



CODE OF CONDUCT POLICY

Date approved:	13 Aug 2019	Date Policy will take effect:	14 Aug 2019	Date of Next Review:	Aug 2022
Approved by:	Pulse Board of Directors				
Custodian title & e-mail address:	Shannan Human, Manager – People and Culture shannan@uow.edu.au				
Responsible Unit:	People and Culture				
Supporting documents, procedures & forms of this policy:	Bullying Prevention Policy Cash Receipting and Banking Policy Conflict of Interest Policy Corporate Credit Card Policy Delegation Policy Disability Policy Drug and Alcohol Policy EEO Anti-Discrimination Policy Fraud and Corruption Prevention Policy Grievance Policy IT Policy Performance Management Policy Privacy/Confidentiality Policy Records Management Policy Respect for Diversity Policy Secondary Employment Policy Sexual Harrassment Prevention Policy Smoke Free Workplace Policy Strategic Plan 2018-2021 Privacy Policy UOW Code of Conduct Work Health Safety Policy Whistleblower Protocols (Corporate Governance Manual)				
References & Legislation:	Anti-Discrimination Act 1977 Australian Securities and Investments Commission Act 2001 Corporations Act 2001 Crimes Act 1900				



	Independent Commission Against Corruption Act 1988 Privacy and Personal Information Protection Act 1998 Protected Disclosures Act 1994 Working with Children Check (NSW Government Website)
Audience:	Internal – Pulse employees only
Expiry Date of Policy:	In place until reviewed

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1 Purpose of Policy

1. The purpose of this document is to set out Pulse's policy on appropriate personal and professional behaviour for all employees. This Policy specifies the behavioural standards and obligations expected of all Pulse employees across all areas of the workplace, in keeping with Pulse's Values.
2. The Code of Conduct Policy provides all employees with a basis for making appropriate day to day decisions that maintain Pulse's reputation for integrity and excellence in the provision of products, programs and services. Relevant legislation, policies and procedures are referenced throughout this document and listed on the cover page of this policy.

2 Definitions

Word/Term	Definition
Award, agreement or contract	The employment instrument under which the employee is employed. This document sets out the conditions of employment for employees and for Pulse.
benefit	Anything that provides a direct or indirect personal gain or potential personal gain to an employee or third party. The benefit may be financial, personal, or non-financial and may include but not be limited to the provision of material or facilities, money, gifts, travel, entertainment and accommodation expenses.
bullying	When an individual or group of individuals repeatedly behaves unreasonably towards a person or group of people and that behaviour creates a risk to health and safety.
confidentiality	Keeping private information that is by its nature confidential, is marked as confidential, is known to be confidential, or which ought to have been known as confidential, including but not limited to personal and health information, information pertaining to student, employment contracts, commercial and legal documents. You may not divulge this information while you are working for an employer or after you leave
conflict of interest	An observable difference between an employee's professional obligation to Pulse and their personal interests. In such circumstances, an employees professional actions or decisions are unacceptably influenced or affected by their own interests and are for their own benefit.
corruption	Corrupt conduct is dishonest behaviour which adversely affects the honest and impartial exercise of official functions.
discrimination	<p>When someone is treated unfairly because they belong to a particular group of people or have a particular characteristic.</p> <p>For example treating someone unfairly or differently because of their sex, pregnancy, race (including colour, ethnicity and descent), disability, sexual preference, religion, transgender, carer's responsibilities, marital status, social origin, political belief, employee association activity, irrelevant criminal record or age.</p> <p>Indirect discrimination occurs when there is a requirement or rule that is the same for everyone but in effect disadvantages people from a particular group more than people from other groups - unless the requirement is reasonable in the circumstances.</p>
employee	All persons employed by UOW Pulse of any seniority and including those in continuing, part-time, permanent, fixed or maximum term, casual, trainee or contract roles.



fraud	Includes theft, criminal deception, making false representations to gain an unjust advantage, abuse of Pulse property or time, and the use of deceit or secrecy to obtain a financial benefit to the detriment of Pulse.
harrasment	Unwelcome behaviour that makes a person feel belittled, intimidated, offended or apprehensive, and that a reasonable person, taking into account all the circumstances, would expect to cause offence, intimidation or apprehension.
gift	A benefit valued at \$100 or more, which may include but not be limited to property, travel, valuable items, entertainment or hospitality.
originator	The person who identifies and reports potential or actual corrupt or fraudulent activity.
procedural fairness	The rules/principles of natural justice to ensure that decision making is fair and reasonable.

