



Code of Conduct

1. Purpose

The aim of the School for Life (“SFL”) Code of Conduct (“the Code”) is to reflect SFL’s belief that human rights are a basic right for everybody, regardless of religion, race, ethnicity, class, caste, gender or other characteristics, and to establish an expected standard of behaviour that is professional and appropriately reflects SFL’s values. This Code aims to ensure that all SFL Representatives act in line with these principles.

All SFL Representatives must observe the highest possible standards of behaviour, ethics and business conduct. This Code sets standards and values that SFL commits to maintain. SFL Representatives are all responsible for their actions and this Code will provide SFL Representatives with a practical guide as to what they can expect from SFL and what is required of all SFL Representatives. SFL complies with relevant legislations and meets best practice standards for employee and volunteer involvement.

All standards contained in this Code are in addition to the general obligations imposed on SFL Representatives including implied duties such as the duty of fidelity and to act in good faith. This Code is designed to be read in conjunction with all other SFL policies.

2. Scope and Application

The Code complies with the ACFID Code of Conduct, the principles and commitments of which aim to contribute to quality development, humanitarian outcomes, and stakeholder trust.

This Policy applies to all employees and volunteers working with SFL, along with contractors, consultants, interns, visitors, Board members and partner organisations with whom we work (collectively, “SFL Representatives”). This Code applies whether the SFL Representative is situated in an SFL office in Australia or at a remote location in Australia or overseas.

The Code applies to any situation where there is a connection with one’s work as an SFL Representative or where one’s behaviour impacts or has the potential to impact SFL. The Code applies to people when representing SFL and as such, it can apply to both during and outside regular working or volunteering hours.

3. Expectations of SFL Representatives

SFL expects that all SFL Representatives will familiarise themselves with the following expectations and perform their role to the best of their abilities and in compliance with these principles.

3.1 Honesty and Integrity

SFL Representatives must act with honesty and integrity in all dealings with individuals, organisations and internal and external stakeholders. SFL Representatives must not:

- a. Influence any person in an inappropriate way to try and obtain any advantages or favours;
- b. Place themselves under any financial or other obligation that may impact the performance of their duties as SFL Representatives;
- c. Request or accept any gifts or benefits which might, either directly or indirectly, compromise or influence them in their role;
- d. Commit to or carry out any employment, work or volunteer role where a conflict of interest arises with SFL; and
- e. Abuse their position to secure benefits for themselves or any family member or friend.

SFL Representatives must:

- a. Disclose any interest (financial or otherwise) in SFL's work where the SFL Representative has an influence on a decision being made

3.2 Compliance with SFL Policies, ACFID Code of Conduct and the SFL Employee Handbook

SFL Representatives must read and comply with all of SFL's policies, and with the requirements and obligations within the SFL Employee Handbook. If they are unable to access these policies, SFL Representatives must ask their line manager for access.

SFL policies include, but are not limited to:

- Anti-Fraud and Anti-Corruption Policy
- Child Protection Policy
- Complaints Handling Policy
- Conflict of Interest Policy
- Control of Funds and Resources Policy
- Diversity and Inclusion Policy
- Human Rights Policy
- Gender Equality Policy
- Non-Development Activity Policy
- Prevention of Sexual Exploitation, Abuse and Harassment Policy
- Privacy Policy
- Social Media Policy
- Protection Against Terrorism Policy
- Transparency Policy

SFL is also a signatory to the Australian Council for International Development ACFID Code of Conduct, and SFL Representatives are encouraged to have read and understood this document, and to comply with the ACFID requirements, in parallel with this Code.

3.3 Perform their role to the best of their ability

SFL Representatives must perform their role with SFL to the best of their ability. This means that SFL Representatives must:

- a. Only engage in conduct which is professional, which has regard to SFL's interests and policies, and which does not bring SFL into disrepute;
- b. Work in a way that ensures their own safety and the safety of others;
- c. Be proactive in protecting and furthering SFL's best interests;
- d. Use SFL's systems and equipment appropriately and for proper purposes. This includes email, messaging, internet access and technology;
- e. Comply with all applicable laws; and
- f. Notify their line manager or an Executive Team Member if other SFL Representatives are not behaving in accordance with the Code or SFL policies.

3.4 Child Safeguarding and Protection

SFL Representatives must:

- a. Read and comply with SFL's Child Protection Policy;
- b. Use appropriate language and avoid profanity and sexual language in the presence of children; and
- c. Report any behaviour by any SFL Representative that is suspected of being child exploitation or abuse (including possession of child exploitation material) to an SFL Executive Team Member.

