOME in PLACE NZ) and its directors, Governance Committee and Advisory members and Employees (or Workers) engaged to carry out business activities on behalf of HOME in PLACE NZ.

3. Policy Statement

Guiding Principals

The interests of the HOME in PLACE Group

Each worker, director, or member of a governance committee or advisory panel has the ability, through their conduct and behaviour, to either enhance and maintain or harm and undermine the trusted and respected reputation of the HOME in PLACE Group.

The expectation is that each worker, director, or member of a governance committee or advisory panel:

- acts professionally and ethically;
- undertakes his or her duties with diligence and care;
- is accountable for the decisions he or she makes and the actions he or she takes;
- deals fairly and equitably with others;
- provides advice which is within the delegation of his or her role and for which he or she is authorised to provide;
- helps protect clients and other stakeholders against potential fraud, theft, discrimination, violence, exploitation, neglect and abuse including child abuse;
- never entertains clients or stakeholders or participates in activities or functions in a way which may damage HOME in PLACE NZ's reputation; and
- uses organisational equipment and systems of work appropriately, for their proper purpose and in accordance with the relevant policies and procedures.

Further, in providing supports or services to people with disability, each worker, director, or member of a governance committee or advisory panel must:

- act with respect for individual rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and conventions;

- respect the privacy of people with disability;
- provide supports and services in a safe and competent manner, with care and skill;
- act with integrity, honesty and transparency;
- promptly take steps to raise and act on concerns about matters that may impact the quality and safety of supports and services provided to people with disability;
- take all reasonable steps to prevent and respond to all forms of violence against, and exploitation, neglect and abuse of, people with disability;
- take all reasonable steps to prevent and respond to sexual misconduct.

For further information, please refer to the following HOME in PLACE Group or HOME in PLACE NZ documents:

- POL-003-02 Child Safeguarding Policy
- POL-003-03 People with Disability Safeguarding Policy
- POL-006-01 Social Media Policy
- POL-038 ICT Electronic Messaging Policy
- POL-039 ICT Mobile Device Policy
- POL-041 ICT Use Policy
- POL-8002 Delegations Policy

The key values – honesty and integrity

The values of the HOME in PLACE Group, as noted in the current HOME in PLACE Strategic Plan, underpin operations. It is recognised that the continued success of the HOME in PLACE Group depends on each worker, director, or member of a governance committee or advisory panel demonstrating the values of honesty and integrity and thereby:

- use HOME in PLACE NZ assets and funds (including corporate credit cards) for proper use in accordance with relevant policies and procedures;
- keep true and accurate records of all transactions (including receipts) which make use of HOME in PLACE NZ funds;
- never amend records with the intention of disguising, concealing or misrepresenting the true nature of the transaction or the involvement with a third party;
- ensure all transactions undertaken during your work are properly recorded;
- never assist a third party to break or evade the law;
- avoid any personal, financial, or other interest which may conflict with their employment and duties; and
- immediately report any suspicions of fraud, theft, or dishonesty.

For further information, please refer to the following HOME in PLACE documents:

Corporate Governance Policies including:

- POL-8047 Conflict of Interest Policy
- POL-8034 Whistleblower Policy
- POL-8013 Fraud and Corruption Policy

Organisational Management Policies including:

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- POL-8015 Petty Cash Policy
- POL-8011 Credit Card Policy
- POL-8010 Motor Vehicle Policy
- POL-8009 Corporate Asset Purchase and Procurement Policy
- POL-8002 Delegation of Authority Policy

Respect and Dignity

HOME in PLACE NZ values difference and supports the development of a diverse and inclusive workforce and governance practice where respect and dignity oversee all interactions.

Discrimination, bullying, harassment, or offensive behaviour of any kind will not be tolerated.

Each worker, director, or member of a governance committee or advisory panel agrees to:

- makes decisions that are based on merit, in accordance with policy, procedure and their delegated authority;
- treat colleagues, clients, customers, stakeholders and other parties with respect and empathy;
- support people with disability to make informed decisions to exercise choice and control over their lives;
- report criminal, inappropriate, or offensive behaviour, abuse of children and people with a disability; and
- respect and support fundamental human rights¹

For further information, please refer to the following HOME in PLACE documents:

- POL-003-02 Child Safeguarding Policy
- POL-003-03 People with Disability Safeguarding Policy
- POL-8021 Leave and Termination of Employment Policy
- POL-8016 Health and Safety at Work Policy
- POL-8002 Delegation of Authority Policy
- POL-028-14 Sexual Harassment Victimisation Policy

Conflicts of Interest

Acting honestly and with integrity requires each of us to manage conflicts of interest and avoid placing personal interests or the interests of another person before those of the HOME in PLACE Group, our clients or other stakeholders.

