

Policy Statement

Northern Sydney Community Transport Group Limited (NSCTG) and its associated entities Stryder Limited (STR) and Lower North Shore Community Transport Incorporated (LNSCT) *trading as* Community Connect Transport (CCT), referred in this document as the '**Group**', respects the rights of its employees, contractors, volunteers, clients and the communities in which it operates, and has a set of standards that it requires staff to abide by throughout their employment. This Code of Conduct (**Code**) sets out these standards.

This Code applies to all current employees, contractors and volunteers of the Group and requires for all to observe all the rules of the Group including those specified in the Constitution, and the Policy and Procedure Manual.

All employees, contractors and volunteers, including the Group Board Directors (**Directors**) and Management Committee Members (**MC Members**), are required to work in a safe, ethical and lawful manner, to the best of their ability and in a manner that is respectful of people and property.

All employees, contractors and volunteers are required to familiarise themselves and comply with this Code that includes Annexures A and B, throughout their employment and report any activity which they believe to be unlawful, unethical or contrary to the vision, purpose and values of the Group.

The *Aged Care Act 2024*, *Aged Care Quality Standards Code of Conduct*, and the *NDIS Quality and Safeguards Commission Code of Conduct* set out obligations on entities relating to Code of Conduct.

All new employees, contractors and volunteers will be provided with a copy of the Code as part of their induction process and will be required to acknowledge they have read or sign a copy of the Code every year.

Your Responsibilities

The Code is based on the following principles which you should abide by:

- Report all observed or suspected fraud, corruption or theft.
- Report all observed or suspected harassment: verbal and/or physical.
- Have respect for the law under which you carry out your duties of employment.
- Perform your duties with professionalism, objectivity, honesty, integrity and compassion, and in the best interests of the people who access the Group's services.
- Treat all persons including clients in a way that is respectful, kind and consistent with the Code.
- Observe fairness, respect and equity in all your dealings with clients, stakeholders, and Government and non-Government representatives.
- Promptly declare real or perceived conflicts of interest and promptly declare any transactions with related parties.
- Ensure the appropriate use of official, private and confidential information.
- Maintain appropriate standards of confidentiality regarding any information gained through your work with the Group.
- Ensure the efficient and effective maintenance and use of resources, property and equipment.

If you become aware of a breach of the Code, you must immediately report the matter to the Group Chief Executive Officer (CEO). If the matter concerns the CEO, you must immediately report the matter to the Group Chair / President.

Contact Details:

CEO: Ms Carla Northam | Ph: 02 9490 9500 | E: ceo@nstcg.org.au

Chair / President: Ms Alexandra Meldrum | E: chair@nsctg.org.au

Duties and Procedures

While conducting your duties with the Group, you are required to:

*In respect of **Disclosure**:*

- Immediately report breaches of the Code and/or any suspicious or criminal behaviour to the CEO.
- Immediately notify the CEO if, during the course of your employment, you are charged with an offence with a possible penalty of imprisonment for 12 months or more or convicted of any criminal offence which may impact on your capacity to carry out your duties.
- Immediately notify the CEO if you lose any demerit points on your driver licence.
- Notify the CEO if you have been required to attend for Jury Duty.

Making a report does not constitute a breach of anyone's rights and must not be done vexatiously or frivolously. Reporting any of these matters to the CEO will not immediately result in any disciplinary action being taken.

The CEO and Directors/MC Members will:

- Follow the procedures in the Fraud Policy and Whistleblower Policy.
- Deal with any reports confidentially.
- Ensure that the person concerned is informed about the matter under consideration and is given the opportunity to present their case.
- Have no personal interest in the matter to be decided, not be biased as to the outcome, and always act in good faith.
- Ensure that a fair decision is reached objectively and the rules of natural justice are followed.
- Adequately justify and document any decision that affects the Group's employees, contractors, volunteers and clients.
- Ensure any decision and action is made in a timely manner.

*In respect of **Personal and Professional Behaviour**:*

- Maintain and develop your knowledge of the Group, its vision, purpose and values, and commit to relevant ongoing professional development.
- Understand and follow all Group policies, procedures, operational manuals, guidelines and practice frameworks relevant to your duties.
- Know and understand the duties of your position as set out in your job description.
- Work towards the attainment of agreed objectives and outcomes established with your manager, including the performance appraisal, planning and review process.
- Provide the highest possible standard of duty of care and report all incidents and/or accidents in an accurate and timely way.
- Support your colleagues and clients in appropriate and collaborative ways

*In respect of **Workplace Behaviour and Personal Conduct**:*

- Ensure the use of alcohol and drugs does not result in unsatisfactory work performance, impairment of judgment or unacceptable behaviour. The consumption of alcohol and/or illicit drugs is not permitted while undertaking your duties. At out-of-hours work-related functions, staff must limit alcohol intake.
- Ensure your conduct does not wilfully distract or otherwise prevent other staff from performing their duties as a result of bullying or harassing behaviour.
- Ensure behaviour and performance is appropriate when representing the Group.
- Ensure health and safety standards are maintained while working.

