



Code of Conduct

Acknowledgement of Country

Estia Health acknowledges the Traditional Owners of Country throughout Australia. We pay our respect to Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander Peoples.

A message from our Chief Executive Officer and Managing Director

Estia Health's purpose is to enrich and celebrate life together, caring for people at an important and often vulnerable time in their life.

How we do this matters. Trust in the way we care for our residents, each other, our business reputation and the environment, is paramount.

Estia Health is committed to acting honestly and with integrity in all its dealings. Our Code of Conduct underpins and supports Estia Health's purpose, principles and values. It is designed to provide consistent expectations about our behaviour and conduct in the workplace and as representatives of Estia Health. It sets out a consistent standard that we all need to follow and provides a framework to maintain the confidence of our workforce, residents, communities and investors. Our Code of Conduct is aligned with the statutory Aged Care and NDIS Codes of Conduct, with which we all must comply.

Our Code of Conduct lays the foundations to guide a workplace and residential aged care home environment where our people and our residents are respected and feel safe.

When things don't seem right, say something and speak up. Our Code of Conduct details how you can do this, as well as the protection and support available to you. Victimisation of those who raise concerns will not be tolerated.

Understanding and acting in accordance with the Estia Health Code of Conduct enables each of us to conduct ourselves ethically and with integrity, be it day-to-day or in the face of change and challenge.

Thank you for your time to read, understand and accept the Estia Health Code of Conduct and joining with us to ensure that we uphold our Code of Conduct in the important and meaningful work that we do at Estia Health.

Sean Bilton

Chief Executive Officer and Managing Director



Sean Bilton

Chief Executive Officer and
Managing Director

“Every day, in every way, we are all individually and collectively responsible to act in accordance with our Code of Conduct”.

Sean Bilton, Chief Executive Officer and Managing Director

Our Vision, Purpose, Principles and Values

Our Vision

Trusted aged care is accessible to all

Our Purpose

We exist to enrich and celebrate life together

To enrich a life means every small action we take can make a difference. As aged care professionals, we look after people at the most important time of their lives. We want to celebrate this time with our residents, their families and our employees.

Our Family Code

A family where everyone belongs

We achieve our purpose by living our family code.

We help bring our vision and purpose to life through our principles and values.

Our principles provide the foundation of how we provide our care and do our work at Estia Health.

Our values describe what behaviour is important in the way in which we care and work.

Our Code of Conduct underpins our ability to act in accordance with our values and principles, to deliver on our purpose and vision.

Our Principles

Creating happiness

We make magical moments happen, in small and special ways

Always approachable

We make time to listen because we care

Taking responsibility

We own our decisions and actions to improve ourselves and help others

Embracing diversity

We acknowledge and respect individual uniqueness

Growing together

We bring out the best in each other and are stronger together

Our Values

Compassion

We demonstrate care and understanding with empathy

Responsiveness

We are approachable, we listen and we take action

Accountability

We are responsible and always act with integrity

Respect

We embrace individuality and choice

Collaboration

We positively engage together to deliver our purpose

Code of Conduct

Who does the Code of Conduct apply to?

Our Code of Conduct applies to all people working at Estia Health. This includes employees, contractors, consultants, volunteers and committee members.

When does the Code of Conduct apply to you?

It applies when you are at work in one of our homes or offices, when you are travelling for work purposes, when you are at work-related events and/or when you are representing yourself as a part of the Estia Health organisation. It also applies when you are outside of work wearing your Estia Health uniform.

What does the Code of Conduct mean for you?

You are expected to:

- Read the Code of Conduct and understand that it applies to you in your work at Estia Health and whenever you are representing Estia Health.
- Promptly complete any training allocated in relation to the Code of Conduct.
- Conduct yourself in accordance with the expectations detailed in the Code of Conduct.
- If you see something that is not aligned with the expectations detailed in the Code of Conduct, speak up.
- If something goes wrong, be honest to help fix problems before they get bigger.
- Seek guidance from your manager or People & Culture representatives if you don't understand any part of the Code of Conduct.

