

# Compliance: Probity

<b>Policy No.</b>	C-4		
<b>Version No.</b>	3	<b>Date:</b>	July 2017
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<b>Review date</b>	July 2020		
<b>Related policies and documents</b>	Gifts policy		

## Scope

This policy applies to all staff, applicants, tenants and contractors of Amélie Housing.

## Policy Statement

It is the policy of Amélie Housing to:

- Make every effort to be fully aware of the way the law may affect the actions and decisions made on behalf of the organisation
- Ensure that the National of Community Housing is notified of any incidents that may damage the reputation of the social housing sector
- Make a commitment to social justice to ensure equity, access, participation and the human rights of all people seeking its services
- Meet the Australian Privacy Principles and all other legal obligations
- Provide a professional, client focussed service at all times

## Compliance

This policy assists Amélie Housing to comply with:

Compliance Document	Section/Number	Area
National Regulatory Framework	4b	Governance
	5a	Probity
National Community Housing Standards	7.2	Staff management and development
	5.2	Good governance
	5.3	Information management systems

## Code of Conduct

The Code of Conduct will provide all staff, volunteers and Directors with the organisation required standards for ethical, non-discriminatory and professional behaviour.

Following the code of conduct is necessary to facilitate successful outcomes and maintain and uphold the reputation of the organisation. This approach helps ensure quality in all aspects of Amélie Housing's operations. All existing and new members of staff, volunteers and Directors are required to sign the Code of Conduct prior to commencement with the organisation.

The staff, volunteers and Directors of Amélie Housing are committed to:

- Providing affordable, accessible, secure and appropriate housing, based on available information about actual and potential tenants' needs and preferences
- Ensuring fair, non-discriminatory and transparent behaviour in all dealings with each other, tenants and members of the community
- Maximising access to services
- Removing barriers to services
- Enabling sustainable tenancies
- Fulfilling duties and responsibilities in a professional, competent and consistent manner
- Ensuring confidentiality and compliance with the National Privacy Laws
- Operating with the highest level of probity
- Avoiding conflicts of interest, and reporting any potential conflict of interest when and if it arises
- Being accountable for their actions
- Reporting corrupt or unethical behaviour
- Ensuring that all tenants, applicants, members of the community, service providers, government representatives and associates are treated with courtesy, respect and equity and in a responsive and sensitive manner

- Working within the organisation's agreed policies and procedures to achieve and exceed sector standards
- Balancing the organisation's social justice and commercial responsibilities in the conduct of all aspects of the business
- Ensuring that the organisation's actions, decisions, policies and procedures are transparent, open accessible to tenants and key stakeholders
- Working productively with other agencies and individuals within the community, to ensure the effective co-ordination of housing services and support to sustain tenancies
- Treating colleagues with respect and honesty
- Acting with respect for the diversity of Australian society, with regard for any group within our community that have traditionally experienced disadvantage, discrimination or marginalisation.

## Conflicts of interest

Amélie Housing will require staff and Directors to declare all known matters where there is, or may be perceived to be, a conflict of interest. A conflict of interest register is kept for this purpose.

During meetings of the Board, where a Director becomes aware of a new conflict of interest not previously declared this will be declared and recorded in the Minutes.

Where decisions and discussions relate to such matters, staff and Directors will absent themselves from the discussion and any decision taken. Conflicts of interest may relate to any project, service delivery, staff matter, use of funds or use of assets belonging to the organisation. Common areas include:

- Financial interest in a business from which Amélie Housing buys goods
- Staff member is present when staff conditions or working conditions are discussed at the meeting
- Recruitment panel member has a family member or close friend applying for the position
- Relative of a Director is offered employment by the organisation
- Directors sit on more than one board.

## Gifts

To avoid perceived conflicts of interest or allegations of corruption, the staff, volunteers and Directors of Amélie Housing will not solicit or accept gifts, bribes, hospitality, benefits, service or favours.

In certain circumstances declining a gift of nominal value may cause unnecessary offence. Gifts of nominal value may be accepted but only if declared and approved by the senior staff member or Board. Approved gifts will be recorded in the gift register and shared with staff, volunteers and Directors.

## Fraud and corruption

Amélie Housing is entrusted by Government, the community and its tenants to manage its services and assets prudently and fairly. As such every Director, staff member and volunteer have a responsibility to guard against fraud and corruption.

Fraud is any deliberate or premeditated act which involves using deception to gain advantage from a position of trust and authority.

Examples may include:

- Accepting bribes or favours to gain access to housing, alternative housing or better housing
- Accepting bribes or favours to buy or lease certain properties
- Misappropriation of tenant rents or charges
- Unauthorised use of organisational assets
- Stealing organisational assets
- Falsifying time sheets or expenses
- Conspiring with others to get a tender
- Running a private business in working hours
- Sending false or duplicate invoices
- Sending invoices for work not done or not completed

To minimise the risk of fraud, Amélie Housing will:

- Develop and implement clear guidelines on managing conflicts of interest
- Ensure that all staff members, volunteers and Directors read, understand and sign the Code of Conduct
- Develop and implement clear guidelines on donations and gifts
- Undertake a fraud risk assessment annually.