

Code of Conduct Policy



1. Purpose

The purpose of this policy is to detail the responsibilities of Southern Cross Care (Tasmania) Inc. (SCC) and its employees in relation to this Code of Conduct. In addition, as an approved provider of aged care and disability services, SCC has responsibilities under the Aged Care Act 2024 (the Aged Care Act) and National Disability Insurance Scheme Act 2013 (the NDIS Act) to take reasonable steps to ensure that aged care workers and key personnel comply with their respective Codes of Conduct.

Code of Conduct and the Strengthened Aged Care Standards

Standard	Outcomes
1: The Person	1.0 Supports Person Centered Care
2: The Organisation	2.0 Supports the foundation of worker expectations and behaviour across the whole standard
3: The Care and Services	3.0 Provides a foundation for Care and Services for all workers
4: The Environment	
5: Clinical Care	5.0 Provides a foundation for Clinical Care for all workers
6: Food and Nutrition	
7: The Residential Community	

2. Scope

This policy applies to employees' conduct while at work, and when employees are representing SCC, or attending an SCC event at any time.

This policy also applies to all Volunteers and Contractors and their employees while undertaking authorised work for SCC.

This policy also applies to all workers (employees, contractors and volunteers) where actions or behaviours are performed outside of SCC authorised work, work sites or agreed work time, and that connect the worker to SCC.

For clarity, this Code of Conduct does not apply to:

- Individuals in care, their family, friends or visitors.
- Allied health professionals, visiting medical practitioners and pharmacists who are contracted by an Individual – not by the provider.
- Tradespeople delivering a one-off maintenance task.

The Code of Conduct intersects with other regulatory agencies. These include:

- The NDIS Quality and Safeguards Commission
- Services Australia
- State Coroner
- AHPRA
- Australian Competition and Individual Commission (ACCC)
- Police
- Aged Care Quality and Safety Commission (including SIRS reporting)

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The Code of Conduct ensures safe, respectful and quality care for older Australians.

3. Definitions

Term	Definition
ACQSC	Aged Care Quality and Safety Commission
Aged Care Worker	As defined in the Code of Conduct for Aged Care, a worker means those who are employed or otherwise engaged (including on a voluntary basis) by the provider and/or those who are employed or otherwise engaged (including on a voluntary basis) by a contractor or subcontractor of the provider to provide care or other services to individuals.
Approved Provider	An entity that provides residential, home care and flexible services. SCC is an approved provider as defined by the Code.
SCC Code of Conduct, the Code	Outlines the standards of conduct expected of people working for or undertaking work on behalf of SCC.
Conduct	Behaviour – revealing itself in actions, responses, words, gestures, or choices.
Confidential Information	Information, knowledge, or communication that is intended to be private including but not limited to: commercially sensitive information, intellectual property and trade secrets, IT systems, business plans, financial information, software, manuals and client information.
Conflict of Interest	A situation in which an SCC employee has a personal, private or commercial interest that is sufficient to appear or be perceived to influence, or does influence, their objectivity in the performance of their duties or a situation in which an opportunity exists for an employee to use their professional capacity to benefit their or others interests.
Contractor	An individual or entity (and their workers) that provide professional services or expertise on a fee for service basis and whom undertake work for more than one client at a time.
Fraudulent Activity	Dishonestly obtaining a benefit or causing a loss by deception or other means.
Governing Persons	As defined by the Code of Conduct for Aged Care –those key personnel who are a member of the group of persons who are responsible for the executive decisions of SCC or any other person who has authority or

	responsibility for, or significant influence over, planning, directing or controlling the activities of SCC.
Inappropriate Behaviour	Inappropriate behaviour is the collective term used in this policy for workplace bullying, harassment, sexual harassment, discrimination, vilification, violence and victimisation. May also be referred to as inappropriate conduct or misconduct.
Intellectual Property	Intellectual property (IP) is the property of your mind or proprietary knowledge. It is a productive new idea you create. This can be an invention, trademark, design, brand or even the application of your idea.
NDIS	National Disability Insurance Scheme – a scheme of the Australian Government, legislated in 2013 that funds costs associated with disability to enable improved quality of life and community connection.
SCC	Southern Cross Care (Tasmania) Inc.
SCC IT Resources	Refers to SCC IT equipment, IT network, hardware, software and any device issued or owned by SCC.
SCC Property	Property owned or managed by SCC, including all intellectual property, IT resources, facilities, assets, office equipment, documents, manuals, reports processes and improvements made by SCC employees whilst they are employed by SCC.
Worker	Any person who carries out work for SCC. This can be: ▪ An employee ▪ A contractor, their employees or subcontractors (including consultants) ▪ An apprentice or trainee ▪ A labour hire worker ▪ A volunteer

4. Policy Statement

At SCC we are committed to keeping people at the centre of everything we do. Our strong tradition of community support remains a cornerstone of our identity. We recognise that our success and sustainability are intrinsically linked to the communities we serve.