If you are a people leader, in addition to the expectations detailed above, you are also expected to:

- Lead by example in ensuring your behaviour models the expectations in the Code of Conduct.
- Ensure your team members are aware of, understand and act in accordance with the Code of Conduct.
- Create a supportive environment where people feel free to raise concerns about behaviour which may be in breach of the Code of Conduct.
- Respond to any concerns raised with you about potential breaches of the Code of Conduct in a timely and appropriate manner, treating concerns with sensitivity.

Making good choices

If you think a decision or action might not be in line with our Code of Conduct, please say something. If you're not sure, our checklist below can help you decide.

- Is this behaviour unlawful or in breach of Estia Health policies?
- Is the behaviour not aligned with Estia Health's values and principles?
- Could this behaviour put a person in danger, or have potential to physically or mentally harm another person?
- If you read a story about this behaviour on social media or in the newspaper, would it make you think that something was wrong?
- If you told your family or friends about the behaviour, would they think that something wasn't right?
- Does knowing about this behaviour make you feel uncomfortable?

If you answer "yes" to any of the checkpoints above, it's possible that the behaviour is in breach of the Code of Conduct, "below the line behaviour" and you should speak up.

If you see something, say something

Estia Health is committed to high standards of ethical conduct and to provide everyone working at Estia Health and others with the means to report suspected misconduct without the fear of repercussions. Reporting misconduct helps keep Estia Health a fair, safe and honest place for residents and staff and it allows the business an opportunity to catch problems early and fix them before they get worse. We all share in the responsibility for promoting a positive workplace and helping Estia Health to do business ethically and legally.

If you think something is in breach of our Code of Conduct, you can raise your concerns by telling the following people:

- Your manager;
- Another manager, a senior leader or executive leader; or
- A People and Culture representative.

Sometimes you may not feel comfortable raising your concerns with any of the people listed above. Estia Health's Say Something Hotline Service is an additional method of support for you to raise concerns of suspected or actual misconduct, including breaches of the Code of Conduct. This service is run by an independent third-party provider.

Concerns can be raised via email, online through the website, by phone or by fax. Concerns can also be raised anonymously without giving any personal information. Below are the contact details for the hotline.



Contact us

Phone: 1300 304 550

Website: <https://saysomething.stoplinereport.com/>

Related policies

- [70-26 Whistleblowing Policy](#)
- [70-6 Reporting and Resolving a Grievance Policy](#)

What happens if you breach the Code of Conduct?

Any breach of the Code of Conduct may result in disciplinary action being taken against you. This might include counselling, a written warning or termination of employment.

What happens will depend on the severity of the breach and relevant circumstances.

Victimisation of those who report breaches of our Code of Conduct or those participating in an investigation into a breach, will not be tolerated.

Related policy

- [70-4 Performance Improvement and Disciplinary Action Policy](#)

Care for our residents

Our residents living in our homes are aging, choosing to live in a community rather than home alone or with other family members or friends, and may be living with dementia, a disability or other chronic health condition. They remain self-determining individuals with varying degrees of capacity and may have support from a substitute decision maker.





The care for all of our residents falls under the regulation of the Aged Care Quality and Safety Commission. Some may also fall under the regulation of the National Disability Insurance Authority.





The Federal government has created codes of conduct under aged care legislation and legislation relating to the National Disability Insurance Scheme (NDIS). These have been introduced to improve the safety, health, wellbeing and quality of life for people receiving aged care, and to boost trust in services. These codes set out expectations for safe and ethical care delivery for all aged care workers, providers and governing persons.

As Estia Health provides care to people protected by both the Aged Care Act 1997 (Cth) and NDIS legislation, we have a responsibility to make sure you understand and abide by these statutory codes. These codes of conduct are very similar, and address the same areas of respect, privacy, provision of care and safety.

It is your responsibility to understand and follow these statutory codes and to speak up if you have any concerns.

The table below details the elements of the aged care statutory code and provides some practical examples of expected behaviours of each element along with elements that are inconsistent with both that code and the NDIS code.

