



Message from Group Chief Executive Officer

St John of God Health Care's Code of Conduct is a key component of who we are, what we do and how we behave. It defines principles, expectations and behaviours that we believe are necessary and essential to successfully deliver on our Mission, Vision and Values.

The *Code* of *Conduct* supports a culture of clearly articulated expectations and accountability, promotes leading positive change, strengthens our ability to adapt and be resilient, and encourages strong capability and relationships.

The Code ensures we treat patients, caregivers and everyone associated with St John of God Health Care with respect, courtesy, fairness and honesty. It ensures the safety, inclusion and wellbeing of all caregivers, and it enables us to act with the utmost care and diligence to understand and be responsible for applying the policies, procedures, guidelines and standards that underpin our Mission, Vision and Values.

Our Code of Conduct is approved by the Board and is regularly reviewed and updated in line with our Values. It is supplemented by policies, processes and procedures that provide practical guidance and set out in more detail the standards we are all expected to meet. These documents are available on our intranet site.

We all have a responsibility to understand and meet the expected standards outlined in the Code at all times. It applies to anyone who works, or provides services, in any capacity for St John of God Health Care, including; Trustees, Board members, caregivers, agency staff and contractors, volunteers, students gaining work experience, visiting medical practitioners and service providers. It is therefore very important that you are familiar with the contents of the Code of Conduct during your employment or engagement with us.

Thank you for the valuable role you play in the St John of God Health Care community, in delivering the care and healing to our patients and clients, and in carrying out your daily activities in line with the standards laid out in the Code of Conduct.

Bryan Pyne

Group CEO



Purpose

St John of God Health Care is committed to providing the highest standards of care to our patients and clients, delivered within an environment that ensures the behaviours and actions of caregivers and the organisation's business affairs comply with all regulatory and legislative requirements and are honest and transparent. The conduct of St John of God Health Care's business operations are in accordance with the Catholic ethical standards¹ and this includes a fundamental respect for life and the dignity of every person.

The Code of Conduct, which has been adopted by the organisation, supplements the Mission, Vision and Values of St John of God Health Care and is an integral part of our corporate governance program.

Our Mission

To continue the healing mission of Jesus.

Our Vision

We are recognised for care that provides healing, hope and a greater sense of dignity, especially to those most in need.

Our Vision outlines St John of God Health Care's guiding principles.

Our Values

Our core Values reflect our heritage and guide our behaviours:

Hospitality

A welcoming openness, providing material and spiritual comfort to all.

To practice hospitality we:

- Participate in creating a friendly work environment.
- Welcome and value new caregivers.
- Acknowledge people by smiling and being friendly.
- Are well mannered and courteous.
- Use a pleasant tone of voice.
- Care for the physical environment at work.

1. See Code of Ethical Standards for Catholic Health and Aged Care Services in Australia, Catholic Health Australia, 2001, and Code of Ethical Standards for Catholic Health and Aged Care Services in Australia: Supplementary Papers, Catholic Health Australia, 2016.

Compassion

Feeling with others and striving to understand their lives, experiences, discomfort and suffering, with a willingness to reach out in solidarity.

To be compassionate we:

- Recognise, nurture and appreciate others.
- Provide support to others in their time of need.
- Show kindness and generosity in all aspects of our role.
- Demonstrate concern and understanding towards patients and families.

Respect

Treasuring the unique dignity of every person and recognising the sacredness of all creation.

To show respect we:

- Take care to use language that does not offend or demean a person's dignity.
- Acknowledge by our actions that each person has a right to our respect.
- Are aware of colleagues' commitments so that they can manage their time effectively, are able to be punctual and meet deadlines.
- Treat all things with care including equipment, furniture, buildings, gardens and personal belongings.

Justice

A balanced and fair relationship with self, neighbour, all of creation, and with God.

To practice justice we:

- Address issues in a respectful manner, as they arise and with the appropriate person.
- Give positive feedback and accept constructive feedback.
- Contribute to the workload as a team.
- Actively discourage gossip and be faithful to colleagues.
- Respect confidentiality at all times.
- Acknowledge that bullying and discriminating behaviour is not acceptable in the workplace.

Excellence

Striving for excellence in the care and services we provide.

