

## CODE OF CONDUCT AND ETHICS POLICY

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### REVISION HISTORY

Latest version updated 2026 and approved by the Board 28/04/2026

## PURPOSE

This policy establishes the ethical framework and behavioural standards expected of all Family Planning Australia (FPA) personnel, including employees, contractors, consultants, volunteers, interns and Non-Executive Directors. It reflects FPA's commitment to operating with integrity in the delivery of reproductive and sexual health services, and its obligations as a recipient of NSW Government grant funding.

## SCOPE

This policy applies to:

- All employees (full-time, part-time, and casual)
- Contractors, consultants, and labour-hire workers engaged by FPA
- Volunteers and Interns
- Non-Executive Directors of the FPA Board
- Any person acting in an official capacity on behalf of FPA.

## DEFINITIONS

| Term                   | Meaning                                                                                                                                                                                 |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Conflict of Interest   | A conflict between an individual's public duties and their private interests which may result in a decision being made on the basis of personal benefit rather than the benefit of FPA. |
| ACFID Code of Conduct  | Minimum standards of governance, management and accountability for Australian development NGOs, as defined by the Australian Council for International Development.                     |
| Misconduct             | Behaviour that contravenes the standards set out in this policy, including serious misconduct that may result in instant dismissal.                                                     |
| NDIS Code of Conduct   | Standards of behaviour required of all workers delivering supports or services to people with disability under the National Disability Insurance Scheme.                                |
| NSW Grant Obligations  | Obligations arising from NSW Government grant funding agreements, including financial accountability, reporting requirements, and compliance with NSW public sector values.             |
| Unacceptable behaviour | Any behaviour that undermines FPA having a diverse and inclusive workplace and includes behaviour that is not consistent with FPA's Code of Conduct and the FPA Values.                 |
| Unlawful behaviours    | Are defined in various State and Federal laws and include discrimination, harassment, bullying, vilification and victimisation.                                                         |
| Whistleblower          | A person who reports, in good faith, a suspected breach of law, policy or ethical standards, and is entitled to protection under the Corporations Act 2001 and FPA policy.              |

## Code of Ethics

Family Planning Australia (FPA's) business is conducted according to the highest standards of honesty, integrity, respect and fairness when dealing with all of our staff, clients, visitors and the community we support. We require that our staff and Board of Directors (non- Executive Directors) meet these high standards. The organisation takes seriously its obligations to comply with all federal, state and local government laws and regulations, as well as common law obligations, and again requires all staff, contractors and consultants to do the same.

## Code of Conduct

Where these standards are not met, appropriate disciplinary action will be taken. In cases of serious misconduct, this may result in instant dismissal of staff or removal of a Non-Executive Director from the Board. Where a breach involves a contravention of law, the relevant government authorities or police will be notified.

### Respect and Dignity

- Treat all staff, clients and visitors with courtesy and respect
- Do not engage in any threatening or harassing behaviour, including physical or verbal abuse
- Do not discriminate on the basis of sex, race, disability, pregnancy, age, marital status, sexual preference, gender identity, family status or family responsibility
- Do not participate in any form of exploitation or abuse.

### Legal and Regulatory Compliance

- Do not perpetrate, permit or fail to report violations of any Commonwealth, NSW state or local government law or regulation, including theft, fraud, bribery and abuse
- Be aware of and comply with FPA's policies and procedures
- Comply with obligations under NSW Government grant funding agreements, including proper use and acquittal of public funds.

### Conflicts of Interest

- Declare any conflict of interest between your role at FPA and any outside activity or interest, in accordance with FPA's Conflict of Interest procedures
- Do not make decisions on matters in which you have a personal interest.

### Workplace Behaviour

- Do not attend work while affected by drugs or alcohol
- Ensure honest dealings with all staff and clients
- Always put safety first and comply with health and safety requirements
- Do not falsify reports, records or documentation
- Always acknowledge other people's work and ideas; do not breach copyright.

## **Use of FPA Resources**

- Do not misappropriate FPA funds, property or resources
- Do not misappropriate funds or property of staff or clients
- Do not use work information or work time for private gain
- Do not use FPA internet or systems to access sexually explicit, harassing or inappropriate material
- Do not use FPA email to send sexually explicit, suggestive or harassing material
- Personal use of the internet is permitted only within FPA's guidelines.