Element		Examples of expected behaviour	Examples of unacceptable behaviour
 <p>A.</p>	Act with respect for people's rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and conventions.	<ul style="list-style-type: none"> ✓ Asking and listening to what residents need and want. ✓ Talking in a way that is easy to understand. ✓ Helping residents to make decisions when they need support. 	<ul style="list-style-type: none"> ✗ Telling a resident to do something they do not want to. ✗ Not including the resident in decisions about their care and services. ✗ Keeping a resident away from places or activities they want to see or do.
 <p>B.</p>	Act in a way that treats people with dignity and respect and values their diversity.	<ul style="list-style-type: none"> ✓ Respecting a resident's social, cultural, religious and ethnic background. ✓ Working in a way that helps residents feel comfortable and safe. ✓ Encouraging residents to speak up about their likes and dislikes. 	<ul style="list-style-type: none"> ✗ Making fun of a resident's social, cultural, religious, ethnic or health background. ✗ Talking down to a resident or treating them in a disrespectful way. ✗ Telling a resident their beliefs are wrong or silly.
 <p>C.</p>	Act with respect for the privacy of people.	<ul style="list-style-type: none"> ✓ Keeping personal information of residents safe in line with Estia Health policies. ✓ Being aware of the personal privacy needs and preferences of residents. 	<ul style="list-style-type: none"> ✗ Not requesting permission of residents when providing personal care and services. ✗ Providing personal care to residents in places that are not private.
 <p>D.</p>	Provide care, supports and services in a safe and competent manner, with care and skill.	<ul style="list-style-type: none"> ✓ Using equipment safely. ✓ Having the right skills, experience and qualifications for the job. ✓ Following Estia Health policies about safe and up to date work practices. 	<ul style="list-style-type: none"> ✗ Providing care or services you do not have the skills or qualifications to provide. ✗ Not reporting unsafe equipment, unsafe practices or near misses to Estia Health managers.

Element		Examples of expected behaviour	Examples of unacceptable behaviour
<p>E.</p> 	<p>Act with integrity, honesty and transparency.</p>	<ul style="list-style-type: none"> ✓ Treating residents fairly and not taking advantage of them. ✓ Being honest about your previous experience and training. ✓ Helping residents understand more about their care and services. 	<ul style="list-style-type: none"> ✗ Lying to Estia Health or to a resident about what you know, or what you hear or see. ✗ Not disclosing a conflict of interest. ✗ Asking or encouraging a resident to give you money or a gift.
<p>F.</p> 	<p>Promptly take steps to raise and act on concerns about matters that may impact the quality and safety of care, supports and services.</p>	<ul style="list-style-type: none"> ✓ Knowing how and what to do if something happens. ✓ Speaking up and reporting concerns to Estia Health to reduce risk of harm. ✓ Making sure residents feel safe to speak up or make a complaint 	<ul style="list-style-type: none"> ✗ Not taking action about a safety or quality concern. ✗ Failing to be open and honest about a safety or quality concern. ✗ Threatening or telling a resident not to complain or report a concern.
<p>G.</p> 	<p>Provide care, supports and services free from:</p> <ul style="list-style-type: none"> i) all forms of violence, discrimination, exploitation, neglect and abuse; and ii) sexual misconduct. 	<ul style="list-style-type: none"> ✓ Being alert to situations that may hurt, upset or take advantage of a resident. ✓ Knowing what violent, abusive or neglectful practices look like. ✓ Not committing or participating in any form of violence, discrimination, exploitation, neglect and abuse, or sexual misconduct. 	<ul style="list-style-type: none"> ✗ Physically forcing or threatening a resident to do something they do not want to. ✗ Neglecting, taking advantage of, or abusing a resident. ✗ Acting in a sexual way with a resident.
<p>H.</p> 	<p>Take all reasonable steps to prevent and respond to:</p> <ul style="list-style-type: none"> iii) all forms of violence, discrimination, exploitation, neglect and abuse; and iv) sexual misconduct. 	<ul style="list-style-type: none"> ✓ Following processes to help prevent harm to residents. ✓ Taking action about a safety risk or concern in line with Estia Health's systems and processes. ✓ Cooperating with Estia Health and with any investigation or enquiry. 	<ul style="list-style-type: none"> ✗ Not raising a suspicion or concern about violence, abuse or neglect of a resident. ✗ Failing to report a serious or reportable incident to Estia Health management. ✗ Not supporting a resident to speak up about concerns of misconduct.



Code of Conduct for Aged Care
Worker Guidance
[agedcarequality.gov.au/
resources/code-conduct-aged-
care-guidance-aged-care-
workers-and-governing-persons](https://agedcarequality.gov.au/resources/code-conduct-aged-care-guidance-aged-care-workers-and-governing-persons)

The Code of Conduct Aged Care – worker quick guide can be accessed [here](#) in a variety of languages.