To achieve excellence we:

- Take responsibility to inform and be informed.
- Encourage caregivers to contribute to decision making.
- Strive to do our best and add value to everything we do.
- Encourage development opportunities for caregivers.
- Actively participate in change processes.

3

Encourage new ideas.

St John of God Health Care

Patient care

St John of God Health Care strives to serve the common good by providing holistic, ethical and person-centred care and support. Caregivers are expected to observe the rights of patients and clients and to ensure that care is always delivered with dignity, compassion and respect while promoting a safe care environment.

Health care practitioners may be required to hold and maintain a registration to practice from a recognised authority. In such instances caregivers will be required to practice in accordance with the professional standards in order to maintain registration and to always hold the required and up to date registration and licenses to practice.

Patient and client confidentiality must be maintained at all times. Caregivers, contractors, sub-contractors, vendors, service providers, agents, students or any other third parties that handle personal information collected and/or held by St John of God Health Care must protect patient and client information by knowing and following the requirements prescribed by St John of God Health Care's policies and procedures and the relevant privacy laws where applicable. Patient and client information, including photos, must not be posted to any website, social media page or any other public or private forum without documented patient or client consent.

Billing and financial practices

Accurate records and accounts

Patient billing and all other business and financial transactions are to be accurately and completely recorded in accordance with accepted accounting practices, relevant legal and regulatory obligations and St John of God Health Care policies and procedures. All such information should be stored in accordance with St John of God Health Care's storage requirements and under no circumstances should a record be tampered with, falsified or amended to conceal something.

The duty to report accurate and truthful information also applies to our internal actions. All work-time and expense records are to be reported accurately and honestly.

Workplace

Confidential information

Caregivers, and all those who have a business or professional relationship with St John of God Health Care are required to maintain the confidentiality of patients, clients, caregivers and other proprietary information. Sharing or disclosing such confidential information to others who are not required to have such information to properly exercise their legitimate duties and responsibilities is not permitted.

Any suspected breaches of the Privacy Act or the St John of God Privacy Compliance Policy must immediately be reported to the relevant Privacy Officer or Health Information manager.

Intellectual property

St John of God Health Care is committed to adhering to all relevant laws and regulations pertaining to intellectual property. All software used by St John of God Health Care to conduct its business must be properly licensed, and only used in accordance with that license.

Outside activities and employment

Caregivers and other service providers have a primary duty to St John of God Health Care and must not engage in other personal, business or professional relationships that present, or could appear to present, a conflict of interest or impact on the caregiver's requirement to perform all duties in a safe and professional manner. Caregivers must declare to their immediate manager, any secondary employment that presents a conflict of interest or exposes our patients or other caregivers to a health and safety risk. Any doubt pertaining to a potential conflict of interest should be raised in a timely manner with management. Caregiver should be aware of, and comply with, the organisation's policy on conflict of interest.

Family and work

Employment of an immediate family member or relative is not permitted where a caregiver has a direct or indirect administrative, supervisory or decision-making authority over the related person. Caregivers who form, or are intending to form, a relationship with another caregiver, and/or where one or the other caregiver has a direct or indirect administrative, supervisory or decision-making authority over the other, must notify their relevant Workforce Manager immediately.

4 Code of Conduct

Political activities

St John of God Health Care is not aligned to any political party. Caregivers should not engage in political activities or comments that may suggest that such actions represent the views or opinions of St John of God Health Care. Caregivers should always stipulate that any views or comments made reflect a personal view only and do not represent the views of St John of God Health Care.

Stewardship of resources

St John of God Health Care is committed to ensuring that its resources are used wisely and only for the purpose intended. Caregivers are expected to be good stewards of the organisation's resources and all have a duty to preserve and protect the assets and resources of the organisation.

Travel, entertainment and business related expenses

Travel, entertainment and business related expenses should be consistent with the role and duties of the caregiver and the relevant St John of God Health Care policies and requirements. Caregivers should comply with the expenditure limits and approval processes when incurring any such expenses.

Conduct in the workplace

Behaviours that are intimidating, disrespectful, harassing, discriminatory or not in keeping with our values compromise the culture of the organisation, the safety of others and our collective ability to provide safe and highly reliable patient and client care. Caregivers are responsible for their actions and behaviours and their impact on others. Caregivers must not act in a manner that compromises their personal safety, or that of others, or prevents others from enjoying a workplace that enables caregivers to flourish and to perform at their best.