3 Application & Scope

This policy applies to all Pulse employees (inc management) and will assist with the resolution of any conduct related issues that may arise and stands beside the 'University Code of Conduct Policy'. It does not exclude or replace other legally binding obligations.

4 Pulse Conduct and Values

1. Pulse is accountable to many stakeholders, including but not limited to its employees, students, the University, suppliers, the public and governments. All Pulse employees will maintain the highest possible ethical standards during their employment, including cooperation, acting responsibility within work duties, ensuring accuracy, honesty, equity, tolerance and acceptance of obligations as well as rights. Employees must demonstrate professional behaviour in all areas of their work, in keeping with Pulse Values, as follows:
 1. Our Values:
 - 1.1. Support
 - 1.2. Community
 - 1.3. Agility
 - 1.4. Quality
 - 1.5. Play

5 Roles & Responsibilities

1. Pulse Management has a responsibility to:
 - 1.1. Ensure that employees are advised of the Code of Conduct Policy and that it is accessible to employees;
 - 1.2. Ensure that this Policy is implemented and applied consistently across all areas;
 - 1.3. Ensure that all records relating to employees are treated as confidential and not disclosed to other employees; and
 - 1.4. Assist with the resolution of any disputes about the Policy.
2. Pulse employees have a responsibility to:

- 2.1. Comply with the Code of Conduct Policy;
- 2.2. Assist with the resolution of any disputes about the Policy; and
- 2.3. Carry out their duties in an accountable manner, in good faith, to the required standard and in a timely and effective way
- 2.4. Follow all reasonable management directions

6 Communication

1. Pulse employees are representatives of Pulse and as such must communicate with each other and all stakeholders promptly with respect, courtesy, honesty and fairness.
2. Employees will communicate in a manner that upholds the values, policies and reputation of the organisation.

Cooperation

3. All Pulse employees will contribute to an environment of mutual cooperation and respect. Employees will:
 - 3.1. Work peacefully and effectively, showing mutual respect for management, other employees and Pulse clients;
 - 3.2. Allow others to complete their work, free from any form of harassment, disrespect or bullying
 - 3.3. Work together to solve any workplace problems and find ways to improve work methods and processes.
 - 3.4. Positively promote and have in mind the interests of Pulse at all times.

7 Work Health and Safety

1. A safe, healthy and secure workplace is the responsibility of all Pulse employees, in keeping with the Work Health and Safety Act 2011. Pulse employees are responsible for the practical implementation and regulation of workplace health and safety as specified in Pulse WHS Policy and the WHS Information Management System. In particular, employees will:
 - 1.1. Complete an WHS induction program in their area of employment and participate in WHS programs;
 - 1.2. Follow health and safety precautions which are in force to protect employees, students and members of the public;
 - 1.3. If under prescribed medication to report in accordance with the Drug and Alcohol policy.
 - 1.4. Follow all security and fire regulation procedures, as instructed by Management;
 - 1.5. Maintain clean and safe work areas;
 - 1.6. Abide by the UOW smoke free university policy;
 - 1.7. Refrain from attending work while under the influence of alcohol or non-prescription drugs, or during a period of time that is specified on a medical certificate, in line with Pulse's drug and alcohol policy;
 - 1.8. Wear appropriate PPE as instructed by your manager
 - 1.9. Report and ensure defective equipment is not used; and
 - 1.10. Report all WHS concerns to Management and/or the People and Culture Department.