The statutory code of conduct under NDIS legislation can be accessed [here](#).

Prevention of Elder Abuse

Any form of abuse or neglect of our residents is unacceptable.

Estia Health is committed to prevention of abuse, and also to dealing effectively with the abuse of residents.

Related policy

- [180-2 Prevention of Abuse in Residential Aged Care and Disability Care](#)

Contact with our residents and their families

Our contact with each resident and/or their family must be of a professional nature only. A key issue for employees is to recognise when we may be crossing the invisible line that separates a resident from an employee, which in turn defines our relationship as professional, ethical and workable.

- We do not share our personal contact details, including mobile telephone numbers, with residents and/or their family members/next of kin.
- We do not accept gifts or money from residents or their families.
- We do not witness or sign documents, such as a will, affidavit or enduring power of attorney, for residents or their families.
- We do not act as the legal representatives of a resident or as a power of attorney or a substitute decision maker.
- We do not give assistance or advice to residents or their families which is outside our area of expertise (such as financial advice, legal advice, family counselling or relationship advice).
- Upon leaving employment at Estia Health, if you wish to continue to visit a resident, you must discuss this with the resident and the home's manager. If the resident is not able to consider such a request, this request must be made to the resident's next of kin.

These steps help protect the integrity of our very special and trusted relationship with our residents.



Care for ourselves and each other

We take steps to provide a safe and respectful working environment for our people, free from abusive, violent, aggressive, discriminatory or bullying behaviours.

Respect

In addition to our care for our residents, we treat each other, family members and visitors to our homes and workplaces with respect and courtesy.

Related policy

- [70-120 Diversity and Inclusion Policy](#)

Health and safety

Ensuring a safe working environment is everyone's responsibility. You must comply with all occupational health and safety policies, regulations and requirements and report any hazard, near miss or incidents to management.

You must be fit for work and able to perform your work safely. This includes being free from impairment due to alcohol or drugs.

The use of cigarettes and e-cigarettes is a health hazard. If you choose to use these products, you may only do so in allocated work breaks and in designated areas, in line with company and site policies and/or guidelines.

Related policy

- [70-112 Health, Safety and Wellbeing Policy](#)



Conduct

We do not tolerate illegal or unlawful conduct or behaviour.

We do not tolerate any form of unlawful discrimination, sexual harassment, harassment, bullying and/or victimisation at work.

These behaviours are disrespectful and create an unsafe working environment. You must not engage in any illegal or unlawful conduct or behaviour.

Related policy

- [70-88 Bullying Discrimination & Harassment Policy](#)

Language

We love that many of our employees speak a language other than English. At times, it may be helpful to speak to a resident or their family in a different language. However, to ensure we create an inclusive working environment, English is to be spoken amongst our employees and other workers in our homes, including in staff rooms.

You must refrain from using obscene or offensive language.

Work expectations

You must conduct your personal affairs in a manner that does not interfere with your duties. This will usually involve doing so outside working hours and outside the workplace.

You must use the resources available to you in the workplace wisely and efficiently, without wasting or using them for personal reasons.

You must follow all lawful and reasonable directions from a manager or supervisor.

You must provide advanced notice of absence from work and seek management approval prior to the absence.

For our rostered employees:

- You must adhere to your rostered shift start and finish time and seek prior approval from management prior to your shift, if you need to commence later or leave earlier than rostered.
- You must not leave work without authorisation.
- You must ensure your attendance at work is accurately recorded in the time and attendance system.



Presentation

Your presentation and appearance reflects the image of Estia Health. You must dress in accordance with the Estia Health uniform policy or other relevant dress code.

In our homes, we aim to provide you with good quality, comfortable uniforms that present our people in a friendly and professional manner. If you work in our homes and are provided with a uniform, you must always wear uniforms while on duty.

Related policy

- [70-125 Presentation Standards Policy](#)

Compliance

Our Code of Conduct operates in conjunction with our other company policies and procedures. This Code cannot cover every circumstance, nor can it address every law, regulation or company policy that may apply to you. You must obtain copies of the policies, standards and procedures relevant to your work. If you have any questions about your obligations or about the Company's expectations, please speak with your manager or a member of the People and Culture team.