Discrimination and harassment

St John of God Health Care is committed to providing a work environment in which all caregivers, patients and clients are treated with respect and dignity and is free from discrimination, or harassment on the basis of race, colour, religion, gender, sexual orientation, gender identity, pregnancy, marital status, age, disability, or union membership. St John of God Health Care views seriously any conduct or behaviours that are not in keeping with our values, policies and legislative requirements.

Quality and risk

Striving for excellence in the care and service we provide is a value of St John of God Health Care. All caregivers and service providers are required to participate in, contribute to and implement quality improvement and risk management practices into all aspects of service.

Workplace health, safety and wellbeing

St John of God Health Care strives to provide a safe workplace for all caregivers, contractors, volunteers and visitors. We all have a duty of care to work in a safe manner and to comply fully with all relevant policies and operating procedures. Our focus is on harm prevention and all caregivers are encouraged to speak up for improved safety in the workplace. Caregivers must report hazards, accidents and incidents in a timely manner and engage appropriately with any injury management programs.

While your safety and wellbeing is a primary concern for St John of God Health Care all caregivers have a duty of care. Caregivers should present for duty fully fit to perform their full range of duties in a safe manner and not pose any risk to their safety, the safety of others, or to our patients and clients. Caregivers who are required to take prescribed medication that may impair, or have the potential to impair, their ability to perform their role in a safe manner must notify their manager at the time the medication is prescribed.

Who must abide by the Code of Conduct?

The Code of Conduct applies to all entities of St John of God Health Care in Australia and New Zealand, to all those employed by St John of God Health Care, or who provide services through, or for, the organisation. This includes all caregivers, agency staff, volunteers, contractors, vendors and anyone else who conducts business for, or on behalf of, St John of God Health Care.

Because the Code of Conduct is integral to our values and our Corporate Governance Program, St John of God Health Care will impose disciplinary action or other appropriate measures against those who fail to adhere to its principles.

St John of God Health Care 5

Gift giving and receiving

St John of God Health Care strives to conduct its operations and decisions in an ethical and transparent manner. Occasionally caregivers may be offered gifts, benefits or hospitality. Usually these will be a token of appreciation and carry no expectation. However, in some cases accepting (or giving) a gift, benefit or hospitality could give the impression a caregiver will favour a particular person or organisation when making decisions. This may not be the intention, but perceptions do matter. Excellence in governance is firmly embedded in our Mission and Vision, and this includes our approach to gifts, hospitality and other benefits, both given and received. It's a key foundation of our integrity and transparency.

Caregivers should be aware of their obligations as outlined in the relevant St John of God Health Care policy when dealing with external parties and or accepting or giving gifts. All decisions must be made in the best interest of St John of God Health Care and be free from bribery, personal gain (direct or indirect) or gain for family members or friends.

Marketing and advertising

Marketing and advertising may be used to educate the public, to provide information to the community, to increase awareness of our services and to recruit caregivers. All marketing and advertising material should comply with St John of God Health Care policies and protocols.

Media communications

All requests for information from media outlets, journalists, members of the public or other external parties must be handled in accordance with the relevant policy. All submissions to media outlets, journalists, online publications or any other public forum that identifies St John of God Health Care may only be lodged prior to securing requisite approval as outlined in the relevant policy. Caregivers should never release information to any external party without the relevant approval.

Legal and regulatory compliance

Change in personal circumstances

St John of God Health Care will not knowingly engage caregivers or contractors who do not hold the relevant qualifications, registration, license or clearance (eg: police clearance and working with children check) to fulfil their role requirements. This information is usually provided to St John of God Health Care as part of the pre-employment

process but may be requested at any time during your engagement with St John of God Health Care.

Should a caregiver's personal circumstances change during the course of employment or engagement that has an impact, or the potential to impact, on the caregiver's ability to work at St John of God Health Care and fulfil the obligations of their role, the caregiver must immediately notify their manager of this change.

Such circumstances would include a caregiver being charged with, or convicted of, a criminal offence, loss of professional registration, or failure to obtain a professional registration, qualification or clearance relevant to the role requirements.