SFL Representatives must not:

- a. Abuse or exploit children;
- b. Engage in sexual relations with children;
- c. Engage in unnecessary or prolonged physical contact with children in the course of their work at SFL;
- d. Contact children that the Representative has met in the course of an SFL activity for purposes other than an SFL activity;
- e. Supply drugs or alcohol to children; or
- f. Use the image of or distribute the personal information of a child without the consent of the child's parent or legal guardian.

3.5 Prevention of Sexual Exploitation, Abuse and Harassment

SFL Representatives must

- a. Promote a culture that empowers individuals, families and communities to be knowledgeable of their rights and avenues of redress;
- b. Create and maintain an attitude and culture of transparency that ensures all people can talk about their context with staff and others, are listened to and treated with respect. This includes helping people understand expectations of staff and methods of feedback;
- c. Respect each vulnerable person's boundaries and empower them to make independent choices and identify what to do if they feel that there is a problem;
- d. Encourage a culture of mutual accountability so that potential abusive behaviour can be challenged;
- e. Maintain awareness of and comply with SFL's Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, including the process for immediate reporting of concerns or allegations of exploitation, abuse or policy non-compliance;
- f. Follow practices which minimise and monitor risks of all forms of exploitation and accidental harm to vulnerable people. This includes complying with legislation of the region in which we operate, and following host / partner agency policy regarding the treatment of vulnerable people;
- g. Self-assess their behaviours, actions, language and relationships, taking care to avoid actions or behaviours that could be perceived by others as exploitative or abusive, or otherwise contrary to the PSEAH Policy;
- h. Use technology (computers, mobile phones, video cameras, cameras or social media) in a dignified and respectful manner, and never to exploit or harass vulnerable people or other project participants, community members, or staff; and
- i. Ensure that personal information is kept confidential, and comply with SFL's policies in regard to consent for any photography or video creation and the safeguarding of identity and privacy of vulnerable people.

SFL Representatives must not:

- a. Behave in any way or develop any relationship that could be reasonably deemed exploitative or abusive;
- b. Act in ways that may place a vulnerable person at risk of abuse, or be reasonably construed as potentially abusive. For example, SFL Representatives must not:
 - i) Use language, make suggestions or offer advice which is inappropriate, demeaning, provocative, offensive or abusive;

- ii) Do things of a personal nature for a vulnerable person that they can do for themselves;
 - iii) Discriminate against, show different treatment, or favour a particular individual to the exclusion of others;
 - iv) Engage in any commercially exploitative activities;
 - v) Spend excessive amounts of time with them away from others or outside of program boundaries;
- c. Request, solicit or accept any payment, gift, service or favour from others, whether for my own personal benefit or for another person, in return for SFL support, goods or services;
 - d. Exchange money, employment, goods or services for sex or sexual services or personal payments from any person (including but not limited to vulnerable people, project participants, staff, partners, volunteers) or engage in any other forms of exploitative behaviour;
 - e. Engage in sexual relationships with people who are project participants in SFL projects or receive SFL partner assistance; or
 - f. Physically, emotionally, spiritually or psychologically abuse another person;

3.6 Respectful Behaviour

SFL Representatives must behave respectfully and uphold SFL's values. SFL Representatives must not:

- a. Engage in discrimination, bullying or harassment;
- b. Behave inappropriately or offensively; or
- c. Abuse any privileged position in relation to the communities, partners and others that SFL works with.

SFL Representatives must:

- a. Respect the human rights of all people;
- b. Encourage diversity;
- c. Respect local cultures and customs; and
- d. Demonstrate respect for people with different backgrounds and beliefs.

3.7 Use of SFL Resources

SFL Representatives must act responsibly with SFL resources, money, equipment and information. SFL Representatives must account for any money, resources and equipment used.

SFL Representatives must not commit any act of fraud, bribery, corruption or money laundering, and must report any suspected misuse of SFL funds or resources.

3.8 Protection of Confidential Information

SFL Representatives may be given access to confidential information about SFL, other SFL Representatives and external relationships SFL has with other organisations or persons. If so:

- a. SFL Representatives may only use confidential information for the express purpose for which it is provided and may not use the information for any other purpose;
- b. SFL Representatives must not disclose any confidential information to a third party, or make the confidential information available to a third party in any way, except as required by the express purpose the confidential information was provided for;
- c. SFL Representatives are bound to protect any confidential information relating to SFL under an obligation of confidence;
- d. If SFL Representatives seek to use confidential information for another or related purpose, prior approval of this use must be sought from an Executive Team Member;
- e. SFL Representatives must not disclose any confidential information or make confidential information known in any way except as provided for by SFL policies and procedures, or as required by law; and
- f. SFL Representatives must ensure that unauthorised persons do not have access to any confidential information.