Our people bring our shared purpose to life, grounded in our founding values of **Integrity**, **Compassion**, and **Respect**. This shapes how we work together across all areas of our organisation.

Every team member is accountable for upholding our values and delivering on our commitments

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with professionalism and care. We are committed to the highest standards of ethical conduct and expect all workers to act in accordance with our Code of Conduct, and the expectations of both the community and the law.

Together, we create a culture and provide services focused on high-quality care, where people feel safe, valued, and supported.

4.1 Additional Code of Conduct obligations:

4.1.1 Aged Care Quality and Safety Commission

The Aged Care Quality and Safety Commission (ACQSC) administers a [Code of Conduct for Aged Care](#) which also applies to all SCC aged care workers and governing persons. In addition, the Statement of Rights is a requirement for all aged care workers.

The ACQSC Code does not provide an exhaustive list of all the behaviours that demonstrate high-quality care. Instead, the ACQSC Code presents a broad framework of conduct that SCC and their aged care workers and governing persons have a responsibility to uphold.

4.1.2 National Disability Insurance Scheme

The National Disability Insurance Scheme (NDIS) [Code of Conduct](#) promotes safe and ethical service delivery by ensuring a set of expectations and conduct are met and applies to all persons providing care or services to a registered NDIS recipient.

4.2 SCC Values

4.2.1 Compassion

- We respond willingly and positively to help meet the needs of those around us.
- We promote a sense of belonging and community.
- We demonstrate and foster empathy, and sensitivity towards residents, clients, their families, our colleagues and the whole community.

4.2.2 Integrity

- We look for the good in all people and recognise the contribution of each individual as we work together.
- We demonstrate honesty and trustworthiness in all that we do.
- We are conscientious and ethical in our decision-making and take responsibility for our own actions.

4.2.3 Respect

- We believe in the sanctity of life and that each life is unique and has special individual worth and dignity.
- We recognise and respect individuality and diversity.
- We treat all people with courtesy and respect regardless of gender, ethnic background, religious belief or economic circumstances.
- We manage our resources wisely to minimise the impact on the environment.

5. Procedure / Link to Procedure(s)

5.1 Our Behaviour – Our Responsibility

At SCC, every worker—whether employee, volunteer, or contractor—is responsible for their own

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conduct and for performing their duties in alignment with our legislative obligations, policies, values, and shared purpose. Our values guide how we behave, interact with others, make decisions, and remain true to our commitments.

All workers must act with respect, integrity and professionalism, avoiding behaviour that could compromise our standards of care, or impact on others negatively, or impact on the reputation of SCC.

In addition to the SCC Code of Conduct (which includes the Aged Care and NDIS codes), all workers must be guided by the Aged Care Act 2024, and uphold the Statement of Rights, and the Strengthened Aged Care Standards.

By upholding the expected behaviours, we foster a person-centred, safe, respectful, and values-driven environment where everyone can contribute meaningfully to our purpose of honouring and enriching the lives of those in our community through high-quality care.

5.1.1 Inappropriate and/or unlawful workplace behaviour: inclusive of but not limited to the following: abuse, neglect, bullying, harassment, discrimination, victimisation and sexual harassment.

SCC's values and beliefs promote cultural safety, inclusion and belonging and support the Statement of Rights and person-centred care. This means we seek to understand and collaborate and build partnerships with those we are entrusted to care for, and with our colleagues. We take the time to explore the differences between ideas and aspirations, and that the needs of people are considered, and respected and valued as we provide services and in our workplaces.

Abuse, neglect, bullying, harassment, discrimination, victimisation and other forms of inappropriate behaviour are all unacceptable and will not be tolerated under any circumstances. These behaviours are inconsistent with our purpose, values and our commitment to the Statement of Rights and the Strengthened Aged Care Standards.

All workers have a shared obligation to create and maintain a compassionate, kind, productive, and respectful work environment that is central to our purpose of honouring and enriching the lives of people in our community.