You must comply with all relevant governing legislation, standards and codes of practice at all times.

You must keep up to date with advances and changes in your work area and maintain any necessary qualifications and/or registration(s).

Serious misconduct

Some forms of misconduct are more serious than others. This is usually because these forms of misconduct may pose a risk to the health and safety of our residents, other employees, families, yourself or reputational damage to Estia Health. Conduct which may result in suspension and potentially termination of employment include but are not limited to:

- presenting for duty under the influence of alcohol or illegal drugs;
- abuse of any kind towards a resident, colleague or visitor;
- sleeping whilst on duty;
- theft of belongings of a resident, colleague or the home;
- committing fraud or acting in a fraudulent manner;
- placing the home, residents or colleagues at risk;
- behaving in a manner which could constitute bullying and/or harassment;
- deliberate, reckless, negligent or careless conduct that may adversely impact the health and safety of residents, relatives, employees or other visitors, or may cause loss to Estia Health; and/or
- any other conduct that is considered serious misconduct under the Fair Work Act 2009 (Cth),

Care for our organisation's reputation

Conflicts of interest

A conflict of interest occurs if your loyalties are divided, for example if you or your family or friends have a personal or commercial interest which may interfere, or be perceived to interfere, with the performance of your duties and responsibilities to Estia Health, making it difficult to perform your role objectively and effectively. The existence of a conflict of interest is not uncommon. What matters is how we manage the conflict.

You must act in the best interests of Estia Health. It is critical that you do not allow personal interests or the interests of family or friends to conflict with the interests of Estia Health. You must avoid participating in decisions and activities which may conflict, or be perceived to conflict, with your duties and responsibilities to Estia Health.

You must not enter into any arrangement or participate in any activity that would conflict with Estia Health's best interests or would be likely to negatively affect Estia Health's reputation.

You must not be involved in any other company or business or organisation as director, agent, employee or consultant, whether paid or unpaid, if there is a possibility that your personal interests could conflict, or be perceived to conflict, with those of Estia Health unless you obtain express approval first from your manager.

If you are involved in a conflict or possible conflict, or become aware of a conflict, you must tell your manager or a member of the People and Culture or Legal team as soon as possible.

Related policy

- [70-118 Conflict of Interest Policy](#)

Opportunities, benefits and ownership of work

You must not use Estia Health or customer property (including intellectual property), or information, your position or opportunities which arise from these to improperly gain benefit for yourself or for another party or to cause detriment to Estia Health or its residents and/or their families.

You have an obligation to avoid all financial, business and other arrangements which may be opposed to the interests of Estia Health, or which may place you in a competitive position with Estia Health.

The product of any work performed while you are with Estia Health, or on behalf of Estia Health, or using Estia Health property (including all intellectual property rights created in connection with that work) belongs to Estia Health.

Anti-bribery and gifts

Estia Health commits to comply and uphold all laws against bribery, corruption and related conduct applying to it in all the jurisdictions where we operate.

Accordingly, Estia Health has a strict policy not to offer secret commissions or bribes to further its business interests. You must not accept any money or other benefit which could be interpreted as an inducement, secret commission or bribe. Care must be exercised in accepting hospitality, entertainment or gifts over and above that required for the normal conduct of business, or which may compromise your impartiality.

We are committed to adopting effective systems to counter bribery and related improper conduct and to monitoring and enforcing these systems. From time to time, we may issue further guidance regarding what is acceptable in the normal course, what you can do with senior manager or Board approval and what is prohibited.

Related policy

- [70-117 Gifts, Entertainment and Hospitality Policy](#)

Fair dealing

You must treat each other and all suppliers, competitors, clients, customers and other stakeholders fairly and with respect. You must act honestly and with high standards of personal integrity and must not act in a manner which is unlawfully discriminatory.

Where you are required to make decisions regarding suppliers and contractors, you must do so based on merit and on a commercial basis, free from any unlawful considerations.

Any information you collect about Estia Health's competitors during the course of your employment or engagement with Estia Health, must be done so in a lawful manner.

Dealings with politicians and government officials

All dealings with politicians and government officials which relate to Estia Health and its business activities must be conducted at arm's length and with the utmost professionalism, to avoid any perception of attempts to gain advantage or to improperly influence the outcome of an official decision.