The perception of a conflict of interest can do as much damage to the reputation of the HOME in PLACE Group as an actual conflict of interest. All workers, directors, and members of a governance committee or advisory panel must be conscious of when and how a conflict may be perceived by others and take appropriate and immediate action to either avoid or address this risk.

¹ As set out in the [UN Universal Declaration of Human Rights](#).

Any interest which may constitute a conflict of interest must be promptly disclosed in accordance with the Conflict of Interest Policy and recorded in HOME in PLACE's online Incident, Risk, Compliance and Information platform.

For further information, please refer to the following HOME in PLACE documents:

- POL-8047 Conflict of Interest Policy
- POL-8002 Delegation of Authority Policy

Safety

All workers, directors, and members of a governance committee or advisory panel are:

- prohibited from possessing or consuming alcohol and/or illegal drugs in the workplace and are prohibited from working under the influence of illegal drugs or alcohol.
- expected to perform their duties within the guidelines of HOME in PLACE NZ Health and Safety at Work Policy and procedures that support health and safety at work and will do all that is reasonably practicable to ensure their safety and the safety of others.
- report any concern about neglect, exploitation, abuse or other concern for the safety or well-being of children and people with a disability;

For further information, please refer to the following HOME in PLACE documents:

- POL-003-02 Child Safeguarding Policy
- POL-003-03 People with Disability Safeguarding Policy
- POL-8016 Health and Safety at Work Policy
- POL-8017 Return to Work Policy

There are Additional Code of Conduct (Safeguarding of children) commitments which set specific clear behavioural guidelines and expectations for workers and Associates who work directly or indirectly with children, particularly in HOME in PLACE's international development programs. These additional commitments are clearly stated in Appendix I and is an integral part of the HOME in PLACE Code of Conduct Policy.

For further information, please refer to Annexure 1 - Additional Code of Conduct (Safeguarding of children) commitments.

Privacy and Confidentiality

All workers, directors, and members of a governance committee or advisory panel may come across private and confidential information relating to HOME in PLACE NZ, colleagues, clients, suppliers or third parties.

All workers, directors, and members of a governance committee or advisory panel must use any private or confidential information provided to them in line with the relevant Privacy and Confidentiality laws.

Misuse of confidential and private information can have severe commercial and reputational consequences for the HOME in PLACE Group and can also negatively impact those whose information is misused.

Each worker, director, and member of a governance committee or advisory panel must:

- ensure information is secure and not share private or confidential information with colleagues unless they need it to perform their duties and their delegation allows them access to this information;
- only release information to third parties if the client (or person affected by the release of the information) has agreed in writing to the information being release or if required under the law;
- follow privacy procedures and requirement to protect information whenever personal details are supplied over the phone, by email or fax;
- follow all IT protocols and procedures for the maintenance of passwords and user profile setup;
- collect, use store, handle, update and destroy information, particularly personally identifiable information, in line with applicable policies and processes;
- never disclose any information about the HOME in PLACE Group or any individual which is not already in the public domain without the proper authority to do so;
- never post inappropriate, false, or malicious comments or materials online relating to the HOME in PLACE Group.

For further information, please refer to the following HOME in PLACE documents:

- POL-006-01 Social Media Policy
- POL-041 ICT Use Policy
- POL-8019 Privacy Policy
- Privacy and Confidentiality Statement in HOME in PLACE NZ Employment Agreements

Standards of dress

All workers, directors, and members of a governance committee or advisory panel must dress in a manner that upholds the professional image of the HOME in PLACE Group and, where required, in an appropriate manner to ensure their work health and safety.

For further information, please refer to the following HOME in PLACE documents:

- POL-8022 Corporate Uniform and Dress Code Policy

How the HOME in PLACE Group ensures compliance with the Code

This Code sets the minimum expectations regarding the conduct and behaviour of each worker, director, and member of a governance committee or advisory panel with the understanding that no policy can cover every conceivable circumstance.