5.1.2 Banning orders: A banning order is a form of enforcement action available to the Commission which prohibits or restricts a person from engaging in, providing or being involved in the provision of aged care. This order may ban a person permanently or for a specified period. Banning orders are considered the Commission's most serious enforcement action in relation to individuals and will therefore only be appropriate for the most serious cases of poor conduct of an individual. The Commission may make a banning order in relation to current and former aged care workers and governing persons if, for example:

- The Commission reasonably believes that the person did not comply, is not complying or is unlikely to comply with the Code.
- The Commission reasonably believes that the person is not suitable to be involved in the provision of aged care (or certain types of aged care), or to engage in certain activities as an aged care worker or as a governing person.
- The Commission reasonably believes there is an immediate or severe risk to the safety,

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health or wellbeing of one or more Individuals if the person is involved in the provision of aged care (or certain types of aged care), or engaged in certain activities as an aged care worker or a governing person.

- The person has at any time been convicted of an indictable offence involving fraud or dishonesty.

SCC is committed to the Code of Conduct for Aged Care and monitors and enforces this Code of Conduct for Aged Care at all times.

5.2 Compliance with the Code, Law, and SCC Policies

SCC expects all workers to carry out their duties in accordance with relevant laws, regulations, policies, and the SCC Code of Conduct (including the Aged Care Code of Conduct and the NDIS Code of Conduct). While we trust our people to act with integrity, kindness, and respect, we also recognise that challenges can arise.

In the event that a worker is charged with a criminal offence—regardless of the court outcome—that is punishable by imprisonment or could reasonably impact their ability to perform their role, they are required to inform their manager. This ensures transparency and supports our commitment to providing high quality care and maintaining a safe, ethical, and values-driven workplace.

By upholding these standards, we continue to foster trust and accountability across our services and all areas of our organisation.

5.3 Workplace Health and Safety

At SCC, the safety of those in our care, their families, and our employees is a fundamental responsibility we all share.

Every worker is accountable for their own safety and for ensuring their actions do not place individuals in care or others at risk. It is an obligation under the Strengthened Aged Care Standards, the Statement of Rights, the SCC Code of Conduct (including the Aged Care Code of Conduct and the NDIS Code of Conduct), and the Aged Care Rules that we provide **safe** and high-quality aged care services. We expect all employees to behave safely at all times, follow reasonable directions and comply with our Work Health and Safety policies, procedures, and practices.

This includes being alert to and promptly reporting any incidents, near misses, hazards, risks or concerns to their manager as soon as practicable. By doing so, we uphold our commitment to a safe, respectful environment for everyone.

5.4 Conflict of Interest

At SCC, our values guide how we respond when conflicts of interest arise. We expect all workers to understand and act appropriately in such situations, ensuring their decisions and actions remain fair, transparent, and aligned with our shared purpose and do not compromise our standard of care or services.

A conflict of interest—whether actual, potential, or perceived—can occur when personal, family, or private interests may interfere with, influence, or appear to influence a worker's ability to perform their duties impartially and/or interfere with the best interests of SCC and those we care

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for or engage with, such as job applicants.

Conflicts of interest also arise with professional boundaries and providing care for individuals. All workers must remain vigilant to undertake their work in accordance with the rights of the individual, by upholding the Statement of Rights, the Strengthened Aged Care Standards, and the respective Codes of Conduct.

All workers are required to actively identify, disclose, and work with their manager to manage any conflicts of interest using the Conflict of Interest Declaration Form. Any real or perceived conflicts must be reported as early as possible—whether prior to commencing with SCC or during the course of their work.

By addressing conflicts openly and responsibly, we uphold the trust placed in us and maintain the integrity of our care and services.

5.5 Confidentiality – Information Privacy

At SCC, we are entrusted with confidential information about members of our community and vulnerable people, workers, our organisation and stakeholders.

In the course of duties, workers may be required to access sensitive information and are responsible for protecting it from loss, theft, or unauthorised use. Any misuse—whether intentional, accidental, or careless—can compromise the wellbeing of individuals and the reputation of SCC.

Confidential information must only be used or shared when required to perform one's role, or when explicitly authorised by a manager. This obligation to maintain confidentiality is a condition of employment (or contract) and continues even after a worker leaves SCC. By safeguarding privacy, we honour the trust placed in us by older people and their families and uphold the values that define our care and service.