## **Confidentiality and Media**

- Do not disclose confidential information to any unauthorised person, including the media
- Direct all media enquiries to the CEO or nominated spokesperson
- Use of social media must comply with FPA's Social Media Policy. Personnel must not make public statements that could be attributed to or embarrass FPA, disclose confidential information, or bring FPA into disrepute.

## **Whistleblower Obligations**

Personnel are encouraged to report, in good faith, any suspected breach of law, regulation, or of this policy, through FPA's established reporting channels.

FPA will protect whistleblowers from detriment in accordance with the Corporations Act 2001 (Cth) – Part 9.4AAA and FPA's Whistleblower Protection Policy.

Victimisation of a whistleblower constitutes serious misconduct.

## **Code of Conduct of Senior Staff and Supervisors**

In addition to complying with the above, senior staff and supervisors also have the responsibility to execute their managerial and supervisory duties with fairness. You should also ensure that you:

- do not condone, permit or fail to report any breaches of the above code of conduct by staff under your supervision
- promote a team spirit amongst staff through your own behaviour
- maintain confidentiality when conducting investigations into employee grievances - avoid bias in decision making
- ensure compliance with the organisation's policies and procedures when counselling and disciplining staff
- disqualify yourself from decision making where you are unable to remain objective
- never pressure an employee to resign
- exercise objectivity when administering rewards or discipline
- do not accept bribes, gifts or benefits
- do not represent someone else's ideas as your own

## Code of Conduct for International Programme

In addition to complying with the above, FPA is a member of the Australian Council for International Development (ACFID) and adheres to [ACFID Code of Conduct](#) which defines minimum standards of governance, management and accountability of development in non-government organisations (NGOs). FPA will ensure that all staff engaged in activities which support our international program, will be informed of the obligations arising from the ACFID Code of Conduct.

## Code of Conduct – Sexuality and Disability Service

In addition to Section 4, all personnel providing supports or services to people with disability must comply with the NDIS Code of Conduct and must:

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

## Non-Executive Director's Responsibility – Conflict of Interest

Non-Executive Directors must declare any conflict of interest on the consent to appointment as a non-Executive Director and notification of interest's form.

Non-Executive Directors must also note conflicts of interest at the commencement of each Board meeting. To facilitate this, conflict of interest is the first agenda item at all Board meetings - requiring non-Executive Directors to state nature of any conflict, or associations prior to the meeting commencing. This is in accordance with Corporations Act 2001 – Sect 191 - Material personal interest - director's duty to disclose.

In the event there is a conflict of interest, the Board Conflict of Interest, Gifts and Related Party Transactions policy should be followed.

## Accountability and Reporting

Accountability for this policy is:

| Role                      | Responsibility                                      | Frequency                          |
|---------------------------|-----------------------------------------------------|------------------------------------|
| Board of Directors        | Approve policy; oversee organisational compliance   | Annually / as required             |
| CEO                       | Implement policy; report material breaches to Board | Ongoing                            |
| Executive                 | Ensure team compliance; investigate breaches        | Ongoing                            |
| Managers and Team Leaders | Ensure team compliance; investigate breaches        | Ongoing                            |
| All Personnel             | Read, understand and comply with this policy        | On commencement and at each review |

## **RELATED DOCUMENTS**

This policy should be read in conjunction with other FPA policies, procedures and documents that define and support FPA's commitment to a diverse and inclusive workplace and the expected behaviour and conduct of its leaders and employees. These include:

- Consent to appointment as non-Executive Director and notification of interests
- Aboriginal and Torres Strait Islander Cultural Protocol Policy
- Conflict of Interest Policy
- Delegations Policy
- Privacy and Confidentiality Policy
- Sexual Harassment Policy
- Social Media Policy
- Social Media for Employees Policy
- Work Health and Safety Policy
- Grievance and Dispute Resolution Procedure

## **EXTERNAL DOCUMENTS**

- Corporations Act 2001 (Cth)
- ACFID Code of Conduct
- NDIS Code of Conduct
- NSW Grants Administration Guide