Environmental management

St John of God Health Care is committed to protecting the environment. Caregivers are to store all chemicals and substances in accordance with applicable laws, regulations, policies and safe operating procedures, and to dispose of all waste and other materials in accordance with those requirements.

Safety of children, young people and adults at risk

St John of God Health Care puts safety and integrity at the centre of building culture, relationships, stewardship and the delivery of our Mission. Our commitment extends to every child, young person and adult with whom we interact. It particularly extends to those most at risk and those who are most vulnerable or have reason to doubt they will be safe, and we always consider the power imbalances that can occur in providing care to these patients and clients. We take a zero tolerance approach to abuse.

When providing care and services to children, young people and adults at risk, all caregivers have a responsibility to:

- Consider the needs of all children, young people and adults at risk, paying particular attention to the needs of Aboriginal and Torres Strait Islander people; individuals who are elderly; are living with a disability; individuals from culturally and linguistically diverse (CALD) backgrounds; children and young people in out-of-home care, or those who are homeless; and, children, young people and adults of diverse sexuality and gender.
- Take all reasonable steps to ensure the immediate safety of children, young people and adults at risk, and eliminate or reduce any risk to them.
- Maintain their personal privacy, freedom of expression and self-determination.

6 Code of Conduct

- Involve children, young people and adults at risk in decision making wherever possible.
- Value the cultural safety of all children, young people and adults at risk paying particular attention when providing care and delivering services to Aboriginal and Torres Strait Islander peoples.
- Maintain appropriate professional boundaries and relationships.
- Speak out when actions, behaviours, language or environments cause harm, place individuals at risk, or when boundaries are violated.
- Report any safety concerns to a manager immediately and relevant authorities as appropriate.

Ethical responsibility

In upholding a culture of honest and ethical conduct and behaviour, St John of God Health Care is guided by the Code of Ethical Standards for Catholic Health and Aged Care Services in Australia and our Mission and Values. As a condition of employment with St John of God Health Care, all caregivers are required to abide by the Code of Conduct and all relevant policies, procedures, legislation and regulations and as amended from time to time. Caregivers are required to participate in all training activities required by St John of God Health Care.

Reporting any suspected breaches

St John of God Health Care has a number of systems, processes and avenues in place that encourage, support and protect caregivers and those who are involved with the organisation to raise any concerns, and report what may be regarded as unethical, illegal, fraudulent or undesirable conduct or behaviour.

Caregivers are encouraged to report or raise their concerns with their immediate manager or Group Workforce in the first instance. If a caregiver is uncomfortable using internal channels then a protected disclosure may be made by contacting a St John of God Health Care protected disclosure officer in accordance with the Whistleblowing Policy and Procedure.

An external reporting option, Your Call, is also available to report any suspected wrongdoing. Disclosures can be made anonymously and confidentially. Your Call will refer the disclosure to our protected disclosure officers for review and in conjunction with the Group Director Workforce the disclosure will be investigated. Your Call can be contacted by phone or online.

Management responsibility

St John of God Health Care, through its Leadership Profile, articulates a set of leadership behaviours that form part of the employment obligations for all St John of God Health Care leaders and managers. Accordingly, managers must set an example and take action when compliance and ethical issues are raised. If necessary, managers must seek assistance for themselves and/or their caregivers when the appropriate action is not clear and when questions arise.

Hotline

1800 940 379

(9am – 12am AEST Monday – Friday)

Portal

www.yourcall.com.au/report (organisation ID: SJGHC)

There will be no negative consequences or retribution for good faith reporting of possible breaches of St John of God Health Care policies or *Code of Conduct*.

Responsibility of all those who are covered by the Code of Conduct

It is the responsibility of all those who are covered by the Code of Conduct to make themselves familiar with any updates. It is also important that all such people continue to familiarise themselves with relevant St John of God Health Care policies, procedures, legislation, regulations and where applicable, professional registration requirements and as amended from time to time. If necessary, caregivers must seek assistance from the relevant manager when the appropriate action is not clear or when questions arise.



About St John of God Health Care

St John of God Health Care is a division of St John of God Health Care, a leading Catholic not-for-profit provider of high-quality health care and community services in Australia and New Zealand.

As a not-for-profit health care provider, we return all surpluses to the communities we serve by updating and expanding our facilities and technology, developing new services, investing in people, and providing our social outreach services to those experiencing disadvantage.

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