If a worker, director, and member of a governance committee or advisory panel has doubts about any aspect of this Code, including whether his or her conduct or the conduct of someone else is consistent with the Code, her or she may seek clarification from:

- a. their manager or a human resource representative if he or she is a worker of the HOME in PLACE Group; or
- b. the Company Secretary or the Chair of the Parent Board if her or she is a director, or member of a governance committee and advisory panel of the HOME in PLACE Group.

Breaches of the Code

All workers, directors, and members of a governance committee or advisory panel have a duty to observe the Code and ensure that no breaches occur. Any breach of the Code requires immediate attention. All workers, directors, and members of a governance committee or advisory panel have a duty to report known or suspected breaches of the Code.

A complaint or disclosure about an alleged breach of the Code should be in writing and contain details about the date, time and nature of the alleged breach and include any available support material. All reports are to be lodged via the Incident, Risk, Compliance, and Information platform using the Misconduct – HOME in PLACE Worker or Suspected Fraud category and reports will be treated sensitively and impartially. The principles of procedural fairness and natural justice will be observed in any action taken in relation to the complaint or disclosure.

The HOME in PLACE Group will protect any “whistle-blower” who reports a violation in good faith and on reasonable grounds and will comply with laws relating to “whistle-blower protection”.

The allegation should be made to:

- the worker’s manager or a human resource representative if he or she is a worker of the HOME in PLACE Group; or
- the Company Secretary or the Chair of the Parent Board if he or she is a director, or member of a governance committee and advisory panel of the HOME in PLACE Group.

The complainant will be informed of the procedure for and outcome of the investigation. All workers, directors, and members of a governance committee or advisory panel are provided access to EAP services free of charge.

Any worker, director, and member of a governance committee or advisory panel may at any time discuss a matter or seek advice on how to proceed with a matter from a human resources representative, any other senior executive, the Chair of the Parent Board or the Company Secretary

For further information, please refer to the following HOME in PLACE documents:

- POL-8013 Fraud and Corruption Policy
- POL-8021 Leave and Termination Policy
- POL-8034 Whistleblower Policy

How Does HOME in PLACE NZ Ensure the Code Remains Effective?

The Human Resources department is responsible for the ongoing review and development of the Code. On the commencement of employment, contractual service, or appointment and then annually thereafter, each worker, director, and member of a governance committee or advisory panel must review the Code and declare that they:

- understand the principles of the Code;
- have complied with the principles of the Code in the previous 12 months; and

- agree to continue to comply with them.

It is a requirement that any breach of the Code will be recorded and reported in line with HOME in PLACE NZ policies and procedures.

Declaration

I have read, understood, and will comply with HOME in PLACE NZ and HOME in PLACE Group Code of Conduct Policy.

Signed: _____ Date: _____

Print Name: _____ Position: _____

Annexure 1 - Additional Code of Conduct (Safeguarding of children) commitments

ACFID Code 1.4.2 – Safeguarding of Children in Code of Conduct

Introduction

Worker members and associates are responsible for maintaining a professional role with children, which means establishing and maintaining clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship would have to commit themselves to the Additional code of Conduct commitments, guidelines, and expectations.

All workers should conduct themselves in a manner that is consistent with the values of relevant government agencies and in their role as Home in Place NZ representative and a positive role model to children. Home in Place NZ has developed this Child Protection Code of Conduct (Safeguarding of Children) to protect children, workers, and the organisation by providing clear behavioural guidelines and expectations, in the following areas:

General

- Conduct myself in a manner that is consistent with the values of Home in Place NZ
- Provide a welcoming, inclusive, and safe environment for all children and young people.
- Respect all children and treat them equally regardless of gender, race, religious or political beliefs, age, physical or mental health, sexual orientation, family and social background and culture, economic status, or criminal background.

Appropriate communication and language

- Encourage open communication between all children, young people, parents, worker, and volunteers and have children and young people participate in the decisions that affect them.
- Will not use inappropriate, offensive, or discriminatory language when speaking with a child or young person.

Banning Alcohol and drugs

- Implement an alcohol and drug free program by banning of Alcohol and drug use in the program.
- Ensure that no children have access to supply of alcohol and drugs.

