

# Compliance: Probity

<b>Policy No.</b>	C-4		
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<b>Review date</b>	July 2024		
<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
- Commit 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-focused service at all times

## Compliance

This policy assists Amélie Housing in complying 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 organisation's reputation. This approach helps ensure quality in all aspects of Amélie Housing's operations. All existing and new members of staff, volunteers and Directors must sign the Code of Conduct before 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 and openly 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
- We are acting with respect for the diversity of Australian society, with regard for any group within our community that has 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 related 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 assets belonging to the organisation. Common areas include:

- Financial interest in a business from which Amélie Housing buys goods
- A staff member is present when staff conditions or working conditions are discussed at the meeting
- A recruitment panel member has a family member or close friend applying for the position
- The organisation offers the relative of a Director employment
- 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 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

The government and the community entrust Amélie Housing and its tenants to manage its services and assets prudently and reasonably. As such, every Director, staff member and volunteer is responsible for guarding against fraud and corruption.

Fraud is any deliberate or premeditated act involving 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 during 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.