



ST PATRICK'S
Technical College



SACE ■ TRAINING ■ APPRENTICESHIPS

Policies & Procedures 3.2

Ethical Business Practices

Version 4: 6 February 2014
Ratified by Board of Directors: Feb 2014
Review Date: Feb 2017





POLICY

At St Patrick's Technical College we are vigilant in adhering to the highest standards of ethical business practice. These standards embody our corporate values. We also embrace observance of these principles as a reflection of good corporate governance. Furthermore, it is of utmost importance to the College that we are not only seen to, but in fact do have a reputation of integrity, honesty and trust in all of our dealings. We believe the maintenance of our high standards and a commitment to the spirit of them plays a significant role in building a strong College, and enhanced reputation in the eyes of our students, parents, industry partners and the wider College community.

At St Patrick's Technical College we expect all our employees will respect the trust placed in them and the integrity of the positions or functions they perform, and always maintain the highest standards of ethical business practice. All business should be conducted legally, honestly and fairly, without conflict of commercial or personal interest, improper or inappropriate enrichment.

Everyone at St Patrick's Technical College is required to strictly adhere to the specific guidelines listed in this policy. The obligation is both a moral and a legal one. We expect all employees will support these standards of ethical business practice and give their total commitment to them.

The policies specifically listed cannot be exhaustive of all potential situations. Employees are expected to maintain the highest standards of ethical business practice at all times in all dealings. Common sense, integrity, honesty and sound judgment should be applied in all circumstances.

GUIDELINES

1. All employees are to adhere to legal practices at all times

- 1.1. Employees are strictly prohibited from removing any property from College premises whether belonging to the College, another staff member or some other party, without prior authorisation from the property's owner.
- 1.2. Falsification of any records at any time is strictly prohibited. In particular, employees are strictly forbidden from falsifying, destroying, removing or altering business records, reports, data or other documentation (whatever the form in which it appears or can be reproduced) including financial, educational, product, technology and personnel information. Falsification of records for the purposes of personal enrichment of oneself or on behalf of another is strictly prohibited.
- 1.3. Employees are strictly prohibited from possession of weapons, explosives, firearms, or any other means of destruction to person or property, within the premises of the College, or outside College premises whilst on organisation business.
- 1.4. Employees are strictly forbidden from assisting any other person to do or procure any of the acts listed in 1.1 - 1.3 inclusive.



1.5. Employees must use their best endeavours to comply with all laws at all times and be vigilant in observing these obligations. If clarification regarding obligations is required, refer to your supervisor, manager or the Principal.

2. Employees are not to profit from their position with the College.

- 2.1. An employee may neither offer nor procure, nor accept or retain any value or benefit from anyone (business or individual) doing or seeking to do business with the College. We do not do business by trading favours.
- 2.2. Not only is the policy of the College to refrain from actual value or benefit, but to be diligent in ensuring the College and employees are not seen to be trading in gifts or favours. The highest standards of propriety are to be maintained.
- 2.3. A 'value' or 'benefit' is defined as a service, compensation, favour, gift, discount, gratuity or anything of financial value or any form of special treatment.
- 2.4. It is not unusual for such things as business luncheons or the presentation of Christmas gifts to occur in the course of business dealings. Provided these items/opportunities of value or benefit are offered during the course of honest, reputable business dealings, are unsolicited and of minimal value, they may be accepted.
- 2.5. Gifts which are sent to employees which are outside the guidelines of 2.4 are to be returned to the sender. Employees must inform their supervisor or manager about the receipt of any such gift.
- 2.6. Employees unsure of whether or not a 'value' or 'benefit' falls within the terms of this policy should consult their immediate supervisor.
- 2.7. At St Patrick's Technical College we consider the value of travel or accommodation to be outside the bounds of the type of gift which may be considered acceptable under guideline 2.4. Under no circumstances may an employee accept travel or accommodation, or reimbursement for it from anyone outside the College.

3. Employees may not undertake activities inconsistent with their employment with us

- 3.1. All employees are engaged on the basis that they are able to and do give their best endeavours to the College at all times without a conflict of external interest or employment. Commercial or business competition or conflicts of interest, or any external activity which does in fact have, or has the potential to affect or diminish the effectiveness or efficiency of an employee in the performance of their duties is not permitted.
- 3.2. Guideline 3.1 applies to all employees, although it is recognised casual or part-time employees have the time to pursue other interests. No matter the employment classification, however, all employees must be diligent in ensuring they are able to give the College their best endeavours at all times.



- 3.3. In stating this policy, we do not wish to intrude on employees' private activities. The College's concern is to avoid any conflicts of interest or outside interests which may diminish the efficiency or effectiveness of job performance.
- 3.4. Any employee uncertain of any aspect of these guidelines should consult with their immediate supervisor, manager, or the Principal.

4. Relationships within and outside the College

- 4.1. As stated in the previous guideline, the College regards employees' personal lives as their private business. However, the College cannot be in a position where the College may be compromised or negatively affected by the relationships of employees. Personal or social relationships which do, or could give rise to the appearance of a conflict of interest with the College or the conduct of our business, are to be refrained from.
- 4.2. Employees who may find themselves in potential or actual violation of this guideline should discuss the matter with their supervisor, manager or the Principal. At St Patrick's Technical College we understand there may be times when relationships nonetheless develop and would look to accommodating such circumstances to the extent it is proper and possible to do so.

5. Conflict of Financial Interest

- 5.1. An external financial interest (or value or benefit) which is in conflict with the College's interest, or gives the appearance of being in conflict, is not permitted.
- 5.2. Provided there is no actual or potential conflict as described in the previous guideline or elsewhere in this policy, receiving compensation or providing services as an employee, consultant, manager or director to an individual or organisation that conducts business with St Patrick's Technical College may be allowable in certain limited circumstances. The prior written approval of St Patrick's Technical College must be obtained.
- 5.3. No employee may have a direct or indirect financial interest in a competitor or with anyone (person or organisation) doing or likely to do business with the College as a vendor.
- 5.4. St Patrick's Technical College never permits ownership by an employee in an organisation which may or does do business with, or is a competitor of St Patrick's Technical College or its subsidiaries or affiliates.
- 5.5. Insider trading is strictly prohibited. No non-public information obtained by employees or otherwise coming to an employee by way of the employment relationship, about the College, our clients or anyone with whom we do business may be used for purposes other than the honest and diligent performance of employee duties.
- 5.6. The use or diverting of any business or personnel information, product, program, technology or patent for personal or other gain to anyone (person or organisation) is strictly forbidden.

Violation or disregard for the standards of ethical business practice or violations of this Ethical Business Practices Policy constitutes grounds for termination of employment with St Patrick's Technical College.



All employees should be aware that, depending on the nature of the violation, immediate dismissal may apply.

In determining the nature of disciplinary action to be taken, regard will be taken to the circumstances of the policy violation and the nature and extent of any damage or harm arising from the violation.

Employees also have an obligation and responsibility to notify their supervisor, manager, or the Principal of violations of this policy they become aware of. All employees have an obligation to uphold these principles. Violation of ethical business practices has the potential to negatively impact on the College's reputation or legal position.

Every employee is required to make prompt and full disclosure to their immediate supervisor of any personal circumstance that would appear to be a violation of this policy. Such disclosure would be favourably viewed by St Patrick's Technical College in determining the College's response.

RELATED POLICIES

- *1.1 – Ethos and Charter*
- *1.2 – Corporate Governance*
- *1.4 – Staff Code of Conduct*
- *3.1 – Employee Relations*
- *3.11 - Disciplinary Procedures*