5.6 Use of Resources

SCC provides workers with access to resources to support the delivery of high-quality care and services. These resources, including property, equipment, and information, must be used responsibly and solely for the benefit of SCC.

All workers are accountable for protecting SCC resources under their control and must not engage in theft, misuse, or misappropriation of any assets, including cash, IT systems, intellectual property, or confidential information. Assisting others in such actions is also strictly prohibited.

SCC is committed to safeguarding its people, assets, and services from any activity—intentional or otherwise—that may cause harm. Workers are expected to use SCC's IT resources ethically, legally, and in a manner that supports the delivery of high-quality care.

All SCC IT systems, including devices, software, networks, and storage, are the property of SCC and are to be used for business purposes in service of our mission and community.

5.7 Gifts, Entertainment and Hospitality

At SCC, we deeply appreciate the gratitude shown by individuals, families, and our community when our people deliver exceptional care and service. However, we must remain mindful of how gifts, entertainment, or hospitality may be perceived.

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To maintain transparency and uphold our values workers must not seek, accept, offer, or provide gifts or hospitality unless clearly aligned with legitimate business practices. Such gestures may unintentionally create perceptions of preferential treatment or obligation.

All offers of gifts, entertainment, or hospitality must be politely declined and reported to the relevant manager or contract supervisor. This ensures we continue to act ethically and maintain the trust placed in us by those we serve.

5.8 Communications including social media

SCC recognises that many workers use a variety of communication tools in their daily lives. However, to protect our people, services, and reputation, all communications about SCC, particularly with the media or on social media, must be carefully managed and only undertaken by those authorised to speak on behalf of the organisation.

Only the CEO is permitted to communicate with the media. All other workers must refrain from making public comments about SCC's operations, residents, or employees, including on social media.

All communications must align with SCC's approved standards, as outlined in our Communications, Media, and Social Media Policies. Workers should pay particular attention to guidelines around personal use of social media to ensure their conduct reflects our values, beliefs and purpose of honouring and enriching lives in our community.

6. Breach of Code of Conduct

SCC is committed to supporting all workers to understand and comply with the respective Codes of Conduct. We do this by:

- Clearly outlining the responsibilities associated with the respective Codes of Conduct
- Providing insight into its key elements and their significance
- Offering examples of expected behaviours and standards of conduct
- Building awareness of the roles of the Aged Care Quality and Safety Commission (ACQSC) and the NDIS Commission

All SCC workers are expected to uphold the requirements of the SCC Code of Conduct. Failure to do so may result in disciplinary action, up to and including termination of employment.

For aged care workers and responsible persons who have additional obligations to the Aged Care and NDIS Codes of Conduct, it's important to note that the ACQSC and NDIS Commission have legislative authority to take compliance and enforcement actions against individuals and providers, which may include banning orders.

By understanding and living the Code, we continue to provide high quality care for those we are entrusted to serve, and build a culture of integrity, safety, compassion and respect across all areas of our organisation.

7. Reporting a Breach of the Code of Conduct

SCC is committed to fostering a culture where workers feel safe and supported in raising concerns about complying with the codes, misconduct, or illegal activity. We encourage all concerns to be raised in good faith, without fear of victimisation.

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There are both informal and formal pathways for reporting a suspected breach. In most cases, concerns should first be raised informally with a manager or contract supervisor. If the concern involves that person, it should be escalated to the next most senior manager.

Further guidance on how to raise and manage suspected breaches is outlined in the SCC Worker Complaints and Grievance Policy, which supports our values and beliefs and ensures all concerns are handled fairly and appropriately.

8. Roles and Responsibilities

8.1 Governance and Leadership Responsibilities

As the leaders of the organisation, the Board and responsible persons play a central role in directing and controlling the executive decisions and activities of the organisation. This includes ensuring the organisation's systems, practices and culture support compliance with the SCC Code of Conduct. Responsible persons are responsible for regular reporting on breaches of the SCC Code of Conduct.

Responsible persons must ensure:

- Workers read, understand and acknowledge the SCC Code of Conduct.
- Workers undergo regular training and professional development that helps staff understand, apply and uphold the behaviours expected under the SCC Code of Conduct (including the Aged Care and NDIS Codes of Conduct).
- They support staff to resolve issues where concerns are identified about compliance with the SCC Code of Conduct (including the Aged Care and NDIS Codes of Conduct).
- They monitor the Banning order register and act accordingly.
- That organisational systems, processes and practices support behaviour consistent with the code.
- They act on reports of behaviour inconsistent with the code.