8 Attendance

1. Attendance will be maintained by Pulse employees, in accordance with the award or agreement that is relevant to them. In particular, employees will:
 - 1.1. Report any absence as soon as is practicable directly to their Manager, prior to the scheduled commencement of their shift, detailing the reason and expected length of absence.
 - 1.2. Submit accurate timesheets at the completion of each shift through Deputy, submit leave requests immediately after or during workplace absences via ConnX.
 - 1.3. Be punctual. A late arrival may mean a pay deduction (in accordance with the relevant award or agreement) and place additional pressure on other employees.
 - 1.4. Repeated, regular or systematic absences will be treated seriously and may result in performance management.
 - 1.5. Absences that are immediately before or after a public holiday will require a medical certificate

9 Grooming and Presentation

1. To assist Pulse in maintaining a professional image, all employees are required to work in a clean and presentable manner relevant to their work area.
 - 1.1. All employees are required to wear a uniform if it has been provided to them.
 - 1.2. If one has not been provided, employees are required to wear smart business attire appropriate for the position they hold.
 - 1.3. Hair should be neat and tidy. Long hair should be tied back or a hair net worn in food areas.
 - 1.4. Personal hygiene must be maintained at a high level which includes showering daily, tidy hair and clean finger nails. No nail polish in food areas.
 - 1.5. No excess jewellery, unapproved badges/statements.
 - 1.6. Name badges must be worn at all times for customer facing staff or as requested by management.
 - 1.7. Footwear suitable for employees work area must be worn at all times and must always be secured to feet (ie: no thongs, sandals etc).
2. Employees are responsible for meeting Pulse personal presentation expectations and it is the responsibility of the manager to inform employees if they are not meeting the standard. Speak with your supervisor if you have further questions.
3. Employees must adhere and comply with relevant standards and regulations relevant and specific to their work area (eg: Childcare regulations, HACCP etc). You should check with your supervisor/manager if you are unsure of expectations.
4. Those staff working front of house require a high level of presentation. Please refer to your supervisor or manager for the Aspire specific grooming and presentation requirements.

10 Facilities and Resources

1. Pulse employees have a duty of care to safeguard Pulse assets. Facilities and resources are to be used efficiently and appropriately, in keeping with relevant policies and legislation, including but not limited to the Corporate Credit Card Policy, IT Policy and the Conflict of Interest Policy. In particular, employees will ensure that:
 - 1.1. Physical assets such as equipment, systems, facilities, corporate credit cards and supplies are used only for conducting Pulse business or for purposes that are authorised by Management;
 - 1.2. All Pulse equipment and resources remain the property of Pulse and are not removed from the premises, other than for authorised work-related purposes;



- 1.3. All personal consumption of Pulse products, such as food, beverages and stationary is personally funded by employees;
- 1.4. No Pulse products are to be provided at a reduced price outside normal in-store promotions;
- 1.5. Serving of family or friends is to be avoided. When this is unavoidable, honesty and integrity must be upheld at all times. See Fraud and Corruption section 12 of this policy
- 1.6. Private use of Pulse resources, including but not limited to time, telephone calls and emails, is short, infrequent and does not interfere with Pulse business;
- 1.7. Where employment ceases, all issued Pulse equipment and resources are returned, such as keys, parking permits and uniforms; and

11 Child Safe Practices

1. Several areas of our business involve working with children. As an organisation we are committed to the Australian Governments *Child Safe Organisations National Principles*. We support the rights of children included in the *UN Convention on the Rights of the Child*, including the right for children to be properly cared for and protected from abuse.
2. As part of an employees work with UoW Pulse, each employee must be aware of the policies, procedures and legislation relevant to their role or department and:
 - 2.1. Ensure that they have a thorough understanding of, and commitment too, our policies and procedures relating to the safety and protection of children.
 - 2.2. Act in the best interest of children and promote the human rights, safety and wellbeing of children at all times.
 - 2.3. Report any breach of policy, unlawful behaviour, or suspected abuse of a child in line with relevant legislation and UoW Pulse Policy.
 - 2.4. Mitigate risks to children's safety, including never being alone with a child, or obtaining images of a child on a personal device.
 - 2.5. Respect the privacy of children and never disclose personal or sensitive information about a child, including images of the child, without the written consent of the child's parents or guardians.

12 Information Management

3. Caution and sound judgement will be used by Pulse employees in the management of Pulse information in accordance with relevant legislation and policies. In general, Pulse employees will ensure that:
 - 3.1. Pulse information is dealt with confidentially and only in accordance for the purposes of Pulse business;
 - 3.2. Pulse files including electronic files, data and other confidential documents are not removed from the premises or copied/transferred except with Management approval and in accordance with the information and privacy policies and legislation listed above;
 - 3.3. Information, such as personnel related information is limited to those who need it to carry out their duties, or to those who assist with carrying out duties because of expertise;
 - 3.4. Confidential Pulse information is not released to the media or other public area; and
 - 3.5. Pulse information is not used in a manner that could result in harm to another person, interfere with the integrity of an investigation, or gain personal or commercial advantage.