*In respect of **Personal Presentation and Dress Standards:***

- Create a professional and identifiable appearance for clients, service providers, and the public in general. If applicable to your role, branded apparel and identification badges are to be worn by employees, contractors and volunteers at all times.
- Promote a positive working environment with limited distractions caused by inappropriate dress. You are expected to dress in a manner that is normally acceptable in similar business establishments.
- Maintain high standards of personal hygiene and presentation. Grooming and personal hygiene affect both the public's impression of the Group as well as internal morale.

*In respect of **All Persons and Their Rights:***

- Support and ensure the rights and dignity of clients are safeguarded and upheld.
- Treat all clients, members of the public, colleagues and stakeholders with dignity and respect and ensure that your conduct is not discriminatory.
- Develop and maintain cross-cultural competency, awareness and skills applicable to your duties, especially in relation to Aboriginal and Torres Strait Islander culture.

Examples of unacceptable conduct includes but is not limited to:

- Offensive, abusive, belittling or threatening behaviour directed at any individual or group.
- Any behaviour on social media that disrespects individuals' dignity, violates privacy, promotes harm, or misrepresents the Group
- Restricting access to training or promotional opportunities on the basis of age, gender, disability, marital status, spiritual beliefs, pregnancy, sexual preference, race, or ethnic or national origin.
- Any behaviour of a sexual nature, especially harassment and inappropriate language.
- Refusing to make any reasonable adjustment to enable a person with a disability to perform a job.
- Any restrictive practices.

The Group operates under a principle of equal opportunity. All staff will receive equal treatment in relation to recruitment and selection for vacancies, promotion, transfer and termination of employment, learning and development opportunities, workforce organisation, and terms and conditions of employment.

*In respect of **Providing Advice, Making Decisions and Use of Authority:***

- Ensure that any advice provided is truthful and based on an accurate and balanced representation of all known relevant facts and should, if necessary, identify the consequences of all known options realistically available.
- Ensure reasonable steps have been taken to obtain all necessary information to make a decision and be reasonably satisfied that the material is factually correct and relevant.
- Not use official duties, status or powers of authority to improperly influence a decision or action.

*In respect of **Privacy and Confidentiality:***

- Ensure there is a legitimate need to record any personal information, the information is factual, and any information collected is kept secure and not disclosed to anyone who does not have a legitimate right to know.
- Not reveal personal information such as home addresses, email addresses or telephone numbers to enquirers, even when they claim to be a relative or friend. You are expected to offer to take the enquirer's details and pass them on to the person concerned.
- Not falsify a client's record or information for personal gain or on behalf of a client.
- Maintain client and organisational confidentiality at all times including storage and location of client files and documented communications with other agencies.

*In relation to **your own privacy when conducting your duties:***

- All information, data and files that are created, accessed or stored using the Group's information technology systems remain the property of the Group.
- You should expect no personal privacy when using the Group information technology systems for emailing or accessing the internet.

*In respect of **Conflicts of Interest and Related Party Transactions:***

- Promptly declare to the CEO and Chairperson any private interests which conflict, or might reasonably be thought to conflict, with your duties.
- Promptly declare to the CEO and Chairperson any dealings or transactions the Group intends to have or are having with people and organisations that are closely related to you, regardless of whether a price is charged for the dealing or transaction.
- Not engage in private employment that may negatively affect work performance or create a conflict of interest with your duties at the Group. This includes not using contacts with any clients of the Group to attempt to sell products, conduct direct marketing or promote personal enterprises.
- Notify the CEO if your personal views conflict with the performance of your duties, or you believe you cannot act impartially, and attempt to resolve the conflict in favour of the public interest.

*In respect of **Gifts and Benefits:***

- Do not ask for or encourage the offer of personal benefits or gifts in connection with your duties or your association with the Group. Politely refuse gifts or benefits which may bring your integrity and impartiality, or that of the Group, into question.
- Do not accept an offered gift or benefit, except where it is of no significant or lasting real value, or where the cultural values of the person or group would suggest that the gift should be accepted. If you unavoidably accept a gift, you must immediately advise the CEO. Such gifts will be deemed the property of the Group.

Examples of acceptable gifts include:

- A low-value gift or token at Christmas time to an employee from a client.
- Normal hospitality when visiting client families or communities.
- Flowers or chocolates as a thank you for speaking at an event or seminar when representing the Group.
- A gift where you are satisfied that acceptance does not compromise your role at the Group.