“Confidential information” means all information of SFL which SFL Representatives become aware of or generate including, but not limited to:

- a. Trade secrets; confidential know-how; personal information of members; information concerning the business, finances, campaigns, research and development, marketing information, strategy or Representatives of SFL or any related body corporate;
- b. Any information that is marked, or they are told, is confidential;
- c. Any information which would reasonably be regarded as confidential which is not otherwise in the public domain other than as a consequence of an unauthorised disclosure.

These confidentiality obligations continue after SFL Representatives leave SFL.

3.9 Use of SFL Systems

When using SFL’s systems, SFL Representatives undertake to:

- a. Comply with SFL’s Privacy Policy and not share confidential information disclosed to them;

- b. Record all information accurately and professionally. This means they will:
 - i) Not delete information unless asked to by a supporter; and
 - ii) Not intentionally record incorrect information;
- c. Respect those in our database. This includes:
 - i) Only using information in their official capacity as an SFL Representative. This means SFL Representatives must not use any information for purposes other than those authorised, whether explicitly or implicitly, by SFL;
 - ii) Not emailing those who have unsubscribed;
 - iii) Calling supporters at reasonable hours; and
 - iv) Recording appropriate notes that do not cause offence to our supporters, or otherwise harm the reputation of SFL or SFL Representatives;
- d. Refrain from storing any information on their personal electronic device or in any other form. If any information is stored in this way, they must undertake to destroy it as soon as practicable;
- e. Refrain from accessing, communicating or displaying inappropriate websites, images or other material that may cause offense to those accessing, viewing or otherwise being exposed to such actions.

3.10 Social Media

When using social media, SFL Representatives are to act in accordance with SFL values and policies outlined in this document. "Social media" includes Facebook, Instagram, Twitter and LinkedIn and any other social networking sites or applications with a public interface.

3.11 Health and Safety

SFL Representatives must:

- a. Follow all SFL policies related to workplace health and safety;
- b. Ensure that their actions do not pose an unacceptable health or safety risk to others; and;
- c. Report any notable risks to health or safety in the workplace to their line manager or Executive Team Member.

3.12 Drugs, Alcohol and Smoking

SFL Representatives must not:

- a. Use, sell, possess or distribute any illicit substances;
- b. Behave irresponsibly in relation to the purchase or consumption of alcohol;
- c. Improperly use or abuse prescription or over-the-counter medication;

- d. Distribute or sell over-the-counter or prescription medication to any other person;
- e. Work under the influence of drugs; or
- f. Consume alcohol at work-related events, or work under the influence of alcohol, except under special circumstances agreed to by management.

SFL Representatives are expected to:

- a. Refrain from smoking or vaping within a reasonable vicinity of other Representatives or members of the public who do not wish to be in contact with smoke or vape; or
- b. Refrain from smoking or vaping whilst in the company of any external stakeholders, such as partner organisations, or be filmed or photographed whilst smoking or vaping.

For the purposes of this section, SFL recognises that passive smoking can be hazardous to health and commits to having a smoke-free workplace

4. SFL's Commitments to SFL Representatives

SFL agrees to the following commitments in relation to SFL Representatives.

4.1 Inclusive and Diverse Work Environment

SFL is an organisation where all people can realise their potential. SFL is committed to building a workplace and community that encourages, supports and values diversity and inclusion. SFL will advance diversity and inclusivity across the organisation, including hiring practices, retention and treatment of SFL Representatives. Any allegations of bullying, harassment or discrimination will be treated in accordance with the SFL Diversity and Inclusion and other relevant policies.

4.2 Healthy and Safe Work Environment

SFL shall:

- a. Comply with SFL's Workplace Health and Safety Policy, and relevant occupational health and safety legislation;
- b. Handle complaints of SFL Representatives in accordance with the Complaints Handling Policy; and
- c. Provide worker's compensation and other relevant insurance coverage for SFL Representatives, ensuring that they are covered for work activities including SFL-related travel.

5. Consequences of Breaching the Code of Conduct

SFL expects SFL Representatives to comply with this Code. If SFL Representatives act outside this Code, they will be subject to disciplinary action. This disciplinary action may

take the form of a warning, formal reprimand or termination of their role. The consequences will be enforced at the discretion of those to whom the SFL Representative is accountable.

6. Declaration

In accepting my role as an SFL Representative, I will carry out my duties and behave in accordance with this Code, as it may be amended from time to time. If I am unclear about any areas of this Code of Conduct, I will seek assistance from my line manager or an Executive Team Member. I am aware that I am obligated to report incidents of malpractice, breaches of conduct or other serious incidents to my line manager, an Executive Team Member or a member of SFL's Board of Directors.

Name: _____

Signature: _____

Date: _____

Policy Approved by:	
Approval Date:	
Policy Owner:	
Last Updated:	