Gifts to Children

- Will not give any gifts to children with an intention to seek physical, relational, and emotional and sexual favours.
- Will not receive any gifts from children on any occasions or season; or for any reasons.

Physical contact with Children

- establishing and maintaining clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship.

- Will not do things of a personal nature that a child can do for him/herself, such as assistance with toileting or changing clothes.
- Will not smack, hit, or physically assault children.
- Take responsibility for ensuring that I am accountable and do not place myself in positions where there is a risk of allegations being made.
- Will not hold, kiss, cuddle or touch a child in an inappropriate, unnecessary, or culturally insensitive way.
- Will not seek to make contact and spend time with any child or young person outside the program times.

Sexual relationships with Children

- Will not develop relationships with children that may be deemed exploitative or abusive.
- Engage in behaviour that is intended to shame, humiliate, belittle, degrade, or exploit children.
- Will not behave provocatively or inappropriately with a child.
- Self-assess my behaviours, actions, language, and relationships with children.
- Will not take children to my home/hotel or other private location or sleep in the same room or bed as a child.
- Will not involve children in sexual relationships.

Child Labour

- Will not engage in behaviour that is intended to shame, humiliate, belittle, degrade or exploit children.
- Develop relationships with children that may be deemed exploitative or abusive.
- Will not Hire minors as domestic labour.

Photos and Images

- Will always portray children in a respectful, appropriate, and consensual way.
- Will not use photograph, video, or interview a child without the informed and documented consent of the child and his/her parents or guardians.
- Will not use Home in Place NZ's computers, mobile phones, video, and digital cameras inappropriately, nor use them for the purpose of exploiting or harassing children.
- A child should always be portrayed in a dignified and respectful manner and not in a vulnerable or submissive manner.
- Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Informed consent must always be sought and documented for the use of a child's story or image. When asking for consent, details should be given as to how, where and for how long the story, information and /or image will be used. We will provide examples of how the story/information and/or image will be used. We will explain how we cannot control the use of images once they are loaded onto the internet and that they can be viewed by anyone with internet access at any time.
- There should be no identifying information of the child used in the publication of images. This includes the child's family name, community, or school name.
- Children should not be portrayed in isolation; instead, they should be portrayed as part of their community.
- Local cultural traditions should be assessed regarding restrictions for reproducing personal images.

- Images should be an honest representation of the context and the facts.
- When sending images electronically, file labels should not reveal identifying information.
- All photographers will be screened for their suitability, including police checks where appropriate.
- A risk assessment (with the child and their family) will be undertaken prior to the publishing of any information/story about an especially vulnerable child.
- A story about an especially vulnerable child will not show their face or any other identifying factors.
- Children should not be portrayed as weak, isolated, and vulnerable. Images of children should portray them as resilient human beings and as partners in the development process.
- All images and information about children will be stored safely and will only be accessed by Home in Place NZ.
- Considers the abuse and exploitation of children to be completely unacceptable. We will take all concerns and reports of child abuse seriously and act on these reports immediately.

Reporting responsibilities

- Report any concerns of child abuse or breach of the Child Safeguarding Policy or this Code of Conduct
- Comply with all relevant national and international child protection legislation.
- Consult with the Child Protection Advisor /Focal Point or other relevant worker if I have any questions regarding child protection and how it relates to my work/relationship with Home in Place NZ.
- It is mandatory for all Home in Place NZ personnel and associates to report any witnessed, suspected, or alleged incidents of child abuse or any breach of the Child Safeguarding Policy and and/ or Home in Place NZ Code of Conduct.
- These concerns may relate to a child, or a worker member involved in the organisation or a concern about a child or person/s outside of the organisation's programs. If you do have a concern, you should immediately follow Home in Place NZ's child abuse reporting procedures.
- All (AGENCY) worker and associates including people in the community and partner organisations.
- Any disclosure, concern or allegation from a child, community member, worker or associate regarding the safety, abuse, or exploitation of a child (this includes actual, suspected, or risk of abuse or harm to a child)
- Any observation or concerning behaviour exhibited by a Home in Place NZ worker, volunteer, or other associate that breaches Home in Place NZ Child Safeguard Policy and the Code of Conduct.

4. Definitions and Acronyms Glossary

For clarification of any definitions or acronyms contained within this document, please click on the [Glossary](#) for information.

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