8.2 Workers Responsibilities

All SCC workers, have a responsibility to undertake their duties consistently with the SCC Code of Conduct and, for employees classified as aged care workers, this includes the Aged Care Code of Conduct and the NDIS Code of Conduct.

Aged care workers have a direct role in the delivery of care and services and their conduct and behaviour also reflects on SCC and its compliance with the Aged Care and NDIS Codes of Conduct.

Aged care workers are required to:

- Read and understand the Code and relevant guidance including the Code of Conduct for Aged Care – Guidance for aged care workers and governing persons .
- Undergo regular training and professional development that helps them understand, apply and uphold the behaviours expected under the Code.
- Understand the consequences of failing to comply with the Code for Southern Cross Care (Tasmania) and for them as individuals.
- Work and be competent within their job description and scope of practice, where applicable.
- Seek guidance from managers to clarify the applicable Codes of Conduct when unsure.
- Understand the difference between appropriate and inappropriate conduct.
- Report any behaviours inconsistent with any of the Codes of Conduct applicable to the

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- workplace to their supervisor, General Manager or the Executive Leadership Team (ELT).
- Are supported to resolve issues where concerns are identified with their compliance with the Code (for example, through training, guidance and supervision to build skills and capability).

Volunteers and contractors are responsible for complying with the SCC Code of Conduct, including the Aged Care and NDIS Codes of Conduct as they are classified as aged care workers and may be subject to orders for non-compliance.

8.3 Others

The ACQSC is responsible for overseeing compliance with its Code.

The NDIS Commission has responsibility for overseeing the compliance of NDIS providers and workers with the NDIS Code of Conduct when delivering supports and services in the NDIS sector.

9. Supporting documents and References

9.1 Government legislation:

Aged Care Act 2024
Age Discrimination Act 2004 (Cth)
Anti-Discrimination Act 1998 (Tas)
Criminal Code 1924 (Tas)
Disability Discrimination Act 1992 (Cth)
Fair Work Act 2009 (Cth)
Human Rights and Equal Opportunity Commission Act 1986 (Cth)
Public Interest Disclosure Act 2002 (Tas)
Racial Discrimination Act 1975 (Cth)
Racial Hatred Act 1995 (Cth)
Sex Discrimination Act 1984 (Cth)
Statement of Rights
Statement of Principles
Strengthened Aged Care Quality Standards
Workplace Gender Equality Act 2012 (Cth)
Workplace Health & Safety Act 2012 (Tas)
Aged Care Quality and Safety Commission (2025) Aged Care Quality Standards and Guidance materials
Aged Care Amendment (Implementing Care Reform) Act 2022
Aged Care and Other Legislation Amendment (Royal Commission Response No.1) Act 2021
Aged Care and Other Legislation Amendment (Royal Commission Response) Act 2022
The National Disability Insurance Scheme Act 2013

9.2 SCC documents:

Advocacy Policy
Choice and Independence Includes Dignity of Risk, Managing Resident/Client Risk Policy
Code of Conduct Policy
Conflict of Interest Policy
Consumer Care Risks Policy
Consumer Wellbeing Policy
Home and Community Services

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Counselling and Disciplinary Policy
Customer Service Policy
Diversity and Inclusion Policy
Dignity and Respect Policy
Elder Abuse and Neglect Policy
Employee guidebook
Feedback and Complaints Management Policy
Incident management Policy
Managing Performance Policy
Minimising Restrictive Practices Policy
Mission Statement
Open Disclosure Policy
Onboarding and Probation Policy
Regulatory Compliance Policy
Reportable Incidents NDIS Consumers Policy
Reporting Framework Policy
Serious Incident Response Scheme (SIRS) Policy
Supporting Consumer Relationships Policy
Whistleblower Policy
Worker Safety Screening Policy
Worker Complaint and Grievance Policy
Workplace Behaviour Policy

9.3 Other:

[Code of Conduct for Aged Care: Guidance for aged care workers and governing persons](#)
[The NDIS Code of Conduct: Guidance for service providers and Guidance for Workers](#)
[Aged Care Quality Standards](#)
[Aged Care Strengthened Quality Standards](#)
[Code of Conduct for Nurses \(Aphra\)](#)

9.4 Policy Review and Implementation

This policy is to be reviewed by the CPO. This policy is to be reviewed at least every 2 years or when changes are necessary in line with Continuous Improvement or Legislative Changes. This policy is effective as of the issue date.