If you accept a gift for personal benefit from a person or organisation in return for favourable treatment of the donor, you will be subject to disciplinary action, including potential termination of employment.

Relevant Legislation & Documents

- *Aged Care Act 2024* <https://www.legislation.gov.au/C2024A00104/latest/text>
- *Annexure A: Aged Care Quality Standards Code of Conduct*
- *Annexure B: NDIS Quality and Safeguards Commission Code of Conduct*
- *NSCT - Fraud Policy*
- *NSCT - Whistleblowing Policy.*

Annexure A:



Code of Conduct for Aged Care

The Code of Conduct for Aged Care describes how you must behave and treat the people in your care. It includes the 8 elements below.



A. Act with respect for people's rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and conventions.



B. Act in a way that treats people with dignity and respect and values their diversity.



C. Act with respect for the privacy of people.



D. Provide care, supports and services in a safe and competent manner, with care and skill.



E. Act with integrity, honesty and transparency.



F. Promptly take steps to raise and act on concerns about matters that may impact the quality and safety of care, supports and services.



G. Provide care, supports and services free from:
i. all forms of violence, discrimination, exploitation, neglect and abuse and
ii. sexual misconduct.



H. Take all reasonable steps to prevent and respond to:
i. all forms of violence, discrimination, exploitation, neglect and abuse and
ii. sexual misconduct.



Visit our website for further information
agedcarequality.gov.au/workers/code-conduct-workers

Annexure B:



The NDIS Code of Conduct applies to all NDIS providers and workers (including employees and contractors).

What does the Code require?

Anyone providing supports and services to people with disability must:

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|---|---|
|  Respect the rights of the person
Act with respect for individual rights to freedom of expression, self-determination and decision-making in accordance with relevant laws and conventions |  Respect privacy
Respect the privacy of people with disability |
|  Deliver services competently
Provide supports and services in a safe and competent manner with care and skill |  Act with integrity
Provide supports and services with integrity, honesty and transparency |
|  Prevent violence, neglect, abuse and exploitation
Take all reasonable steps to prevent and respond to all forms of violence, exploitation, neglect and abuse of people with disability |  Take action on quality and safety
Promptly take steps to raise and act on concerns about matters that might have an impact on the quality and safety of supports provided to people with disability |
| |  Prevent sexual misconduct
Take all reasonable steps to prevent and respond to sexual misconduct. |

If you witness any activity that breaches the NDIS Code of Conduct, either at your organisation or at another provider, you should report it to the NDIS Commission. Your report will help us take direct action to protect the safety of people with disability.

To report a possible breach of the NDIS Code of Conduct call 1800 035 544.

For more information about the NDIS Code of Conduct, visit the NDIS Quality and Safeguards Commission website at www.ndiscommission.gov.au

Version History

Version	Date reviewed/ approved	Reason for review
1.0	20 November 2018	Comprehensive rewrite and merge of previous separate policy and procedure documents
1.0	5 December 2019	Annual review; no amendments made.
1.1	2 December 2020	Annual review; add contact details; add 'Fraud and Whistleblower Policy' to disclosure procedures; add 'related party transactions' to 'conflicts of interest duties.
1.1	8 December 2021	Annual review; no amendments made.
1.1	7 December 2022	Annual review; no amendments made.
1.2	21 February 2024	Annual review; amendments to reflect the new CEO title; amendments to reflect new contact details
1.3		Adopted LNSCT CoC as NSCTG CoC. Amendments to reflect NSCTG and inclusion of Aged Care Act 2024, Aged Care Code of Conduct for Workers, & NDIS Code of Conduct. Amended and updated LNSCT to NSCTG and associated entities STR & LNSCT, referred in this document as NSCTG. Changing LNSCT Management Committee Members to NSCTG Board Directors (Board). Updated contact details.
1.3.1	12 August 2025	Reviewed by ARCC. Amended and updated LNSCT to NSCTG and associated entities STR & LNSCT, referred in this document as 'the Group'. Updated contact details. Amended Management Committee Members to MC Members and Board Directors to Directors. Amended Chairperson to Chair/President to reflect correctly for STR - Board and LNSCT - Management Committee
1.3.2	26 August 2025	Approved by Boards/MC minor amendments made to include the word 'safe', reference to Annexures A & B. Added a sentence in Your Responsibilities regarding 'treating all clients' and in Examples of Unacceptable conduct regarding social media.

Code of Conduct Agreement

I, (Print.Name)_____ have read and understood this Code of Conduct and agree to abide by all elements in this document.

By signing this Agreement, I confirm that I understand my responsibilities and commit to working to the highest standards and contributing to a safe and positive workplace.

Signed:_____ Date:_____

Witness: (Print.Name)_____

Witness Signature:_____ Date:_____