13 Conflicts of Interest

1. Pulse employees must avoid conflicts of interest to ensure that their activities and interests do not conflict with their obligations to, or the interests of Pulse. Pulse Conflict of Interest Policy covers this area of conduct.

14 Social Media and IT

1. Employees who use social media either as part of their job, or in a personal capacity are accountable for messages and content issued. Pulse should always be portrayed in line with the company values.
2. An employee should not make or share offensive or negative comments or pictures about Pulse, its customers, or other Pulse employees.
3. Do not download, retrieve send or store inappropriate, sexually explicit, racist or otherwise offensive material on your computer or any company owned device.
4. Use of personal electronic devices, including mobile phones, is not permitted in customer facing environments without manager permission.

15 Fraud and Corruption

1. Fraudulent and corrupt activities are inappropriate and a conflict of interest for Pulse employees (see the Conflict of Interest Policy). All employees must avoid fraud and corruption to ensure that their activities and interests uphold the reputation, integrity, finances and business of Pulse.
2. Employees are required to report suspicions of corrupt conduct, maladministration and serious and substantial waste of Pulse resources. Pulse Fraud and Corruption Prevention Policy covers this area of conduct.
3. Employees are expected to comply with all Pulse policies and procedures and conduct their work honestly and with integrity at all times.

16 Secondary Employment

1. Pulse employees must not undertake secondary employment if such employment is a conflict of interest and may have an adverse effect, or perceived adverse effect on the performance of their duties and responsibilities, or on the reputation, integrity, finances or business of Pulse. Pulse Secondary Employment Policy covers this area of conduct.

17 Discrimination, Bullying and Harassment

1. Pulse employees must not harass, bully or discriminate against other Pulse employees, University staff, students, clients, customers or members of the public. Discrimination and harassment may be an offence under the Anti-Discrimination Act 1977 and may be on the grounds of gender, marital status, pregnancy, age, race, ethnic or national origin, physical or intellectual impairment, carer responsibilities, transgender status, religious beliefs, sexual orientation, HIV/AIDS, medical conditions or political affiliations. Pulse Bullying Prevention Policy, Sexual Harassment Prevention Policy and EEO Anti-Discrimination Policy cover this area.

18 Managing breaches of the Code

1. Pulse employees at all levels are responsible for behaving appropriately and in accordance with this Policy. The Conduct and Values outlined throughout this Policy are to be supported and followed. All breaches of the Code will be dealt with promptly, in keeping with this Policy and other relevant policies, procedures and legislation.



2. Breaches of the code should be reported to your relevant People and Culture Business Partner for discussion and advice on action if required.

Version Control and Change History

Version Control	Date Effective	Approved By	Amendment
1	25/08/2009	Board Of Directors	New policy developed to supersede the Code of Conduct Policy, Policy Number:HR/ER/24-04/1.
2	17/4/2012	Board of Directors	Migrated into new QA format and updated workplace safety section to current legislation. Updated Values, broadened 'employee' definition and added consultation with management when growing facial hair.
3	24/6/2014	Board of Directors	Updated Logo; Removed 'The' before Pulse; Removed '&' from WH&S; Strengthen employee attendance requirements; Changed 'taking pride' (subjective) to 'meeting Pulse expectations; breaches if caught during fraud; Removed reference to section 10 of Conflict Policy, full reference remains; expanded to full title of Board of Director (Chair) during investigations of managers. Added procedural fairness principles.
4	18/01/2017	Scheduled Review March 2017. To then be approved by the Board	Removed Pulse logo. Removed all applicable mentions of "Pulse" and replaced with "Pulse"
5	12/06/2018		Updated: Pulse values, definition of harassment, Communication, employee responsibilities, attendance, Roles and Responsibilities moved to top of document, update employee responsibilities, social media and IT, fraud and corruption, information management now includes electronic files. Removed Employee and Management action and updated with 'managing breaches of the code' to be more flexible in our response to breaches.