You must not make any donation or other financial contribution to any political party or candidate for an election or sponsor any organisations (other than in a purely personal capacity) without seeking and obtaining prior approval from Estia Health senior management.

Insider trading

You must never trade on or disclose inside information. This includes information about Estia Health which has not been made public.

Related policy

- [Estia Health Limited Trading Policy](#)

Social Media

You are required to exercise good judgement when posting on social media.

Related policy

- [190-0 Social Media Policy](#)



Care for our information and data

Confidentiality

In the course of your duties, you may have access to business or personal information about Estia Health, its residents and their families, employees, suppliers and our business partners. This may include business strategies, marketing and sales plans, competitive analysis, financial plans and forecasts, customer or employee information, supplier information and pricing.

This information has been given by the relevant individual or organisation in good faith that it will be treated sensitively and used in a respectful and lawful manner.

You must keep confidential information acquired during your duties with or for Estia Health, or acting on behalf of Estia Health, confidential, even after you leave or cease your engagement or employment. You must not access or request or make improper use of or transfer or disclose confidential information to anyone else except as required by your position or as authorised or legally required with approval of your manager or the General Counsel. If such information inadvertently comes into your possession, it should be returned immediately.

Privacy

You must respect and safeguard the privacy of personal information held by Estia Health regarding its clients, customers, suppliers, employees and others. If you have access to this information, you must ensure that it is collected, kept, disclosed, handled and used in a manner that complies with relevant laws and internal policies and procedures.

Systems and data

You must access data and use IT equipment in alignment with Estia Health's IT Acceptable Use Policy, in order to safeguard our technology and data.

You must not engage in the development, implementation, dissemination and use of any material; either hard copy and/or electronic, either in the workplace and/or in private that would bring Estia Health and/or its employees/management into disrepute and/or legal compromise.

Related policies

- [80-0 IT Acceptable Use Policy](#)
- [180-1 Privacy of Information Policy](#)

Related documentation

- [70-88 Bullying Discrimination & Harassment Policy](#)
- [70-118 Conflict of Interest Policy](#)
- [70-120 Diversity and Inclusion Policy](#)
- [Estia Health Limited Trading Policy](#)
- [70-117 Gifts, Entertainment and Hospitality Policy](#)
- [80-0 IT Acceptable Use Policy](#)
- [70-6 Reporting and Resolving a Grievance Policy](#)
- [70-4 Performance Improvement and Disciplinary Action Policy](#)
- [70-125 Presentation Standards Policy](#)
- [180-2 Prevention of Abuse in Residential Aged Care and Disability Care](#)
- [180-1 Privacy of Information Policy](#)
- [70-112 Health, Safety and Wellbeing Policy](#)
- [190-0 Social Media Policy](#)
- [70-26 Whistleblowing Policy](#)

Related Aged Care Quality Sandards

- Standard 8: Organisational Governance

Revision history

Revision No	Date	Initials	Description Changes
V0	10-Nov-17	-	Initial release
V1	03-Jun-19	J. Thomas	<ul style="list-style-type: none"> • Updated behavioural expectations of all employees, contractors and volunteers. • Breaches of the Code of Conduct and other misconduct will be managed through both informal and formal processes as warranted. • Serious misconduct was defined in this policy.
V2	18-Jun-20	J. Thomas	<ul style="list-style-type: none"> • Updated to align to the refreshed brand style guide and includes amendments to Our Code. • Minor changes in wording regarding soliciting/accepting gifts.
V3	02-May-22	L. Keogh C. Gillard	<ul style="list-style-type: none"> • Updated Code of Conduct.
V4	30-Nov -22	C. Gillard	<ul style="list-style-type: none"> • Updated to include Aged Care and NDIS Codes of Conduct expectations. • Updated to remove detail regarding social media given stand-alone social media policy. • Minor typographical and formatting changes.
V5	17-Mar-23	C. Gillard	<ul style="list-style-type: none"> • Comprehensive re-write and re-structuring of Code of Conduct.
V6	03-Oct-23	B. Davine	<ul style="list-style-type: none"> • Update to Acknowledgment of Country.
V7	15-Dec-23	C. Gillard	<ul style="list-style-type: none"> • Removal of reference to Board Chair. • Change of See Something Say Something contact details